North Carolina
State Rehabilitation Council

REFLECTIONS

on a Mission

2019 ANNUAL REPORT

Table of Contents

Message from the Chair	3
The Mission and Purpose of the Council	4
2019: The Year in Numbers	
SRC Objectives	6
SRC Strategic Plan 2017-2020	7
SRC Standing Committees	8
Executive Committee	8
Consumer Input and Public Outreach Committee	9
Policy and Rules Review Committee	10
Community Outreach, Advocacy and Member Development	10
Liaison Activities	10
Public Forums	12
SRC Member Training	12
Review and Analysis of the Client Satisfaction Survey	
Survey Process	15
Overview of Survey	16
Council Recommendations	22
2019 Meeting Schedule	
The Members of the North Carolina State Rehabilitation Council: 2018-19	25



Customer Feedback

Advocacy



John Marens, Chair North Carolina State Rehabilitation Council

Message from the Chair

The NC State Rehabilitation Council (SRC) works in partnership with the Division of Vocational Rehabilitation Services (DVRS) to maximize opportunities for employment and independence for North Carolinians with disabilities. The council provides guidance and feedback on how to improve existing services and recommendations on the development of new services and programs to meet the needs of consumers.

The council enthusiastically supports the mission of public rehabilitation programs, to help North Carolinians with disabilities prepare for, obtain and retain competitive integrated employment and to help employers recruit, train and retain employees with disabilities. Working in collaboration with the division's Program Evaluation team, the council evaluates extensive quarterly data regarding how many individuals are being served by DVRS, the outcomes of services provided and client satisfaction with those services. The SRC also sponsors two public forums each year, during which we provide consumers and families across the State the opportunity to share their experiences – positive or negative – with the council. By combining insights gleaned from data with the direct feedback from stakeholders, the council can identify challenges and opportunities for DVRS.

The council also helps the division develop goals for the future. As 2020 marks the 100th anniversary of the public vocational rehabilitation program, we will be working in partnership with DVRS to set goals that are specific to the needs of North Carolinians with disabilities, measurable, attainable, relevant to the mission and realistic within the three-year strategic plan.

It has been and will continue to be a privilege to be a member of the SRC. The council is active and thoughtful, relies on the lived experiences of members to provide meaningful feedback and recommendations. We value the input and advice offered through mechanisms like our public forums and public website. As the old saying goes, change is the only constant in life, and we anticipate the changes and challenges in the years to come. As SRC chairperson, my goals are to ask the right questions and provide valuable suggestions to improve services for North Carolinians with disabilities.

The Mission of the Council

To enhance the employment, independent living and equality of individuals with disabilities in the state of North Carolina.

The Purpose of the Council

To advise and work in partnership with the NC Division of Vocational Rehabilitation Services.

To assist the division in accomplishing its mission to promote employment and independence for people with disabilities through partnerships and community leadership.

To provide guidance, input and recommendations relative to the development and expansion of vocational rehabilitation services and programs in an effort to maximize employment opportunities and independence for individuals with disabilities.

To advocate for legislation that supports individuals with disabilities in making successful transitions into the workforce and the community.

To provide customers and stakeholders of vocational rehabilitation services with a formal mechanism to influence policy and the direction of the division at the highest administrative level of the state.

2019: The Year in Numbers



SRC Objectives

- To carry out the following, after consulting with the state's Workforce Development Board: review, analyze and advise the Designated State Agency (DSA) regarding the performance of the Designated State Unit (DSU) under this Title, particularly with responsibilities related to eligibility (including order of selection); extent, scope and effectiveness of the services provided; and functions performed by state agencies that affect the ability of individuals with disabilities in achieving outcomes under this Title.
- To carry out the following in partnership with the Division of Vocational Rehabilitation Services (DSU): develop, agree to, and review state goals, and provide in accordance with Section 101(a) (15) (C); evaluate the effectiveness of the vocational rehabilitation program; and submit reports of progress to the Commissioner in accordance with Section 101(a) (15) (E).
- 3. To advise the NC Department of Health and Human Services (DSA) and the Division of Vocational Rehabilitation Services (DSU) regarding activities authorized to be carried out under this Title and assist in the preparation of the State Plan and amendments to the Plan, applications, reports, needs assessments and evaluations required by this Title.
- 4. To the extent possible, conduct reviews and analysis of the effectiveness of, and consumer satisfaction, with the functions of the NC Department of Health and Human Services: the vocational rehabilitation services provided by the Division of Vocational Rehabilitation Services and other public and private entities responsible for providing services to individuals with disabilities under the Act; and the employment outcomes achieved by eligible individuals receiving services under Act, including the availability of health and other employment benefits in connection with such employment outcomes.
- 5. To prepare and submit an annual report to the Governor and the Commissioner of RSA on the status of the vocational rehabilitation programs operating within the state and to make this report available to the public.
- 6. To avoid duplication of efforts and to enhance the number of individuals served.

- 7. Coordinate with the activities of other councils within the state, including: the Statewide Independent Living Council; the advisory panel established under Section 612(a) (21) of the Individuals with Disabilities Act Amendments of 1997; the state Council on Developmental Disabilities; the state Mental Health Planning Council; the state Workforce Investment Board; and other public and private organizations, groups and functions such as the Council of State Administrators for Vocational Rehabilitation, the National Rehabilitation Association, and the NC Rehabilitation Association.
- 8. To provide for coordination and to establish working relationships between the NC Department of Health and Human Services and the Statewide Independent Living Council and the centers for independent living in the state.
- 9. To perform other functions consistent with the purposes of this Title comparable to other functions performed by the council.

SRC Strategic Plan 2017-2019

The council met in March of 2017 to review and develop a new strategic plan. The plan has five strategic goals and sub-strategies. These goals provide guidance when formulating each SRC meeting agenda and establishing committee priorities. The SRC's commitment to the goals has aided in accomplishing their mission for the period ending in calendar year 2019.

- 1. To sustain service capacity of the NC Division of Vocational Rehabilitation Services
- 2. To ensure individualized services planning is client driven
- 3. To improve marketing, communication and outreach
- 4. To improve the efficiency of the vocational rehabilitation process
- 5. To improve or create transportation options for vocational rehabilitation consumers

During every quarterly council meeting, the chair reviews the five goals of the SRC Strategic Plan or 2017-2019 and sub-strategies to guarantee the council is meeting their goals. In December, council members and staff jointly developed a strategic plan for 2020-2022.

SRC Standing Committees Executive Committee

The Executive Committee acts on behalf of the council, consistent with the council's purpose as outlined in its bylaws. The committee is responsible for compiling the council's response to the Unified State Plan and triennial Comprehensive Needs Assessment, preparing the annual report, establishing meeting agendas and setting the general direction of the council and its committees.

To expand SRC participation in the development and implementation of the Unified State Plan, the council's Executive Committee addresses development, implementation and progress towards state plan and SRC goals within the "Goals, Priorities and Strategies" section of the plan during meetings with the division director. The Executive Committee, along with the division's Planning and Evaluation staff, reports on the Unified State Plan to the full council at each quarterly meeting for input and approval.

Members discussed technical changes to section 3.1 of House Bill 250, which clarifies structure and membership of the council, as well as the working relationship between the council and DVRS. Members also advocated to adjust the mileage reimbursement rate for members to reflect the rate for state employees. The option of remote meeting participation was brought up as a means of providing options for members unable to attend meetings in person.

The 25th annual C. Odell Tyndall Legislative Breakfast was hosted in March by the North Carolina Rehabilitation Association (NCRA). Legislative leaders heard personal testimonies from individuals with disabilities who attained or are working toward their employment and independent living goals with the support of NC's vocational rehabilitation, assistive technology and independent living programs.

In 2019, North Carolinians were impacted by severe weather throughout the state, including areas that have not fully recovered from similar events over the past few years. To better understand the ongoing challenges of delivering services during crisis situations, members sought presentations from subject matter experts. Strategic planning is required to effectively educate consumers about documentation requirements at the time of application and how to expedite services. DVRS Quality Development Specialists are developing policies and a new casework review tool to ensure that division staff capture the measurement priorities outlined in the Workforce Innovation and Opportunity Act (WIOA), such as measurable skill gains and competitive integrated employment sustained over time.

The Executive Committee advocates for strong leadership roles on the council, and carefully reviews the membership terms. New members are encouraged to serve on designated committees to provide a more balanced representation. The Executive Committee produced a colored print and a web-based annual report posted to the public website. The report summarizes the work of the council and highlights essential components of its mission, such as consumer satisfaction.

Consumer Input and Public Outreach Committee

The Consumer Input and Public Outreach Committee reviews, analyzes and makes recommendations to the council regarding the effectiveness of vocational rehabilitation services delivered by the division and other public and private agencies in the state. The committee also gathers information using the consumer satisfaction survey, public forums and feedback from the NC Client Assistance Program.

The committee reviewed the current methods and strategies for monitoring consumer input and public outreach. The contract with North Carolina State University permits ~1,600 telephone surveys of agency consumers to be conducted. Feedback from consumers provides quality data and enables the agency to track trends, assess consumer needs and implement appropriate adjustments in how service is provided.

With participation from the full council, the committee gathered input at public forums held in Cherokee on April 11 and Lumberton on September 19. In Cherokee, attendees addressed the need for better communication between consumers and staff and spoke to the adverse impacts of staff turnover. The challenges of rural living were a focus of discussion, as the lack of access to reliable internet service and transportation impacts employment opportunities in the area. One consumer remarked that employers within the region would benefit from additional training in diversity and inclusion.

Stronger enforcement of disability laws such as Title I of the ADA was a focal point of the Lumberton session. Transportation was also noted as a barrier due to system capacity, time restrictions for picking up or dropping of for appointments or work. One consumer shared her vocational rehabilitation success story, which began with physical restoration services, counseling and sponsorship of training. She is now pursuing a career in rehabilitation counseling and has become a mentor to other people with disabilities.

Policy and Rules Review Committee

The Policy and Rules Review Committee makes recommendations related to division policy and procedures that impact the public, are subject to public rule-making hearings under NC's Administrative Procedures Act and are required for WIOA compliance.

Division policy changes were made in the following areas: Work Adjustment Training Policy Draft and Transition Plan; Prior Approval Requirements, Memorandum of Agreement with Disability Rights NC; Hurricane Dorian - Shelter Work; NC Disability Determination Services Records Sharing Procedures; Pre-Employment Transition Services; Residential Modifications; National Voter Registration Act (NVRA) Voter Registration and Application Revisions; NVRA FAQ Document; Extended Services; Background Checks Policy; Rehabilitation Counselor Proficiency Process; Cash Management Policies; and Louisburg College Support Services.

Community Outreach, Advocacy and Member Development

The council's goal is to have greater impact on its mandates in the areas of community outreach, advocacy and SRC member development.

Liaison Activities

The council designates members to serve as SRC representatives to seven liaison groups, and several special interest groups. To fulfill that mission, the council continues to focus on identifying candidates who can effectively liaise with these groups. Involvement is seen as a critical opportunity to partner with key stakeholders, as well as provide strategic paths for community outreach, advocacy and member development. The seven groups are:

- Council on Education Services for Exceptional Children
- Mental Health Planning Council
- NC Substance Abuse Federation
- NC Council on Developmental Disabilities
- NC Statewide Independent Living Council
- NC Commission on Workforce Development
- Commission for Mental Health, Developmental Disabilities, and Substance Abuse

The ongoing information exchange between stakeholder groups has helped to educate members within each sector. Members attended conferences, steering council and workforce board meetings hosted by the NC Division of Workforce Solutions and NCWorks Commission, including the 32nd annual NCWORKS Partnership Conference in Greensboro.

NCRA held their fall training conference at Harrah's Cherokee Casino and Resort in Cherokee, NC. The theme was *Creating Harmony in Rehabilitation: Blending Social Determination of Health and Rehabilitation Practices.* SRC member, Dr. Glacia Ethridge, presented two conference sessions: *The Intersection of Disability, Addiction and Crime and their Impact for Ex-Offenders with Disabilities and Meeting the Needs of Clients with Disabilities Coping with Opioid Addiction.* The NCRA launched a community service project by partnering with Family Services of the Eastern Band of Cherokee Indians to prepare and deliver firewood to those in need on the reservation.

Public Forums

To obtain consumer input beyond the consumer satisfaction survey and the division's website, the council held forums in the western and eastern regions of the state.

At the April 11 forum at the Chestnut Tree Inn in Cherokee, NC, staff-consumer communications, technology and transportation were the focus of discussions. One local consumer shared how his virtual employment situation allowed him to work from home while helping to care for his elderly parents. Consumers were advised to speak with their counselors to better understand the vocational rehabilitation process.

On September 19, the SRC hosted a forum at Robeson Community College in Lumberton, NC. Trending issues included lack of employer awareness of disability law and the need for staff cross-training to provide general assistance to applicants. A local consumer spoke about his experience recuperating from two heart attacks and how VR helped him find multiple jobs compatible with his abilities as his health needs changed over the years.

The forums continue to serve as a valuable way to obtain consumer input and increase awareness of the SRC's advocacy role in ensuring that the needs of the consumer and agency are met. Members strategized with regional and local staff to find viable solutions that can be implemented statewide.

SRC Member Training

In December 2019, three new council members participated in an orientation session to learn about their role on the SRC. Each member received an SRC Reference Manual. During the quarterly full council meetings, members engaged in discussions with regional and local managers and guest speakers about the challenges of providing services and cultivating partnerships with community organizations and local businesses.

Throughout 2019, members were informed about various topics of interest and concern. For example, members learned about the divisions new requirement for documenting National Voter Registration Act activities, including notifying consumers that they can register to vote when applying for VR services. Guest speakers from Harrah's Cherokee Casino shared their experiences working with individuals with disabilities in a competitive integrated environment. The casino is considered one of the largest employers in the western region of the state. Harrah's adapts positions by making them accessible and creating opportunities for people with disabilities to work in various areas of the casino. Prospective applicants tour the facility to observe and get a sense of what it would be like to work in the casino environment.

The council learned about Governor Roy Cooper's Executive Order #92, Employment First for North Carolinians with Disabilities. The Office of State Human Resources (OSHR) is the lead agency named in the executive order, with the NC Division of Health and Human Services identified as consulting agency. Representatives from OSHR and DVRS formed a working group to facilitate implementation of activities, policies and programs that further progress towards goals outlined in the executive order. One initiative focused on providing Windmills disability awareness and inclusion training to all cabinet-level agency HR staff and offering trainings to all state agencies. A second initiative was to provide "train-the-trainer" instruction on successfully completing applications for state government employment to DVRS regional employment specialists, who subsequently provided training to DVRS and DSB staff who assist job seekers with disabilities.

Members also learned about career and professional development opportunities within DVRS. One example is the division's Step-Up Program, which provides leadership training for a select group of internal applicants. DVRS outreach to universities is intended to raise awareness of internship and employment opportunities within the division. In meetings with the college system, Council for Accreditation of Counseling and Related Educational Programs (CACREP) reported a decline in the number of students going into the rehabilitation field. For those students who are enrolled in rehabilitation, the "brick and mortar" group is concentrating on Mental Health and Substance Abuse areas of study with plans to go into the private sector. Students are utilizing fewer RSA Grants, and funding sources are going to schools instead. Some states have reported vacancies lasting years or have lowered their requirements; however, the issue is still prevalent.

Members were informed that several school systems elected to not sign third-party agreements allowing staff to enter the school system to reach transitional age students, resulting in fewer referrals for VR services. To strategically address this situation, the division will endeavor to build relationships with school partners by communicating the value that VR brings to students with disabilities. Additionally, members were updated about the Work Incentives Planning and Assistance (WIPA) program, which enables disability benefits recipients to make informed choices about work, providing education to individuals and families about how earnings may impact benefits. Additional funding was requested to increase the number of WIPA counselors serving consumers and develop a plan to provide WIPA counseling statewide.

DVRS is preparing for the transition to a new electronic case management system, the Electronic Network Centered on Rehabilitation Effectiveness (ENCORE). After reviewing multiple proposals, Geographic Solutions, Inc. was selected as vendor. Among other clients, Geographic Solutions works with the NC Division of Workforce Solutions, hosting the public-facing employment application, NCWorks Online. The new case management system will have secure consumer and service provider portals, be accessible and offer the ability to accept electronic signatures creating quicker turnarounds for documentation purposes and enhanced service experience for customers and service partners. The planned go-live date for Phase I functionality is December 2021.

Regional directors, unit managers and other staff spoke to the council about successes and challenges within their service areas; a common theme of these presentations is the difficulty managing vacancies and vacant caseloads. High vacancy rates and related hiring and retention issues in the field of vocational rehabilitation are of concern to VR agencies across the country and innovative solutions are being explored at the national and local level. In NC, the three regional directors meet with human resources staff on a weekly basis and DVRS Director Kathie Trotter has regular consultations the division's Human Resources Director. DVRS seeks feedback from staff regarding satisfaction with their work and conducts exit interviews to identify issues that cause staff to leave their position. Exiting employees indicate they leave DVRS for other job opportunities, due to extra workloads affiliated with WIOA reporting and because their work does not align as closely with their field of study as anticipated.

The SRC suggested that the division review and enhance career marketing and media strategy by focusing on the mission and demonstrating that VR is about more than just a salary, highlighting benefits and the positive impact on lives of consumers.

Review and Analysis of the Client Satisfaction Survey

The consumer satisfaction survey is mandated by the Rehabilitation Act of 1973, as amended (the Act), which states that the SRC shall conduct a review and analyze the effectiveness of client satisfaction with:

- The functions performed by the designated state agency
- Vocational rehabilitation services provided by state agencies, and other public and private entities responsible for providing vocational rehabilitation services to individuals with disabilities under the act
- Employment outcomes achieved by eligible individuals receiving services under Title I of the act including the availability of health and other employment benefits in connection with those employment outcome

Survey Process

The survey is conducted by the SRC in cooperation with division staff. Council and staff share responsibility for analyzing and reporting the results.

The 2019 Client Satisfaction Survey was conducted by telephone through a contract with the North Carolina State University, Center for Urban Affairs and Community Services. From a weighted sample of 1,699 clients with open or recently closed cases. After adjusting for clients who could not be contacted after six attempts, the completion rate was 98.4 percent.

Overview of Survey

Measurement scales include four sections:

I. Satisfaction with VR Counselor and Staff II. Client Assistance Program (CAP) Information III. Barriers to Employment IV. Additional Questions

Section I. Satisfaction with Counselor and Staff contained fourteen items regarding the client's experience with NCVR, including their interactions during eligibility, IPE development and after achieving employment. Clients indicating dissatisfaction were given the option to explain.

Section II. This section asks client's whether they were informed about the Client Assistance Program and their right to appeal agency decisions with which they disagree. Sub-items were added to determine if clients received information about NCCAP's services when they applied for services and when completing an individualized plan for employment (IPE).

Section III. Barriers to Employment contained nine items that were prompted if the client was not working, at the time of the survey was conducted. Some items were revised from previous version of the survey and an addition "N/A" response was added.

Section IV. Additional questions included an open-ended question for clients, which asked what VR could do to improve its services, as well as two items prompted for clients who exited the vocational rehabilitation process without a successful employment outcome. These clients were asked (a) why they felt their case was closed before they achieved employment and (b) whether VR could have done more to help them start working.



Survey Completion Results



Satisfaction with Counselor and Staff:

18 North Carolina Department of Health and Human Services



Satisfaction with Timeliness of Services:

Satisfaction with Overall Experience:





Informed about Client Assistance Program at time of:

Informed about right to appeal at time of:



North Carolina State Rehabilitation Council 2019 Annual Report 21

Barriers to employment:



Council Recommendations

The executive committee provided the following recommendations to the division regarding goals, priorities or strategies.

Recommendation 1:

In support of their strategic plan pertaining to legislative advocacy, the council recommended again this year for the division to prepare for their distribution, customized reports for each NC legislative district, featuring the beneficial return on investment that VR provides to consumers and the economy of each legislative district within the state. The DVRS Planning and Evaluation unit will continue to support this request, revising the customized reports based on input and adding success stories to provide a human element to the data presented. The reports will continue to be prepared and distributed to NC legislators during the upcoming session.

Recommendation 2:

To improve the efficiency of the vocational rehabilitation process, the council recommends exploring methods of expediting the provision of consumer services, including client purchases, conducting reviews of process to identify opportunities for increased efficiencies, exploring ways to involve staff in identifying and addressing inefficiencies and increasing capacity to serve consumers who use English as a second language. DVRS supports all components of this recommendation and is currently addressing them.

Recommendation 3:

The council recommended that quarterly full council meetings contain a standing agenda item for the Client Assistance Program to provide an activity update. Further, the council recommended a standardized set of questions and topic areas be provided to regional director and/or unit manager to use as a guideline for reporting activities during quarterly meetings. DVRS has incorporated the recommended changes and will continue with these standing topics until the council recommends further adjustments.

Recommendation 4:

The council recommended continuation of consumer input sessions. held in conjunction with two of the council's annual meetings, to gather feedback from various communities across the state and to strongly encourage staff attendance at such sessions whenever possible. DVRS will continue to actively support jointly conducted input sessions twice annually, canvassing various communities across the state and focusing on how the VR program is addressing consumers' needs through its service provision.

Recommendation 5:

Whereas the council is concerned about providing responsive services to consumers and realizes the division's abilities in this area are impeded when high vacancy rates occur within the division, the council recommends that DVRS provide regular updates regarding key vacancies, including direct service positions such as counseling positions, so that the council may advocate appropriately as included within the council's current strategic plan. DVRS supports this recommendation and will continue to work with council members to regularly provide updates through statewide and regional vacancy reports.

Recommendation 6:

Whereas the SRC Consumer Input and Public Outreach Committee acknowledged decreasing response rates on client satisfaction self-administered written questionnaires, the council recommends that DVRS continue the use of the telephonic client satisfaction survey. Further, the council recommends extending the survey to clients in active status and employing a weighted sampling method to maintain costs and better ensure representation across disability types, minority status, age, and gender. DVRS supports this recommendation and will adjust its sampling practices, contracts, and purchase orders accordingly.

Recommendation 7:

Whereas the council acknowledges the importance of reliable transportation solutions in assisting consumers who are preparing for, obtaining and maintaining employment and recommends the division actively explore partnerships focused on creative transportation solutions that will better meet the needs of all individuals with disabilities within the state. The division also acknowledges the significance of this need and supports this recommendation. The senior director serves on the NC Department of Transportation's Planning Council for NC Moves 2050, which is working to address these needs at the systems level, while systematically exploring individualized solutions through partnerships.

2019 Meeting Schedule		
April 11-12	Cherokee	
June 13-14	Raleigh	
September 19-20	Lumberton	
December 12-13	Raleigh	

Members of the North Carolina State Rehabilitation Council: 2018-19

John Marens , Chair Representing the NC Client Assistance Program (NCCAP)

Baldwin "Keith" Renner, Vice Chair Representing Labor

Margaret "Meg" Ackley,

Representing Regional Rehabilitation Centers for the Physically Disabled (Termed 9/30/19)

Cindy Arrington

Representing NC Statewide Independent Living Centers (SILC) (Resigned 11/01/19)

Glacia Ethridge Representing Non-Divisional Rehabilitation Counselors

Doreen Byrd Representing Parent Training And Information Centers

Brenda Cogdell

Representing Community Rehabilitation Services Providers (Termed 6/30/19)

Patti Cox

Representing State Education Living Agency (IDEA)

Tracey Craven

Representing Community Rehabilitation Services Providers (Appointed 8/29/19)

Peter Murphy

Representing Disability Advocacy Groups

Wayne Giese

Representing Disability Advocacy Groups (Termed 6/30/19) James "Jim" Godfrey

Representing Business and Industry Sector (Termed 9/30/19)

Cindy Harrell Representing Business and Industry Sector

Gerald "Jerry" Higgins

Representing Disability Advocacy Groups

Celeste Hunt

Representing Directors of Projects Under Section 121

Agreta Limerick

Representing NC Department of Commerce, Division of Workforce Solutions

John "Locke" Milholland IV Representing Disability Advocacy Groups (Appointed 9/26/19)

Clare "Ping" Miller

Representing NC Chamber of Commerce (Appointed 1/31/19)

Sandy Pendergraft

Representing Disability Advocacy Groups

Vacant for 2019-2020

1) Regional Physical Disability Rehabilitation Centers

2) NC Statewide Independent Living Council

Non-Voting Member

Kathie Trotter, Division Director Vocational Rehabilitation Services



NC STATE REHABILITATION COUNCIL

c/o NC Division of Vocational Rehabilitation Services 2801 Mail Service Center | Raleigh, NC 27699-2801 919-855-3500 | 1-800-689-9090 | TTY 919-855-3579 Fax 919-733-7968 | www.ncdhhs.gov/dvrs

State of North Carolina | Roy Cooper, Governor Department of Health and Human Services | Mandy K. Cohen, Secretary www.ncdhhs.gov

NCDHHS does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or provision of services.