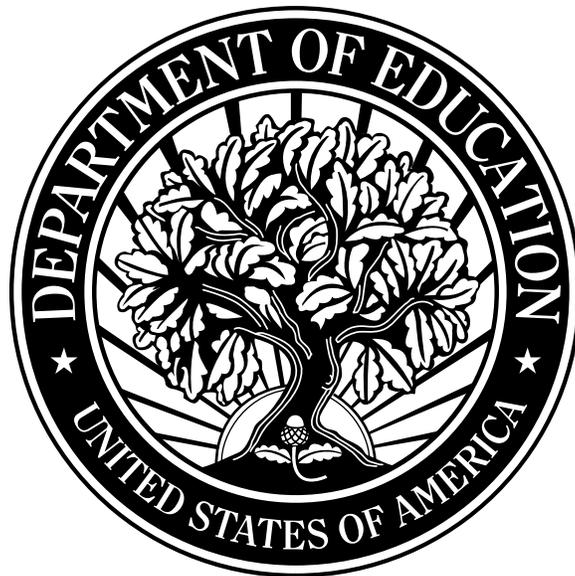


**State Vocational Rehabilitation Services
and
State Supported Employment Services
Programs**

**Federal Fiscal Year 2022
Monitoring and
Technical Assistance Guide**



**U.S. Department of Education
Office of Special Education and
Rehabilitative Services
Rehabilitation Services Administration
State Monitoring and Program Improvement
Division**

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I. Monitoring Objective, Values, and Scope

A. Objective and Values

Consistent with the requirement in Section 107(a) of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by Title IV of the Workforce Innovation and Opportunity Act (WIOA), to conduct annual reviews and periodic on-site monitoring of programs authorized under Title I of the Rehabilitation Act, the Rehabilitation Services Administration (RSA) has collaborated with vocational rehabilitation (VR) agencies in the development of this Monitoring and Technical Assistance Guide (MTAG). As explained in the MTAG, the objective of monitoring is to support State VR agencies and RSA in improving results for individuals with disabilities seeking high-quality competitive integrated employment by responding to the unique needs and challenges of individual agencies. Fundamental to this monitoring approach are values shared by RSA and its State partners. RSA is committed to these values as it partners with State VR agencies in the conduct of monitoring to foster continuous improvement in outcomes for individuals with disabilities. As such, RSA's monitoring—

- Values and supports the Federal/State partnership;
- Focuses on areas designed to meet the needs of State VR agencies and RSA;
- Addresses the characteristics and circumstances of individual VR agencies with respect to the areas reviewed and the conduct of the monitoring;
- Fosters transparent and thoughtful verbal and written communication;
- Promotes the use of and improves the validity and reliability of programmatic and fiscal data;
- Makes efficient and effective use of RSA and State VR agency personnel and time devoted to the process;
- Delivers accurate, targeted, purposeful, and timely technical assistance, balanced with the need to assure compliance with fiscal and programmatic requirements;
- Maximizes results for VR participants;
- Leads to continuous improvement in the VR program; and
- Supports alignment of the public workforce system monitoring protocols and provides emphasis on coordination and collaboration at the Federal and State Level in evaluating and reporting performance and compliance across the core programs.

Embodying these values, this MTAG explains the process through which RSA will provide technical assistance to, and review the progress of, VR agencies in: 1) improving the quality of services for, and employment outcomes achieved by, individuals with disabilities, and 2) complying with requirements under the Rehabilitation Act.

B. Scope of Review

1. General

Pursuant to Section 107(a) of the Rehabilitation Act, RSA must conduct periodic on-site monitoring and annual reviews to determine whether a VR agency is complying substantially with the provisions of its State Plan under Section 101 and the State Plan Supplement under

Section 606 of the Rehabilitation Act and with the evaluation standards and performance indicators established under Section 106 of the Rehabilitation Act (which are subject to the performance accountability measures in Section 116(b) of WIOA and 34 C.F.R. part 361, subpart E). The specific programs covered by this MTAG include—

- The State Vocational Rehabilitation Services program (VR program), established under Title I of the Rehabilitation Act; and
- The State Supported Employment Services program (Supported Employment program), authorized under Title VI of the Rehabilitation Act.

During RSA’s programmatic and fiscal monitoring, the designated State unit’s nondelegable responsibilities for the administration of the VR and supported employment programs described in 34 C.F.R. § 361.13(c) will be particularly emphasized. These responsibilities include—

- All decisions affecting eligibility for VR services, the nature and scope of available services, and the provision of these services;
- The determination to close the record of services of an individual who has achieved an employment outcome in accordance with 34 C.F.R. § 361.56;
- Policy formulation and implementation;
- The allocation and expenditure of VR funds; and
- Participation as a partner in the one-stop service delivery system established under title I of WIOA, in accordance with 20 C.F.R. part 678.

2. Focus Areas

In its monitoring of the State VR and Supported Employment programs, SMPID will address two focus areas when reviewing the performance and compliance of each agency during on-site and off-site reviews. These focus areas cover—

- Performance of the VR and Supported Employment programs, including how the VR agency is implementing strategies to achieve continuous improvement in competitive integrated employment outcomes;
- Financial management of the VR and Supported Employment programs that supports improved program management and service delivery to and outcomes for individuals with disabilities.

The nature and scope of each focus area, along with the activities to be conducted under each, is contained in Sections III and IV, respectively, of this MTAG. As a result of the activities reviewed in each of the focus areas, review teams may identify—

- Strategies, including innovative practices, used by VR agencies to improve competitive integrated employment outcomes for individuals with disabilities, including students and youth with disabilities;
- Recommendations leading to continuous improvement in the outcomes achieved by individuals with disabilities and engagement with employers through the VR and Supported Employment programs;

- Compliance findings and corrective actions to improve processes and procedures, including internal controls supporting effective and efficient program operations and data-based decision making; and
- Areas of technical assistance that will assist and support VR agencies in rethinking approaches and applying flexibility to improve performance.

3. Other Areas of Review

In general, the review team will conduct monitoring activities related only to those areas of review described above in B.2. However, a team may, after consulting with the VR agency and SMPID management, engage in further monitoring activities in areas not covered above, if such areas are of significant concern, and if the VR agency would benefit from technical assistance through the monitoring process.

C. Technical Assistance

To ensure VR agencies and their educational and workforce partners receive quality and timely technical assistance services, RSA consults with: 1) the Office of Special Education Programs (OSEP) in the Office of Special Education and Rehabilitative Services; 2) the Employment and Training Administration and the Office of Disability Employment Policy in the U.S. Department of Labor; 3) the Administration for Community Living in the U.S. Department of Health and Human Services; and 4) relevant training and technical assistance centers and demonstration projects funded by RSA, OSEP, and these and other Federal agencies regarding the provision of services for individuals with disabilities, including students with disabilities. The purpose of this coordinated technical assistance service delivery model is to assist VR agencies and their partners in providing quality VR and other services to individuals with disabilities leading to competitive integrated employment. Each technical assistance center focuses its efforts on a specific set of strategies and practices designed to provide universal, targeted, and intensive technical assistance to maximize the transition, employment, independence, and integration into the community of individuals with disabilities.

In Federal fiscal year (FFY) 2020, RSA funded three five-year technical assistance centers. They include—

- The Vocational Rehabilitation Technical Assistance Center for Quality Management (VRTAC-QM) awarded to San Diego State University for the purpose of providing training and technical assistance to VR agencies in order to assist them to manage available staff and fiscal resources, improve effective service delivery, and increase the number and quality of employment outcomes for individuals with disabilities;
- The Vocational Rehabilitation Technical Assistance Center for Quality Employment (VRTAC-QE) awarded to the University of Wisconsin for the purpose of providing training and technical assistance to VR agencies in order to support the implementation of innovative and effective employment strategies and supporting practices; and
- The National Technical Assistance Center on Transition: The Collaborative (NTACT:C) jointly funded with OSEP and awarded to the University of North Carolina-Charlotte for the purpose of providing training and technical assistance to VR agencies and State and local educational agencies in order to support the development and implementation of

services, including pre-employment transition services for students with disabilities supported by IDEA and students with disabilities supported by Section 504; and transition services to students and youth with disabilities, including youth who have dropped out of school, are homeless or are involved with the juvenile justice system.

Following monitoring, RSA review teams in the State Monitoring and Program Improvement Division (SMPID) will share with the Training and Service Programs Division (TSPD) project officers who are responsible for the administration of the technical assistance centers, the technical assistance needs of VR agencies that will enable them to take the steps necessary to improve performance and resolve compliance findings, and, as applicable, feedback from the agencies about the quality of technical assistance provided by the centers. In turn, TSPD project officers will share information with RSA review teams about any intensive and targeted technical assistance provided by the technical assistance centers to the VR agencies. VR agencies receiving intensive or targeted technical assistance may, at their discretion and in coordination with the technical assistance centers, involve center staff prior to or during the monitoring process and may continue working together during the development and implementation of the corrective action plan (CAP). RSA intends that the technical assistance provided in conjunction with the monitoring process will reflect a partnership among RSA staff, VR agencies, and the technical assistance centers.

In addition, the VRTAC-QM is collaborating with RSA to develop a self-assessment tool for use by VR agencies. This tool will be made available as a universal technical assistance product and posted on the VRTAC-QM's website. VR agencies will be able to use the tool on a regular basis (e.g., annually) to perform a "wellness check" assessing the programmatic and fiscal strengths of the agencies' VR program. They also will be able to use the tool as they prepare for RSA monitoring or as an assessment of the agency's technical assistance needs that can be addressed by RSA-funded technical assistance centers.

II. Overview of the Process

A. Agencies for Review

From FFY 2017 through FFY 2021, RSA conducted 55 on-site monitoring and off-site reviews of 54 VR agencies. To facilitate the efficient and effective implementation of this process for the remaining 24 VR agencies, RSA will take steps to shorten the review cycle, when feasible, considering the availability of RSA resources.

B. Accountability Model

1. Background

SMPID uses an accountability model to carry out monitoring activities while increasing the effective use of its resources to administer the VR program. The model is consistent with the guidelines set forth in the Department of Education's Directive titled "Guide for Managing Formula Grant Programs," dated August 13, 2019.

2. Accountability Model

The FFY 2022 accountability model is comprised of three programmatic factors (program year (PY)), one factor related to previous monitoring, and two fiscal factors (FFY):

- PY 2020 State VR program employment rate;
- PY 2020 State VR program employment rate in the second quarter after exit;
- PY 2020 State VR program employment rate in the fourth quarter after exit;
- Amount of time since RSA last monitored the State VR program;
- Amount of the State formula award allotment for the VR program as a percentage of the total Federal appropriation for the VR program; and
- State percentage of the required non-Federal share (match) provided for the VR program based upon the State's formula award allotment.

Note: All data are computed on a State basis to align the RSA accountability model with the principles in Title I of WIOA, under which core partners in the workforce development system, including VR agencies, are required to develop performance targets and report the Annual State Performance Report at the State level. This method ensures comparability between States with one combined agency and States with more than one VR agency (general and blind). In making the calculations, SMPID will review data reported on the Case Service Report (RSA-911) and relevant financial reports, for the most recent period for which complete data are available. Further details about the Accountability Model can be found in Appendix A.

C. Selection of States

During each Federal fiscal year of the monitoring cycle, SMPID will use the accountability model and information obtained through, for example, the review and approval of WIOA Unified or Combined State Plans, requests for technical assistance, changes due to agency

reorganization, etc., to select VR agencies for either on-site monitoring or off-site reviews (see Appendix A).

SMPID will assign each State VR agency an overall accountability score of one to five and will schedule those States with higher overall accountability scores and/or demonstrated significant technical assistance needs for review earlier in the monitoring cycle. As VR agencies indicate the need for more immediate technical assistance and support, SMPID may monitor a VR agency more than once during the monitoring cycle. SMPID may monitor VR agencies with lower scores through the conduct of off-site reviews, as they demonstrate less need for immediate technical assistance.

To the extent possible when applying the accountability model, SMPID will choose from general and blind or combined VR agencies as appropriate from across the geographic regions of the United States. If a State has established a general and a blind VR agency for providing VR services, SMPID will review both VR agencies in the same Federal fiscal year as much as is practicable. In such instances, SMPID will issue a separate report to each agency.

Circumstances may require SMPID to provide additional technical assistance to meet specific and pressing VR agency needs as opposed to a second full monitoring review. These circumstances include, but are not limited to, requests from VR agencies for more immediate assistance, identification of issues requiring prompt attention from SMPID, or the adverse impact on a VR agency's operations resulting from natural disasters.

D. Duration of the Monitoring Process

To the extent possible, SMPID will begin the monitoring process for selected VR agencies following the issuance of the MTAG for each Federal fiscal year and conclude all on-site visits and off-site reviews by September 30. However, the monitoring process for each VR agency under review is not intended to last the length of the entire Federal fiscal year. The review team, in collaboration with the VR agency, will determine the start date of the monitoring process accommodating as much as possible the schedules of the VR agency. The process generally includes preparation and planning activities, an on-site visit or off-site review, and the development and issuance of draft and final monitoring reports.

E. Stages of the Monitoring or Review Process

1. Planning and Preparation

The RSA review team will contact each VR agency selected for on-site monitoring or off-site review. The monitoring team will review documentation and conduct teleconferences related to the focus areas in preparation for on-site visit or off-site review activities.

Through teleconferences or other remote methods, the review team, in coordination with the VR agency, will—

- Introduce the RSA team responsible for the review, including the team lead, and identify the VR agency staff who will be involved in the review;

- Select dates for the on-site visit or off-site review activities;
- Identify diverse stakeholders and partners to be invited to participate in the review, as appropriate, including State Rehabilitation Council (SRC) members, the Client Assistance Program, community rehabilitation programs (CRPs), employers, workforce development partners, educational agencies, and VR agency consumers and their representatives; and
- Determine the involvement of representatives of the technical assistance centers in the review, in coordination with the VR agency, and notify them of the review schedule.

Through a series of scheduled teleconferences or other remote methods, the review team will—

- Discuss the monitoring process and the substance of the focus areas included in this MTAG with VR agency management, and progress made related to previous recommendations and findings relevant to the scope of the review;
- Discuss the agency’s current characteristics and situation, such as its organizational structure and resources for service provision, the State’s economic conditions and local labor markets, and the agency’s strategic planning goals and objectives, so that remaining preparation activities and on-site/off-site activities are tailored to meet significant areas of need;
- Discuss and identify the VR agency’s technical assistance needs and determine how and when they will be addressed;
- Gather information pertinent to the focus areas of the review from representatives of the VR agency, SRC and Client Assistance Program, as appropriate; and
- Develop the agenda for on-site visit or off-site review activities with VR agency management and personnel.

The review team will also review documents provided by the VR agency in accordance with the document request related to each focus area prior to the on-site visit or off-site review (Appendix B). Specifically, the review team will use the information obtained from these documents, analyses of programmatic and fiscal data, and the teleconferences or remote methods described above, to identify, in collaboration with the VR agency, on-site monitoring or off-site review activities that will lead to a productive review.

2. On-site Visit and Off-site Review Activities

The review team will schedule the on-site visit or off-site review activities with each VR agency, accommodating as much as possible the schedules of VR agency management and personnel. While all team members will actively participate in the review, the on-site visit or off-site review team will engage in a variety of activities, including, but not limited to—

- An entrance meeting to introduce review team participants and VR agency management and personnel, and to review the on-site monitoring or off-site review agenda;
- Activities and discussions with key personnel about the focus areas;
- The review of policies, procedures, practices, or innovative strategies with key personnel related to the focus areas;

- The review of internal control processes and procedures, which may include a service record review only in the limited circumstances when such a review is necessary to determine the effective implementation of the internal controls;
- The provision of technical assistance requested by the VR agency or recommended by RSA; and
- An exit meeting to discuss: 1) information gathered and observed by the Review team at this stage in the process that may form the basis for potential recommendations and findings (Note that any reference to potential recommendations and findings is subject to change based on input from RSA management, other Department offices, and Federal agencies such as the U.S. Department of Labor.), 2) next steps in the process, 3) follow-up teleconferences or activities, and 4) input and feedback from VR agency management and personnel and other participants in the review concerning the monitoring process and activities.

On-site activities may include site visits to schools, CRPs, or other area offices. These visits will generally occur within the surrounding geographic area of the State capitol, or the city in which the VR agency's primary administrative office is located.

The review team or the VR director may invite VR agency management and personnel, the leadership of the designated State agency (DSA), as applicable, and the chairperson or a representative of the SRC to participate in both the entrance and exit meetings, as well as any other activities in which their involvement would be pertinent.

Individuals with whom the review team may engage in discussions related to the focus areas during the on-site visit or off-site review may include—

- VR agency supervisors and counselors;
- State educational agency (SEA) and local school district staff responsible for providing VR services to students with disabilities, particularly those students receiving pre-employment transition services;
- The DSA director;
- Other staff from the DSA responsible for fiscal or administrative oversight;
- Commissioners of agencies for the blind or other stand-alone VR agencies;
- Representatives of CRPs, specifically those contracted to provide pre-employment transition services to students with disabilities;
- Workforce development partners and employers;
- VR agency consumers and their families, as appropriate, and other stakeholders; and
- State auditors.

3. Follow-up Activities

After the on-site visit or off-site review activities, the review team may require further documentation from the VR agency to supplement information obtained prior to or during the visit. Additional teleconferences or remote methods may be necessary to clarify any outstanding questions or concerns the team has or to gather further details about a particular issue.

F. The Draft Report

The review team will develop a draft report containing—

- Analyses, observations, and recommendations to improve VR agency performance in each focus area;
- Programmatic and fiscal compliance findings, and required corrective actions to improve VR agency management and operations and outcomes for individuals with disabilities; and
- Descriptions of technical assistance provided during the review that will result in continuous improvement in the performance of the VR agency as well as technical assistance that will be required after the conclusion of the review.

After consultation with RSA management, the review team will offer the VR agency an opportunity to discuss the team's current thinking about findings, corrective actions, observations, and recommendations. The review team will develop and transmit the draft monitoring report to the VR agency once the draft report has completed internal review by RSA and as needed, relevant departmental or inter-departmental review. If the review team anticipates delays in the issuance of the draft report, this information will be shared with the VR agency with the intention of increasing the transparency of the monitoring process.

Once the draft report is issued, the VR agency will have 15 business days to submit written responses to the draft report. If there are extenuating circumstances, the VR agency may submit a written request for an extension that must—

- Detail the nature of the extenuating circumstances;
- Include a proposed due date by which the agency could provide its response; and
- Be submitted to RSA at least 5 working days before the end of the 15 business days provided for the agency's response.

RSA will notify the VR agency if a new submission deadline is approved.

The VR agency responses to the draft report should include—

- Identification of factual errors either in a comment inserted in the document, if substantial, or in redline track changes, if minor, or through an email;
- Responses to any programmatic or fiscal recommendations, compliance findings, and corrective actions in the designated areas for response in the report;
- The attachment of supporting documentation or data as needed to substantiate VR agency responses; and
- Requests for technical assistance to carry out the recommendations and corrective actions identified in the draft report.

If the VR agency would like a teleconference with the monitoring team to discuss the draft report, the agency should submit a request to the review lead as quickly as possible after receipt of the draft report. Delays in scheduling this call do not extend the 15 business days the agency has to submit its written response to the draft report. The discussions with the VR agency

management and staff may be used to assist the agency in its development of responses to the draft report or clarify information provided by the VR agency in its responses and request additional documentation to support statements made in the responses. Preliminary discussions may also occur between the VR agency and the review team about technical assistance that is identified or requested as a result of the review.

G. The Final Monitoring Report

Based on the information the VR agency provides in response to the draft report, the review team will develop the final monitoring report, making any corrections as needed. The review team also may modify or eliminate a recommendation, compliance finding, or corrective action after consulting with SMPID management, the Department's Office of the General Counsel, other Department officials, or other agencies, as warranted by the VR agency's response to the draft report.

In addition to the information included in the draft report, the final report will contain the VR agency's responses to the draft report and any requests for technical assistance to support the VR agency in carrying out the recommendations and corrective actions to improve agency management and operations and outcomes for individuals with disabilities. Documentation or exhibits the VR agency submits in support of its responses to the draft report will be included in the final report at RSA's discretion. The review team may request additional assurances or documentation from the VR agency in connection with programmatic or fiscal findings. The final report will indicate when such material is required.

Once completed, the review team will transmit the final report electronically to the VR agency and the SRC. The VR agency, SRC, and others as appropriate, will be notified upon publication of the final report on the RSA website.

If the analysis and finalization of a particular finding or findings will unreasonably delay issuance of the complete final monitoring report, RSA will issue a partial final monitoring report containing the findings for which analysis has been completed. The partial monitoring report also will briefly summarize the findings for which analysis has not been completed and indicate that these findings will be transmitted through a separate communication or addendum to the partial final monitoring report at a later date.

The final report represents RSA's final decision related to the issues identified by the review team during the on-site visit or offsite review.

Review teams will share the findings from each monitoring report across SMPID staff to ensure consistency when addressing similar issues in subsequent reviews.

H. Corrective Action Plan

A corrective action plan (CAP) is a step-by-step plan of action that is developed to achieve targeted outcomes for resolution of identified monitoring findings. Within 45 calendar days from the issuance of the final report, the VR agency will submit for RSA review and approval a CAP

to address findings identified through the monitoring process to improve the VR agency's compliance, performance, and employment outcomes.

RSA, in collaboration with the VR agency to the extent possible, will identify target dates by which specific corrective action steps will be completed dependent on the specific facts related to each finding. In most instances, corrective actions should be completed within nine months following the approval of the CAP. In accordance with 2 C.F.R. § 200.303(d), VR agencies must "take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings." To facilitate the VR agency's development of the CAP and to promote consistency in the information contained in the plan, all CAPs will be developed, approved, and tracked by the RSA State team.

The content of the CAP must include—

- Statement of programmatic or fiscal findings consistent with the final report;
- Steps the VR agency will take to correct the finding(s). Include what steps will be implemented and how they will be implemented;
- Timelines for completion of steps;
- Person responsible for ensuring corrective action step is completed; and
- The evidence of success. What evidence will be submitted to demonstrate systemic correction of the identified issue(s).

The review team will transmit instructions to the VR agency for the submission of its CAP on the approved CAP form. The VR agency will use the CAP form to provide quarterly progress reports on implementing the CAP. The agency's State Liaison will notify the VR agency once the CAP is approved by RSA.

The first CAP progress report is due to the State Liaison no later than 30 calendar days after the end of the first full quarter following the approval of the CAP, and then 30 calendar days after each subsequent quarter is concluded, until all corrective actions are completed and the CAP is retired. Following monitoring and implementation of corrective actions, at a defined interval (e.g., two years), where appropriate, RSA may contact the agency to determine if additional technical assistance is required.

VR agencies are required to make substantive progress toward the resolution of all findings within the required timelines. In the event an agency does not make progress toward compliance through the approved CAP, RSA, at its discretion, may require the agency to take additional steps including, but not limited to, revising the CAP steps, timeline, target dates, etc. Depending upon the nature of the findings, RSA may take additional enforcement action including assigning specific conditions to the VR grantee's award(s) or designating the grant as high risk. In accordance with Department policy, RSA may not closeout a grant award in compliance until ALL corrective actions have been successfully resolved.

I. Involvement of Consultants in the Review Process

VR agencies, at their discretion, may involve contracted consultants in any or all stages of the review process, including the exchange of information and conduct of teleconferences/video

conferences in preparation for the on-site visit or off-site review activities, on-site or off-site monitoring sessions, follow-up teleconferences, and the development of responses to draft reports as well as the development of the CAP. During the initial stages of the monitoring process, VR agencies should inform RSA about the role of any consultants retained. The review team will direct all communication to VR agency management and staff, as well as to technical assistance center representatives and other stakeholders when appropriate, but not to the consultants.

J. Evaluation of the Review Process

Consistent with RSA's commitment to continuous improvement, all participants in the monitoring and technical assistance review process, including VR agency management and personnel, SRC members, the Client Assistance Program, technical assistance centers, and other stakeholders, may, at any point in the monitoring process, provide written comment and suggestions for improvement of the review process to RSA. This feedback may be used to inform future monitoring activities.

III. Focus Area—Performance of the State Vocational Rehabilitation Services and State Supported Employment Services Programs

A. Nature and Scope

RSA will assess the performance of the State Vocational Rehabilitation Services (VR program) and State Supported Employment Services program (Supported Employment program) by reviewing RSA-911 data; the VR agency’s internal controls, including policies and procedures; and conducting in-depth interactive discussions with the VR agency and other appropriate entities. The RSA review team will consider the unique characteristics and circumstances of individual VR agencies with respect to their performance during the period under review. RSA will provide technical assistance to promote continuous improvement in the VR and Supported Employment programs, maximize the quality of services and outcomes for VR participants, and improve the validity and reliability of program data to assist the VR agency in making data-driven and strategic program management decisions.

The data used in the analysis are those collected and reported by the VR agency through the RSA-911 based on RSA Policy Directives [16-04](#) and [19-03](#). These data include joint data elements necessary for the calculation of performance indicators for all core programs in the workforce development system, including the VR program, established in Title I of WIOA. The analysis is intended to serve as a broad overview of the performance of the VR and Supported Employment programs administered by the VR agency and should not be construed as a definitive or exhaustive review of all available VR program data. The data tables generally measure performance of the VR agency based on data for individuals with open and closed service records from program years (PY) 2018, 2019, and 2020. The analysis will cover the data in Tables 1 through 10 and the Other Measures That Matter developed by the RehabData Workgroup in FFY 2020. RSA also will review policies and procedures related to internal controls necessary for the verification of data.

The review team will examine the data tables and the relationship and interplay of these data elements and use a variety of other resources to analyze the VR agency’s performance. For example, RSA will assess the efficacy of services provided to eligible individuals with disabilities by reviewing the quality of employment outcomes, including such factors as hours worked, earnings, and the receipt of other benefits. Also, the examination of data related to the percentage of individuals with disabilities served with particular types of impairments may be indicative of decisions made by VR agency management based on the results of the comprehensive statewide needs assessment (CSNA) and other information.

In addition to data tables, the review team will use a variety of other resources to better understand the VR agency’s performance. Other resources may include, but are not limited to—

- VR Agency policies and procedures related to the provision of pre-employment transition services, competitive integrated employment, and supported employment services; and

- VR services portion of the most recent Unified or Combined State Plan describing goals and priorities pertaining to the performance of the VR and Supported Employment programs.

The review team will share data tables with the VR agency prior to the on-site monitoring visit or off-site review. Throughout the monitoring or review process, RSA will engage the VR agency in discussions related to factors that may inform or explain performance considering any unique circumstances experienced by the VR agency.

RSA will review quality assurance processes and internal control activities related to the VR agency's case service records and may, in limited circumstances, review a sample of individual case service records. In such an event, the review team will discuss the selection of service records with each VR agency, which may vary by agency as each is unique in the method it uses to maintain records. RSA will use the information obtained through the review of service records to assist in assessing the effectiveness of a VR agency's internal controls for the accuracy and validity of its data.

As a result of its analysis and discussions with key VR agency officials and staff, RSA may develop recommendations intended to assist the VR agency in its efforts to improve performance in identified areas. Generally, compliance findings will not be generated by the analysis unless, for example, RSA finds that the VR agency lacks sufficient internal controls, VR agency policies or procedures reviewed in conjunction with the performance analysis are not consistent with Federal requirements governing the VR program, or program data are not accurately tracked and reported.

The RSA team will review the VR agency's performance on the WIOA performance indicators established in Section 116(b) of WIOA, discussing any issues related to reliability and validity of the data and the potential effect on the State and VR agency negotiated levels of performance, as applicable. RSA will provide technical assistance as necessary or upon request.

Prior to and during the monitoring activities related to the performance focus area, RSA will provide technical assistance requested by the VR agency or on needs identified by the RSA team.

B. Data Analysis of the Performance of the VR and Supported Employment Programs

During the on-site monitoring or off-site review process, the RSA team will conduct an analysis of the performance of the VR and Supported employment programs guided by the questions below. These questions are intended to generate meaningful discussions and may lead to additional questions or areas for exploration.

VR Agency Profile

Resources: Appendix C

- Table 1—VR Agency Profile
- Other Measures That Matter:
 - 1. Sustaining Employment after Exit

- 2. Profile: Quality Employment
- 3. Profile: VR Process Efficiency
- 5. Percent of Participants Enrolled in Education/Training Program Leading to a Recognized Credential/Employment

The VR agency profile provides a summary of data that is designed to capture some of the most salient information about the VR agency’s performance in the most recently completed program years. Among the data represented are the number of applicants and eligible individuals, the number of participants, the VR agency’s employment rate, the number of individuals with disabilities who achieved competitive integrated employment or supported employment, data related to VR process efficiency and services, and data on the WIOA performance indicators. In addition, RSA will review the role of the VR agency in WIOA partnerships, governance, and participation on the State and local workforce development boards and in the one-stop centers.

Questions:

1. In reviewing the data in the VR agency profile, what impressions does the VR agency have regarding its performance? Does the profile present an accurate picture? If not, why?
2. Does the VR agency have any strategies for improving its performance as reflected in the profile?
3. Does the VR agency experience any challenges or barriers related to the number of applicants or individuals served in the VR program? If so, what are they?
4. What recent trends in the employment rate has the VR agency experienced? What strategies is the VR agency undertaking to improve its employment rate?
5. Does the VR agency have any unique circumstances or issues that have affected its overall performance as reflected in the profile?
6. Does the VR agency have adequate representation and input within the workforce development system in the State, which will lead to opportunities to improve performance in assisting individuals to achieve quality employment outcomes? Does the VR director represent the VR program on the State workforce development board? What improvements in performance can be attributed to VR representation on the local workforce boards and in one-stop centers?

The VR Process

Resources: Appendix C

- Table 1—VR Agency Profile
- Table 3—Number and Percentage of Individuals Exiting at Various Stages of the VR Process
- Table 4—Number and Percentage of Individuals Exiting by Reason during the VR Process
- Other Measures That Matter:

- 3. Profile: VR Process Efficiency
- 4. Profile: VR Service Provision

Timely and effective customer service leads to high-quality competitive integrated employment outcomes for VR program participants. Being engaged with applicants and eligible individuals with disabilities and assisting them during the eligibility and IPE development processes are attributes of positive customer service. It is helpful to look at trend data, including the most recent program year, to create an understanding of the engagement and movement of individuals with disabilities through the VR process. Through such an analysis, the VR agency and the review team can pinpoint potential obstacles to efficient service delivery and engagement of individuals with disabilities throughout their VR journey. In many instances, such analysis can help to identify potential reasons for high attrition rates and premature exit at various stages of the VR process. It is equally valuable to examine data that show positive trends to assess the effectiveness of VR agency initiatives, practices or policy changes to improve performance.

Questions:

7. Referral and Application:

- a. Has the VR agency experienced rising or falling trends in the number of total applicants over the past three years? If so, what is contributing to these trends and what efforts are being made to address factors or circumstances around these trends?
- b. Are applicants leaving before eligibility determination? If so, why? What are the sources of referrals and do these pose any concerns for the VR agency?

8. Eligibility:

- a. Is the VR agency experiencing delays in the determination of eligibility of applicants? If so, what is the reason and what efforts is the VR agency making to ensure compliance with the 60-day time frame?
- b. How does the VR agency monitor compliance?

9. Ineligibility:

- a. Is the VR agency providing the required trial work experiences for individuals prior to determining that an individual is ineligible because the individual is too severely disabled to benefit from VR services?
- b. What other reasons for ineligibility is the VR agency reporting?

10. IPE Development:

- a. Is the VR agency experiencing delays in the development of individualized plans for employment (IPE)? If so, what steps is the VR agency taking to address these delays?
- b. What percentage of individuals are leaving before the development of the IPE?
- c. Are services provided timely following the development of the IPE? Are participants leaving the VR program after receiving services on the IPE prior to achieving employment?
- d. Can the VR agency describe why these exits are occurring and the strategies the VR agency is employing to increase the number of individuals achieving an employment outcome?

11. Service Record Closure and Exit

- a. Is the VR agency ensuring that all VR services identified on the IPE, including post-employment services that are necessary for the achievement of the individual's employment goal have been provided consistent with the individual's unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice?
- b. Do the service records contain the supporting documentation for closure?
- c. For youth with disabilities receiving extended services provided by the VR agency, does case closure occur after the completion of those extended services?
- d. If VR services are provided to individuals with the most significant disabilities employed in an integrated setting who are provided VR services on a short-term basis while working toward competitive supported employment, are their case service records closed following the completion of those services?

12. Informed Choice:

- a. How is the VR agency ensuring and documenting informed choice throughout the VR process?
- b. How is the VR agency assisting eligible individuals and participants in making an informed choice, for example, in the selection of an employment goal, services and providers, etc.
- c. Do policies and practices reflect the role of informed choice?

13. Attrition:

- a. At what points in the VR process are most individuals with disabilities exiting the VR program?
- b. What circumstances contribute to individuals exiting without employment outcomes?
- c. Has the VR agency implemented any strategies to decrease attrition?

14. Engagement:

- a. What internal control activities, including policies and procedures, are in place to ensure individuals with disabilities are provided timely engagement and services throughout the VR process?
- b. What quality assurance steps and VR agency practices are in place to promote and sustain optimal engagement of VR participants?

15. Data and Quality Assurance:

- a. How does the VR agency use data to inform and improve the VR process?
- b. How does the VR agency ensure the accuracy and validity of data?

16. Order of Selection (OOS):

- a. Is the VR agency on an OOS? If so, how long has it been on an OOS?
- b. How many categories are currently open, and how many individuals were on the waiting list at the end of each year?
- c. What factors or circumstances are responsible for the implementation of the OOS and the increase or decrease in the waiting list?
- d. Does the VR agency anticipate going off of an OOS in the future?
- e. Are individuals on the waiting lists being referred to other workforce programs?

- f. If the VR agency is not on an OOS, is the VR agency considering implementing an OOS? If so, what are the reasons for considering an OOS?
- g. If the VR agency is not considering implementing an OOS, are there indicators that the VR agency is experiencing capacity issues, such as delays in IPE development or service delivery?

VR Services

Resources: Appendix C

- Table 1—VR Agency Profile
- Table 2—Number and Percentage of Participants Served by Primary Disability Type
- Table 5—VR Services Provided to Participants
- Table 6—Number of Participants Who Earned Measurable Skill Gains, and Types of Measurable Skill Gains Earned
- Other Measures That Matter:
 - 4. Profile: VR Service Provision
 - 5. Percent of Participants Enrolled in Education/Training Program Leading to a Recognized Credential/Employment

Active engagement and meaningful service provision will result in VR program participants achieving competitive integrated employment. The exercise of informed choice and the timely provision of quality VR services needed for VR participants to attain and maximize their employment goals is integral to the success of the VR program.

The information in Table 5 is intended to provide a general overview of the provision of services and the potential effect on the ability of eligible individuals to achieve quality employment. The VR services data have been categorized into three subcategories: Training Services, Career Services, and Other Services. Training services may include such services as postsecondary education, vocational and occupation skills training, on-the-job training, and apprenticeship training. A full list of training services is provided in Section 134(c)(3)(D) of WIOA. Career services may include assessments, group or individual counseling, or career planning. A full list of career services is listed in Section 134(c)(2) of WIOA. Other services would include any other service provided through the VR program not specified as training or career services in WIOA. These services include, for example, transportation, maintenance, reader services, or interpreter services. In addition to the analysis of these specific services, RSA will review the performance indicators related to measurable skill gains and credential attainment in Tables 1 and 6, and data captured in other measures that matter.

Questions:

17. Services and Service Delivery:

- a. What training, career, and other services are provided most often and least often for participants? How do these compare nationally to VR agency type?
- b. What correlations exist between the services being provided and the achievement of employment outcomes, both in terms of the quality of employment outcomes and the quantity of employment outcomes? Do certain services lead to better outcomes?

- c. Do participants exit after receiving certain services without attaining an employment outcome? If so, what types of services are provided to those not achieving an employment outcome?
- d. Are the services being provided meeting the specific and unique needs of individuals in each of the five major disability categories, including the provision of support services?
- e. Are VR services being provided consistent with individuals' informed choice? How are participants making an informed choice regarding their services?
- f. What types of services is the VR agency providing to assist individuals with disabilities in gaining work skills (e.g., work-based learning experiences, internships, etc.)?
- g. To what extent is the VR agency providing pre-apprenticeship and apprenticeship training? Are these resulting in employment in the apprenticeship field?
- h. To what extent, if any, is the VR agency using comprehensive transition programs to assist individuals with intellectual and developmental disabilities in their journey to employment?
- i. Has the VR agency implemented customized employment services specifically for individuals with the most significant disabilities?
- j. To what degree is the VR agency providing job placement services and on-the-job training?
- k. How does the VR agency consider the State and local labor market information and future projections, as well as other information, when establishing the employment goal with the individual and evaluating and planning the training and educational needs of the individual in the development of the IPE and the provision of VR services?
- l. Is the VR agency providing VR services in-house, through vendors or providers using fee-for-service arrangements or contracts, or a combination of both? How does the VR agency monitor or evaluate the effectiveness of VR services as well as consumer satisfaction with VR services?
- m. Has the VR agency made any significant changes in its services or service delivery models? If so, what changes were made and why?

18. Policies and Practices:

- a. What policies or innovative practices has the VR agency developed or implemented to increase the opportunities to achieve quality employment involving: STEM fields, apprenticeship programs, customized employment, customized training, OJTs, etc.?
- b. Has the VR agency made any changes in its policies or procedures related to the provision of VR services (e.g., implementation of a financial needs test, cost containment measures, use of comparable services or benefits, etc.).
- c. To what extent, if any, is the VR agency providing job retention services? Describe the policies and procedures outlined addressing how and when job retention services are provided.
- d. Has the VR agency received feedback or input from the State Rehabilitation Council or independent commission or stakeholders regarding its policies related to services or service delivery? If so, what was the nature of the feedback and how did the VR agency address the feedback or concerns?
- e. How does the VR agency communicate and ensure that VR counselors and staff understand policies and procedures related to services, service delivery, and reporting?
- f. What degree of autonomy do VR counselors have in authorizing services and what internal control activities are in place?

- g. What internal controls are in place to ensure VR agency policies and procedures are being followed and applied consistently?

19. Coordination:

- a. To what extent has the VR agency coordinated with other WIOA partner programs or other State programs to provide/coordinate services that benefit VR program participants?
- b. Does the VR agency have cooperative agreements/MOUs with other State agencies? If so, what agencies? How have these benefitted the VR agency's performance?
- c. How does the agency track co-enrollment in other WIOA programs? What effect, if any, is this having on the VR agency?
- d. Are other WIOA program services readily available to VR participants or individuals on waiting lists if the VR agency has an OOS?
- e. How does the VR agency coordinate the provision of supported employment services, including extended services, with other providers?
- f. Does the VR agency serve individuals jointly with another VR agency in the State or out-of-State and how are services coordinated? Is there a formal agreement?
- g. Does the VR agency refer individuals to centers for independent living in the State for independent living or VR services that assist individuals to obtain competitive integrated employment? If not, why not?

20. MSG and Credential Attainment:

If individuals with disabilities have the opportunity to earn a recognized credential, they are more likely to achieve high-quality competitive integrated employment.

- a. How does the VR agency identify, capture, and document MSG attainment in case service records? How is this data verified? Do service records have supporting documentation?
- b. How do training services leading to MSG and/or recognized credential attainment from a postsecondary education or training program compare to the national averages for VR agency type?
- c. Has the VR agency increased or decreased its performance in this area during the review period?
- d. How does the VR agency determine MSGs? Of the percent eligible to earn a MSG, how many have achieved an MSG? What efforts is the VR agency making to increase the number of individuals eligible for MSGs who achieve an MSG?
- e. How does the VR agency ensure accurate reporting of MSGs? Has the VR agency provided training to staff? Who provides the training specific to MSGs and what is the frequency of training provided to staff?
- f. Has the VR agency developed policies or procedures and required documentation for MSG?
- g. To what extent is the VR agency providing postsecondary and vocational training leading to credentials and improved opportunities to maximize quality employment outcomes? What do the VR agency's policies on postsecondary education and training provide for participants, and do the policies allow for exceptions?
- h. Has the VR agency developed policies or procedures and required documentation for credential attainment?

Quality of Employment Outcomes

Resources: Appendix C

- Table 1—VR Agency Profile
- Table 3—Number and Percentage of Individuals Exiting at Various Stages of the VR Process
- Table 4—Number and Percentage of Individuals Exiting by Reason during the VR Process
- Table 5—VR Services Provided to Participants
- Table 7—Median Hourly Earnings, Median Hours Worked per Week, Sources of Support, and Medical Insurance Coverage for Participants Who Exited with Competitive Integrated Employment or Supported Employment
- Table 8—Number of Participants Who Exited with Competitive Integrated Employment or Supported Employment by the Most Frequent SOC Title (PY 2019)
- Other Measures that Matter:
 - 1. Sustaining Employment after Exit
 - 2. Profile: Quality Employment
 - 3. Profile: VR Process Efficiency
 - 5. Percent of Participants Enrolled in Education/Training Program Leading to a Recognized Credential/Employment
 - 6. Profiles: Pre-Employment Transition Services

The mission of the VR program is to maximize employment opportunities for all individuals with disabilities, including those with the most significant disabilities, and to assist individuals with disabilities to achieve economic self-sufficiency. VR program participants should sustain employment after they exit the VR program. To guide the analysis and discussion of quality employment outcomes, the RSA team will review a variety of data elements with the VR agency, including the following:

- Employment status at exit;
- Employment rate;
- Median wages earned;
- Median weekly hours worked;
- Health insurance at exit;
- Social security benefits at exit;
- Individuals who exited with competitive integrated employment, including supported employment;
- Individuals employed in second quarter after exit and fourth quarter after exit;
- Percent of individuals who retained employment;
- Types of occupations that VR participants obtain;
- Efforts to promote career advancement;
- The attainment of MSGs and credentials;
- Efforts to assist individuals in achieving parity with the general working population; and
- Strategies to promote job retention.

The VR agency may include technical assistance centers in performance discussions and monitoring reviews, including those related to employment practices and analyses of quality employment outcomes.

Questions:

21. Employment Rate:

- a. Given its employment rate, what strategies has the VR agency developed to improve its overall performance in assisting individuals with significant and most significant disabilities to achieve and retain competitive integrated employment or supported employment, including customized employment?
- b. What reasons or challenges does the VR agency attribute to any changes in the percentage of competitive integrated employment outcomes in recent years?
- c. How does the agency's employment rate compare with that of similar type agencies and the national employment rate for the VR program?

22. Quality Indicators:

- a. How does the VR agency view its performance related to median hourly wages, median hours worked, health insurance and social security benefits at exit?
- b. Has the VR agency compared its performance on median hourly wage earnings and health insurance to any State information on earnings and medical benefits for the general population?
- c. Are there differences in employment status or quality indicators for primary disability, significance of disability and students or youth with disabilities?
- d. To what extent is the VR agency's collaboration with employers, the NET, and workforce development partners resulting in opportunities for quality employment outcomes?
- e. Does the VR agency have strategies to reduce the need of individuals with disabilities for public support? Has there been a change in the number of individuals in receipt of public support (e.g., SSI, SSDI, TANF), other sources of support and medical insurance coverage (e.g., medical assistance) as a result of VR services and benefits counseling?
- f. What strategies has the VR agency engaged in to assist individuals with significant and most significant disabilities to advance in employment, including apprenticeships and advanced training in the fields of science, technology, engineering, or mathematics (STEM), including computer science, medicine, law or business, in accordance with the requirements of Section 103(a)(18) of the Rehabilitation Act?
- g. In the most recent program year, what were the five most common SOC codes in which competitive employment outcomes were classified? Were they representative of the broad range of SOC categories or concentrated in particular categories? Which SOC codes are associated with the highest and lowest median hourly wages?
- h. Has the VR agency encountered any challenges or barriers in assisting individuals with disabilities in achieving quality employment outcomes? If so, what are they?
- i. What initiatives or practices is the VR agency implementing to improve the quality of employment outcomes? How is the VR agency "rethinking" its policies and practices, including business engagement and involvement with workforce partners, to assist individuals with disabilities to achieve quality employment outcomes that meet their career goals?

- j. What strategies does the VR agency employ to promote career advancement, attainment of MSGs and credentials, and improvement in the quality and quantity of employment outcomes, including supported employment outcomes? Describe any evaluation plans or methods to evaluate the effectiveness of these strategies and any preliminary evaluation findings that indicate discernable effects on the performance of the VR agency as a result of the implementation of these strategies.

23. Supported Employment:

- a. How does the VR agency coordinate natural supports with businesses and employment networks, as well as extended services with long-term support providers (e.g., developmental disability and mental health agencies) for youth with most significant disabilities and are there any challenges?
- b. To what extent is the VR agency using the short-term basis to assist individuals with the most significant disabilities to achieve competitive integrated employment?
- c. What strategies is the VR agency using to increase the number and quality of supported employment outcomes?

24. Data Sharing:

- a. Is the VR agency a signatory to the State Wage Interchange System (SWIS) Agreement? If the VR agency has not signed the SWIS Agreement what separate interstate wage sharing agreements has the VR agency executed with other States to satisfy the requirement that States use interstate wage records in measuring a State's performance on the WIOA primary indicators of performance?
- b. What, if any, challenges has the VR agency experienced related to obtaining, using, tracking and reporting State quarterly wage data or supplemental employment data from sources such as its State Unemployment Insurance Agency or through SWIS for—
 - i. Participants employed within the State;
 - ii. Participants employed outside the State;
 - iii. Individuals employed in occupations not covered by State quarterly wage data, including Federal employment, self-employment, and employment in non-covered agricultural occupations;
 - iv. Participants employed 2nd quarter after exit*;
 - v. Earnings for participants employed in the 2nd quarter after exit*; and
 - vi. Participants employed 4th quarter after exit*
(*includes the outcomes of students with disabilities, who received pre-employment transition services and became VR program participants)
- c. To what extent does the VR agency participate in other data sharing agreements? For example, does the VR agency have existing agreements with—
 - i. Secondary or postsecondary institutions for the purpose of obtaining information regarding enrollment, measurable skill gains, or credential attainment; or
 - ii. State workforce partners for the purpose of determining co-enrollment in other workforce programs.

Pre-Employment Transition Services

Early career exploration through pre-employment transition services increases the likelihood of achieving high-quality competitive integrated employment. VR agencies began reporting RSA-911 data related to the provision of pre-employment transition services to students with disabilities, including potentially eligible students and those determined eligible for the VR program. The review team will analyze data on the number of students with disabilities, the number of those receiving pre-employment transition services, and the types of services provided. In addition, RSA will provide information related to the breakout of students with disabilities who received pre-employment transition services as potentially eligible students with disabilities and students with disabilities who received these services under an IPE, as well as the number of students with disabilities who advance from potentially eligible status to VR program participant status and their outcomes. These data may be used to evaluate the relationship between the provision of pre-employment transition services, participation in the VR process, and employment outcomes.

Resources: Appendix C

- Table 9—Number of Students with Disabilities Reported, and the Number and Percentage of Students with Disabilities Who Received Pre-Employment Transition Services
- Table 10—Number and Percentage of Required Pre-Employment Transition Services Provided
- Other Measures that Matter:
 - 6. Profiles: Pre-Employment Transition Services

Questions:

25. What is the age range for students with disabilities receiving pre-employment transition services?
26. How does the VR agency identify and conduct outreach to students with disabilities who are potentially eligible for pre-employment transition services?
27. What percentage of students with disabilities reported on the RSA-911 is receiving pre-employment transition services? Why are reported students with disabilities not receiving pre-employment transition services? What strategies is the VR agency using to increase the number of individuals receiving pre-employment transition services?
28. Which of the five required pre-employment transition services does the VR agency provide or arrange for the provision of the most and the least? Why? Which of the five required activities are primarily provided by VR agency staff and which services are generally provided through CRPs? Are pre-employment transition services available statewide?
29. Are there differences in the service modalities, level, or availability of pre-employment transition services in different parts of the State (e.g., unavailable CRPs in rural areas of the

State, level of LEA coordination or cooperation)? What strategies is the VR agency employing to address any deficits?

30. How are students with disabilities informed of their options and involved in the selection of pre-employment transition services and the entity to provide such services?
31. Some students with IPEs receive pre-employment transition services as well as VR services necessary to support their participation in pre-employment transition services. What VR services are these students with disabilities receiving that may be charged to the reserved funds?
32. How does the VR agency engage with partners and education programs to collaboratively provide pre-employment transition services, including planning activities, joint activities and coordination activities such as IEP meetings? What challenges, if any, is the VR agency experiencing in collaborating with education programs and other partners to provide pre-employment transition coordination activities?
33. What challenges has the VR agency experienced in the provision of pre-employment transition services (e.g., COVID-19 pandemic, expenditure of the required reserved funds) and what strategies has the VR agency undertaken to meet these challenges? How have they affected performance?
34. Of those receiving one or more pre-employment transition services, what percentage are potentially eligible and what percentage are applicants of the VR program? How many students with disabilities are exiting pre-employment transition services without applying for further VR services? What strategies is the VR agency using to encourage potentially eligible students with disabilities to consider applying for the VR program?
35. Does the VR agency have updated and accurate policies and procedures to implement pre-employment transition services requirements, including the provision of services to students with disabilities who are potentially eligible for VR services?
36. Does the VR agency have policies related to referral for pre-employment transition services; application for VR services; collaborative service provision; service agreements; and the documenting, tracking, and reporting of such services?
37. How does the VR agency ensure accurate tracking and reporting of pre-employment transition services provided to students with disabilities? How are VR staff tracking and documenting time spent providing required pre-employment transition services or coordination activities for students with disabilities?

C. RSA-911 Data Reporting Internal Controls

Resources: Policies and procedures related to internal controls necessary for the verification of RSA-911 data.

This area assesses performance accountability in relation to the internal control requirements in 2 C.F.R. § 200.303. Internal controls means a process, implemented by a non-Federal entity,

designed to provide reasonable assurance regarding the achievement of objectives in the effectiveness and efficiency of operations, reliability of reporting for internal and external use, and compliance with applicable laws and regulations. Internal controls are established and implemented as a measure of checks and balances to ensure proper expenditures of funds. Internal controls serve to safeguard assets and prevent fraud, waste, abuse, and mismanagement. They include methods and procedures the grantee uses to manage the day-to-day operations of grant-supported activities to assure compliance with applicable Federal requirements and that performance goals are being achieved. RSA will review the VR agency's current policies and procedures related to internal controls and quality assurance.

The VR agency is required to maintain verifying documentation in an individual's service record, particularly regarding eligibility determination, IPE development, services provided, and case closure. The use of an electronic case management system does not remove the requirement for the agency to maintain either hard copies or scanned copies of required supporting documentation in the individual's service record. RSA staff will review VR agency internal controls, and in limited circumstances, a sample of RSA-911 case service records to ensure the documentation in the service record is accurate, complete, and supports the data entered into the RSA-911.

Questions:

38. In addition to case reviews, how does the VR agency's system of internal controls ensure that data are reported accurately, and they are valid?
39. What technical assistance, if any, does the VR agency need on the requirements for developing and implementing improved internal controls to ensure that data reported are accurate and valid?
40. What training and technical assistance does the VR agency need on the type of source documentation required to validate the data reported through the RSA-911? Describe the VR agency's policies and procedures that implement RSA TAC 19-01: [Guidance for Validating Jointly Required Performance Data Submitted under WIOA](#).
41. Describe how the VR agency adjusts its RSA-911 reporting based on RSA's edit checks for the data collection. How does the VR agency ensure future reporting errors are avoided based upon past errors generated by the edit checks?

D. Technical Assistance

The following questions are designed to assess the quality of the technical assistance provided by RSA and RSA-funded technical assistance centers, as well as to identify the ongoing technical assistance needs of the VR agency. During the preliminary meetings with the VR agency in preparation for the on-site monitoring or off-site review, the VR agency is encouraged to identify specific technical assistance needs to achieve continuous improvement in performance, which RSA can address during its on-site or off-site meetings or which can be referred to the RSA technical assistance centers.

42. What technical assistance needs does the VR agency have on any issue or topic related to the performance focus area?
43. Has the VR agency received technical assistance from RSA staff on any issue or topic related to this focus area? If so, please describe the nature of the technical assistance provided and the need for any additional technical assistance.
44. Has the VR agency received technical assistance from one or more of the RSA-funded technical assistance centers on a topic or issue related to this focus area? If so, from which center? Was the technical assistance universal, targeted, or intensive? Please describe the technical assistance received. What were the objectives and results?

IV. Focus Area—Financial Management of the State Vocational Rehabilitation Services and State Supported Employment Services Programs

A. Nature and Scope

The effective and efficient fiscal administration of the VR and Supported Employment programs is essential to the ability of a VR agency to maximize the funds available for attainment of employment outcomes for individuals with disabilities. RSA will review components of the grantee's financial management system. RSA will assess the fiscal accountability of the programs to—

- Ensure funds are expended within the period of obligation and are used only for allowable purposes;
- Ensure programs have sound internal controls and reliable reporting systems;
- Identify needed improvements in fiscal policy, processes and procedures; and,
- Ensure a relative benefit to the VR system is proportional to the expenditure (e.g., contracts, one-stops, indirect cost rates, cost allocation plans, etc.).

Internal controls means a process, implemented by the grantee, designed to provide reasonable assurance regarding the achievement of objectives in the effectiveness and efficiency of operations, reliability of reporting for internal and external use, and compliance with applicable laws and regulations. Internal controls serve to safeguard assets and prevent fraud, waste, abuse, improper payments, and mismanagement. They include methods and procedures the grantee uses to manage the day-to-day operations of grant-supported activities to assure compliance with applicable Federal requirements and that performance goals are being achieved. The VR agency's internal controls for ensuring compliance with fiscal requirements will be a core component of the financial management system review.

The Federal fiscal requirements referenced during the review include—

- Rehabilitation Act and VR and Supported Employment program implementing regulations in 34 C.F.R. Part 361 and 34 C.F.R. Part 363, respectively;
- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) located in 2 C.F.R. Part 200;
- Education Department General Administrative Regulations (EDGAR) in 34 C.F.R. Part 76;
- Departmental and RSA guidance, including Policy Directives (PDs), Technical Assistance Circulars (TACs), Grant Bulletins, Frequently Asked Questions (FAQ), etc.; and
- Grant Award terms and conditions.

The review team will use a variety of resources and documents from the current FFY and three FFYs prior. If the issues identified include FFYs beyond the three prior FFYs, RSA may request additional information as needed. Resources and documentation to be reviewed include data submitted by the VR agency (e.g., Federal Financial Reports (SF-425), VR Financial Reports

(RSA-17), and the VR services portion of the Unified or Combined State Plan) and in the Department's Grants Management System (G5).

The review team will review the following documents to ensure adherence to accountability requirements, and may request additional information, if needed:

- Single Audit findings and corrective actions;
- State/agency allocation/budget documents and fiscal reports;
- Agency policies, procedures, and forms (e.g., monitoring, procurement, etc.);
- Documentation of obligations and expenditures, including contracts, purchase orders, invoices, etc.; and
- Grant award notifications, documentation of non-Federal share/match (e.g., interagency transfers, third-party cooperative arrangements (TPCAs), establishment and construction projects, private donations), maintenance of effort (MOE), and program income documentation.

The review team will work collaboratively with the VR agency to obtain the documentation necessary to complete the review (see Appendix B), while minimizing the amount of documentation requested to the extent possible.

The degree to which the review team addresses each fiscal requirement is dependent upon the individual circumstances of the agency. The review team will analyze the information obtained prior to on-site monitoring or off-site review activities by reviewing the documentation submitted, conducting teleconferences, and examining reported data to determine the level of review required for each component.

B. Period of Performance—VR program

Period of performance is the time during which the non-Federal entity (grantee) may incur new obligations to carry out the work authorized under the Federal award (2 C.F.R. § 200.77). For purposes of the Department's Grant Award Notifications (GANs), the period of performance is referred to as the Federal Funding Period.

To accurately account for Federal and non-Federal funds, the VR agency must ensure that allowable non-Federal and Federal obligations and expenditures are assigned to the correct FFY award. RSA uses the financial information reported by the grantee to determine each VR agency's compliance with fiscal requirements (e.g., reservation of funds, matching, MOE, etc.). Therefore, if the grantee is not assigning obligations and expenditures to the correct FFY, in accordance with the period of performance requirements, RSA is unable to determine, with certainty, the grantee's compliance with these Federal requirements.

Because issues identified in this area significantly affect other areas of the fiscal review, if substantive issues related to period of performance are identified, this area will become a primary focus area for the fiscal review.

Questions:

1. Identify the State's requirements for determining when funds are considered obligated.
2. Identify the VR agency's internal control processes for tracking and reporting non-Federal and Federal obligations and expenditures to the correct FFY award. This includes a review of the fiscal data elements used by the VR agency to ensure tracking and alignment of obligations and expenditures to the correct FFY award. Specific areas for review include, but are not limited to—
 - Authorizations for consumer services;
 - Administrative costs (e.g., rent, utilities, personnel salaries, travel); and
 - Contracts (short-term and long-term).
3. Identify how the agency ensures obligations are liquidated within the period of performance or subsequent 120-day liquidation period.
4. Describe the agency's internal control processes for calculating, and ensuring the accuracy of financial data, including the Federal and non-Federal share of obligations and expenditures, reported on the SF-425/RSA-17.
5. Describe the agency's processes for ensuring that adjustments (e.g., journal entries, rebates, refunds, etc.) are applied to the correct FFY.
6. How can these internal controls be improved?

C. Match (non-Federal share)—VR and Supported Employment programs

VR Program

This area assesses the matching requirements for the VR program. It includes an assessment of whether the matching level was met, as well as whether the sources of match were consistent with Federal requirements. Because match is the basis for determining a State's compliance with the VR program MOE requirements (34 C.F.R. § 361.62(a)), review of this area may include MOE when issues are identified.

VR program implementing regulations require that the State must incur a portion of expenditures under the VR services portion of the Unified or Combined State Plan from non-Federal funds to meet its cost sharing requirements (34 C.F.R. § 361.60). The required Federal share for expenditures made by the State, including expenditures for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan, is 78.7 percent. The State's share is 21.3 percent.

RSA staff will address requirements pertaining to the sources of non-Federal share used by the State as the match for the VR program including, but not limited to:

- State appropriations and interagency transfers;
- TPCAs;

- Establishment projects; and
- Randolph-Sheppard set aside expenditures.

Prior to the review, RSA will ask the VR agency to identify the sources and amounts of match contributed by the VR agency, by FFY, for the period under review. Additionally, RSA will request the agency's internal control processes for ensuring that only allowable expenditures are reported as the match.

State Appropriations and Interagency Transfers

Resources: SF-425/RSA-17 financial reports and agency documentation of non-Federal expenditures (e.g., general ledger, accounting records)

Match from State appropriations include obligations and expenditures from funds appropriated by the State to the DSA or designated State unit (DSU) to pay the State's share of program expenditures. This source may include State expenditures made on behalf of the program from a central account or other State department. For example, a State pays for personnel fringe benefits and indirect costs from a central pool of State funds. The actual State expenditures from this pool for VR staff providing allowable VR services would be treated as State appropriated funds.

This area includes non-Federal funds transferred to or otherwise under the control of the VR agency, so long as the VR agency maintains control over the determination of eligibility, the provision of services, and the allocation and expenditure of the funds.

Questions:

7. What are the sources and amounts of State appropriations reported as match by the VR agency, by FFY, for the period under review?
8. What are the agency's internal control processes for ensuring that only allowable expenditures are reported as the match? How can these internal controls be improved?

Third-Party Cooperative Arrangements (TPCAs)

Resources: Documentation related to TPCAs (e.g., contracts, agreements, and invoices), and TPCA review instrument in Appendix D of this MTAG

TPCAs are agreements between the VR agency and other State or local public agencies (referred to as cooperating agencies). TPCAs allow the VR agency to utilize a third party to provide VR services to applicants for, or recipients of services from, the VR program. Services are typically provided by cooperating agency staff and may not be provided by VR counselors or other VR agency staff. The review of TPCAs includes those for the provision of pre-employment transition services.

The RSA review team will complete the TPCA review instrument in Appendix D of the MTAG to assess consistency of TPCAs with the requirements of 34 C.F.R. § 361.28. This includes the agency's process for ensuring that TPCA costs are allocable to the VR program in accordance with the relative benefits received (2 C.F.R. § 200.405).

Establishment Projects

Resources: Policies related to establishment projects, establishment project contracts or agreements; comprehensive statewide needs assessment; VR services portion of the Unified or Combined State Plan; SF-425/RSA-17 financial reports

This area assesses fiscal accountability for VR funds used for the establishment, development, or improvement of a public or non-profit CRP to provide VR services to applicants and eligible individuals of the VR program that promote integration into the community and competitive integrated employment, including supported employment and customized employment (Section 103(b)(2) of the Rehabilitation Act and 34 C.F.R. § 361.49(a)(1)). The VR agency must evaluate the needs of VR participants in the comprehensive Statewide needs assessment (CSNA) (34 C.F.R. § 361.29) to determine whether the VR agency can establish, develop, or improve a public or non-profit CRP (34 C.F.R. § 361.5(c)(16) and (17), and 34 C.F.R. § 361.49(a)(1)). The need to establish, develop, or improve a CRP, along with goals and priorities and strategies to address the need, must be reported in the VR services portion of the Unified or Combined State Plan.

The questions below address the pre-planning requirements, as well as the use of non-Federal funds earmarked for establishment projects (34 C.F.R. § 361.60(b)(3)(i)).

Questions:

9. Identify any contracts or agreements the agency has regarding the establishment, development, or improvement of a public or non-profit CRP. For these agreements, specify—
 - Where the CSNA incorporates the need to establish, develop, or improve a public or non-profit CRP;
 - The goals and priorities and strategies related to each establishment project;
 - How the agency determined the amount of funds to be contributed toward the project, including the source of the non-Federal funds (e.g., VR agency State appropriation, CRP non-Federal funds);
 - How the agency and CRP will ensure that only allowable applicants or recipients of VR services receive VR services from the establishment project; and
 - Identify the process the agency used to ensure that all pertinent Federal requirements were addressed, such as the requirement that the Federal share of the cost of construction for the facilities for a FFY will not exceed an amount equal to 10 percent of the State's allotment under Section 110 for such year (Section 101(a)(17)(A) of the Rehabilitation Act) and that the Federal share for expenditures made for the construction of a facility for CRP purposes may not be more than 50 percent of the total cost of the project (34 C.F.R. § 361.60(a)(2)).

Randolph Sheppard Set Aside

Resources: Agency documentation of set-aside expenditures, Report of Vending Facility Program (RSA-15)

VR agencies serving as the State Licensing Agency are authorized by the Randolph- Sheppard Act to set aside funds for the purposes set forth in the statute. Such expenditures, in certain categories, are considered as non-Federal expenditures in support of the Federal VR program. Therefore, these expenditures must also be reported as non-Federal expenditures on the VR agency's financial reports for purposes of determining match and MOE.

- Acquisition of new and replacement equipment;
- Maintenance and repair of equipment;
- Management Services and Supervision; and
- Initial operating costs not to exceed 6 months.

Questions:

10. Identify how the agency tracks obligations and expenditures from set-aside funds.
11. Identify the agency's internal control processes for ensuring that only allowable non-Federal expenditures, including set-aside expenditures, are reported as match. How can these internal controls be improved?

Supported Employment Program

Resources: Federal Financial Reports and agency documentation of non-Federal expenditures

This area assesses the matching requirements for the Supported Employment program. It includes an assessment of whether the matching level was met, as well as whether the sources of the match were consistent with Federal requirements. Supported Employment program regulations require that the State expend 50 percent of its total Supported Employment allotment for the provision of supported employment services, including extended services, to youth with the most significant disabilities. This means the amount of Federal funds spent on allowable services for non-youth with the most significant disabilities may not exceed the amount of Federal funds matched and spent on youth with the most significant disabilities. The Supported Employment funds required to be reserved and expended for services to youth with the most significant disabilities are awarded through the SE-B grant award. The Federal share for expenditures from the State's SE-B grant award is 90 percent. The statutorily required 10 percent match requirement applies to the costs of carrying out the provision of supported employment services, including extended services, to youth with the most significant disabilities. This means that the 10 percent is applied to total expenditures, including both the Federal and non-Federal shares, incurred for this purpose, and that the non-Federal share must also be spent on the provision of supported employment services, including extended services, to youth with the most significant disabilities.

Questions:

12. For the SE-B award, identify the sources and amounts of match reported by the VR agency, by FFY, for the period under review.

13. Describe the agency's internal control processes for ensuring that only allowable expenditures are reported as the match. In particular, how does the agency ensure that only expenditures for the provision of supported employment services, including extended services, to youth with the most significant disabilities are counted as the match? How can these internal controls be improved?

D. Vendor Contracts

Resources: Policies and procedures regarding contracting, including determining the rates of the payment, and contract monitoring

This area addresses the requirements related to contracting for purchased services. Uniform Guidance requires that States follow the same policies and procedures it uses for procurements from its non-Federal funds (2 C.F.R. § 200.317). Contract policies are necessary to ensure that contract language results in the VR agency receiving the necessary data that it must collect and report with the frequency required by the terms and conditions of the VR award (2 C.F.R. § 200.318). In addition, VR agencies are responsible for oversight of the operations of the Federal award supported activities. The non-Federal entity must monitor its activities under Federal awards, including contracts, to assure compliance with applicable Federal requirements and performance expectations are being achieved (2 C.F.R. § 200.319(a)). Through the use of contracts, VR agencies must relate financial data and accomplishments to performance goals and objectives of the Federal award, consistent with the reporting of data on the SF-425, RSA-17, RSA-2, and RSA-911 reports (2 C.F.R. § 200.319(b)). VR agencies are required to develop and maintain written policies governing rates of payment for all purchased VR services (34 C.F.R. § 361.50(c)). These policies outline the process the VR agency completes to ensure the rates of payment for VR services are allowable, reasonable and allocable to the award, in accordance with Uniform Guidance Cost Principles (2 C.F.R. §§ 200.403, 200.404 and 200.405).

Two areas related to vendor contracts will be reviewed:

- Contract development/implementation (e.g., ensuring required language, determining rates of payment, invoice processing, budget management, etc.); and
- Contract monitoring.

This review area includes contracts for the provision of pre-employment transition services, and one-stop MOUs and operational budgets, including infrastructure funding agreements.

Questions:

14. Identify the agency's internal control processes related to contract development and implementation (e.g., ensuring contracts contain required language, determining rates of payment for services and ensuring that contract payments are reasonable, etc.).
15. Identify the agency's internal control processes for ensuring there is sufficient supporting documentation to determine the payment requested was for allowable VR services and consistent with the provisions of the contract.

16. Identify the agency's contract monitoring processes and the outcomes of contract monitoring.
17. How can these internal controls be improved?

E. Prior Approval

Resources: Policies and procedures regarding prior approval, including procedures for identifying items that require approval and the process for obtaining prior approval

The review team will examine internal controls the grantee has implemented to ensure prior approval is attained when specifically required for allowability. The Uniform Guidance (2 C.F.R. § 200.407) requires prior written approval (prior approval) for various grant award activities and proposed obligations and expenditures. Prior approval comes from a Department official who is authorized to approve a proposed expenditure.

Questions:

18. What are the agency's internal control processes for ensuring that prior approval is obtained where required? How can these internal controls be improved?
19. Has the agency paid any expenditure for which prior approval was specifically required for allowability? If so, did the grantee request and receive prior written approval from RSA before making the expenditure?

F. Technical Assistance

The following questions are designed to assess the quality of the technical assistance provided by RSA and the OSEP and RSA-funded technical assistance centers, as well as to identify the ongoing technical assistance needs of the VR agency.

20. What technical assistance needs does the VR agency have on any issue or topic related to this focus area?
21. Has the VR agency received technical assistance from RSA staff on any issue or topic related to this focus area? If so, please describe the nature of the technical assistance provided.
22. Has the VR agency received technical assistance from one or more of the RSA-funded technical assistance centers on a topic or issue related to this focus area? If so, from which center? Was the technical assistance universal, targeted, or intensive? Please describe the technical assistance received. What were the objectives/results?
23. Did the technical assistance provided by RSA and RSA-funded centers aid the VR agency in correcting or improving its management of the VR program and delivery of services to individuals with disabilities?

APPENDIX A

Vocational Rehabilitation Program

Accountability Model

I. Background

To monitor the VR program in a manner consistent with Section 107 of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by Title IV of the Workforce Innovation and Opportunity Act (WIOA), and the Department of Education's (Department) policies, and to address technical assistance needs of VR agencies, the State Monitoring and Program Improvement Division (SMPID) within the Rehabilitation Services Administration (RSA), developed an accountability model to enable it to carry out monitoring activities while increasing the effective use of its resources to administer the VR program. The model is consistent with guidelines set forth in the Department's Directive titled "Guide for Managing Formula Grant Programs," dated August 13, 2019.

II. Federal Fiscal Year (FFY) 2022 Accountability Model

The FFY 2022 accountability model is comprised of three programmatic factors, one factor related to the last year RSA conducted monitoring of the VR agency, and two fiscal factors, for a total of six performance indicators, as follows:

1. PY 2020 State VR program employment rate;
2. PY 2020 State VR program employment rate in the second quarter after exit;
3. PY 2020 State VR program employment rate in the fourth quarter after exit;
4. The amount of time since RSA last monitored the State VR program;
5. Amount of the State formula award allotment for the VR program as a percentage of the total Federal appropriation for the VR program; and
6. State percentage of the required non-Federal share (match) provided for the VR program based upon the State's formula award allotment.

All data are computed on a State basis to align the RSA accountability model with the principles in Title I of WIOA, under which core partners in the workforce development system, including VR agencies, establish levels of performance statewide and report performance results on the Annual Statewide Performance Report (WIOA Annual Report) at the State level. This method also will ensure comparability between States with one combined agency and States with more than one VR agency (general and blind). In making the calculations, SMPID will review data reported on RSA collection instruments, including the RSA-911, the Financial Status Reports (SF-425), and the VR Financial Reports (RSA-17) for the most recent period for which complete data are available. Therefore, the data used in the calculation of the factors comprising the FFY 2022 model are accurate and reliable. Importantly, the data elements used in the calculation of the factors are not subjective in nature, further reducing the likelihood of errors.

III. Description of Factors

The six factors to be analyzed through the model are described more fully below, including the basis for their use, the methods of calculation, and threshold levels of performance equating with numerical scores.

1. State VR program's employment rate

Basis: Even though employment rate is not one of the performance indicators, under Section 116 of WIOA, when individuals with disabilities exit the VR program with competitive integrated employment outcomes, they are more likely to be employed in the second and fourth quarters after exit. In addition, ensuring that individuals with disabilities maximize their employment opportunities, through the provision of VR services, remains an intrinsic purpose of the VR program.

Method of Calculation: To calculate performance on this factor using RSA-911 data—

- Identify the total number of individuals who received VR services and exited the VR program in the most recent program year in the State. Combine data for States with two VR agencies;
- Identify the total number of individuals who received VR services and who achieved a competitive integrated employment outcome in the State. Combine data for States with two VR agencies;
- Obtain a percentage by dividing the total number of eligible individuals who received VR services and exited and who achieved a competitive integrated employment outcome by the total who received VR services and exited. Multiply this number by 100; and
- Rank each State from high to low. Divide the position number in this ranking by the number of States, 56, and multiply by 100 to determine the percent. For example, if an agency was ranked 22 out of 56, the risk percent would be 39 percent.

Scoring Thresholds: Assign numerical scores based on the table below. 1 represents the lowest risk; 5 represents the highest risk.

Percent	Risk Score
0-20	1
21-40	2
41-60	3
61-80	4
81-100	5

2. State VR program's employment rate in the second quarter after exit

Basis: As one of the six performance indicators, outlined in section 116 of WIOA, this factor is the percentage of VR program participants who are in unsubsidized employment during the second quarter after exit from the program.

Method of Calculation: The specifications for calculating this factor are outlined in [RSA-TAC-17-01](#)—

- Based on the percentage, rank each State from high to low. Divide the position number in this ranking by the number of States, 56, and multiply by 100 to determine the percent. For example, if an agency was ranked 22 out of 56, the risk percent would be 39 percent.

Scoring Thresholds: Assign numerical scores based on the table below. 1 represents the lowest risk; 5 represents the highest risk.

Percent	Risk Score
0-20	1
21-40	2
41-60	3
61-80	4
81-100	5

3. State VR program’s employment rate in the fourth quarter after exit

Basis: As one of the six performance indicators, outlined in section 116 of WIOA, this factor is the percentage of VR program participants who are in unsubsidized employment during the fourth quarter after exit from the program.

Method of Calculation: The specifications for calculating this factor are outlined in [RSA-TAC-17-01](#)—

- Based on the percentage, rank each State from high to low. Divide the position number in this ranking by the number of States, 56, and multiply by 100 to determine the percent. For example, if an agency was ranked 22 out of 56, the risk percent would be 39 percent.

Scoring Thresholds: Assign numerical scores based on the table below. 1 represents the lowest risk; 5 represents the highest risk.

Percent	Risk Score
0-20	1
21-40	2
41-60	3
61-80	4
81-100	5

4. The amount of time since RSA last monitored the State VR program

Basis: RSA recognizes the risk associated with infrequent monitoring and that some State VR programs may not be monitored for several years depending where they fall in the monitoring cycle. As a result, RSA will factor into its risk assessment the amount of time since its last monitoring review of each State VR program.

Method of Calculation: To calculate this factor—

- Identify the previous FFY in which RSA monitored the State VR program;
- Subtract this from the current FFY to derive the number of years since the last monitoring review; and
- Rank each State from high to low. Divide the position number in this ranking by the number of States, 56, and multiply by 100 to determine the percent. For example, if an agency was ranked 22 out of 56, the risk percent would be 39 percent.

Scoring Thresholds: Assign numerical scores based on the table below. 1 represents the lowest risk; 5 represents the highest risk.

Percent	Risk Score
0-20	1
21-40	2
41-60	3
61-80	4
81-100	5

5. Amount of the State formula award allotment for the VR program

Basis: Use of this factor is consistent with the guidelines contained in the Guide for Managing Formula Grants (ODS: 1-102) issued by the Department on August 13, 2019. States allotted a greater amount of the total Federal formula award potentially possess a greater amount of financial resources with which to assist a larger number of individuals with disabilities to achieve employment. Consequently, these States can have a more significant effect on VR program performance nationally.

Method of Calculation: To calculate fiscal performance on this factor using the allocation for FFY 2019—

- This calculation is based on the State’s formula award allotment and is not adjusted to account for reallocation, Maintenance of Effort penalties, or other changes to the allotment.

Scoring Thresholds: Assign numerical scores based on the table below. 1 represents the lowest risk; 5 represents the highest risk.

Formula Grant Award Amount	Risk Score
0- \$9,999,999	1
\$10,000,000 - \$29,999,999	2
\$30,000,000 - \$59,999,999	3
\$60,000,000 - \$99,999,999	4
≤ \$100,000,000	5

6. State percentage of the required non-Federal share (match) provided for the VR program based upon the State’s formula award allotment

Basis: To access Federal VR program funds necessary for the provision of services to VR consumers, a State must be able to provide the required non-Federal share. The inability to match Federal funds results in a reduction of agency resources needed to serve consumers and achieve program goals.

Method of Calculation: To calculate fiscal performance on this factor using data reported on the SF-425 for FFY 2019—

- The calculation for States with combined agencies is made by dividing the agency non-Federal share provided at the end of the award period by the amount of non-Federal share required to match the agency’s formula award amount. The calculation for States with two VR agencies is derived by dividing the sum of the non-Federal share provided for both agencies by the end of the award period by the amount of non-Federal share required to match the State’s total formula allotment.

Scoring Thresholds: Assign numerical scores based on the table below. 1 represents the lowest risk; 5 represents the highest risk. States that provided non-Federal funds equal to or greater than 100 percent of the required non-Federal share are assigned a score of 1.

Percent of Match	Risk Score
100<	1
90-99.9	2
80-89.9	3
70-79.9	4
<70	5

IV. Method to Determine Level of Monitoring

While the described calculations will be performed for each State on an annual basis, resulting in a State’s overall score, only a portion of States will be selected for review in each Federal fiscal year in a manner that ensures States with higher scores and most in need of technical assistance are scheduled earlier in the review cycle. To select the States for review in FFY 2022, SMPID will add the State scores for each of the factors and divide by 5 to calculate an average State program accountability score ranging from 1.00 to 5.00.

A. On-Site Monitoring and Off-Site Reviews

SMPID will conduct comprehensive on-site monitoring, or off-site reviews when travel is not possible, of a select number of State VR agencies with higher accountability scores to review the programmatic and fiscal performance of the VR and Supported Employment programs.

Scope: This monitoring will entail implementation of all areas of programmatic performance and fiscal review contained in Sections III and IV of this MTAG.

Monitoring Team and Activities: The monitoring team, consisting of at least two program members and one fiscal member, will review documentation and conduct teleconferences related to all focus areas in preparation for an on-site visit, typically lasting for one week (or off-site review activities when travel is not possible).

B. Off-Site Review

SMPID may conduct off-site reviews of select State VR agencies with lower accountability scores to review the programmatic and fiscal performance of the VR and Supported Employment programs.

Scope: The off-site review will entail implementation of select areas of programmatic performance and fiscal review in Sections III and IV of this MTAG jointly determined by the review teams and the State VR agencies.

Review Team and Activities: The review team, consisting of at least two program members and one fiscal member, will review documentation and conduct teleconferences related to the areas of review.

Additionally, on-site monitoring and off-site reviews will involve the identification of strategies designed to improve program and fiscal performance.

APPENDIX B

Vocational Rehabilitation Agency Required Documents

The review team will use documentation provided by the VR agency to inform the development of the on-site agenda and in the review of each focus area. In accordance with 2 C.F.R. § 200.337(a), records of non-Federal entities, the “Federal awarding agency, Inspectors General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives, must have the right of access to any documents, papers, or other records of the non-Federal entity which are pertinent to the Federal award, in order to make audits, examinations, excerpts, and transcripts. The right also includes timely and reasonable access to the non-Federal entity’s personnel for the purpose of interview and discussion related to such documents.” In accordance with 34 C.F.R. § 81.34(b)(3), “a statement that the recipient failed to maintain records required by law or failed to allow an authorized representative of the Secretary access to those records constitutes a prima facie case for the recovery of the funds affected.”

VR agencies are responsible for submitting the requested documentation at least 30 days prior to the on-site monitoring or off-site review date unless the review team approves a later date based upon extenuating circumstances. When submitting requested documentation, please remember the following:

1. Do not include personally identifiable information (e.g., names, Social Security numbers, dates of birth, etc.);
2. Send copies of signed, executed documents for the last completed Federal fiscal year (FFY);
3. “Contract,” as used in this list, means an agreement or promise with another entity to provide goods or services in exchange for VR or Supported Employment funds. These agreements may be referred to as memoranda of understanding, memoranda of agreement, letters of understanding, letters of agreement, grants, agreements, contracts, purchase orders, or service authorizations;
4. If a particular request is not applicable to the VR agency, or if the information is not otherwise available, include a statement letting the review team know;
5. If the data being submitted contains State or agency specific codes or titles, please include a reference sheet that provides an explanation of the code or title to facilitate review;
6. Submit the requested information as soon as it is available. It is not necessary to submit all the documentation at one time. Submitting the information to the review team as soon as possible helps ensure there is adequate time to review the documentation prior to the on-site visit;

7. Provide fiscal data by Federal fiscal year (FFY), not State fiscal year or program year; and
8. Label each document submitted with the corresponding number used in the Document Request.

After the initial information has been submitted, the RSA Financial Management Specialist may need to request additional supporting fiscal documents or clarifying information related to the document submission categories in order to complete the review process. Prior to the review, the team's Financial Management Specialist will work with the VR agency to determine the number of documentation samples being requested and the timeframe from which the samples should be taken (e.g., contracts, third-party cooperative arrangements, etc.).

Note: Many agencies have established collaboration websites where RSA review team members can access and download the requested documentation. Please coordinate with the review team if this is an approach your agency may wish to utilize. The Department does not currently have the capability to provide this service.

DOCUMENTATION REQUEST

III. Performance of the State VR and Supported Employment Programs	Date Submitted
1. Policies and procedures regarding RSA-911 internal control process (e.g., ensuring data accuracy, reliability, and timely submission).	
2. Case file description or table of contents.	
3. Draft or issued policies related to the achievement of employment outcomes in competitive integrated employment and supported employment.	
4. Draft or issued policies related to the provision of customized employment services necessary to assist an eligible individual to achieve an employment outcome in customized employment.	
5. Draft or issued policies related to assisting eligible individuals to achieve employment outcomes.	
6. State educational agency (SEA) and local educational agency (LEA) agreements.	
7. Draft or issued policies for the provision of pre-employment transition services.	
8. Third-party cooperative arrangement and fee-for-service agreements/contracts for the provision of pre-employment transition services.	
9. Work-based learning agreement.	
10. Draft or written procedures for tracking data related to the provision of pre-employment transition services.	
11. Identification or documentation of the minimum and maximum age students with disabilities are eligible to receive pre-employment transition services.	
12. A copy of the most recently completed Comprehensive Statewide Needs Assessment (optional).	

IV. Financial Management of the State Vocational Rehabilitation Services and State Supported Employment Services Programs	Date Submitted
1. Period of Performance	
A. Documentation that identifies State requirements for the assignment, tracking and reporting of non-Federal and Federal obligations and liquidation of expenditures.	
B. Policies and procedures that outline the process for assignment of non-Federal and Federal obligations and expenditures to the correct period of performance for a FFY award for authorizations/purchase orders, contracts, personal salaries, rent, utilities, etc.	
i. Description of tracking system (e.g., program or cost objective coding) that demonstrates how obligations and expenditures are assigned, tracked and reported.	
C. Supporting documentation of control activities that demonstrate how the process for assigning, tracking, liquidating, and reporting of obligations and expenditures meet period of performance requirements.	

D. Policies and procedures for ensuring the accurate and timely submission of Federal financial reports (SF-425) and VR financial reports (RSA-17).	
E. Supporting documentation for SF-425/RSA-17 data submitted. RSA financial management specialists will work with agencies to determine the reports for which to submit the supporting documentation.	

2. Match in VR and Supported Employment Programs For FFYs 2019 to 2021 provide dollar amounts (\$) for the following sources of non-Federal share (match), for each program per FFY	Date Submitted
A. Sources for VR and Supported Employment:	
i. State appropriations.	
ii. Interagency transfers.	
iii. Third-party cooperative arrangements.	
iv. Randolph-Sheppard program set-aside (VR Program Only).	
v. Construction/Establishment expenditures - not included in State appropriations (VR Program Only).	
vi. Other (e.g., non-Federal grants, donations, local funds, etc.).	
B. Third-Party Cooperative Arrangements (TPCA):	
i. Policies and procedures regarding TPCAs (including for the provision of pre-employment transition services).	
ii. Contracts/agreements.	
iii. Supporting documentation (e.g., cooperating agency personnel activity reports/work logs, monthly progress reports, invoices, etc.).	
C. Establishment Projects (VR Program Only):	
i. Policies and procedures regarding establishment projects, including pre-planning.	
ii. Requirements, demonstration of the need for establishment and reflection of goals and priorities in the VR services portion of the Unified or Combined State plan.	
iii. Contracts/agreements.	
iv. Supporting documentation (e.g., progress reports, invoices, etc.).	
D. Randolph-Sheppard Set-Aside Funds:	
i. Policies and procedures regarding the VR agency's use of Randolph-Sheppard set-aside funds as match in the VR program.	
ii. Supporting documentation that demonstrates only allowable set-aside fund expenditures are counted as match for the VR program (DSU management services and supervision).	
iii. Acquisition by DSU of vending facilities or equipment; initial stocks and supplies not to exceed six months; and initial operating expenses not to exceed six months).	

3. Vendor Contracts and Agreements <i>For each sample provided, when applicable, include the: announcement, requests for proposal/bid, original contract, amendments, invoices, payment approval, monthly and quarterly reports, verification of performance, corrective actions, final output, and reconciliation. Contact your RSA review team fiscal representative to identify what contract sample sets to send.</i>	Date Submitted
A. Procurement policies and procedures used by the State in procuring VR and Supported Employment goods or services, including requirements for requests for proposal, etc.	
B. Contracts used to purchase VR services, including pre-employment transition services (purchased services). Please see note in italics in general heading 3 above about the number and service type of contract documentation to send.	
C. Policies and procedures regarding contract monitoring.	
D. Samples of completed contract monitoring from the sample set of contracts provided, when available.	
E. One-stop MOUs and operational budgets, including infrastructure funding agreements	

4. Prior Approval	Date Submitted
Policies and procedures regarding prior approval, including procedures for identifying items that require approval and the process for obtaining prior approval.	

APPENDIX C

Vocational Rehabilitation Services and Supported Employment Programs Performance Tables

Table 1—[AGENCY] VR Agency Profile (PYs 2018-2020)

Table 2—[AGENCY] Number and Percentage of Participants Served by Primary Disability Type (PYs 2018-2020)

Table 3—[AGENCY] Number and Percentage of Individuals Exiting at Various Stages of the VR Process (PYs 2018-2020)

Table 4—[AGENCY] Number and Percentage of Individuals Exiting by Reason during the VR Process (PYs 2018-2020)

Table 5—[AGENCY] VR Services Provided to Participants (PYs 2018-2020)

Table 6—[AGENCY] Types of Measurable Skill Gains Earned and Number of Participants Who Earned Measurable Skill Gains (PYs 2018-2020)

Table 7—[AGENCY] Median Hourly Earnings, Median Hours Worked per Week, Sources of Support, and Medical Insurance Coverage for Participants Who Exited with Competitive Integrated Employment or Supported Employment (PYs 2018-2020)

Table 8—[AGENCY] Number of Participants Who Exited with Competitive Integrated Employment or Supported Employment by the Most Frequent SOC Title (PYs 2018-2020)

Table 9—[AGENCY] Number of Students with Disabilities Reported, and the Number and Percentage of Students with Disabilities Who Received Pre-Employment Transition Services (PYs 2018-2020)

Table 10—[AGENCY] Number and Percentage of Required Pre-Employment Transition Services Provided (PYs 2018-2020)

Vocational Rehabilitation Program Other Measures That Matter

Measure 1—[AGENCY] Sustaining Employment After Exit (January 1, 2019 – December 31, 2019)

Measure 2—[AGENCY] Profile: Quality Employment (PY 2020)

Measure 3—[AGENCY] Profile: VR Process Efficiency (PY 2020)

Measure 4—[AGENCY] Profile: VR Service Provision (PY 2020)

Measure 5—[AGENCY] Percent of Participants Enrolled in Education/Training Program Leading to a Recognized Credential/Employment (PY 2020)

Measure 6—[AGENCY] Profile: Pre-Employment Transition Services (PY 2020)

Vocational Rehabilitation Services and Supported Employment Programs Performance Tables

Table 1—[AGENCY] VR Agency Profile (PYs 2018-2020)

VR Agency Profile Data	2018	2019	2020
Employment Rate			
Number of Participants Exiting in Competitive Integrated Employment or Supported Employment			
Percentage of Timely Eligibility Determinations			
Percentage of Eligibility Determination Extensions			
Percentage of Timely IPE Development			
Percentage of Initial IPE Extensions	NA	NA	
Number of Applicants			
Number of Individuals Determined Eligible			
Number of Individuals with an IPE and No VR Services Provided			
Number of Participants (with an IPE and VR Services Provided)			
WIOA Performance Indicators (General/Blind VR agency)	2018	2019	2020
Measurable Skill Gains Rate			
Employment Rate in 2 nd Qtr After Exit			
Median Earnings in 2 nd Qtr After Exit			
Employment Rate in 4 th Qtr After Exit			
Credential Attainment Rate			
WIOA Performance Indicators (Statewide)	2018	2019	2020
Measurable Skill Gains Rate			
Employment Rate in 2 nd Qtr After Exit			
Median Earnings in 2 nd Qtr After Exit			
Employment Rate in 4 th Qtr After Exit			
Credential Attainment Rate			

Calculation Table 1: VR Agency Profile

VR Agency Profile Data	Number/Percentage
Employment Rate	RSA-911: (Total individuals with Data Element 354 Type of Exit = 6 divided by Total individuals with Data Element 354 Type of Exit = 4 or 6) multiplied by 100
Number of Individuals Exiting in Competitive Integrated Employment or Supported Employment	RSA-911: Total individuals with Data Element 354 Type Of Exit = 6
Percentage of Timely Eligibility Determinations	RSA-911: (Total individuals with Data Element 38 Date of Eligibility Determination during the PY and Data Element 39 Eligibility Determination Extension = 0 where Data Element 38 minus Data Element 7 Date of Application is less than or equal to 60 days divided by Total individuals with Data Element 38 during the PY and Data Element 39 = 0) multiplied by 100
Percentage of Eligibility Determination Extensions	RSA-911: (Total individuals with Data Element 38 during the PY and Data Element 39 = 1 divided by Total individuals with Data Element 38 during the PY) multiplied by 100
Percentage of Timely IPE Development	RSA-911: (Total individuals with the earlier of Data Element 48 Date of Most Recent or Amended IPE and Data Element 127 Start Date of Initial VR Service On or After IPE during the PY and within 90 days or later of Data Element 38 Date of Eligibility Determination or Data Element 41 Date of Exit from OOS Waiting List, divided by Total individuals with Data Element 48 during the PY) multiplied by 100. * PY 2020 calculation will be adjusted to use data element 398 – Date of Initial IPE in place of data element 48
Percentage of Initial IPE Extensions	RSA-911: (Total individuals with Data Element 398 during the PY and Data Element 399 = 1 divided by Total individuals with Data Element 398 during the PY) multiplied by 100
Number of Applicants	RSA-911: Total individuals with Data Element 7 Date of Application during the PY
Number of Individuals Determined Eligible	RSA-911: Total individuals with Data Element 38 Date of Eligibility Determination during the PY
Number of Individuals with an IPE and No VR Services Provided	RSA-911: Total individuals with Data Element 48 Date of Most Recent or Amended IPE during the Program Year and Data Element 127 Start Date of Initial VR Service On or After IPE is blank
Number of Participants (with an IPE and VR Services Provided)	Amended Joint Performance Specs: Item 12 for PY
Measurable Skill Gains Rate	Amended Joint Performance Specs: Item 32 for PY
Employment Rate in 2 nd Qtr After Exit	Amended Joint Performance Specs: Item 16 for PY
Median Earnings in 2 nd Qtr After Exit	Amended Joint Performance Specs: Item 26 for PY
Employment Rate in 4 th Qtr After Exit	Amended Joint Performance Specs: Item 19 for PY
Credential Attainment Rate	Amended Joint Performance Specs: Item 29 for PY

Table 2—[AGENCY] Number and Percentage of Participants Served by Primary Disability Type (PYs 2018-2020)

Primary Disability Type by Group	PY 2018 Number of Participants	PY 2018 Percent	PY 2019 Number of Participants	PY 2019 Percent	PY 2020 Number of Participants	PY 2020 Percent
Visual						
Auditory or Communicative						
Physical						
Cognitive						
Psychological or Psychosocial						
Detailed Primary Disability Type	PY 2018 Number of Participants	PY 2018 Percent	PY 2019 Number of Participants	PY 2019 Percent	PY 2020 Number of Participants	PY 2020 Percent
Blindness						
Other Visual Impairments						
Deafness, Primary Communication Visual						
Deafness, Primary Communication Auditory						
Hearing Loss, Primary Communication Visual						
Hearing Loss, Primary Communication Auditory						
Other Hearing Impairments (Tinnitus, Meniere's Disease, hyperacusis, etc.)						
Deaf-Blindness						
Communicative Impairments (expressive/receptive)						
Mobility Orthopedic/Neurological Impairments						
Manipulation/Dexterity Orthopedic/Neurological Impairments						
Both Mobility and Manipulation/Dexterity Orthopedic/Neurological Impairments						
Other Orthopedic Impairments (e.g., limited range of motion)						
Respiratory Impairments						
General Physical Debilitation (e.g., fatigue, weakness, pain, etc.)						
Other Physical Impairments (not listed above)						

Detailed Primary Disability Type	PY 2018 Number of Participants	PY 2018 Percent	PY 2019 Number of Participants	PY 2019 Percent	PY 2020 Number of Participants	PY 2020 Percent
Cognitive Impairments (e.g., impairments involving learning, thinking, processing information and concentration)						
Psychosocial Impairments (e.g., interpersonal and behavioral impairments, difficulty coping)						
Other Mental Impairments						

Calculation Table 2: Number and Percentage of Participants Served by Primary Disability Type

Primary Disability Type by Group	Number of Participants	Percent
Visual	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 01 or 02	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 01 or 02 divided by total number of participants) multiplied by 100
Auditory or Communicative	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 03, 04, 05, 06, 07, 08, or 09	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 03, 04, 05, 06, 07, 08, or 09 divided by total number of participants) multiplied by 100
Physical	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 10, 11, 12, 13, 14, 15, or 16	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 03, 04, 05, 06, 07, 08, or 09 divided by total number of participants) multiplied by 100
Cognitive	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 17	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 17 divided by total number of participants) multiplied by 100
Psychological or Psychosocial	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 18 or 19	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 18 or 19 divided by total number of participants) multiplied by 100
Detailed Primary Disability Type	Number of Participants	Percent
Blindness	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 01	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 01 divided by total number of participants) multiplied by 100

Detailed Primary Disability Type	Number of Participants	Percent
Other Visual Impairments	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 02	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 02 divided by total number of participants) multiplied by 100
Deafness, Primary Communication Visual	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 03	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 03 divided by total number of participants) multiplied by 100
Deafness, Primary Communication Auditory	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 04	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 04 divided by total number of participants) multiplied by 100
Hearing Loss, Primary Communication Visual	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 05	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 05 divided by total number of participants) multiplied by 100
Hearing Loss, Primary Communication Auditory	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 06	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 06 divided by total number of participants) multiplied by 100
Other Hearing Impairments (Tinnitus, Meniere's Disease, hyperacusis, etc.)	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 07	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 07 divided by total number of participants) multiplied by 100

Detailed Primary Disability Type	Number of Participants	Percent
Deaf-Blindness	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 08	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 08 divided by total number of participants) multiplied by 100
Communicative Impairments (expressive/receptive)	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 09	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 09 divided by total number of participants) multiplied by 100
Mobility Orthopedic/Neurological Impairments	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 10	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 10 divided by total number of participants) multiplied by 100
Manipulation/Dexterity Orthopedic/Neurological Impairments	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 11	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 11 divided by total number of participants) multiplied by 100
Both Mobility and Manipulation/Dexterity Orthopedic/Neurological Impairments	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 12	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 12 divided by total number of participants) multiplied by 100
Other Orthopedic Impairments (e.g., limited range of motion)	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 13	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 13 divided by total number of participants) multiplied by 100

Detailed Primary Disability Type	Number of Participants	Percent
Respiratory Impairments	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 14	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 14 divided by total number of participants) multiplied by 100
General Physical Debilitation (e.g., fatigue, weakness, pain, etc.)	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 15	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 15 divided by total number of participants) multiplied by 100
Other Physical Impairments (not listed above)	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 16	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 16 divided by total number of participants) multiplied by 100
Cognitive Impairments (e.g., impairments involving learning, thinking, processing information and concentration)	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 17	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 17 divided by total number of participants) multiplied by 100
Psychosocial Impairments (e.g., interpersonal and behavioral impairments, difficulty coping)	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 18	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 18 divided by total number of participants) multiplied by 100
Other Mental Impairments	RSA-911: Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 19	RSA-911: (Total number of participants (Data Element 127 Start Date of Initial VR Service On or After IPE not blank) with Primary Disability Data Element 43 Type of Impairment Code = 19 divided by total number of participants) multiplied by 100

Table 3—[AGENCY] Number and Percentage of Individuals Exiting at Various Stages of the VR Process (PYs 2018-2020)

Individuals Who Exited the VR Program			PY2018	PY 2019	PY 2020	
Number of Individuals Who Exited the VR Program						
Exit Type	PY 2018 Number of Individuals	PY 2018 Percent	PY 2019 Number of Individuals	PY 2019 Percent	PY 2020 Number of Individuals	PY 2020 Percent
Individual exited as an applicant, prior to eligibility determination or trial work experience						
Individual exited during or after a trial work experience						
Individual exited after eligibility, but from an order of selection waiting list						
Individual exited after eligibility, but prior to a signed IPE						
Individual exited after an IPE without an employment outcome						
Individual exited after an IPE in noncompetitive and/or nonintegrated employment						
Individual exited after an IPE in competitive and integrated employment or supported employment						
Individual exited as an applicant after being determined ineligible for VR services						
Potentially eligible individual exited after receiving pre-employment transition services and has not applied for VR services						NA
Supported Employment			PY 2018 Number of Participants	PY 2019 Number of Participants	PY 2020 Number of Participants	
Number of Participants Who Exited with a Supported Employment Outcome in Competitive Integrated Employment						
Number of Participants Who Exited with a Supported Employment Outcome in Noncompetitive and/or Nonintegrated Employment						

Calculation Table 3: Number and Percentage of Individuals Exiting at Various Stages of the VR Process

Number of Individuals Who Exited the VR Program	RSA-911: Total number of individuals where Data Element 353 Date of Exit within PY	
Exit Type	Number of Individuals	Percent
Individual exited as an applicant, prior to eligibility determination or trial work experience	RSA-911: Total number of individuals where Data Element 354 Type of Exit = 0	RSA-911: (Total number of individuals where Data Element 354 Type of Exit = 0 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Individual exited during or after a trial work experience	RSA-911: Total number of individuals where Data Element 354 Type of Exit = 1	RSA-911: (Total number of individuals where Data Element 354 Type of Exit = 1 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Individual exited after eligibility, but from an order of selection waiting list	RSA-911: Total number of individuals where Data Element 354 Type of Exit = 2	RSA-911: (Total number of individuals where Data Element 354 Type of Exit = 2 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Individual exited after eligibility, but prior to a signed IPE	RSA-911: Total number of individuals where Data Element 354 Type of Exit = 3	RSA-911: (Total number of individuals where Data Element 354 Type of Exit = 3 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Individual exited after an IPE without an employment outcome	RSA-911: Total number of individuals where Data Element 354 Type of Exit = 4	RSA-911: (Total number of individuals where Data Element 354 Type of Exit = 4 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Individual exited after an IPE in noncompetitive and/or nonintegrated employment	RSA-911: Total number of individuals where Data Element 354 Type of Exit = 5	RSA-911: (Total number of individuals where Data Element 354 Type of Exit = 5 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Individual exited after an IPE in competitive and integrated employment or supported employment	RSA-911: Total number of individuals where Data Element 354 Type of Exit = 6	RSA-911: (Total number of individuals where Data Element 354 Type of Exit = 6 divided by Number of Individuals Who Exited the VR Program) multiplied by 100

Exit Type	Number of Individuals	Percent
Individual exited as an applicant after being determined ineligible for VR services	RSA-911: Total number of individuals where Data Element 354 Type of Exit = 7	RSA-911: (Total number of individuals where Data Element 354 Type of Exit = 7 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Potentially eligible individual exited after receiving pre-employment transition services and has not applied for VR services. Code no longer available as of PY 2020.	RSA-911: Total number of individuals where Data Element 354 Type of Exit = 8	RSA-911: (Total number of individuals where Data Element 354 Type of Exit = 8 divided by Number of Individuals Who Exited the VR Program) multiplied by 100

Supported Employment	Number
Number of Individuals Who Exited with a Supported Employment Outcome in Competitive Integrated Employment	RSA-911: Total number of individuals where Data Element 354 Type of Exit = 6 and Data Element 356 Employment Outcome at Exit = 5
Number of Individuals Who Exited in Supported Employment with Noncompetitive and/or Nonintegrated Employment	RSA-911: Total number of individuals where Data Element 354 Type of Exit = 5 and Data Element 356 Employment Outcome at Exit = 5

Table 4—[AGENCY] Number and Percentage of Individuals Exiting by Reason during the VR Process (PYs 2018 - 2020)

Reason for Exit	PY 2018 Number of Individuals	PY 2018 Percent	PY 2019 Number of Individuals	PY 2019 Percent	PY 2020 Number of Individuals	PY 2020 Percent
Individual is No Longer Available for Services Due to Residence in an Institutional Setting Other Than a Prison or Jail					NA	NA
Health/Medical						
Death of Individual						
Reserve Forces Called to Active Duty						
Foster Care					NA	NA
Ineligible after determined eligible						
Criminal Offender						
No Disabling Condition						
No Impediment to Employment					NA	NA
Does Not Require VR Service					NA	NA
Disability Too Significant to Benefit from Service					NA	NA
No Long-Term Source of Extended Services Available					NA	NA
Transferred to Another Agency						
Achieved Competitive Integrated Employment Outcome						
Extended Employment						
Extended Services Not Available						
Unable to Locate or Contact						
No Longer Interested in Receiving Services or Further Services						
All Other Reasons						
Short-Term Basis Period	NA	NA	NA	NA		
Ineligible: Pursuant to 511	NA	NA	NA	NA		
Ineligible: Following Trial Work	NA	NA	NA	NA		
Number of Individuals Who Exited the VR Program		NA		NA		NA

Calculation Table 4: Number and Percentage of Individuals Exiting by Reason during the VR Process

Reason for Exit	Number	Percent
Individual is No Longer Available for Services Due to Residence in an Institutional Setting Other Than a Prison or Jail * Code discontinued as of PY 2020	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 1	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 1 divided by Number of Individuals Who Exited the VR Program (Data Element 353 Date of Exit within PY)) multiplied by 100
Health/Medical	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 2	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 2 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Death of Individual	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 3	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 3 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Reserve Forces Called to Active Duty	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 4	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 4 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Foster Care * Code discontinued as of PY 2020	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 5	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 5 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Ineligible after determining eligible	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 6	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 6 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Criminal Offender	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 7	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 7 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
No Disabling Condition	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 8	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 8 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
No Impediment to Employment * Code discontinued as of PY 2020	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 9	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 9 divided by Number of Individuals Who Exited the VR Program) multiplied by 100

Reason for Exit	Number	Percent
Does Not Require VR Service * Code discontinued as of PY 2020	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 10	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 10 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Disability Too Significant to Benefit from Service * Code discontinued as of PY 2020	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 11	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 11 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
No Long-Term Source of Extended Services Available * Code discontinued as of PY 2020	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 12	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 12 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Transferred to Another Agency	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 13	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 13 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Achieved Competitive Integrated Employment Outcome	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 14	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 14 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Extended Employment	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 15	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 15 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Extended Services Not Available	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 16	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 16 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Unable to Locate or Contact	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 17	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 17 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
No Longer Interested in Receiving Services or Further Services	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 18	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 18 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
All Other Reasons	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 19	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 19 divided by

Reason for Exit	Number	Percent
		Number of Individuals Who Exited the VR Program) multiplied by 100
Short Term Basis Period * Code created as of PY 2020	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 20	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 20 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Ineligible: Pursuant to 511 * Code created as of PY 2020	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 21	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 21 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Ineligible: Following Trial Work * Code created as of PY 2020	RSA-911: Total number of individuals where Data Element 355 Reason for Exit = 22	RSA-911: (Total number of individuals where Data Element 355 Reason for Exit = 22 divided by Number of Individuals Who Exited the VR Program) multiplied by 100
Number of Individuals Who Exited the VR Program	RSA-911: Total number of individuals where Data Element 353 Date of Exit within PY	N/A

Table 5—[AGENCY] VR Services Provided to Participants (PYs 2018-2020)

Participants Who Received Services				PY 2018	PY 2019	PY 2020
Total Number of Participants Who Received VR Services						
Training Services Provided to Participants	PY 2018 Number of Participants	PY 2018 Percent	PY 2019 Number of Participants	PY 2019 Percent	PY 2020 Number of Participants	PY 2020 Percent
Graduate Degree Training						
Bachelor Degree Training						
Junior or Community College Training						
Occupational or Vocational Training						
On-the-Job Training						
Apprenticeship Training						
Basic Academic Remedial or Literacy Training						
Job Readiness Training						
Disability Related Skills Training						
Miscellaneous Training						
Randolph-Sheppard Entrepreneurial Training						
Customized Training						
Work-Based Learning Experience	NA	NA	NA	NA		
Career Services Provided to Participants	PY 2018 Number of Participants	PY 2018 Percent	PY 2019 Number of Participants	PY 2019 Percent	PY 2020 Number of Participants	PY 2020 Percent
Assessment						
Diagnosis and Treatment of Impairment						
Vocational Rehabilitation Counseling and Guidance						
Job Search Assistance						
Job Placement Assistance						
Short-Term Job Supports						
Supported Employment Services						
Information and Referral Services						
Benefits Counseling						
Customized Employment Services						
Extended Services (for youth with the most significant disabilities)						

Other Services Provided to Participants	PY 2018 Number of Participants	PY 2018 Percent	PY 2019 Number of Participants	PY 2019 Percent	PY 2020 Number of Participants	PY 2020 Percent
Transportation						
Maintenance						
Rehabilitation Technology						
Personal Attendant Services						
Technical Assistance Services						
Reader Services						
Interpreter Services						
Other Services						

Calculation Table 5: VR Services Provided to Participants

Total Number of Participants Who Received VR Services	Amended Joint Performance Specs: Item 12 Count of UNIQUE individuals where Element 127 Start Date of Initial VR Service On or After IPE <= end of PY and Element 353 Date of Exit within the report period or Element 353 Date of Exit is null
Training Services Provided to Participants	Calculation: To determine the number of participants who received each of the specified services, sum the number of participants (those with Data Element 127 that is not blank) where services provided is greater than 0. To determine the percentage receiving the specified service, divide the number of participants who received the specified service in the PY by the total number of participants served and multiply by 100.
Career Services Provided to Participants	Calculation: To determine the number of participants who received each of the specified services, sum the number of participants (those with Data Element 127 that is not blank) where services provided is greater than 0. To determine the percentage receiving the specified service, divide the number of participants who received the specified service in the PY by the total number of participants served and multiply by 100.

Other Services Provided to Participants	<p>Calculation: To determine the number of participants who received each of the specified services, sum the number of participants (those with Data Element 127 that is not blank) where services provided is greater than 0.</p> <p>To determine the percentage receiving the specified service, divide the number of participants who received the specified service in the PY by the total number of participants served and multiply by 100.</p>
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Table 6— [AGENCY] Number of Measurable Skill Gains Earned by Type and Number of Participants Who Earned Measurable Skill Gains (PYs 2018-2020)

Type of Measurable Skill Gains Earned	PY 2018 Number	PY 2019 Number	PY 2020 Number
Educational Functioning Level			
Secondary Diploma			
Postsecondary Transcript/ Report Card			
Training Milestone			
Skills Progression			
Total			
Participants Who Earned Measurable Skill Gains	PY 2018 Number	PY 2019 Number	PY 2020 Number
Number of Participants Who Earned Measurable Skill Gains			

Calculation Table 6: Types of Measurable Skill Gains Earned and Number of Participants Who Earned Measurable Skill Gains (PYs 2018-2020)

Types of Measurable Skill Gains Earned	Calculation
Educational Functioning Level	RSA-911: The number of Participants who had a Date Enrolled During Program Participation in an Education or Training Program Leading to a Recognized Postsecondary Credential before the end of the PY and a Date of Most Recent Measurable Skill Gain: Educational Functioning Level (EFL) within the PY
Secondary Diploma	RSA-911: The number of Participants who had a Date Enrolled During Program Participation in an Education or Training Program Leading to a Recognized Postsecondary Credential before the end of the PY and a Date of Most Recent Measurable Skill Gain: Secondary within the PY
Postsecondary Transcript/Report Card	RSA-911: The number of Participants who had a Date Enrolled During Program Participation in an Education or Training Program Leading to a Recognized Postsecondary Credential before the end of the PY and a Date of Most Recent Measurable Skill Gain: Postsecondary Transcript/Report Card within the PY
Training Milestone	RSA-911: The number of Participants who had a Date Enrolled During Program Participation in an Education or Training Program Leading to a Recognized Postsecondary Credential before the end of the PY 2017 and a Date of Most Recent Measurable Skill Gain: Training Milestone within the PY
Skills Progression	RSA-911: The number of Participants who had a Date Enrolled During Program Participation in an Education or Training Program Leading to a Recognized Postsecondary Credential before the end of the PY and a

	Date of Most Recent Measurable Skill Gain: Skills Progression within the PY
Number of Participants Who Earned Measurable Skill Gains	RSA-911: The number of Participants who had a Date Enrolled During Program Participation in an Education or Training Program Leading to a Recognized Postsecondary Credential before the end of the PY , and a Date of Most Recent Measurable Skill Gain: Educational Functioning Level(EFL) within the PY or a Date of Most Recent Measurable Skill Gain: Secondary within the PY or a Date of Most Recent Measurable Skill Gain: Postsecondary Transcript/Report Card within the PY or a Date of Most Recent Measurable Skill Gain: Training Milestone within the PY or a Date of Most Recent Measurable Skill Gain: Skills Progression within the PY

Table 7— [AGENCY] Median Hourly Earnings, Median Hours Worked per Week, Sources of Support and Medical Insurance Coverage for Participants Who Exited with Competitive Integrated Employment or Supported Employment (PYs 2018-2020)

Median Hourly Earnings and Hours Worked per Week at Exit			PY 2018	PY 2019	PY 2020	
Number of Participants Who Exited in Competitive and Integrated Employment or Supported Employment						
Median Hourly Earnings at Exit						
Median Hours Worked per Week at Exit						
Primary Source of Support at Exit	PY 2018 Number of Participants	PY 2018 Percent	PY 2019 Number of Participants	PY 2019 Percent	PY 2020 Number of Participants	PY 2020 Percent
Personal Income						
Family and Friends						
Public Support						
Other Sources						
Public Support at Exit	PY 2018 Number of Participants	PY 2018 Percent	PY 2019 Number of Participants	PY 2019 Percent	PY 2020 Number of Participants	PY 2020 Percent
Social Security Disability Insurance (SSDI) at Exit						
Supplemental Security Income (SSI) for the Aged, Blind, or Disabled at Exit						
Temporary Assistance for Needy Families (TANF) at Exit						
General Assistance (State or local government) at Exit						
Veterans' Disability Benefits at Exit						
Workers' Compensation at Exit						
Other Public Support at Exit						
Medical Insurance Coverage at Exit	PY 2018 Number of Participants	PY 2018 Percent	PY 2019 Number of Participants	PY 2019 Percent	PY 2020 Number of Participants	PY 2020 Percent
Medicaid at Exit						
Medicare at Exit						
State or Federal Affordable Care Act Exchange at Exit						
Public Insurance from Other Sources at Exit						
Private Insurance Through Employer at Exit						
Not Yet Eligible for Private Insurance Through Employer at Exit						
Private Insurance Through Other Means at Exit						

Calculation Table 7: Median Hourly Earnings, Median Hours Worked per Week, Sources of Support, and Medical Insurance Coverage for Participants Who Exited with Competitive Integrated Employment or Supported Employment

		Calculation
Number of Participants Who Exited in Competitive Integrated Employment or Supported Employment		RSA-911: Total participants with Data Element 354 Type of Exit = 6
Median Hourly Earnings at Exit		RSA-911: Data Element 359 Hourly Wage values are listed in order, from the lowest to the highest value. The value in the middle of this list is the median hourly earnings value, so there is the same quantity of numbers above the median number as there is below the median number where Data Element 353 Date of Exit falls within the Program Year, Data Element 127 Start Date of Initial VR Service On or After IPE is not blank, Data Element 354 Type of Exit = 6
Median Hours Worked per Week at Exit		RSA-911: Data Element 360 Hours Worked in a Week at Exit values are listed in order, from the lowest to the highest value. The value in the middle of this list is the median hourly earnings value, so there is the same quantity of numbers above the median number as there is below the median number where Data Element 353 Date of Exit falls within the Program Year, Data Element 127 Start Date of Initial VR Service On or After IPE is not blank, Data Element 354 Type of Exit = 6
Primary Source of Support for Participants Employed at Exit	Number	Percent
Personal Income	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 368 Primary Source of Support at Exit = 1	RSA-911: (Total number of participants with Data Element 154 Type of Exit = 6 and Data Element 368 Primary Source of Support at Exit = 1 divided by number of participants who Exited with Data Element 354 Type of Exit = 6) multiplied by 100
Family and Friends	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 368 Primary Source of Support at Exit = 2	RSA-911: (Total number of participants with Data Element 154 Type of Exit = 6 and Data Element 368 Primary Source of Support at Exit = 2 divided by number of participants who Exited with Data Element 354 Type of Exit = 6) multiplied by 100
Public support	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 368 Primary Source of Support at Exit = 3	RSA-911: (Total number of participants with Data Element 154 Type of Exit = 6 and Data Element 368 Primary Source of Support at Exit = 3 divided by number of participants who Exited with Data Element 354 Type of Exit = 6) multiplied by 100

Primary Source of Support for Participants Employed at Exit	Number	Percent
Other Sources	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 368 Primary Source of Support at Exit = 4	RSA-911: (Total number of participants with Data Element 154 Type of Exit = 6 and Data Element 368 Primary Source of Support at Exit = 4 divided by Number of participants who Exited with Data Element 354 Type of Exit = 6) multiplied by 100
Public Support at Exit	Number	Percent
Social Security Disability Insurance (SSDI) at Exit	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 361 Social Security Disability Insurance (SSDI) at Exit is greater than zero (or, in PY 2020 Data Element 396 = 1)	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 361 Social Security Disability Insurance (SSDI) at Exit is greater than zero divided by number of participants with Data Element 354 Type of Exit = 6 (or, in PY 2020 Data Element 396 = 1) multiplied by 100
Supplemental Security Income (SSI) for the Aged, Blind, or Disabled at Exit	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 362 Supplemental Security Income (SSI) for the Aged, Blind, or Disabled at Exit is greater than zero (or, in PY 2020 Data Element 396 = 2)	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 362 Supplemental Security Income (SSI) for the Aged, Blind, or Disabled at Exit is greater than zero divided by number of participants with Data Element 354 Type of Exit = 6 (or, in PY 2020 Data Element 396 = 2) multiplied by 100
Temporary Assistance for Needy Families (TANF) at Exit	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 363 Temporary Assistance for Needy Families (TANF) at Exit is greater than zero (or, in PY 2020 Data Element 396 = 3)	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 363 Temporary Assistance for Needy Families (TANF) at Exit is greater than zero divided by number of participants with Data Element 354 Type of Exit = 6 (or, in PY 2020 Data Element 396 = 3) multiplied by 100
General Assistance (State or local government) at Exit	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 364 General Assistance (State or local government) at Exit is greater than zero	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 364 General Assistance (State or local government) at Exit is greater than zero divided by number of participants with Data Element 354 Type of Exit = 6) multiplied by 100

Public Support at Exit	Number	Percent
Veterans' Disability Benefits at Exit	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 365 Veterans' Disability Benefits at Exit is greater than zero	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 365 Veterans' Disability Benefits at Exit is greater than zero divided by number of participants with Data Element 354 Type of Exit = 6) multiplied by 100
Workers' Compensation at Exit	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 366 Workers' Compensation at Exit is greater than zero	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 366 Workers' Compensation at Exit is greater than zero divided by number of participants with Data Element 354 Type of Exit = 6) multiplied by 100
Other Public Support at Exit	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 367 Other Public Support at Exit is greater than zero (or, in PY 2020 Data Element 396 = 4)	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 367 Other Public Support at Exit is greater than zero divided by number of participants with Data Element 354 Type of Exit = 6 (or, in PY 2020 Data Element 396 = 4) multiplied by 100
Medical Insurance Coverage at Exit	Number	Percent
Medicaid at Exit	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 369 Medicaid at Exit = 1 (or, in PY 2020 Data Element 397 includes a code of '1')	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 369 Medicaid at Exit = 1 divided by number of participants with Data Element 354 Type of Exit = 6 (or, in PY 2020 Data Element 397 includes a code of '1') multiplied by 100
Medicare at Exit	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 370 Medicare at Exit = 1 (or, in PY 2020 Data Element 397 includes a code of '2')	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 370 Medicare at Exit = 1 divided by number of participants with Data Element 354 Type of Exit = 6 (or, in PY 2020 Data Element 397 includes a code of '2') multiplied by 100
State or Federal Affordable Care Act Exchange at Exit	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 371 State or Federal Affordable Care Act Exchange at Exit = 1 (or, in PY 2020 Data Element 397 includes a code of '3')	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 371 State or Federal Affordable Care Act Exchange at Exit = 1 divided by number of participants with Data Element 354 Type of Exit = 6 (or, in PY 2020 Data Element 397 includes a code of '3') multiplied by 100
Public Insurance from Other Sources at Exit	RSA-911: Total number of participants with Data Element 354 Type of Exit	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 372 State or Federal Affordable Care

Medical Insurance Coverage at Exit	Number	Percent
	= 6 and Data Element 372 Public Insurance from Other Sources at Exit = 1 (or, in PY 2020 Data Element 397 includes a code of '4')	Act Exchange at Exit = 1 divided by number of participants with Data Element 354 Type of Exit = 6 (or, in PY 2020 Data Element 397 includes a code of '4') multiplied by 100
Private Insurance Through Employer at Exit	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 373 Private Insurance Through Employer at Exit = 1 (or, in PY 2020 Data Element 397 includes a code of '5')	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 373 Private Insurance Through Employer at Exit = 1 divided by number of participants with Data Element 354 Type of Exit = 6 (or, in PY 2020 Data Element 397 includes a code of '5') multiplied by 100
Not Yet Eligible for Private Insurance Through Employer at Exit	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 374 Not Yet Eligible for Private Insurance Through Employer at Exit = 1 (or, in PY 2020 Data Element 397 includes a code of '6')	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 374 Not Yet Eligible for Private Insurance Through Employer at Exit = 1 divided by number of participants with Data Element 354 Type of Exit = 6 (or, in PY 2020 Data Element 397 includes a code of '6') multiplied by 100
Private Insurance Through Other Means at Exit	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 375 Private Insurance Through Other Means at Exit = 1 (or, in PY 2020 Data Element 397 includes a code of '7')	RSA-911: Total number of participants with Data Element 354 Type of Exit = 6 and Data Element 375 Private Insurance Through Other Means at Exit = 1 divided by number of participants with Data Element 354 Type of Exit = 6 (or, in PY 2020 Data Element 397 includes a code of '7') multiplied by 100

Table 8— [AGENCY] Number of Participants Who Exited with Competitive Integrated Employment or Supported Employment by the Most Frequent SOC Title (PYs 2018-2020)

No.	PY 2018 SOC Title	PY 2018 Number of Participants	PY 2018 Median Hourly Earnings
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
No.	PY 2019 SOC Title	PY 2019 Number of Participants	PY 2019 Median Hourly Earnings
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
No.	PY 2020 SOC Title	PY 2020 Number of Participants	PY 2020 Median Hourly Earnings
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			

Calculation Table 8: Number of Participants Who Exited with Competitive Integrated Employment or Supported Employment by the Most Frequent SOC Title

SOC Title	Number of Participants	Median Hourly Earnings
RSA-911: The most frequently occurring SOC Titles (Data Element 357)	Count of individuals in the most frequently occurring SOC Titles (Data Element 357 Primary Occupation at Exit)	RSA-911: For each SOC category Data Element 359 Hourly Wage at Exit values are listed in order, from the lowest to the highest value. The value in the middle of this list is the median hourly earnings value, so there is the same quantity of numbers above the median number as there is below the median number where Data Element 353 Date of Exit falls within the Program Year, Data Element 127 Start Date of Initial VR Service On or After IPE is not blank, Data Element 354 Type of Exit = 6

Table 9— [AGENCY] Number of Students with Disabilities Reported, and the Number and Percentage of Students with Disabilities Who Received Pre-Employment Transition Services (PYs 2018-20200)

Students with Disabilities	PY 2018 Number/ Percentage of Students	PY 2019 Number/ Percentage of Students	PY 2020 Number/ Percentage of Students
Total Students with Disabilities Reported			
Students with Disabilities Reported with 504 Accommodation			
Students with Disabilities Reported with IEP			
Students with Disabilities Reported without 504 Accommodation or IEP			
Total Students with Disabilities Who Received a Pre-Employment Transition Service			
Potentially Eligible Students with Disabilities Who Received a Pre-Employment Transition Service			
Students with Disabilities, Who Applied for VR Services, and Received a Pre-Employment Transition Service			
Percentage of Students with Disabilities Reported Who Received a Pre-Employment Transition Service			

Calculation Table 9: Number of Students with Disabilities Reported, and the Number and Percentage of Students with Disabilities Who Received Pre-Employment Transition Services

Students with Disabilities	Number/Percentage of Students
Total Students with Disabilities Reported	RSA-911: Total cases where Data Element 22 Student with a Disability = 1 and 2 and 3
Students with Disabilities Reported with 504 Accommodation	RSA-911: Total cases where Data Element 22 Student with a Disability = 1
Students with Disabilities Reported with IEP	RSA-911: Total cases where Data Element 22 Student with a Disability = 2
Students with Disabilities Reported without 504 Accommodation or IEP	RSA-911: Total cases where Data Element 22 Student with a Disability = 3
Total Students with Disabilities Who Received a Pre-Employment Transition Service	RSA-911: Total cases where Data Element 97 Job Exploration Counseling Provided by VR Agency Staff (in-house), Data Element 98 Job Exploration Counseling Provided Through VR Agency Purchase, Data Element 103 Work Based Learning Experiences Provided by VR Agency Staff (in-house), Data Element 104 Work Based Learning Experiences Provided Through VR Agency Purchase, Data Element 109 Counseling on Enrollment Opportunities Provided by VR Agency Staff (in-house), Data Element 110 Counseling on Enrollment Opportunities Provided Through VR Agency Purchase, Data Element 115

Students with Disabilities	Number/Percentage of Students
	Workplace Readiness Training Provided by VR Agency Staff (in-house), Data Element 116 Workplace Readiness Training Provided Through VR Agency Purchase, Data Element 121 Instruction in Self Advocacy Provided by VR Agency Staff (in-house), Data Element 122 Instruction in Self Advocacy Provided Through VR Agency Purchase = 1 and Data Element 22 Student with a Disability = 1,2, or 3
Potentially Eligible Students with Disabilities Who Received a Pre-Employment Transition Service	RSA-911: Total cases where Data Element 97 Job Exploration Counseling Provided by VR Agency Staff (in-house), Data Element 98 Job Exploration Counseling Provided Through VR Agency Purchase, Data Element 103 Work Based Learning Experiences Provided by VR Agency Staff (in-house), Data Element 104 Work Based Learning Experiences Provided Through VR Agency Purchase, Data Element 109 Counseling on Enrollment Opportunities Provided by VR Agency Staff (in-house), Data Element 110 Counseling on Enrollment Opportunities Provided Through VR Agency Purchase, Data Element 115 Workplace Readiness Training Provided by VR Agency Staff (in-house), Data Element 116 Workplace Readiness Training Provided Through VR Agency Purchase, Data Element 121 Instruction in Self Advocacy Provided by VR Agency Staff (in-house), Data Element 122 Instruction in Self Advocacy Provided Through VR Agency Purchase = 1 and Data Element 22 Student with a Disability = 1,2, or 3 and Data Element 7 is blank
Students with Disabilities, Who Applied for VR Services, and Received a Pre-Employment Transition Service	RSA-911: Data Element 97 Job Exploration Counseling Provided by VR Agency Staff (in-house),Data Element 98 Job Exploration Counseling Provided Through VR Agency Purchase, Data Element 103 Work Based Learning Experiences Provided by VR Agency Staff (in-house), Data Element 104 Work Based Learning Experiences Provided Through VR Agency Purchase, Data Element 109 Counseling on Enrollment Opportunities Provided by VR Agency Staff (in-house), Data Element 110 Counseling on Enrollment Opportunities Provided Through VR Agency Purchase, Data Element 115 Workplace Readiness Training Provided by VR Agency Staff (in-house), Data Element 116 Workplace Readiness Training Provided Through VR Agency Purchase, Data Element 121 Instruction in Self Advocacy Provided by VR

Students with Disabilities	Number/Percentage of Students
	Agency Staff (in-house), Data Element 122 Instruction in Self Advocacy Provided Through VR Agency Purchase = 1 and Data Element 22 Student with a Disability = 1,2, or 3 and Data Element 7 IS NOT NULL
Percentage of Students with Disabilities Reported Who Received a Pre-Employment Transition Service	RSA-911: Total cases where Data Element 97 Job Exploration Counseling Provided by VR Agency Staff (in-house),Data Element 98 Job Exploration Counseling Provided Through VR Agency Purchase, Data Element 103 Work Based Learning Experiences Provided by VR Agency Staff (in-house), Data Element 104 Work Based Learning Experiences Provided Through VR Agency Purchase, Data Element 109 Counseling on Enrollment Opportunities Provided by VR Agency Staff (in-house), Data Element 110 Counseling on Enrollment Opportunities Provided Through VR Agency Purchase, Data Element 115 Workplace Readiness Training Provided by VR Agency Staff (in-house), Data Element 116 Workplace Readiness Training Provided Through VR Agency Purchase, Data Element 121 Instruction in Self Advocacy Provided by VR Agency Staff (in-house), Data Element 122 Instruction in Self Advocacy Provided Through VR Agency Purchase = 1 and Data Element 22 Student with a Disability = 1,2, or 3 divided by Total cases where Data Element 22 Student with a Disability = 1,2, or 3

Table 10—[AGENCY] Number and Percentage of Required Pre-Employment Transition Services Provided (PYs 2018-2020)

Pre-Employment Transition Services	PY 2018 Number of Pre- Employment Transition Services Provided	PY 2018 Percent of Total Pre- Employment Transition Services Provided	PY 2019 Number of Pre- Employment Transition Services Provided	PY 2019 Percent of Total Pre- Employment Transition Services Provided	PY 2020 Number of Pre- Employment Transition Services Provided	PY 2020 Percent of Total Pre- Employment Transition Services Provided
Total Pre-Employment Transition Services Provided						
Job Exploration Counseling						
Work-Based Learning Experiences						
Counseling on Enrollment Opportunities						
Workplace Readiness Training						
Instruction in Self-Advocacy						

Calculation Table 10: Number and Percentage of Required Pre-Employment Transition Services Provided

Pre-Employment Transition Services	Number of Pre-Employment Transition Services Provided
Total Pre-Employment Transition Services Provided	RSA-911: Count of rows where Data Element 97 Job Exploration Counseling Provided by VR Agency Staff (in-house) = 1 + Count of rows where Data Element 98 Job Exploration Counseling Provided Through VR Agency Purchase = 1 + Count of rows where Data Element 103 Work Based Learning Experiences Provided by VR Agency Staff (in-house) = 1 + Count of rows where Data Element 104 Work Based Learning Experiences Provided Through VR Agency Purchase = 1 + Count of rows where Data Element 109 Counseling on Enrollment Opportunities Provided by VR Agency Staff (in-house) = 1 + Count of rows where Data Element 110 Counseling on Enrollment Opportunities Provided Through VR Agency Purchase = 1 + Count of rows where Data Element 115 Workplace Readiness Training Provided by VR Agency Staff (in-house) = 1 + Count of rows Data Element 116 Workplace Readiness Training Provided Through VR Agency Purchase = 1 + Count of rows where Data Element 121 Instruction in Self Advocacy Provided by VR Agency Staff (in-house) = 1 + Count of rows Data Element 122 Instruction in Self Advocacy Provided Through VR Agency Purchase = 1
Job Exploration Counseling	Count of rows where Data Element 97 Job Exploration Counseling Provided by VR Agency Staff (in-house) = 1 + Count of rows where Data Element 98 Job Exploration Counseling Provided Through VR Agency Purchase = 1
Work Based Learning Experiences	Count of rows where Data Element 103 Work Based Learning Experiences Provided by VR Agency Staff (in-house) = 1 + Count of rows where Data Element 104 Work Based Learning Experiences Provided Through VR Agency Purchase = 1
Counseling on Enrollment Opportunities	RSA-911: Count of rows where Data Element 109 Counseling on Enrollment Opportunities Provided by VR Agency Staff (in-house) = 1 or Count of rows where Data Element 110 Counseling on Enrollment Opportunities Provided Through VR Agency Purchase = 1

Pre-Employment Transition Services	Number of Pre-Employment Transition Services Provided
Workplace Readiness Training	Count of rows where Data Element 115 Workplace Readiness Training Provided by VR Agency Staff (in-house) = 1 or Count of rows Data Element 116 Workplace Readiness Training Provided Through VR Agency Purchase = 1
Instruction in Self Advocacy	Count of rows where Data Element 121 Instruction in Self Advocacy Provided by VR Agency Staff (in-house) = 1 or Count of rows Data Element 122 Instruction in Self Advocacy Provided Through VR Agency = 1

Vocational Rehabilitation Program Other Measures That Matter

Measure 1—[AGENCY] Sustaining Employment After Exit (January 1, 2019 – December 31, 2019)

This measure is the percentage of VR program participants who are employed at exit and employed in the Second and Fourth Quarters after Exit.

	Number/Percent
Number Exited with Employment (01/01/2019-12/31/2019)	
Number Employed in Second Quarter after Exit AND Fourth Quarter after Exit	
Percentage Sustaining Employment	%

Measure 2—[AGENCY] Profile: Quality Employment (PY 2020)

This profile provides information related to employment status at exit and four quality indicators of employment:

1. Median Hourly Earnings.
2. Median Hours Worked per Week.
3. Employer-Provided Health Insurance; and
4. Social Security beneficiary information

Primary Disability	Number of Participants Exiting with Employment	Percentage of Total Exiting with Employment	Median Hourly Earnings at Exit	Median Hours Worked per Week at Exit	Number with Health Insurance at Exit	Number with SS Benefits at Exit	Percentage Employed at Exit
Visual		%					%
Communication		%					%
Physical		%					%
Intellectual		%					%
Psychosocial		%					%
Significance of Disability	Number of Participants Exiting with Employment	Percentage of Total Exiting with Employment	Median Hourly Earnings at Exit	Median Hours Worked per Week at Exit	Number with Health Insurance at Exit	Number with SS Benefits at Exit	Percentage Employed at Exit
Significant		%					%
Most Significant		%					%
Students with Disabilities	Number of Participants Exiting with Employment	Percentage of Total Exiting with Employment	Median Hourly Earnings at Exit	Median Hours Worked per Week at Exit	Number with Health Insurance at Exit	Number with SS Benefits at Exit	Percentage Employed at Exit
Received Pre-Employment Transition Service under IPE		%					%

Measure 3—[AGENCY] Profile: VR Process Efficiency (PY 2020)

This profile provides information related to how efficiently individuals with disabilities were determined eligible for the VR program and received an Individualized Plan for Employment (IPE) within the Program Year. This profile will also show the outcomes these individuals if they exited during the Program Year.

Application to Eligibility (PY 2019)		Number		
Number of Individuals Who Applied in PY 2020				
Number of Individuals Determined Eligible in PY 2020				
Application to Eligibility (PY 2020)	30 Days after Application	31 and 60 Days after Application	61 or More Days after Application	
Number Determined Eligible in PY 2020 within:				
Percentage Determined Eligible PY 2020 within:	%	%	%	
Number Determined Eligible in PY 2020 Who Exited with Employment during PY 2020 within:				
Number Determined Eligible in PY 2020 Who Exited without Employment during PY 2020 within:				

Eligibility to IPE (PY 2020)		Number			
Number of Individuals Who Had IPEs Developed in PY 2020					
Eligibility to IPE (PY 2020)	30 Days after Eligibility	31 and 60 Days after Eligibility	61 and 90 Days after Eligibility	91 or More Days after Eligibility	
Number with IPEs Developed in PY 2020 within:					
Percent of IPEs Developed in PY 2020 within:					
Number with IPEs Developed in 2020 Who Exited with Employment during PY 2020					
Number with IPEs Developed in 2020 Who Exited without Employment during PY 2020					

Measure 4—[AGENCY] Profile: VR Service Provision (PY 2020)

This profile shows the number of VR program participants who received at least one VR service divided by the total number of VR program participants.

VR Program Participants	PY 2020 Q1	PY 2020 Q2	PY 2020 Q3	PY 2020 Q4
Number of Participants Receiving VR Services				
Total Number of Participants				
Percentage Receiving VR Services	%	%	%	%

Measure 5—[AGENCY] Percentage of Participants Enrolled in Education/Training Program Leading to a Recognized Credential/Employment (PY 2020)

This measure shows the number of VR program participants who could earn a Measurable Skill Gains, as they work towards a Recognized Postsecondary Credential or Employment, divided by the total number of VR program participants being served. This measure uses the MSG Rate denominator as its numerator while the denominator is the total number of VR program participants.

Program Year 2020 MSG Rate Denominator	Program Year 2020 Total Number of Participants Served	Program Year 2020 Percentage of Participants Eligible to Earn MSG

Measure 6—[AGENCY] Profile: Pre-Employment Transition Services (PY 2020)

These profiles provide information related to the breakout of students with disabilities who received pre-employment transitions services in terms of the potentially eligible students with disabilities and the students with disabilities who received these services under an IPE and the number of students with disabilities who advance from potentially eligible status to VR program participant status and their outcomes. This data may be used to evaluate the relationship between the provision of pre-employment transition services, movement in the VR process, and employment outcomes.

Students with Disabilities (PY 2020)	Job- Exploration Counseling	Workplace Readiness Training	Work-Based Learning Experience	Counseling on PSE Enrollment	Self- Advocacy Training	One or More Service
Number of Potentially Eligible Students Who Received Service						
Number of Students Who Received Service under IPE						
Number of Students Who Received Service as Both Potentially Eligible and under an IPE						
Number of Students Who Exited with Employment during PY						
Number of Students Who Exited without Employment during PY						

	Number/ Percentage
Total Number of Participants in VR Program	
Number of Potentially Eligible Students with Disabilities Who Received Pre-Employment Transition Services	
Percentage of Potentially Eligible Students with Disabilities Who Received Pre-Employment Transition Services	%
Total Number of Applicants to VR Program	
Number of Potentially Eligible Students with Disabilities Who Applied to VR Program	
Percentage of Potentially Eligible Students with Disabilities Who Applied to VR Program	%

APPENDIX D

Third-Party Cooperative Arrangement Review Instrument

I. Introduction

Historically, some vocational rehabilitation (VR) agencies have used sources of match other than State general revenue fund appropriations directed to the designated State unit (DSU) to meet the non-Federal share (match) requirement for Federal VR program funds. Such matching funds can come from a variety of sources. The use of funds other than State general revenue appropriations to the DSU is allowable under the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by Title IV of the Workforce Innovation and Opportunity Act (WIOA), and there are specific statutory requirements pertaining to the use of such funds. A significant number of VR agencies utilize third-party cooperative arrangements (TPCA) as a source of match for Federal VR funds. The Federal regulations, which detail the TPCA requirements, in 34 C.F.R. § 361.28 read, in pertinent part, as follows:

- (a) The designated State unit may enter into a third-party cooperative arrangement for providing or contracting for the provision of vocational rehabilitation services with another State agency or a local public agency that is providing part or all of the non-Federal share in accordance with paragraph (c) of this section, if the designated State unit ensures that—
 - (1) The services provided by the cooperating agency are not the customary or typical services provided by that agency but are new services that have a vocational rehabilitation focus or existing services that have been modified, adapted, expanded, or reconfigured to have a vocational rehabilitation focus;
 - (2) The services provided by the cooperating agency are only available to applicants for, or recipients of, services from the designated State unit;
 - (3) Program expenditures and staff providing services under the cooperative arrangement are under the administrative supervision of the designated State unit; and
 - (4) All requirements of the VR services portion of the Unified or Combined State Plan, including a State's order of selection (OOS), will apply to all services provided under the cooperative arrangement.
- (b) If a third-party cooperative arrangement does not comply with the statewideness requirement in 34 C.F.R. § 361.25, the State unit must obtain a waiver of statewideness, in accordance with § 361.26.

II. The Cooperating Agency Must Furnish All or Part of the Non-Federal Share

The first requirement for TPCAs is that the third-party cooperating agency is a State or local public agency that furnishes all or part of the non-Federal share (34 C.F.R. § 361.28(a)). Public, as applied to an agency, organization, or institution, means that the agency, organization, or institution is under the administrative supervision or control of a government other than the Federal government (34 C.F.R. § 77.1). TPCAs cannot be developed with private non-profit or for-profit entities.

The following questions may be helpful.

1. Is the cooperating agency a State agency or other public agency?
2. Is the cooperating agency furnishing all or part of the non-Federal share for that particular TPCA?

If the answer to the above questions is NO, the TPCA is not in compliance with the requirements of 34 C.F.R. § 361.28 and 34 C.F.R. § 77.1.

In addition, the Federal VR regulations that detail the TPCA non-Federal share requirements, in 34 C.F.R. § 361.28 read, in pertinent part, as follows:

- (c) The cooperating agency's contribution toward the non-Federal share required under the arrangement, as set forth in paragraph (a) of this section, may be made through:
 - (1) Cash transfers to the designated State unit;
 - (2) Certified personnel expenditures for the time cooperating agency staff spent providing direct vocational rehabilitation services pursuant to a third-party cooperative arrangement that meets the requirements of this section. Certified personnel expenditures may include the allocable portion of staff salary and fringe benefits based upon the amount of time cooperating agency staff directly spent providing services under the arrangement; and
 - (3) other direct expenditures incurred by the cooperating agency for the sole purpose of providing services under this section pursuant to a third-party cooperative arrangement that—
 - (i) Meets the requirements of this section;
 - (ii) Are verifiable as being incurred under the third-party cooperative arrangement; and
 - (iii) Do not meet the definition of third-party in-kind contributions under 2 C.F.R. § 200.96.

The following questions may be helpful.

1. What is/are the source(s) of non-Federal share that the cooperating agency provides under the TPCA (i.e., cash, certified personnel expenditures, other direct expenditures)?
2. How much/what percentage of each source is provided?
3. What internal controls has the VR agency established to ensure that non-Federal share is reasonable, necessary, and allocable to the TPCA, making it allowable as match for the VR program?
 - Is cash transferred directly by the cooperating agency into the sole account of the VR agency?
 - Are certified personnel expenditures submitted by the cooperating agency along with supporting documentation (e.g., personnel activity reports) to demonstrate time worked on the TPCA vs. time not worked on the TPCA?
 - Are other direct expenditures submitted by the cooperating agency along with supporting documentation (e.g., receipts) that ensures the expenditures were incurred during the time the TPCA contract was in force, for the sole purpose of providing VR services to applicants and recipients of VR services under the TPCA?
4. Is there a budget within the TPCA contract that specifically identifies the portion of allowable costs that meet the 34 C.F.R. § 361.28 provisions, including those incurred as non-Federal share for the direct provision of VR services, and those incurred with Federal VR funds?

III. New or Modified Services with a VR Focus

The second requirement for TPCAs is “the services provided by the cooperating agency are not the customary or typical services provided by that agency but are new services that have a VR focus or existing services that have been modified, adapted, expanded, or reconfigured to have a VR focus” (34 C.F.R. § 361.28(a)(1)). The question of whether services are “new” or “modified, adapted, expanded, or reconfigured” may be difficult to discern. The services cannot be services that the cooperating agency is providing or has the legal responsibility to provide.

The following questions may be helpful in determining whether a service is “new” or “modified, adapted, expanded, or reconfigured.”

1. Does the TPCA specify that the cooperating agency is responsible for providing or directly arranging for the provision of (e.g., contracting for) the VR services specified in the arrangement?
2. When was the TPCA program started, and what customary services were being provided by the cooperating agency prior to that time?
3. Are the VR services provided through the TPCA program also available to individuals through avenues other than the TPCA? For example, if a high school student is provided job coaching through a TPCA, are other high school students who are not being served through the TPCA also provided job coaching?
4. Were the TPCA staff already providing the same VR services to applicants/recipients of VR services prior to the TPCA’s implementation?

5. Is there a substantive difference between the services provided by the cooperating agency prior to the TPCA and “new” or “modified, adapted, expanded, or reconfigured” VR services?
6. Does the TPCA contract detail the VR focus of the new or modified services?

If the services are not “new” or “modified, adapted, expanded, or reconfigured,” then these services cannot be included in the arrangement. If such services are included in the arrangement, the TPCA is out of compliance with 34 C.F.R. § 361.28(a)(1).

IV. Services are Only Available to Applicants for, or Recipients of, VR Services

The third regulatory requirement for TPCAs is that “the services provided by the cooperating agency are only available to applicants for, or recipients of, services from the designated State unit” (34 C.F.R. § 361.28(a)(2)). It is important to look for language in the TPCA document that outlines whom the program will serve. Even if the written document states that the program serves only VR applicants or recipients, it is important to discern how it unfolds in practice. Students with disabilities who are potentially eligible for services from the VR program may receive the five pre-employment transition services required activities (34 C.F.R. § 361.48(a)(2)) regardless of whether they have applied or been determined eligible for VR services (34 C.F.R. § 361.48(a)(1)) and are considered recipients of VR services. However, all individuals must be applicants or determined eligible for the VR program to receive any of the VR services provided under 34 C.F.R. § 361.48(b), including when those services are provided under a TPCA.

The following questions may be helpful in determining whether the services are provided to applicants for, or recipients of, VR services.

1. Are all individuals served through the TPCA program applicants for, or recipients of, VR services?
2. Does the TPCA provide the five pre-employment transition services required activities in 34 C.F.R. § 361.48(a)(2), or other VR services identified in 34 C.F.R. § 361.48(b)?
3. What role do the VR counselors play in the TPCA program?

If the TPCA provides any VR services under 34 C.F.R. § 361.48(b) that have different requirements than the five pre-employment transition services required activities under 34 C.F.R. § 361.48(a)(2), the following questions apply.

4. How do VR counselors ensure that individuals with disabilities have applied or been determined eligible for VR services when a TPCA provides VR services identified in 34 C.F.R. § 361.48(b)?
5. How and when is an application for VR services taken?
6. How and when is eligibility for VR services determined?

7. When is an individualized plan for employment (IPE) written?
8. At what point in the VR process are services provided?

If the cooperating agency wants to serve individuals who are neither applicants for nor recipients of VR services, the cooperating agency may do so provided no Federal or non-Federal VR funds are used to support those services (e.g., personnel costs, supplies, etc.). The VR agency could use neither Title I funds to serve such individuals, nor consider the costs of serving such individuals paid with non-Federal funds in the VR agency's efforts to comply with the matching requirements under 34 C.F.R. § 361.60. These individuals must be served outside of the parameters of the TPCA. RSA recommends that the cooperating agency and VR agency clarify such arrangements in the written agreement implementing the TPCA.

V. DSU Maintains Administrative Supervision

The fourth regulatory requirement for TPCAs is that "program expenditures and staff providing services under the cooperative arrangement are under the administrative supervision of the designated State unit" in accordance with 34 C.F.R. § 361.28(a)(3). Staff providing services under the TPCA must not be employees of the VR agency.

The following questions may be helpful in determining whether the DSU is maintaining "administrative supervision."

1. Is there a signed agreement supported by a line-item budget that details the personnel and other associated costs? (Generally, this is enough to meet this requirement.)
2. Who supervises the provision of VR services under the TPCA?
3. Who manages and administers the TPCA contract (program and fiscal components)?
4. What types of performance measures are included in the TPCA and who evaluates the performance?
5. Who/what agency maintains control of the expenditures of the program?
6. What internal control activities do VR agency staff conduct to ensure non-Federal and Federal expenditures are spent under the TPCA in accordance with the 34 C.F.R. § 361.28 requirements?
7. How does the VR agency ensure that non-Federal and Federal expenditures reported as incurred under the TPCA are allocable to the TPCA program?
8. How does the VR agency ensure that non-Federal share provided as match under the TPCA is consistent with 34 C.F.R. § 361.28(c)?
9. What are the hiring and firing practices for third-party program staff?

10. What agency is responsible for issuing paychecks to the cooperating agency providing the TPCA VR services?
11. Who does the TPCA program staff consider as the lead of the program and supervisor?
12. Who performs the non-delegable VR program duties outlined in 34 C.F.R. § 361.13?

For example, a TPCA transition program’s third-party cooperative arrangement staff is employees of the schools (the schools do the hiring and firing, issue the paychecks, etc.). However, the VR agency maintains control of expenditures; has authority over the TPCA staff; is involved with the interview process; performs continuous reviews of the schools’ progress, performance and internal controls; conducts at least annual reviews of performance expectations; and maintains control of the non-delegable functions of the VR program. This would meet the requirement of “administrative supervision” even though the TPCA staff members are not employees of the DSU but rather are employees of the school.

If there is no administrative supervision exercised by the VR agency, the VR program must restructure the TPCA contract to ensure the requirements listed above are met. RSA is available to provide technical assistance, upon request.

VI. VR Services Portion of the Unified or Combined State Plan Requirements Apply

The fifth regulatory requirement for TPCAs is that “all requirements of the VR services portion of the Unified or Combined State Plan, including a State’s order of selection (OOS), will apply to all services provided under the cooperative arrangement” (34 C.F.R. § 361.28(a)(4)). If an agency is on an OOS, the TPCA program must also adhere to the OOS for the individuals that it serves. Please note that the VR agency must continue to provide pre-employment transition services to students with disabilities who were receiving any of the five pre-employment transition services prior to being determined eligible for VR services and placed in a closed OOS priority category or waiting list (34 C.F.R. § 361.36(e)(3)(i)). So long as the students received one of the required activities, prior to being placed in a closed priority category under an OOS, they can receive any of the five required activities while on a waiting list.

The following questions may be helpful:

1. If the VR agency is on an OOS, are the individuals served in the TPCA program selected based on that OOS?
2. How is informed choice provided to individuals served via the TPCA?
3. Are there any limits or caps on services provided under the TPCA?
4. What, if any, services are being provided by the VR agency through TPCAs to individuals assigned to a closed OOS priority category or waiting list?
5. Are all the requirements within the agency’s VR services portion of the Unified or Combined State Plan being adhered to by the cooperating agency?

NOTE: If this requirement is not met, the RSA team will provide technical assistance to restructure the arrangement language to clearly specify that all requirements under the VR services portion of the Unified or Combined State Plan are to be met and eliminate provisions that are not consistent with the VR services portion of the Unified or Combined State Plan.

VII. Statewideness

The final regulatory requirement for TPCAs is that “if a third-party cooperative agreement does not comply with the statewideness requirement in 34 C.F.R. § 361.25, the State unit must obtain a waiver of statewideness, in accordance with 34 C.F.R. § 361.26” (34 C.F.R. § 361.28(b)). Pursuant to 34 C.F.R. § 361.25, “The vocational rehabilitation services portion of the Unified or Combined State Plan must assure that services provided under the vocational rehabilitation services portion of the Unified or Combined State Plan will be available in all political subdivisions of the State, unless a waiver of statewideness is requested and approved in accordance with 34 C.F.R. § 361.26.”

The main questions to ask for this requirement are as follows.

1. Are the services provided through the TPCA available to all individuals across the State? If so, statewideness is met.
2. If not, has the VR agency obtained a waiver of statewideness through the submission of its most recent VR services portion of the Unified or Combined State Plan?

Are the services provided through the TPCA program offered throughout the State, yet some parts of the State are not participating in the program? If so, this does not meet the statewideness requirement. For example, if a TPCA transition program is offered in all parts of the State, but is not available statewide because not all schools in the State participate in the program, the statewideness requirement is not met and the VR agency must request a waiver of statewideness.

TPCAs with school districts to provide transition services to eligible students receiving special education services from the school system, or working with a county developmental disability or mental health office to establish an employment program for individuals who are eligible for both the county programs and for VR almost always require a waiver of statewideness.

A VR agency may provide services under a waiver of statewideness when the—

- Non-Federal share of the cost of the services to be provided under the waiver is met from funds provided by a public agency;
- Services are likely to promote the vocational rehabilitation of substantially larger numbers of individuals with disabilities, or of individuals with disabilities with particular types of impairments; and
- The VR agency includes in the VR services portion of the Unified or Combined State Plan, and the Secretary of Education approves, a waiver of statewideness (34 C.F.R. § 361.26(a)).

The requirements for requesting a waiver of statewideness are found in 34 C.F.R. § 361.26(b).

VR agencies must request approval from RSA, by submitting an attachment to the State Plan, prior to waiving responsibility for providing services statewide. The waiver of statewideness request must—

- Identify the types of services to be provided;
- Include a written assurance that the cooperating agency will make available the non-Federal share of funds required for the arrangement;
- Include a written assurance that the VR agency approval will be obtained for each service before that service is put into effect; and
- Include a written assurance that all other requirements under the VR services portion of the Unified or Combined State Plan will apply to all services approved under the waiver.

APPENDIX E

Fiscal Data Tables - Focus Area

Due to the transition of the RSA Management Information System (RSAMIS) during the period of review, fiscal staff are in the process of revising the fiscal data tables to reflect changes to the data structure. Consequently, RSA has not included the fiscal tables in the MTAG at this time. Any questions about the fiscal data used for the review should be addressed to the Financial Management Specialist that is conducting the review.