

**FISCAL YEAR 2017
MONITORING REPORT
ON THE
COLORADO DIVISION OF
VOCATIONAL REHABILITATION
AND
SUPPORTED EMPLOYMENT PROGRAMS**



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SECTION 1: EXECUTIVE SUMMARY

A. Background

Section 107 of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by Title IV of the Workforce Innovation and Opportunity Act (WIOA), requires the Commissioner of the Rehabilitation Services Administration (RSA) to conduct annual reviews and periodic on-site monitoring of programs authorized under Title I of the Rehabilitation Act to determine whether a vocational rehabilitation (VR) agency is complying substantially with the provisions of its State Plan under section 101 of the Rehabilitation Act and with the evaluation standards and performance indicators established under section 106 subject to the performance accountability provisions described in section 116(b) of WIOA . In addition, the Commissioner must assess the degree to which VR agencies are complying with the assurances made in the State Plan Supplement for Supported Employment Services under Title VI of the Rehabilitation Act.

Through its monitoring of the State Vocational Rehabilitation Services program (VR program) and State Supported Employment Services program (Supported Employment program) administered by the Colorado Division of Vocational Rehabilitation (CO DVR) in Federal fiscal year (FFY) 2017, RSA:

- Assessed the performance of the VR and the Supported Employment programs with respect to the achievement of quality employment outcomes for individuals with disabilities and those with the most significant disabilities, including students and youth with disabilities;
- Identified strategies and corrective actions to improve program and fiscal performance related to the following focus areas:
 - Performance of the VR Program;
 - Transition Services, including Pre-Employment Transition Services, for Students and Youth with Disabilities;
 - Supported Employment program;
 - Allocation and Expenditure of VR and Supported Employment Program Funds; and
 - Joint WIOA Final Rule Implementation.

In addition, RSA reviewed a sample of individual case service records to assess internal controls for the accuracy and validity of RSA-911 data and provided technical assistance to the VR agency to enable it to enhance its performance.

The nature and scope of this review and the process by which RSA carried out its monitoring activities, including the conduct of an on-site visit from April 17 through 21, 2017, is described in detail in the Federal [FFY 2017 Vocational Rehabilitation Program Monitoring and Technical Assistance Guide](#).

B. Summary of Observations and Findings to Improve Performance

RSA's review of CO DVR resulted in the observations and findings summarized below. The entire observations and findings, along with the recommendations and corrective actions that the agency can undertake to improve its performance, are contained within the sections of this report covering the focus areas to which they pertain. RSA compares CO DVR's performance to the national performance for all combined agencies. This is for comparison only; there are no requirements for VR agencies to meet or exceed national performance levels.

Observations

- Despite the significant increase in the rehabilitation rate and the number of individuals obtaining employment during the review period, there was not a concurrent improvement in the quality of employment outcomes.
- Despite the fact that the employment rate for youth under the age of 25 at exit was better than the national performance for combined agencies, the quality of employment outcomes achieved by this population was poorer than the national performance, which may be attributed, in part, to CO DVR's focus on short-term services and a lack of emphasis on postsecondary education.
- CO DVR provides required pre-employment transition services to eligible and potentially eligible students with disabilities, but at the time of the review, was not effectively tracking these services, particularly authorized and pre-employment coordination activities.
- In general, CO DVR's performance on measures of the quality of employment outcomes achieved by individuals in supported employment was not as strong as compared to the national performance of combined agencies or as compared to CO DVR's performance for all individuals served.

Findings

- Based on the analysis of the data provided, CO DVR did not consistently comply with the requirement of 34 CFR §361.41(b)(1) because it did not make all eligibility determinations in a timely manner, namely within the required 60-day time standard.
- As the FFYs 2014-2016 data demonstrate, CO DVR did not comply with the requirement of 34 CFR §361.45(a)(1) because it did not develop all individualized plans for employment (IPE) in a timely manner, namely within the required 90-day period pursuant to 34 CFR §361.45(e).
- CO DVR did not comply with the prior approval requirements in 2 CFR §200.407.

C. Summary of Technical Assistance

During the review process, RSA provided the following technical assistance to CO DVR:

- Discussed how CO DVR's business staff can use labor market information to identify employment leading to careers and the importance of focusing on services that lead to careers for individuals with disabilities;
- Explained how rapid movement of individuals through the VR process and insufficient use of postsecondary education and training may lead to employment outcomes of lower quality;
- Described strategies that CO DVR may use to resolve discrepancies between the electronic and paper case service records;
- Provided technical assistance on revising the State educational agency agreement, local educational agreements, and pre-employment transition services policies;
- Clarified whether potentially eligible students can receive services through a third-party cooperative arrangement (TPCA) using the estimate provided by the forecasting model for pre-employment transition services;
- Described how to use the estimate provided by the forecasting model of potentially eligible students who have disabilities throughout the State so that required, authorized, and coordination activities listed in 34 CFR §361.48(a) can be provided concurrently and counted toward the 15 percent reserve;
- Clarified when Title VI funds may appropriately be used when working with an individual needing supported employment (i.e., once a job placement has occurred);
- Clarified the need for supported employment policies on integrated employment on a short-term basis and customized employment;
- Informed CO DVR that pre-employment transition services reservation and expenditure of funds requirements can be met in the carryover year, assuming that criteria for carrying over those funds has been met in the year of appropriation (34 CFR §361.64(b));
- Explained the legal basis for the requirement to reserve and expend 15 percent of the funds for provision of pre-employment transition services (Sections 110(d) and 113(a) of the Rehabilitation Act);
- Explained the difference between TPCAs and Inter-Agency Transfers, and how match is generated by the cooperating agency (34 CFR §361.28(c)), the VR agencies role in administrative control (34 CFR §361.28(a)(3), and the need to charge only certified time of staff providing direct VR services (34 CFR §§34 CFR 361.28(c)(2));
- Discussed requirements and guidance related to prior approval (2 CFR §200.77), specifically, the parameters for types of costs that require prior approval and the process for requesting that approval;
- Described methods to address potential maintenance of effort (MOE) penalties, since at the time of this visit CO DVR anticipated a MOE penalty to be assessed in the summer of 2017; and
- Provided guidance on appropriate representation on the State Workforce Development Board (State Board) for the VR program.

As a result of the monitoring process, CO DVR and RSA identified the need for additional technical assistance in the following areas:

- How CO DVR can work with its Business Outreach staff and how it can use labor market surveys to identify the training and educational programs that will provide the skills necessary for employment leading to careers;
- Further assistance on how to use the estimate of all eligible and potentially eligible students who have disabilities throughout the State so that required, authorized, and coordination activities outlined in 34 CFR §361.48(a) can be provided concurrently and counted toward the 15 percent reserve;
- Further assistance on the option of integrated employment on a short-term basis, particularly as it looks to work with individuals with more significant disabilities who might otherwise have gone into non-competitive employment;
- How to develop policies and procedures on the provision of extended services for youth with disabilities;
- Guidance on representation of the State VR agency on the Statewide Workforce Development Board (SWDB);
- Guidance on how to establish a baseline when using SWIS data for analyzing wage information;
- Guidance on how to establish a data sharing agreement with unemployment insurance (UI) given that both agencies are in the same department (CDLE);
- How to establish an infrastructure funding agreement (IFA) in situations where VR is not co-located with a one-stop, but nonetheless receives services from that one-stop. RSA will share IFA technical assistance as it is developed; and
- How to measure Effectiveness in Serving Employers, and the methods the core programs will use to measure Effectiveness in Serving Employers, one of the six primary performance accountability measures.

D. Review Team Participants

Members of the RSA review team included Sean Barrett (Fiscal Unit); Fred Isbister and Caneshia McAllister (Technical Assistance Unit); Brian Miller, Shannon Moler, and David Wachter (Vocational Rehabilitation Unit); and Steve Zwillinger (Data Collection and Analysis Unit). Although not all team members participated in the on-site visit, each contributed to the gathering and analysis of information, along with the development of this report.

E. Acknowledgements

RSA wishes to express appreciation to the representatives of CO DVR for the cooperation and assistance extended throughout the monitoring process. RSA also appreciates the participation of others, such as the State Rehabilitation Council (SRC), the Client Assistance Program (CAP) and advocates, and other stakeholders, in the monitoring process.

SECTION 2: FOCUS AREA – PERFORMANCE OF THE VOCATIONAL REHABILITATION PROGRAM

A. Nature and Scope

Through implementation of this focus area, RSA assessed the achievement of quality employment outcomes by individuals with disabilities served in the VR program by conducting an in-depth and integrated analysis of core VR program data and review of individual case service records. The analysis represents a broad overview of the VR program administered by CO DVR and included employment outcomes in competitive integrated employment and supported employment. It should not be construed as a definitive or exhaustive review of all available VR program data. The data generally measures performance based on individuals who exited the VR program during the most recently completed three-year period for which data are available. Consequently, the tables do not provide complete information that could otherwise be derived from examining open service records. The analysis includes the number of individuals participating in the various stages of the VR process; the number and quality of employment outcomes; the services provided to eligible individuals; the types of disabilities experienced by individuals receiving services; and the amount of time individuals are engaged in the various stages of the VR process, including eligibility determination, development of the IPE, and the provision of services. RSA also reviewed policies and procedures related to internal controls necessary for the verification of data and compared the performance of CO DVR with that of all VR agencies of similar type (i.e., combined agencies authorized to serve all eligible individuals in the State).

In addition to data tables, the review team used a variety of other resources to better understand the performance trends indicated by the outcomes measured. Other resources included but were not limited to:

- Agency policies and procedures related to the provision of transition and pre-employment transition services, competitive integrated employment, and supported employment services; and
- Description in the VR services portion of the program year 2016 Unified or Combined State Plan describing goals and priorities pertaining to the performance of the VR program.

The review team shared the data with the VR agency prior to the on-site visit and solicited information throughout the review process explaining the performance trends demonstrated by the data. Specifically, the review team met with:

- The VR agency director and executive management team;
- VR agency managers and supervisors;
- VR counselors;
- VR staff from the business outreach and support team;

- VR agency support personnel; and
- Representatives of the SRC, the CAP, and other VR program stakeholders including the Colorado Department of Education involved in the SEA and LEA agreements.

In addition to a review of the RSA-911 and RSA-113 data provided by the VR agency, RSA conducted a review of 30 individual case service records. RSA provided guidelines to the VR agency prior to the on-site visit. The review team discussed the selection of service records with CO DVR, and the method it uses to maintain records. RSA used the information obtained through the review of service records to assess CO DVR's internal controls for the accuracy and validity of RSA-911 data.

The review team provided technical assistance on the WIOA joint performance accountability measures established in section 116(b) of WIOA. RSA did not issue compliance findings on these measures. However, the review team and VR agency used these measures to discuss the potential effect of the joint performance accountability measures on the State and agency level performance.

RSA provided additional technical assistance to the VR agency during the course of monitoring to enable it to improve programmatic performance.

B. Overview

RSA reviewed CO DVR's performance during FFYs 2014, 2015, and 2016, with particular attention given to the number and quality of outcomes achieved by individuals with disabilities in the State. Additionally, the review addressed the number of individuals who were determined eligible for VR services, who were placed on a waiting list due to implementation of an Order of Selection (OOS), and who received services through the VR program. The data used in this review were provided by CO DVR to RSA on the Quarterly Cumulative Caseload Report (RSA-113) and the Case Service Report (RSA-911).

The VR Process

After CO DVR ceased its order of selection (OOS) in February 2014, the agency experienced a large increase in the number of individuals served whose service records were closed from FFY 2014 to FFY 2016. During this time period, the number of applicants increased from 5,634 in FFY 2014 to 7,719 in FFY 2016. During the same time period, the number of individuals determined eligible increased from 3,785 in FFY 2014 to 10,647 in FFY 2015, then decreased to 8,461 in FFY 2016. From FFY 2014 to FFY 2016, the total number of individuals who exited from the VR system as applicants and from trial work experiences decreased. However, during the same time period, the number of individuals who exited from the VR system without employment outcomes, after eligibility, but before an IPE was signed and services were received, increased from 1,425 to 2,124 individuals. On the other hand, the number of individuals who achieved employment and whose service records were closed increased from 1,704 to 2,545 individuals, and the total number of individuals who exited without employment whose service records were closed decreased from 2,205 to 1,515 individuals. In addition, the percentage of

individuals who were accepted for VR services but received no services decreased from 75.4 percent in FFY 2014 to 25.4 percent in FFY 2016, possibly as a result of reviewing service records in preparation for new reporting requirements under WIOA. However, the number and percentage of individuals who exited without employment outcomes after eligibility, but before an IPE was developed and services were provided, increased from 19.6 percent in FFY 2014 to 32.2 percent in FFY 2016, greater than the national performance of 23.4 percent for combined agencies.

Employment Outcomes

The percentage of individuals served whose service records were closed with employment of all individuals whose service records were closed increased from 23.4 percent in FFY 2014 to 38.3 percent in FFY 2016, while the percentage of individuals whose service records were closed without employment decreased from 30.3 percent to 22.8 percent during the same period. Similarly, the rehabilitation rate increased from 43.6 percent in FFY 2014 to 62.7 percent in FFY 2016. The number and percentage of individuals who achieved supported employment outcomes of all those who achieved employment increased from 7.8 percent (133) in FFY 2014 to 21.1 percent (537) in FFY 2016. From FFY 2014 to FFY 2016, the average hourly earnings for competitive employment outcomes increased from \$11.81 per hour to \$11.87 per hour, which is slightly higher than the national performance of \$11.84 per hour for combined agencies. Conversely, the average hours worked per week decreased from 28.42 hours per week in FFY 2014 to 26.88 hours per week in FFY 2016, which was below the national performance of 30.3 hours for combined agencies.

VR Services Provided

From FFY 2014 to FFY 2016, the number of individuals served by CO DVR increased from 3,909 to 4,060 individuals. Of the individuals whose service records were closed after receiving services, the percentage who received four-year or university training services decreased from 10.3 percent in FFY 2014, to 5.1 percent in FFY 2016, which was below the national performance of 8.8 percent for combined agencies; this trend of decreasing services during the period reviewed also occurred with miscellaneous training decreasing from 23.3 percent to 11.2 percent, compared to 7.8 percent for combined agencies, and the percentage of individuals who received occupational/vocational training decreased from 5.7 percent in FFY 2014, to 1.2 percent in FFY 2016, when the national performance was 10.1 percent for combined agencies. Of the individuals who received career services, whose service records were closed in FFY 2014, 82.4 percent received guidance and counseling with an increase to 99.9 percent in FFY 2016, which is higher than the national performance of 64.4 percent for combined agencies, and 55.2 percent of individuals whose service records were closed in FFY 2016 received assessment services compared to 57.2 percent for combined agencies nationally. In FFY 2014, 3.9 percent of individuals whose service records were closed received on-the-job supports, which increased to 15.6 percent in FFY 2016, while 13.5 percent received on-the-job supports short-term in FFY 2014, which decreased to 10 percent in FFY 2016. From FFY 2014 to FFY 2016, the percentage of individuals who received job search assistance increased from 27.8 percent to 37 percent, slightly higher than 33.2 percent for combined agencies in FFY 2016. In addition, 21.4 percent

of individuals received job placement services in FFY 2014, increasing to 24.8 percent in FFY 2016, which is lower than the national performance of 29.8 percent for combined agencies. Of the individuals who received other services, whose service records were closed in FFY 2016, individuals who received transportation services decreased from 20.6 percent in FFY 2014 to 15 percent in FFY 2016, which is well below 34.5 percent for combined agencies nationally. Only the percentage of individuals who received rehabilitation technology during the review period increased, from 11.6 percent in FFY 2014 to 20.6 percent in FFY 2016, an increase of nine percentage points.

Select Measures for All Individuals Served by Impairment Type

From FFY 2014 to FFY 2016, the most significant change in the numbers and percentages of individuals served was for individuals with Intellectual and Learning disabilities; this population increased from 29.3 percent (1,144) to 35.7 percent (1,451). The group showing the second largest increase was individuals with Auditory and Communicative disabilities; this group increased from 16 percent (626) to 19.0 percent (771). Individuals with Physical disabilities served decreased from 20 percent (782) to 16.0 percent (648). The other two disability groups also decreased, with individuals with Visual disabilities decreasing from 5.2 percent (203) to 3.7 percent (151) and individuals with Psychosocial and psychological disabilities decreasing from 29.5 percent, or 1,154 individuals, to 25.6 percent, or 1,039 individuals served. During the same period, the employment rates for all individuals served by type of impairment increased from FFY 2014 to FFY 2016, with individuals with Auditory and Communicative disabilities having the largest increase in their employment rate of 26.9 percent and individuals with Visual impairments having the lowest increase in their employment rate of 9.4 percent. Each of the other three disability groups showed an increase by 16 percent or slightly more. All five disability groups achieved a rehabilitation rate above the national performance for combined agencies.

Length of Time in Stages of the VR Process

For the past three years, CO DVR has consistently improved its performance with respect to eligibility determinations. The percentage of individuals served who were determined eligible within 60 days from the date of application increased from 72.7 percent in FFY 2014 to 83.7 percent in FFY 2015, and in FFY 2016 the percentage increased to 89.9 percent, compared to 82.6 percent for combined agencies in FFY 2016. The results for youth with disabilities under the age of 25 at exit were similar, with 80.2 percent of these individuals determined eligible within the required 60-day time standard in FFY 2014, while CO DVR determined eligibility for 89.9 percent of individuals within the 60-day time standard in FFY 2015 and 93.9 percent in FFY 2016. For individuals in supported employment, 85.7 percent were determined eligible within the 60-day time frame in FFY 2014, 89.5 percent in FFY 2015, and 94.0 percent in FFY 2016, compared to the national performance of 85.6 percent.

Before the passage of WIOA, CO DVR required that the IPE be developed within 120 days from the date on which eligibility was determined. Effective July 22, 2014, VR agencies were required to develop an IPE within 90 days from the date of eligibility determination for all individuals

served. In FFYs 2014, 2015, and 2016, the percentage of individuals for whom an IPE was developed within 90 days increased from 63 percent, to 64 percent, and then to 65.8 percent, respectively, well below the 75.1 percent for combined agencies nationally. Similar results occurred for youth under age 25. In FFY 2014, 73 percent of individuals under age 25 at exit had an IPE developed within the 90-day time frame. This percentage increased to 78 percent in FFY 2015 and then decreased to 74.2 percent in FFY 2016, which is slightly below the national performance for combined agencies of 75.79 percent. The results for individuals in supported employment were similar, with 73.7 percent of such individuals completing an IPE within the 90-day time standard in FFY 2014, 74 percent in FFY 2015, and 73.2 Percent in FFY 2016, compared to 81 percent for combined agencies nationally. For individuals in supported employment under age 25 at exit, the results decreased from 77.3 percent meeting the 90-day standard in FFY 2014 to 63.3 percent meeting the standard in FFY 2016.

When asked about extensions to the 90 day requirement, CO DVR reported that the AWARE system alerts VR counselors when IPE development takes longer than 90 days and produces a letter to be sent to individuals for notification and signature. Upon investigating the AWARE system during the case review process, this function was noted but it was not possible to investigate each case to determine if the extension was completed due to the scope of the internal controls review.

Standard Occupational Codes for Individuals Who Achieved Employment Outcomes

The distribution of outcomes across the standard occupational classification codes for the years reviewed was quite broad, with individuals achieving outcomes in a wide variety of employment categories. The largest percentage of individuals were employed in office and administrative staff support, with 602 individuals, or 23.7 percent, in FFY 2016, with an average hourly wage of \$9.90. Transportation and material moving was second with 391 individuals, or 15.4 percent, achieving an employment outcome in this category, with an average hourly wage of \$9.00. Food preparation and serving was the third most represented classification, with 275 individuals achieving employment in this occupational group, or 10.8 percent, in FFY 2016, with an average hourly wage of \$8.67. The fourth most common employment outcome was in the classification of personal care and service, with 189 individuals, or 7.4 percent, in FFY 2016, with an average hourly wage of \$9.00.

C. Internal Controls

- **Data Integrity Review:** During the on-site monitoring visit, RSA conducted a service record review of 30 randomly chosen case files from RSA-911 data submitted to RSA by CO DVR. The purpose of this review was to determine the integrity of the documentation in the paper file by comparing it with the data in the agency's case management system. To determine the reliability of the data, two staff members from the RSA review team and two staff members from the agency's quality assurance (QA) team, who were familiar with the electronic case management system, divided the 30 folders between the

two teams, with each team comprised of one staff person from the agency and one staff person from RSA. The eight data elements reviewed included: date of application, date of eligibility determination, date of IPE development, start date of employment, weekly earnings at exit or closure, employment status at closure, type of closure, and date of closure. After completing the review of the files, RSA determined that some data in the case management system were not consistent with the information in the paper files. Of the 30 files reviewed, 18 files had discrepancies in six of the eight elements, four files had inconsistent dates for Start Date of Employment in Primary Occupations, and four files had inconsistent dates for Employment Status at Closure when the dates from the case management system were compared with the information in the paper file.

- **Data Integrity Procedures:** To obtain and maintain the data integrity of the program, the Director of CO DVR hired a QA specialist who meets with the Senior Leadership Team (SLT) on a quarterly basis to review the results from the QA Reviews that are completed throughout the performance year (April-March). The aims of these meetings are to identify trends and patterns in service delivery, and to identify any issues that may be occurring at the statewide, regional, office, or individual counselor level.

CO DVR Supervisors and Lead Counselors complete QA Reviews using a survey review tool that was designed to evaluate cases for compliance with Federal regulations and State policy and procedures. All CO DVR casework is reviewed as part of the QA Review process. Regional Managers use QA Reports provided during the quarterly Assurance meetings to identify areas of need within their respective regions. Upon completion of the quarterly QA meetings, the QA Specialist provides District Supervisors with a list of issues which are used to define the structure of trainings and guidelines for supervisory meetings with the staff.

Additionally, Regional Managers and District Supervisors use QA Review results as one component of the process to determine if individual staff members require performance improvement plans and/or corrective actions. Operationally the SLT reviews the QA Review data as part of the process of determining if a service delivery policy is unclear or needs revision. When a need to revise or clarify a policy is identified, the area of concern is given to the CO DVR Policy Advisory Committee for further consideration and to make adjustments as needed.

D. Analysis of Performance and Observations

RSA's review and analysis of the performance of CO DVR in this focus area resulted in the following observations.

2.1 Quality of Employment Outcomes

Observation: Despite the significant increase in the rehabilitation rate and the number of individuals obtaining employment during the review period, there was not a concurrent improvement in the quality of employment outcomes.

- The percentage of applicants increased by 27% from 5,634 in FFY 2014 to 7,719 in FFY 2016. This increase in applicants took place during the same time that CO DVR eliminated 1,429 individuals from the OOS waiting list. This combination of increased applicants and elimination of the waiting list was reflected in the increase of the total individuals found eligible in FFY 2015, which were 6,862 more than the previous year. In addition, those who exited without employment but after eligibility and before signing an IPE and before receiving services in FFY 2015 increased to 4,072 or 54 percent, slightly over half of all individuals whose cases were closed in that year. While these trends are of concern, further analysis shows that in FFY 2014, 1,704 individuals exited the program with an employment outcome, and in FFY 2016, that number increased to 2,545, resulting in an increase in the employment rate from 43.6 percent in FFY 2014 to 62.7 percent in FFY 2016.
- Despite this substantial improvement in the employment rate and overall employment outcomes, performance was not as strong for those measures indicating the quality of those outcomes, such as the average hourly wage earned, or the average number of hours worked in a week. The Average hourly wage grew only slightly from \$11.81 in FFY 2014, to \$11.87 in FFY 2016, just above the national performance for combined agencies of \$11.84. The median wage for those with a competitive employment outcome in FFY 2016 was \$10.00 per hour. The average hours worked dropped from 28 in FFY 2014 to 26.8 in FFY 2016.
- The decrease in the quality of employment outcomes may be due, in part, to the relatively short time individuals are receiving services under an IPE. A large number of those who achieved employment did so in a relatively short period of time. In FFY 2016, the percentage of individuals who were in plan for four to six months rose sharply from 1.3 percent in FFY 2014 to 27.5 percent in FFY 2016, a substantially higher percentage compared to the national performance of 12.6 percent for combined agencies.
- Less time in plan equates to fewer services that might lead to employment outcomes that can represent the beginning of a career. For example, data show a significant decrease in all individuals served who participated in postsecondary education with the support of CO DVR during the same time period. The numbers of individuals receiving four-year university training and individuals receiving community college training have consistently decreased during this time period. In FFY 2014, individuals receiving either four-year university or community college training represented 14.1 percent of individuals whose service records were closed; in FFY 2016 this percentage dropped to 7.0 percent, while the national performance for combined agencies was 16.7 percent in that FFY.

E. Recommendations

RSA's review of the performance of the VR program in this focus area resulted in the following recommendations. Appendix C of this report indicates whether or not the agency has requested technical assistance to enable it to implement any of the below recommendations.

RSA recommends that CO DVR:

2.1 Quality of Employment Outcomes

- 2.1.1 Improve the quality of employment outcomes for individuals being served, including youth with disabilities, and individuals with the most significant disabilities who require supports to achieve their vocational goal;
- 2.1.2 Develop goals and strategies targeting the quality of employment outcomes;
- 2.1.3 Review the nature and scope of the delivery of VR services that correlate to employment outcomes that can lead to a career, or advancement in employment, and identify potential barriers to access or use of these services on the part of VR program consumers; and
- 2.1.4 Identify effective strategies for employing labor market information at the field level and through the work of the business outreach specialists to assist VR consumers in finding career path employment opportunities.

F. Findings and Corrective Actions to Improve Performance

RSA's review of the performance of the VR program in this focus area resulted in the identification of the following findings and corrective actions to improve performance. Appendix C of this report indicates whether or not the agency has requested technical assistance to enable it to implement any of the below corrective actions.

2.1 Timely Determination of Eligibility

Issue: Did CO DVR make eligibility determinations within the required 60-day time frame from the date of application during the review period.

Requirement: Under 34 CFR §361.41(b)(1), CO DVR must make eligibility determinations for individuals who have submitted an application for VR services, including applications made through common intake procedures in one-stop centers under section 121 of WIOA, within 60 days, unless there are exceptional and unforeseen circumstances beyond the agency's control and the individual and CO DVR agree to a specific extension of time or an exploration of the individual's abilities, capabilities, and capacity to perform in work situations is carried out in accordance with 34 CFR §361.42(e).

Analysis: RSA analyzed the length of time it took for CO DVR to make eligibility determinations after individuals completed an application for VR services, and CO DVR

demonstrated a marked increase in the percentage of individuals meeting the standard over the three years reviewed. The percentage of individuals served who were determined eligible within 60 days from the date of application increased from 72.7 percent in FFY 2014 to 83.7 percent in FFY 2015, and in FFY 2016 the percentage increased to 89.9 percent, compared to 82.6 percent for combined agencies nationally in FFY 2016. The percentages for youth under age 25 at exit who met the 60-day eligibility standard and the percentages of individuals in supported employment who met the standard were higher than for all individuals, with percentages in FFY 2016 increasing to over 90 percent. Nevertheless, CO DVR did not consistently meet the standard for all three years reviewed.

Conclusion: Based on the analysis of the data provided, CO DVR did not consistently comply with the requirement of 34 CFR §361.41(b)(1) because it did not make all eligibility determinations in a timely manner, namely within the required 60-day time standard.

Corrective Action Steps: CO DVR must:

- 2.1.1 Submit the action steps that CO DVR will take, including timelines, to ensure that eligibility determinations are made in a timely manner pursuant to 34 CFR §361.41(b)(1).
- 2.2 Timely development of the IPE

Issue: Did CO DVR develop IPEs within the required 90-day timeframe during the review period.

Requirement: Pursuant to 34 CFR§361.45(e), CO DVR must develop IPEs within 90 days from the date on which an individual is determined eligible for VR services, unless CO DVR and the individual agree to a specific extension of time and date by which the IPE will be completed.

Analysis: RSA analyzed the length of time it took for CO DVR to develop IPEs for individuals determined eligible for VR services. In particular, FFY 2016 data reported by CO DVR on the RSA-911 show that:

- Only 65.8 percent of all individuals served whose cases were closed had an IPE developed within the required 90-day period;
- Only 74.2 percent of individuals under the age of 25 at exit whose cases were closed had an IPE developed within the required 90-day period; and
- Of the individuals who achieved an employment outcome with supports, only 73.2 percent had IPEs developed in 90 days, while for those individuals under the age of 25 at exit who achieved an employment outcome with supports, only 63.3 percent had an IPE developed within the required 90-day period.

During the onsite visit, CO DVR management informed RSA that the opening of all categories under the OOS and moving 9,000 eligible consumers into active status in a 15-month period created challenges, particularly with respect to the development of the IPE. To address this

problem, teams consisting of selected VR counselor volunteers and regional supervisors reviewed the progress of IPEs being completed, and the counselors for those cases with IPEs that were nearing or surpassing the 90-day time frame were informed by email of the need to complete the IPE or apply for an extension. Senior management met twice a month to monitor the agencies performance and develop solutions that would improve the timely development of the IPE.

Conclusion: As the FFYs 2014-2016 data demonstrate, CO DVR did not comply with the requirement of 34 CFR §361.45(a)(1) because it did not develop all IPEs in a timely manner, namely within the required 90-day period pursuant to 34 CFR §361.45(e). During the on-site review, CO DVR demonstrated to the RSA team its data analysis process and shared some of its more recent performance results from FFY 2017, which indicate the agency's efforts to address the issue of timely IPE development were having a positive effect.

Corrective Action Steps: CO DVR must:

- 2.2.1 Submit the action steps that CO DVR will take, including timelines, to ensure that IPEs are developed in a timely manner pursuant to 34 CFR §361.45(e) as required by 34 CFR §361.45(a)(1).

G. Technical Assistance

During the course of monitoring activities, RSA provided technical assistance to CO DVR as described below, and in several instances indicated here, this technical assistance has continued after the review.

- RSA and CO DVR discussed the decrease of career-focused training services being provided to individuals. Comparing FFY 2016 to FFY 2014 shows a significant decrease in the provision of training services that have the potential to prepare individuals for employment in careers and that can allow for greater earning potential and employer-provided benefits. CO DVR indicated during this discussion that during the fiscal years under review the VR agency focused on providing services to those who moved from the waiting list into active status, the significant increase in applications to the agency at that time, and resolving the findings from a recent State Audit. Moving forward, CO DVR will work with its Business Outreach staff and utilizing Labor Market Survey's to identify the training and educational programs that will provide the skills necessary for employment leading to careers.
- During the on-site review, RSA and CO DVR discussed the significant increase in the number of individuals who exited the VR program with employment after the development of an IPE in less than one year. In FFY 2014, 19.9 percent of individuals moved from IPE to a closure with employment in 12 months or less, but in FFY 2016, this increased to 69.2 percent. CO DVR recognized the decline in long-term training and educational services being provided and understood that the rapid movement through the system may result in employment outcomes of lesser quality. CO DVR will work with

RSA to identify strategies to support vocational goals leading to careers, when appropriate.

- During the on-site review, RSA conducted the case review of 30 randomly chosen consumer files from the RSA 911 submitted by DVR. After completing the review of these data, RSA determined that the integrity of the data could be improved considerably in the area of consistency between the paper files and the case management system files. Of the 30 files, 18 files had discrepancies in six of the eight elements, with the IPE dates and the Start of employment dates having the most errors. The agency explained that, for example, if the counselor enters the start date a few days later into the case management system, the counselor cannot back-date the start date to the date indicated in the paper file. CO DVR will work with RSA to identify strategies that will correct this problem.

SECTION 3: FOCUS AREA – TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES FOR STUDENTS AND YOUTH WITH DISABILITIES

A. Nature and Scope

Through the implementation of this focus area, RSA assessed the VR agency performance and technical assistance needs related to the provision of transition services, including pre-employment transition services, to students and youth with disabilities and the employment outcomes achieved by these individuals. For purposes of the VR program, “transition services” are defined as a coordinated set of activities for a student or youth with a disability, designed within an outcome-oriented process that promotes movement from school to post-school activities, including post-secondary education, vocational training, competitive integrated employment, supported employment, continuing and adult education, adult services, independent living, or community participation.

The Act, as amended by WIOA, places heightened emphasis on the provision of services, including pre-employment transition services, to students and youth with disabilities to ensure they have meaningful opportunities to receive training and other services necessary to achieve employment outcomes in competitive integrated employment. Pre-employment transition services are designed to help students with disabilities to begin to identify career interests that will be explored further through additional VR services, such as transition services.

“Pre-employment transition services,” defined in section 7(30) of the Act and 34 CFR §361.5(c)(42), include both required activities and authorized activities specified in section 113 of the Rehabilitation Act and in 34 CFR §361.48(a). Pre-employment transition services also include pre-employment transition coordination activities. Section 113(a) of the Rehabilitation Act requires that VR agencies provide, or arrange for the provision of, pre-employment transition services to students with disabilities who are eligible or potentially eligible for VR services. The term “potentially eligible” is specific to the provision of pre-employment transition services but is not defined in the Rehabilitation Act. A “student with a disability,” as defined in section 7(37) of the Rehabilitation Act and 34 CFR §361.5(c)(51), includes the minimum age for the receipt of pre-employment transition services, the minimum age for the provision of transition services under IDEA, and the maximum age for the receipt of services under IDEA; thus, the implementing definition of “student with a disability” may vary from State to State.

“Youth with a disability” is defined in section 7(42) of the Rehabilitation Act and in 34 CFR §361.5(c)(58) as an individual with a disability who is age 14 through 24. The distinction between the definitions of “student with a disability” and “youth with a disability” is critical for purposes of the various authorities for providing transition-related services, including pre-employment transition services.

During the monitoring process, RSA and the VR agency jointly reviewed applicable data and documentation related to transition and pre-employment transition services, which included:

- State educational agency (SEA) and local educational agency (LEA) agreements;
- Policies and procedures related to the provision of transition services, including pre-employment transition services;
- Sample third-party cooperative arrangement (TPCA) contracts for the provision of pre-employment transition services;
- An on-the-job training agreement;
- Assurance 4(c) and descriptions (j), (m), and (o), and any other relevant information from the most recently submitted VR services portion of the Unified or Combined State Plan;
- Information related to the most recent comprehensive statewide needs assessment (CSNA); and
- Timesheets and invoices for tracking expenditures for the provision of pre-employment transition services for purchased services and services provided by VR agency personnel under section 113 of the Rehabilitation Act and 34 CFR §361.48(a) for the provision of pre-employment transition services.

In gathering information related to the provision of transition services, including pre-employment transition services, RSA consulted:

- The VR agency director and other senior managers;
- VR agency fiscal officers and staff;
- VR agency counselors;
- VR agency transition coordinators and staff; and
- Educational agencies.

B. Overview

Transition services, including pre-employment transition services, for students and youth with disabilities provided by CO DVR are coordinated by the newly formed transition and youth services unit, which reports to the CO DVR Director. The transition and youth services unit recently acquired a transition and youth services unit manager who provides technical assistance regarding transition and pre-employment transition services, as well as oversees and manages three lead VR counselors. The three lead VR counselors are assigned to high schools throughout the local school districts and manage youth-focused caseloads while providing training and mentoring on a regional basis. CO DVR hopes to add more VR counselors who manage solely youth-focused caseloads in the near future. CO DVR has been proactive in updating the transition section of the policy manual, which includes pre-employment transition services, and training has been provided to VR counselors on a statewide basis.

Every supervisor and VR counselor has responsibility to be a liaison with the local school districts, cultivate relationships, and provide education and information to partners. CO DVR has assigned specific staff to function as liaisons and service providers with each school district in

the State. VR counselors keep track of provision of the five required pre-employment transition services by submitting monthly time sheets, which are entered into the KRONOS time keeping system by a time keeper. Each VR counselor must submit this monthly time sheet whether or not pre-employment transition services were provided, and it is estimated that 70 to 80 percent of the district liaisons have some type of pre-employment transition activity to report each month.

Transition and pre-employment transition client services are authorized in the AWARE system and paid from the CORE financial system. AWARE has the ability to report on the specific services provided, to include pre-employment transition services; however, KRONOS does not have this capability at this time even though it does contain the data provided by individual VR counselors. Additional safeguards are programmed within each system to ensure that only pre-employment transition services are charged to the 15 percent reserve and to ensure that administrative costs are not charged to the 15 percent reserve.

CO DVR has entered into TPCAs with school districts and Boards of Cooperative Education (BOCEs) to develop programs that provide transition and pre-employment transition services for students and youth with disabilities, including the School to Work Alliance Program (SWAP). SWAP specialists are employees of the local districts and BOCEs, which are Colorado's educational service agencies. The BOCEs provide technical assistance, training, monitoring, and product development and dissemination. Aspects related to the fiscal administration of SWAPs will be discussed in section 5 of this report pertaining to the allocation and expenditure of VR and supported employment resources.

School to Work Alliance Program (SWAP)

In addition to being provided by VR counselors, transition services, including pre-employment transition services, for students and youth with disabilities are also provided through SWAP sites. CO DVR currently has 36 SWAP sites, which means that CO DVR has 36 TPCAs to provide transition/pre-employment transition services in the State. These sites involve approximately 130 of Colorado's 178 school districts and serve over 2,500 youth annually. SWAP is a collaborative initiative between CO DVR and local school districts and is supported by the Colorado Department of Education (CDE). A joint training with VR counselors and SWAP specialists was scheduled to take place after this on-site review to further discuss changes to service provision put in place by WIOA, such as the addition of pre-employment transition services.

SWAP provides year-round individualized services to assist students (ages 15-21) and youth (ages 15-24) with disabilities on their career path through pre-employment transition services and youth services that will lead to employment and self-sufficiency. These services may include job exploration, work-based learning experiences, post-secondary education counseling, workplace readiness training, self-advocacy and vocational counseling and guidance, job development, job placement, on-the-job training and job-site support. SWAP promotes an "employment first" approach that acts as a bridge between the education and CO DVR systems to enhance transition services while supporting individuals in obtaining career entry level positions that lead to self-sufficiency. Reportedly, with the provision of pre-employment

transition services, the focus on employment is shifting toward providing work-based learning experiences and more meaningful opportunities to receive training and other services necessary to achieve employment outcomes in a competitive integrated setting.

Referrals to SWAP can be made from the schools through the individualized education programs (IEPs) or the 504 process, through a CO DVR counselor, or directly to a SWAP office. The appropriate time for referral is when a student's or youth's primary focus is employment and the student or youth is available for services. Pre-employment transition services are available to students who are potentially eligible, but all youth with a disability who receive youth services under the SWAP program must be eligible participants of the VR program. School records are provided by SWAP specialists for SWAP participants and the IPE is developed and approved by the VR counselor for those participants who apply for services and are found eligible by the VR counselor. All SWAP services are provided under the guidance and approval of a CO DVR counselor.

Since the SWAP contracts reportedly only cover 130 of Colorado's 178 school districts and CO DVR has not applied for a waiver of statewideness, the agency was asked how SWAP is provided on a statewide basis. CO DVR indicated that even though district participation varies, services similar to those provided by SWAP are available in all areas of the State on an as-needed basis. This means that SWAP specialists may travel to a neighboring district that does not have a SWAP contract to provide SWAP services, or similar services may be provided to the student or youth in need of such services in an effort to promote client choice. In areas where districts cannot sustain a program (e.g., schools with minimal enrollment or areas where the economy does not warrant investment in such programs), CO DVR reports that it strives to extend services from existing SWAP programs through the LEAs and that LEAs may also choose to extend services to neighboring districts through a memorandum of understanding (MOU) outside of a SWAP contract based on student need and the ability of the district to cover additional students.

C. Analysis of Performance and Observations

RSA's review and analysis of the performance of CO DVR in this focus area resulted in the following observations:

3.1 Quality of Employment Outcomes for Youth under Age 25 at Exit

Observation: Despite the fact that the employment rate for youth under the age of 25 at exit was better than the national performance for combined agencies, the quality of employment outcomes achieved by this population was poorer than the national performance, which may be attributed, in part, to CO DVR's focus on short-term services and a lack of emphasis on postsecondary education.

- Data show that the employment rate for individuals under age 25 at exit went from 53.9 percent in FFY 2014 to 67.96 percent in FFY 2015, and then went down slightly to 64.06 percent in FFY 2016, which was still higher than the employment rate for individuals in

this age group for combined agencies (54.85 percent). Further, the number of individuals under age 25 at exit who achieved competitive employment outcomes consistently increased after the agency eliminated the OOS waiting list, with the FFY 2016 percentage (99.66 percent) higher than the national percentage for combined agencies (97.55 percent).

- Although data show that the total number of individuals under age 25 at exit served by CO DVR and the number of competitive employment outcomes for this group increased from FFY 2014 through FFY 2016, a large number of these individuals who achieved employment did so in a relatively short period of time. In FFY 2014, only 2.4 percent of the individuals under age 25 at exit whose service records were closed had an elapsed time from IPE development to closure of 4-6 months. This percentage rose sharply to 33.57 percent in FFY 2015, falling to 28.1 percent in FFY 2016, which was substantially higher than the national percentage of 8.9 percent among combined agencies.
- Additionally, comparatively few individuals under age 25 at exit participated in postsecondary education and long-term training programs with the support of CO DVR during the same period of time. The percentage of individuals under age 25 at exit receiving four-year university training consistently decreased over the three-year period (2014-6.1 percent; 2015-4.2 percent; and 2016-2.8 percent). CO DVR's provision of this service in FFY 2016 is also lower than the national percentage of 9.9 percent for combined agencies.
- Possibly as a result of this apparent focus on short-term services and a lack of postsecondary education, the majority of the jobs obtained by individuals under age 25 at exit were of a lower quality during the period under review. In FFY 2016, data show that the average hourly wage earned by this group was \$9.77 per hour, which was less than the national performance for this population of \$10.12 for combined agencies. According to standard occupational classification (SOC) codes, the top three jobs obtained by individuals under age 25 at exit in FFY 2016 were Office and Administrative Support Occupations (26.7 percent), Transportation and Material Moving Occupations (19.3 percent), and Food Preparation and Serving Related Occupations (15.6 percent).

3.2 Provision of Pre-Employment Transition Services

Observation: CO DVR provides required pre-employment transition services to eligible and potentially eligible students with disabilities, but at the time of the review, was not effectively tracking these services, particularly authorized and pre-employment coordination activities.

- When asked if all five of the required pre-employment transition services activities are provided to all eligible and potentially eligible students with disabilities throughout the State, CO DVR reported that VR counselors and SWAP sites do provide all of the five required activities throughout the State; however, authorized and pre-employment transition coordination activities are not being provided concurrently. CO DVR reported that in an effort to provide these services, potentially eligible students are being identified through a recently developed forecasting model.

- During the onsite review, 34 CFR §361.48(a) was analyzed for authorized and pre-employment transition coordination activities CO DVR may already be providing in relation to potentially eligible students with disabilities throughout the State that could count toward the 15 percent reserve. Since the onsite review, CO DVR has released guidance to staff on tracking coordination activities that staff have already been providing during the implementation of the required activities.

D. Recommendations

RSA's review of the performance of the VR program in this focus area resulted in the following recommendations. Appendix C of this report indicates whether or not the agency has requested technical assistance to enable it to implement any of the below recommendations.

RSA recommends that CO DVR:

3.1 Quality of Employment Outcomes

- 3.1.1 Continue to evaluate the reasons behind the low number of youth receiving postsecondary education and training; and
- 3.1.2 Continue to develop and implement strategies to address the focus on short term services and a lack of postsecondary education among youth in order to provide more meaningful opportunities for training and other services necessary for youth to achieve employment outcomes in a competitive integrated setting.

3.2 Provision of Pre-employment Transition Services

- 3.2.1 Continue to analyze 34 CFR §361.48(a) to identify pre-employment transition coordination and authorized activities CO DVR may already be providing in relation to potentially eligible students with disabilities throughout the State that could count toward the 15 percent reserve; and
- 3.2.2 Develop and implement strategies based on the estimated number of all eligible and potentially eligible students with disabilities throughout the State so that required, authorized, and coordination activities can be provided concurrently and counted toward the 15 percent reserve.

E. Findings and Corrective Actions to Improve Performance

RSA's review of the performance of the VR program in this focus area did not result in the identification of any findings and corrective actions to improve performance.

F. Technical Assistance

During the course of monitoring activities, RSA provided technical assistance to CO DVR as described below.

- RSA provided technical assistance on the revision of agreements and policies on pre-employment transition services. The RSA review team explained that CO DVR must update its formal interagency agreement with the State educational agency to provide for the requirements in 34 CFR §361.22(b), as well as requirements related to the coordination and provision of pre-employment transition services in §361.48(a). Further, the RSA review team explained that 34 CFR §361.50 states that VR agencies must develop written policies governing the nature and scope of each of the VR services, including policies related to SWAP, and the criteria under which each service is provided. Including the revised policies and procedures related to SWAP in the formal interagency agreement between CO DVR and CDE will help the agencies partner more effectively and further emphasize complementing versus duplicating services provided by both CO DVR and SEA/LEAs. Updating this policy will also help CO DVR shift the focus of SWAP from an employment first model toward providing work-based learning experiences and more meaningful opportunities for youth to receive training and other services necessary to achieve employment outcomes in a competitive integrated setting.
- RSA provided technical assistance on whether individuals who are potentially eligible can receive services through a TPCA. In accordance with 34 CFR §361.48(a), students with disabilities who are potentially eligible for services from the VR program may receive the five required pre-employment transition services activities (34 CFR §361.48(a)(2)) regardless of whether they have applied or been determined eligible for VR services (34 CFR §361.48(a)(1)). Furthermore, the preamble to the regulations at 81 FR 55629 states that DSUs may enter into TPCAs for the provision of group transition services or pre-employment transition services so long as all requirements of 34 CFR §361.28 are satisfied.
- RSA provided technical assistance on how to use the estimate provided by the forecasting model of potentially eligible students who have disabilities throughout the State to CO DVR so that required, authorized, and coordination activities outlined in 34 CFR §361.48(a) can be provided concurrently and counted toward the 15 percent reserve. The review team explained that, pursuant to section 113(b) and (d) of the Act and 34 CFR §361.48(a)(2) and (4), the State must use funds reserved in accordance with section 110(d)(1) of the Act and 34 CFR §361.65(a)(3) to provide “required” pre-employment transition services and coordination activities related to those pre-employment transition services. If funds remain after the provision of these services, the State may expend remaining reserved funds on those “authorized” pre-employment transition services described in section 113(c) of the Act and 34 CFR §361.48(a)(3). The review team explained that the analysis should include those authorized and coordination activities that CO DVR may already be providing in relation to potentially eligible students that could count toward the 15 percent reserve.

CO DVR has requested additional technical assistance in the following areas:

- CO DVR requested further technical assistance on how to use the estimate of all eligible and potentially eligible students who have disabilities throughout the State so that required, authorized, and coordination activities outlined in 34 CFR §361.48(a) can be

provided concurrently and counted toward the 15 percent reserve. RSA along with the WINTAC will provide further technical assistance on these issues.

SECTION 4: FOCUS AREA – STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM

A. Nature and Scope

Through this focus area, RSA assessed the Supported Employment program, authorized under title VI of the Rehabilitation Act, as amended by WIOA, and regulations in 34 CFR part 363. The Supported Employment program provides grants to assist States in developing and implementing collaborative programs with appropriate entities to provide programs of supported employment services for individuals with the most significant disabilities, including youth with the most significant disabilities, to enable them to achieve a supported employment outcome in competitive integrated employment. Grants made under the Supported Employment program supplement grants issued to States under the VR program.

WIOA made several significant changes to title VI of the Rehabilitation Act that governs the Supported Employment program. The amendments to title VI are consistent with those made throughout the Rehabilitation Act to maximize the potential of individuals with disabilities, especially those individuals with the most significant disabilities, to achieve competitive integrated employment and to expand services for youth with the most significant disabilities.

The changes to the Supported Employment program made in the Rehabilitation Act, as amended by WIOA, covered in this focus area include:

- The extension of the time frame for the provision of supported employment services from 18 to 24 months (section 7(39)(C) of the Rehabilitation Act, 34 CFR §361.5(c)(54)(iii), and 34 CFR §363.50(b)(1));
- The requirement that supported employment must be in competitive integrated employment or, if not in competitive integrated employment, in an integrated setting in which the individual is working toward competitive integrated employment on a short-term basis (section 7(38) of the Rehabilitation Act, and 34 CFR §363.1);
- The requirement that supported employment funds and/or VR program funds be available for providing extended services to youth with the most significant disabilities for a period of time not to exceed four years, or until such time that a youth reaches the age of 25 and no longer meets the definition of “youth with a disability,” whichever occurs first (section 604(b) of the Rehabilitation Act and 34 CFR §363.4(a)(2)); and
- The reduction of the amount of funds that may be spent on administrative costs (section 606(b)(7)(H) of the Rehabilitation Act and 34 CFR §363.51).

To facilitate the provision of monitoring and technical assistance activities, and in preparation for the on-site visit, the RSA and CO DVR reviewed applicable documentation and resources related to the Supported Employment program, including, but not limited to:

- VR agency policies and procedures related to the provision of supported employment and extended services;
- Third-party cooperative arrangements and/or cooperative agreements with employers, State agencies, private nonprofit organizations, and other groups that fund extended services;
- Third-party cooperative arrangements and/or cooperative agreements with supported employment vendors and associated community rehabilitation programs (CRPs);
- Supported employment assurances 5, 6, and 7 and descriptions e, j.1.A, k.2.B, l.2, n, o, p, and q and any additional information from the VR services portion of the most recently approved Unified or Combined State Plan;
- Procedures to limit expenditures on administrative costs to 2.5 percent of the State's supported employment award; and
- Performance data related to the number and percentage of individuals with the most significant disabilities receiving supported employment services and achieving supported employment outcomes.

In gathering information related to this focus area, the review team consulted:

- The VR agency director and other senior managers;
- VR agency counselors;
- VR agency supported employment coordinators and staff;
- Supported employment vendors and associated CRPs; and
- Entities with which the VR agency has third-party cooperative arrangements.

B. Overview

CO DVR has contracted with CRPs for much of the direct service provision to individuals who require supports or youth under age 25 who need extended services to achieve a vocational goal. CO DVR has 15 contracts statewide for supported employment – 12 are with community mental health centers, 2 are with sole providers in rural areas, and 1 is a private non-profit.

Most of these CRPs utilize a version of the Dartmouth model, referred to by CO DVR as IPS, the evidence-based individual placement and support model, which focuses on moving individuals into the employment setting as quickly as possible, and not waiting for treatments or medical interventions to be completed. The goal of these CRPs is to have individuals who indicate upon referral that they are interested in work to be in front of a hiring manager within 30 days. This model employs a zero exclusion approach, meaning that no one is turned away even if they require medical or mental health interventions in order to fully achieve their vocational goal. The model operates with the assumption that engagement with the employment setting provides structure and support that facilitates recovery and stabilization for those individuals who need treatments or interventions. This approach so far appears to be improving CO DVR's performance on measures including timeliness of VR process benchmarks and provision of VR services, as well as employment outcomes. Of the 15 mental health centers with which DVR has

contracts, nine implement the IPS model; two of these contracts were recently added to the roster of supported employment service providers.

There is an IPS steering committee, the purpose of which is to ensure the process is as smooth as possible. The priority of the steering committee is to make processes more seamless. CO DVR asserted that the IPS approach has resulted in more individuals with significant disabilities being served while reducing costs by 36%.

One of the challenges VR counselors face, who work with individuals referred to them from the CRPs using the IPS model, is that the IPS and VR processes do not always mesh easily until the individual is in a plan to achieve a vocational goal. Additionally, VR counselors report that often the individual is stable and successful in their employment by the time they are determined eligible for VR services, making it difficult for VR counselors and the individual consumer to agree on the necessary services to achieve the vocational goal. CO DVR has initiated cross-training between providers and VR counselors and staff to increase understanding of how each program works. As is often the case, turnover is a challenge in the provider community, making it necessary to constantly train new CRP staff on how the VR program works, and in particular, how supported employment works.

As of April, 2017, CO DVR had revised all of its service policies pertaining to the provision of supported employment services, including the provision of services on a short-term basis (when the individual has not yet achieved but is working toward competitive employment), customized employment, and extended services for youth with disabilities. The revised supported employment policies closely adhere to final VR program regulations implementing new provisions in WIOA. CO DVR has implemented a series of trainings to ensure that all VR counselors and staff are familiar with the new policies and are prepared to implement them fully. These trainings will continue through FFY 2017 and into FFY 2018.

At this time CO DVR does not use the option of short term or customized employment, choosing to focus on competitive integrated employment. In discussion with the team, DVR indicated it may need further technical assistance on the option of employment on a short-term basis when an individual has not yet achieved competitive employment, particularly as it looks to work with more individuals who might otherwise have chosen non-competitive employment.

CO DVR leadership, managers, and staff were familiar with, and were fully implementing all requirements regarding the closure of individuals in supported employment in accordance with regulations found at 34 CFR §361.56, §§363.54, and §363.55.

CO DVR revised its supported employment policies and procedures as a result of technical assistance received from RSA to charge VR services to the Title VI grant once the individual is first placed in an employment setting, rather than when a vocational goal with supports is identified on the IPE. The latter practice was discontinued, and VR counselors and supervisors now understand when it is appropriate to charge VR services to the Title VI grant.

CO DVR is using its entire Title VI grant award, and is effectively tracking through its case management system the 50 percent reserve for extended services for youth under age 25. No administrative charges are assessed against the Title VI grant, so there are no concerns with respect to the new 2.5 percent limit on administrative costs for the supported employment program. CO DVR expressed no concerns regarding meeting the new 10 percent match requirement for the 50 percent reserve since it is such a relatively small amount.

Table 5.1.A shows a dramatic spike in the number of individuals achieving an employment outcome with supports from FFY 2014 to FFY 2016, from 133 to 537, respectively, or 7.8 to 21 percent of all outcomes achieved. This is nearly double the national performance of 11.6 percent for supported employment outcomes for combined agencies. CO DVR explained that this is due in large part to the opening of all categories under the OOS in FFY 2015 after all categories had been closed for several years.

At the same time, data in Table 5.5.a shows that 18 percent and 10 percent of individuals who achieved supported employment in FFY 2015 and 2016, respectively, had cases closed with a supported employment outcome in less than three months of IPE development. Similarly, 40 and 36 percent of individuals were closed with a supported employment outcome between four and six months of IPE development in 2015 and 2016, respectively, compared to just three percent in 2014. This trend is not as pronounced for youth under 25, with closer to 30 percent of these individuals exiting within six months. The adoption of the rapid employment IPS model by CRPS likely drives these trends of moving individuals through the VR process and into employment relatively quickly.

Regarding services provided, VR counseling is the most frequently provided VR service to CO DVR's overall supported employment population at virtually 100 percent in each of the three years reviewed, significantly higher than the national performance of 69.5 percent in FFY 2016. This is followed by assessment is the most often provided VR service of those measured in Table 5.2.a, at just over 50 percent across all three years, compared to 61 percent for combined agencies nationally in 2016. The provision of job placement grew over the three years, rising from 30 to 51 percent, above the national performance in 2016 of 45.1 percent.

Table 5.2.a shows that virtually no college, 4-year university, junior college, or occupational or vocational training was provided to individuals achieving an employment outcome with supports. In the case of vocational training, in 2014 17 individuals, or 12.7 percent, received this service, but this then dropped to zero in the subsequent two years. National performance is similarly in the low single digits in terms of the percentage of individuals with a supported employment outcome receiving these services. The rapid employment model, with a strong emphasis on placement, is a likely intervening variable that limited the number of individuals who seek postsecondary training, as well as the nature of the disability types receiving supported employment services.

While on the job, apprenticeship, and academic remedial training was negligible, job readiness training was closer to the national average for combined agencies in FFYs 2014 and 2015, at 15.8 and 14 percent, respectively, with the national percentage being 19.9 percent, but CO DVR

only provided this service to 6.5 percent, or 35 individuals, in FFY 2016. It is unclear as to why the rate for this service dropped in this year.

The provision of benefits counseling dropped from 20 to three percent for this population, just as some services were expanded over the three years under review. The provision of transportation services grew from 12 to 22 percent, but remained below the national performance for combined agencies in FFY 2016 of 28 percent. The number of individuals receiving maintenance tripled to 102 individuals, or 19 percent, but is still below the national performance of 24 percent for combined agencies.

C. Analysis of Performance and Observations

RSA's review and analysis of the performance of CO DVR in this focus area resulted in the following observation.

4.1 Quality of Employment Outcomes for Individuals in Supported Employment

Observation: In general, CO DVR's performance on measures of the quality of employment outcomes achieved by individuals in supported employment was not as strong as compared to the national performance of combined agencies or as compared to CO DVR's performance for all individuals served.

CO DVR recognized that the program did not perform as well on these measures, and noted that this may be due in part to the VR agency's focus on competitive integrated employment, and the rapid employment model, or IPS, utilized by many of the CRPs contracted to provide supported employment services. As noted above, CO DVR's approach is to move individuals as quickly through the process as possible, so that individuals who express interest in employment are in front of an employer or hiring agent within 30 days. CRPs using the IPS model also practice zero exclusion policies, including for individuals with mental health disabilities, which means that individuals are not expected to complete medical interventions or treatment prior to moving into the employment setting. This method appears very effective in achieving goals of participation rates, timeliness of services and the VR process, and outcomes, but may affect the quality of outcomes as measured by wages and benefits earned and hours worked.

The average hourly wage earned by individuals who achieved an employment outcome with supports did not change over the course of the three fiscal years reviewed and remained at around \$9.25 an hour, just under the national performance of \$9.30 for combined agencies in FFY 2016, while the average number of hours per week dropped from 20.3 to 17.5 over the same three years, compared to 22.4 for the national performance for combined agencies. Only 9.1 percent of individuals achieving competitive supported employment outcomes worked more than 35 hours per week, compared to just over 13 percent nationally.

The relatively low hourly wages and average hours worked per week may have affected CO DVR's performance for the number of individuals who achieved an employment outcome with supports that met Social Security's definition of substantial gainful activity, or SGA. The

percentage of individuals achieving an outcome at SGA dropped from 27.8 to 16.5 percent of supported employment outcomes, but more than twice as many individuals met SGA in 2016 than in FFY 2014, with 89 compared to 37 individuals achieving SGA. Thus, while the total number achieving SGA increased, the percentage on the whole declined.

The average wage earned by those under age 25 at exit with a supported employment outcome was close to the overall wage, at \$8.90 in 2016, compared to \$9.25 overall, and just a bit over the national performance of \$8.77. However, average hours worked for this cohort is substantially lower at just over 14 hours per week, while the national performance is 21 hours per week, nearly the same as the national performance for all individuals achieving supported employment outcomes. Only five individuals under age 25 at exit worked more than 35 hours, and just nine individuals under age 25 at exit achieved a vocational goal that met the definition of SGA.

Supported employment outcomes with employer provided medical benefits did not change significantly as a percentage of supported employment outcomes, and is in keeping with the national performance for combined agencies.

D. Recommendations

RSA's review of the performance of the VR program in this focus area resulted in the following recommendations. Appendix C of this report indicates whether or not the agency has requested technical assistance to enable it to implement any of the below recommendations.

RSA recommends that CO DVR:

4.1 Quality of Employment Outcomes for Individuals in Supported Employment

- 4.1.1 Develop strategies to improve its performance on indicators measuring the quality of employment outcomes for individuals pursuing a vocational goal with supports, including improvement in wages, hours worked, and benefits received, as appropriate;
- 4.1.2 Collaborate with CRPs with which it contracts, including those that employ the IPS model, to implement these strategies; and
- 4.1.3 Develop strategies, including cross-training as necessary, to blend the approaches of the IPS model with traditional VR processes to ensure a smooth hand off from CRP to the VR counselor, and to improve the quality of referrals to CO DVR.

E. Findings and Corrective Actions to Improve Performance

RSA's review of the performance of the VR program in this focus area did not result in the identification of any findings and corrective actions to improve performance.

F. Technical Assistance

During the course of monitoring activities, RSA provided technical assistance to CO DVR as described below.

- RSA discussed with CO DVR the timing of when Title VI funds can be used to pay for supported employment services. Previously, CO DVR was unclear that these funds were to be spent once an individual was placed in employment status.
- RSA provided technical assistance on the need to develop policies for the use of integrated employment on a short-term basis and customized employment, despite the agency's disinclination to utilize these services in preference of focusing on competitive integrated employment for all its consumers, including those with the most significant disabilities.

CO DVR requested further technical assistance, as follows:

- CO DVR indicated it may wish to receive further technical assistance on the option of integrated employment on a short-term basis, particularly as it looks to work with individuals with more significant disabilities who might otherwise have gone into non-competitive employment. CO DVR will likely seek assistance on this topic from the WINTAC initially.
- At the time of the review, CO DVR had not yet had the need to provide any extended services for youth under age 25, as such supports are provided through interagency agreements. However, the agency recognizes it may be responsible for more of these services in the future to fill potential gaps in coverage for youth in need of extended services. CO DVR revised its supported employment policies to reflect the new flexibility to provide extended services and will work with WINTAC and RSA to ensure it implements this option appropriately.

SECTION 5: FOCUS AREA – ALLOCATION AND EXPENDITURE OF STATE VOCATIONAL REHABILITATION SERVICES AND STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM FUNDS

A. Nature and Scope

Through this focus area RSA assessed the fiscal accountability of the VR and Supported Employment programs to ensure funds are being used only for intended purposes; programs have sound internal controls and reliable reporting systems; CO DVR is maximizing resources available for program needs; and funds support the achievement of employment outcomes for individuals with disabilities, including youth with disabilities and individuals with the most significant disabilities. RSA reviewed CO DVR'S adherence to Federal fiscal accountability requirements, which include both general administrative and program-specific requirements.

General administrative requirements refer to:

- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) located in 2 CFR §200. These regulations establish the foundation of Federal cost principles and standards for determining costs for Federal awards while reducing the administrative burden on award recipients and guarding against the risk of waste and misuse of Federal funds;
- Education Department General Administrative Regulations (EDGAR) in 34 CFR part 76. These regulations are applicable to Department of Education (Department) grantees and establish uniform administrative rules for the Department's Federal grants to State administered programs; and
- Departmental and RSA guidance, including Policy Directives (PDs), Technical Assistance Circulars (TACs), Grant Bulletins, Frequently Asked Questions (FAQ), etc.

Program-specific requirements refer to the Act and VR and Supported Employment program implementing regulations in 34 CFR part 361 and 34 CFR part 363, respectively. These requirements establish the specific provisions related to the administration and operation of the VR and Supported Employment programs.

In addition to the fiscal accountability requirements covered in this focus area, RSA reviewed fiscal requirements pertaining to the VR program funds reserved for the provision of pre-employment transition services (i.e., the prohibition against the use of these funds for administrative costs) and Supported Employment program funds (i.e., the limit on the use of these funds for administrative costs to 2.5 percent of the award to youth with the most significant disabilities). The nature and scope of this focus area did not include a review of the extent to which States have satisfied the requirements to reserve at least 15 percent of the Federal VR program award for expenditures on pre-employment transition services, to reserve 50 percent of Supported Employment program funds for services to youth with the most significant

disabilities, and to provide a 10 percent match for this amount, or to track expenditures toward these reserves. Instead, in FFY 2017, RSA will provide technical assistance to, and review the progress of, each State toward satisfying these requirements through other processes established by the State Monitoring and Program Improvement Division's (SMPID) Fiscal unit.

RSA used a variety of resources and documents from the period covering FFY 2014 through FFY 2016. Of the issues identified included Federal fiscal years prior to 2014, RSA requested additional information within the statute of limitations. Resources and documentation included data maintained on RSA's Management Information System (MIS) generated from reports submitted by CO DVR (e.g., Federal Financial Reports (SF-425), Annual VR Program/Cost Report (RSA-2), and the VR services portion of the program year 2016 Unified or Combined State Plan). These data were organized into a fiscal profile for each State and shared with the VR agency and served as a reference for discussions regarding the areas covered within this focus area.

The review team reviewed the following documents, as needed, to ensure adherence to accountability requirements (list is not exhaustive):

- A-133 audit findings and corrective actions;
- State/agency allocation/budget documents and annual fiscal reports;
- Agency policies, procedures, and forms (e.g., monitoring, personnel cost allocation, 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 projects, private donations), maintenance of effort (MOE), and program income documentation.

Prior to conducting the review, RSA provided CO DVR with a documentation request that included a list of the documentation that the agency needed to provide prior to the start of the review in a manner that enabled RSA to analyze the documents prior to the on-site visit. The review team requested additional supporting fiscal documents or clarifying information regarding TPCA's, Inter-Agency Agreements and amounts of match per source.

The degree to which the review team addressed each accountability requirement was dependent upon the individual circumstances of the agency. The review team analyzed the information obtained prior to the on-site visit by reviewing the documentation requested, conducting teleconferences, and examining RSA-MIS data to determine the level of review required for each component.

B. Overview

RSA reviewed processes related to expenditure of funds. CO DVR ensures fiscal and programmatic review of expenditures by generally requiring approval from both fiscal and

program experts before expenses are paid. This practice is implemented widely and appears to be an effective method to ensure agency control of funds.

Information learned from this process is utilized to monitor case expenditures at local levels as well as to guide decision making processes at administrative levels. Regional offices monitor expenditures, identify trends, and respond accordingly. Teams of statewide administrative staff meet routinely to monitor program and fiscal data and use this information to inform agency planning. This is particularly important as the agency has recently opened all order of selection (OOS) categories.

Staff time sheets reflect specific duties and time spent on each of the different grant areas. Time spent is certified by supervisors who have knowledge of staff activities. This data is entered into statewide tracking systems (Kronos) which are then used to allocate costs to appropriate cost centers per the approved indirect cost rate.

CO DVR and CDLE representatives were present in many discussions and meetings, often working collaboratively in addressing RSA's questions. It was apparent that CO DVR maintained a close working relationship with CDLE staff.

State appropriation, as a percentage of match from FFY 2014 – 2016, was 57.6 percent, 53.4 percent, and 44.3 percent. The remainder of matching funds is reported as coming almost exclusively from TPCAs. CO DVR has met its match requirement in each of the past three years, in fact CO DVR overmatched in FFYs 2015 and 2016, resulting in matched but unspent VR funds of \$5,865,990 and \$15,051,822, respectively.

Discussions with CO DVR staff indicate the overmatching is due to a combination of factors related, in part, to exiting from OOS. CO DVR anticipated a certain level of Federal expenditures and planned for sufficient match to meet those anticipated service levels. However, consumers returned at a slower rate than anticipated and, as a result, FFY 2015 and 2016 expenditures were lower than anticipated. CO DVR was not able to adjust the match provided to reflect the lower level of expenditures. CO DVR continued to utilize State appropriations as match in FFY 2015 and 2016 (\$5,167,856 and \$3,122,915, respectively).

Discussions with CO DVR staff indicate that they were aware overmatching was possible for FFY 2015 and FFY 2016. Services provided by the TPCAs were deemed valuable and continuing them was a priority. The agency asserted it was not possible to cut back on TPCA's to reduce the amount of match, which led, in part, to the un-spent but matched Federal funds.

C. Analysis of Performance and Observations

RSA's review of the performance of the VR program in this focus area did not result in any observations.

D. Recommendations

RSA's review of the performance of the VR program in this focus area did not result in any recommendations.

E. Findings and Corrective Actions to Improve Performance:

RSA's review of the performance of the VR program in this focus area resulted in the identification of the following finding and corrective actions to improve performance. Appendix C of this report indicates whether or not the agency has requested technical assistance to enable it to implement any of the below corrective actions.

5.1 Prior Approval

Issue: Did CO DVR meet the prior approval requirements in 2 CFR §200.407. This area of investigation is included on page 53 of the MTAG.

Requirements: The Uniform Guidance at 2 CFR §200.407, includes a list of specific circumstances for which prior approval from the Federal awarding agency in advance of the occurrence is either required for allowability or recommended in order to avoid subsequent disallowance or dispute based on the unreasonableness or non-allocability. For example, 2 CFR §200.439(b)(1) states that capital expenditures for general purpose equipment, buildings, and land are unreasonable as direct charges, except with the prior written approval of the Federal awarding or pass through entity. The Uniform Guidance at 2 CFR §200.62(a)(3) also requires the agency have internal control over compliance requirements for Federal awards to demonstrate compliance with Federal statutes, regulations, and the terms and conditions of the Federal award.

On November 2, 2015, the Department of Education adopted the final regulations found in 2 CFR 200 ([Federal Register notice 80 FR 67261](#)). The Department issued notifications to grantees regarding the new requirements and made training and technical assistance documents available to grantees to assist in implementation of the new requirements. To ensure that RSA grantees were aware of the applicability of the prior approval requirements, RSA included a special clause on the FFY 2016 Grant Award Notifications that stated, in pertinent part, "that the prior approval requirements listed in the Uniform Administrative Requirements, Costs Principles, and Audit Requirements for Federal Awards (Uniform Guidance) (2 CFR part 200) are applicable to this award. Grantees are responsible for ensuring that prior approval, when required, is obtained prior to incurring the expenditure. Grantees should pay particular attention to the prior approval requirements listed in the Cost Principles (2 CFR 200 subpart E)." In addition, information regarding the requirements in 2 CFR 200 was communicated to grantees via RSA's listserv on September 23, 2015.

Analysis: Prior to on-site activities, RSA requested the agency's written policies, procedures or processes that ensure the agency was meeting the prior approval requirements. CO DVR was unable to provide this documentation. RSA discussed this requirement further on-site. CO DVR stated that there is no policy addressing prior approval.

Conclusion: CO DVR is not in compliance with 2 CFR §200.407 because it has no policies or practices related to meeting prior approval requirements in 2 CFR §200.407.

RSA requires that CO DVR:

5.1.1 Develop and implement policies and procedures, as well as a written internal control process, including a monitoring component, to ensure ongoing compliance with the prior approval requirements.

F. Technical Assistance

During the course of monitoring activities, RSA provided technical assistance to CO DVR on:

- Allowable and unallowable sources of match (34 CFR §361.60). Information was provided in response to efforts to diversify sources of match;
- Requirements related to period of performance and what criteria are required to allow funds to be obligated after the year of appropriation, i.e. carry over (34 CFR §361.64(b) and 2 CFR §200.77);
- Effect of carry over on pre-employment transition service requirements. In a response to questions, RSA informed CO DVR that the pre-employment transition service reservation requirements can be met in the carry over year, assuming that criteria for carrying over those funds was met in the year of appropriation (34 CFR §361.64(b));
- Pre-employment transition services requirements. RSA responded to questions regarding the legal basis for requiring that funds be reserved and expended (Sections 110(d) and 113 (a) of the Rehabilitation Act);
- The differences between TPCA's and Inter-agency Transfers and how match is generated by the co-operating agency (34 CFR §361.28(c)), the VR agencies role in administrative control (34 CFR §361.28(a)(3)), and the appropriate use of certified time of staff providing direct VR services as match (34 CFR §361.28(c)(2));
- Requirements and guidance related to prior approval (2 CFR §200.77). RSA discussed the types of costs that require prior approval and the process for acquiring that approval. On April 11, 2018, RSA issued Technical Assistance Circular (TAC) 18-02, entitled "Submission procedures for prior written approval requests under the State Vocational Rehabilitation Services Program," and RSA will continue to work with CO DVR to implement procedures consistent with this TAC.
- Methods to address potential MOE penalties. At the time of the review, CO DVR anticipated a potential MOE penalty to be assessed in the summer of 2017. RSA and CO DVR discussed options for addressing the penalty including loss a portion of the 2017 fourth quarter award and/or reduction in future years' Federal awards.

SECTION 6: FOCUS AREA – JOINT WORKFORCE INNOVATION AND OPPORTUNITY ACT FINAL RULE IMPLEMENTATION

A. Nature and Scope

The U.S. Department of Education and the U.S. Department of Labor (collectively, the Departments) issued the WIOA Joint Rule for Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions; Final Rule (Joint WIOA Final Rule) to implement jointly administered activities authorized by title I of WIOA. These jointly-administered regulations apply to all core programs of the workforce development system established by title I of WIOA and are incorporated into the VR program regulations through subparts D, E, and F of 34 CFR part 361.

WIOA strengthens the alignment of the public workforce development system's six core programs by compelling unified strategic planning requirements, common performance accountability measures, and requirements governing the one-stop delivery system. In so doing, WIOA places heightened emphasis on coordination and collaboration at the Federal, State, local, and tribal levels to ensure a streamlined and coordinated service delivery system for job seekers, including those with disabilities, and employers.

Under WIOA, the workforce development system consists of the following six core programs:

- Adult, Dislocated Worker, and Youth programs, authorized under title I;
- Adult Education and Family Literacy Act (AEFLA) program, authorized under title II;
- Employment Service program authorized under the Wagner-Peyser Act, as amended by title III; and
- VR program authorized under title I of the Rehabilitation Act of 1973, as amended by title IV.

Through this focus area, RSA:

- Assessed CO DVR progress toward fulfilling its role as one of the core programs in the workforce development system;
- Identified areas where CO DVR partnership and collaboration with other core programs should be strengthened; and
- Provided technical assistance to CO DVR to assist in implementing the Joint WIOA Final Rule.

This focus area consists of the following topical areas: Governance, Unified or Combined State Plans, One-Stop Operations, and Performance Accountability. To gather information pertinent to these topics, RSA reviewed the Program Year (PY) 2016 Unified or Combined State Plan and sample Memoranda of Understanding and Infrastructure Funding Agreements related to the one-

stop service delivery system, as available. Review teams met with the VR agency director, managers, and personnel, as well as representatives of the Colorado Department of Labor and Employment (CDLE).

B. Overview

CO DVR is represented on the statewide workforce development board by the executive director of the Colorado Department of Labor and Employment (CDLE). The administrator of CO DVR meets with the CDLE executive director on a weekly basis to share concerns and discuss issues regarding VR and the workforce development system. Five of the six core partners of the workforce development system are located within CDLE, resulting in a high degree of collaboration and cross-agency training and awareness. CDLE is host to the core partner steering committee that develops and implements the State plan as well as all aspects of WIOA. There are 24 appointees to the steering committee implementing WIOA across the six core partners. CO DVR conducts quarterly meetings that include training and strategy development and implementation. Employment First is a major focus of CO DVR's efforts so that core partners as well as community providers understand the purpose and goals of the VR program. CO DVR spoke to more than 1,000 Coloradans in the course of its cross-training in preparation for WIOA.

District and regional managers participate on local workforce development boards (LWDBs), and assist in the development of local plans and certification of one-stop centers.

CO DVR participates directly with the development and implementation of the combined State plan through its representation on the WIOA implementation steering committee. CO DVR is preparing to complete its next comprehensive statewide needs assessment, and will consult with its core workforce partners to ensure that strategies and goals deriving from the results are consistent with the strategies and goals of other programs under the combined plan. Labor market information utilized for the joint content requirements of the combined State plan is now part of the tool kit that VR counselors use to assist consumers with job searches and the development of vocational goals.

Colorado VR counselors participated in training on career pathways. Twenty-one emerging sectors have been identified, with particular attention given to developing a talent pipeline into those sectors. At least 15 sector experts have been identified to assist in developing these emerging sector career pathways, including health care, manufacturing, and travel and recreation, among others.

CO DVR is playing a lead role in assessing programmatic and physical accessibility to one-stop job centers. CO DVR is currently revising its MOUs to reflect new requirements under WIOA, with one LWDB developing a model MOU for other LWDBs to utilize. The revised MOUs will be completed in the summer of 2017, and the infrastructural funding agreement (IFA) later the same year.

The WIOA Titles I and III programs are taking the lead on coordinating the submission of the WIOA Annual Statewide Performance Report Template in accordance with 34 CFR§361.160.

New performance measures under WIOA are being incorporated into CO DVR's case management system and for purposes of regular data analysis. Quarterly wage information will be added to the dashboard of elements that VR counselors as well as managers and supervisors will track. CO DVR is working closely with Unemployment Insurance (UI) to develop strong data sharing protocols, including wage information. Collaboration with the national student clearing house is also underway to generate more data sharing, and CO DVR expects to establish a data sharing agreement with the State Workforce Information System to be able to gather wage data from 42 other participating states.

C. Analysis of Performance and Observations

RSA's review of the performance of CO DVR in this focus area did not result in the identification of observations and recommendations.

D. Recommendations

RSA's review of the performance of CO DVR in this focus area did not result in the identification of observations and recommendations.

E. Findings and Corrective Actions to Improve Performance

RSA's review of the performance of the VR program in this focus area did not result in the issuance of findings and corrective actions to improve performance.

F. Technical Assistance

During the course of monitoring activities, RSA provided technical assistance to CO DVR as follows:

The Colorado Division of Vocational Rehabilitation (DVR), which administers the VR program—one of the core workforce development programs that are authorized under the Rehabilitation Act, as amended by title IV of WIOA, is housed in the Colorado Department of Labor and Employment (CDLE). The CDLE also houses the Adult, Youth, Dislocated Worker, and Wagner-Peyser programs—all core workforce development program partners authorized under title I of WIOA. An executive director oversees the CDLE, including five of the six core partners.

While on-site in Denver for its review, RSA learned that CO DVR is represented on the State Workforce Development Board (State Board) by the executive director of CDLE, who also represents the four additional core partners identified above, authorized under title I of WIOA.

Section 101(b)(1)(C)(iii)(I)(aa) of WIOA requires that the State Board be comprised of, among others, representatives from “the lead State officials with primary responsibility for the core programs” (see also 20 CFR 679.110(b)(3)(iii)(A)(1)). The preamble to the final regulations explains further that 20 CFR 679.110(b)(3)(iii)(A)(1)(i) through (iii) were modified for purposes

of the final regulations to make clear that the title II AEFLA and the title IV VR programs must each be represented by a single, unique representative (see 81 FR 56072, 56074 (Aug. 19, 2016)). Therefore, one representative cannot represent all the core programs housed within CDLE as is the case in Colorado.

This policy position by the U.S. Department of Labor (DOL) is consistent with 20 CFR 679.110(e), which requires that State Board members representing core programs, such as the VR program, be individuals who have optimum policy-making authority for the core program that they represent. Pursuant to 20 CFR 679.120(a): a representative with “optimum policy-making authority” is an individual who can reasonably be expected to speak affirmatively on behalf of the entity he or she represents and to commit that entity to a chosen course of action.

Finally, the VR regulations at 34 CFR 361.13(c)(1) specify certain functions that are the sole responsibility of the VR agency, including participation as a partner in the workforce development system. This would include the VR program’s participation on the State Board pursuant to 20 CFR 679.110(b)(3)(iii)(A)(1)(iii) and 20 CFR 679.120(a). The VR program director does not have the authority to delegate this authority to another entity or individual (34 CFR 361.13(c)(2)). As a result, the CO DVR director does not have the authority to delegate to the executive director of CDLE the authority to represent the VR program on the State Board. Therefore, the State Board is not in compliance with section 101(b) of WIOA and 20 CFR 679.110(b)(3)(iii)(A)(1)(iii) of its implementing regulations by having the executive director of CDLE represent the Adult, Youth, Dislocated Worker, and Wagner-Peyser and VR programs on the State Board. After consultation with DOL and the U.S. Department of Education’s Office of Career, Technical, and Adult Education on this matter, RSA recommends that Colorado revise its State Board composition by appointing the director of CO DVR to the State Board to represent the VR program. Enforcement of this matter falls under the jurisdiction of DOL.

CO DVR has requested additional technical assistance in the following areas:

- CO DVR seeks guidance on how far back one should go to establish a baseline when utilizing SWIS data for analyzing wage information;
- CO DVR seeks technical assistance on how to establish a data sharing agreement with UI given that both agencies are in the same department (CDLE);
- CO DVR seeks guidance on how to establish an infrastructure funding agreement (IFA) in situations where VR is not co-located with a one-stop, but nonetheless receives services from that one-stop. RSA will share IFA technical assistance as it is developed; and
- CO DVR seeks technical assistance on how they will measure Effectiveness in Serving Employers, and the methods the core programs will use to measure Effectiveness in Serving Employers – one of the six primary performance accountability measures.

APPENDIX A: PROGRAM AND FISCAL PERFORMANCE DATA TABLES

This appendix contains the program and fiscal performance data tables used throughout the review. Data were drawn from the RSA-113, the RSA-911, and SF-425. The RSA-113 report is a quarterly submission that provides cumulative information at the end of the Federal fiscal year. The data from the RSA-113 cover both open and closed cases as reported to RSA at the end of the Federal fiscal year. The RSA-911 contains only information on cases closed during the Federal fiscal year covered by the report and does not include information related to those cases remaining open in the next Federal fiscal year.

Table 3.1 CO-C Case Status, Exit Status, and Employment Outcomes for All Individuals - FFY 2014-2016

Performance category	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total applicants	5,634		6,105		7,719		511,205	
Total eligible individuals	3,785		10,647		8,461		255,928	
Agency implementing order of selection	Yes		Yes		No		-	
Individuals on order of selection waiting list at year-end	4,078		0		0		11,437	
Individuals in plan receiving services	7,131		7,822		9,187		534,116	
Percent accepted for services who received no services		75.4%		40.6%		25.4%		23.30%
Exited as applicants	479	6.6%	286	3.8%	424	6.4%	29,456	12.3%

Exited trial experience/extended evaluation	37	.5%	25	.3%	22	.3%	1,956	.8%
Exited with employment	1,704	23.4%	1,686	22.4%	2,545	38.3%	82,808	34.6%
Exited without employment	2,205	30.3%	1,187	15.8%	1,515	22.8%	65,276	27.3%
Exited from OOS waiting list	1,429	19.6%	256	3.4 %			3,516	1.5%
Exited without employment outcomes, after eligibility, before an IPE was signed or before receiving services	1,425	19.6%	4,072	54.2%	2,124	32.2%	56,055	23.4%
Total received services	3,909	53.7%	2,873	38.2%	4,060	61.1%	148,084	61.9%
Employment rate	43.6%		58.7%		62.7%			55.9%
Competitive employment outcomes	1,560	91.5%	1,608	95.4%	2,391	93.9%	78,859	95.2%
Supported employment outcomes	133	7.8%	314	18.6 %	537	21.1%	9,673	11.7%
Average hourly earnings for competitive employment outcomes	\$11.81		\$11.44		\$11.87		\$11.84	
Average hours worked for competitive employment outcomes	28.42		26.87		26.88		30.3	
Median hourly earnings for competitive employment outcomes	\$9.51		\$9.23		\$10.00		\$10.00	
Median hours worked for competitive employment	30		25		25		30.0	

outcomes								
Quarterly median earnings	\$3,614		\$3,315		\$3,484		\$3,900.00	

Data sources: RSA-911, RSA 113

Table 3.2.a CO-C VR Training Services Provided for Individuals Served - FFYs 2014-2016

Training Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of individuals served	3,909		2,873		4,060		148,084	
College or university training	9	0.2%	5	0.2%	3	0.1%	1,951	1.3%
Four-year or university training	403	10.3%	277	9.6%	209	5.1%	13,025	8.8%
Junior or community college training	142	3.6%	94	3.3%	72	1.8%	9,790	6.6%
Occupational or vocational training	222	5.7%	78	2.7%	49	1.2%	14,961	10.1%
On-the-job training	50	1.3%	37	1.3%	27	0.7%	2,840	1.9%
Apprenticeship training	5	0.1%	0	0.0%	2	0.0%	83	0.1%
Basic academic remedial or literacy training	26	0.7%	17	0.6%	10	0.2%	2,357	1.6%
Job readiness training	270	6.9%	230	8.0%	221	5.4%	30,291	20.5%
Disability-related skills training	175	4.5%	200	7.0%	184	4.5%	4,642	3.1%
Miscellaneous training	912	23.3%	586	20.4%	453	11.2%	11,595	7.8%

Data source: RSA-911

Table 3.2.b CO-C VR Career Services Provided for Individuals Served - FFYs 2014-2016

Career Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of individuals served	3,909		2,873		4,060		148,084	
Assessment	2,236	57.2%	1,858	64.7%	2,240	55.2%	84,756	57.2%
Diagnosis and treatment of impairment	1,197	30.6%	781	27.2%	740	18.2%	43,641	29.5%

Career Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Vocational rehab counseling and guidance	3,222	82.4%	2,860	99.5%	4,057	99.9%	95,439	64.4%
Job search assistance	1,085	27.8%	1,228	42.7%	1,502	37.0%	49,182	33.2%
Job placement assistance	836	21.4%	980	34.1%	1,005	24.8%	44,189	29.8%
On-the-job supports-short term	529	13.5%	603	21.0%	405	10.0%	20,412	13.8%
On-the-job supports-SE	154	3.9%	318	11.1%	635	15.6%	11,615	7.8%
Information and referral services	93	2.4%	258	9.0%	262	6.5%	33,306	22.5%
Benefits counseling	167	4.3%	105	3.7%	84	2.1%	8,715	5.9%
Customized employment services	155	4.0%	9	0.3%	10	0.2%	928	0.6%

Data source: RSA-911

Table 3.2.c CO-C VR Other Services Provided for Individuals Served - FFYs 2014-2016

Other Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of individuals served	3,909		2,873		4,060		148,084	
Transportation	807	20.6%	603	21.0%	610	15.0%	51,017	34.5%
Maintenance	685	17.5%	439	15.3%	489	12.0%	32,145	21.7%
Rehabilitation technology	454	11.6%	523	18.2%	838	20.6%	24,372	16.5%
Reader services	11	0.3%	14	0.5%	8	0.2%	151	0.1%
Interpreter services	110	2.8%	84	2.9%	106	2.6%	2,590	1.7%
Personal attendant services	8	0.2%	8	0.3%	3	0.1%	247	0.2%
Technical assistance services	60	1.5%	57	2.0%	40	1.0%	1,437	1.0%
Other services	609	15.6%	529	18.4%	514	12.7%	32,136	21.7%

Data source: RSA-911

Table 3.3.a CO-C Outcomes by Type of Impairment - FFYs 2014-2016

Type of Impairment	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Visual - Employment outcomes	114	6.7%	113	6.7%	99	3.9%	5,241	6.3%
Visual - Without employment outcomes	89	4.0%	57	4.8%	52	3.4%	2,861	4.4%
Auditory and Communicative - Employment outcomes	329	19.3%	291	17.3%	613	24.1%	11,490	13.9%
Auditory and Communicative - Without employment outcomes	297	13.5%	136	11.5%	158	10.4%	3,490	5.4%
Physical - Employment outcomes	260	15.3%	246	14.6%	318	12.5%	14,906	18.0%
Physical - Without employment outcomes	522	23.7%	290	24.4%	330	21.8%	14,128	21.7%
Intellectual and Learning disability - Employment outcomes	584	34.3%	619	36.7%	975	38.3%	28,084	34.0%
Intellectual and Learning disability - Without employment outcomes	560	25.4%	330	27.8%	476	31.4%	21,270	32.7%
Psychosocial and psychological - Employment outcomes	417	24.5%	417	24.7%	540	21.2%	22,897	27.7%
Psychosocial and	737	33.4%	374	31.5%	499	32.9%	23,281	35.8%

Type of Impairment	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
psychological - Without employment outcomes								
Total served - Employment outcomes	1,704	100.0%	1,686	100.0%	2,545	100.0%	82,618	100.0%
Total served - Without employment outcomes	2,205	100.0%	1,187	100.0%	1,515	100.0%	65,030	100.0%

Data source: RSA-911

Table 3.2.b CO-C All Individuals Served by Type of Impairment FFYs 2014-2016

Type of Impairment	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Visual - Individuals served	203	5.2%	170	5.9%	151	3.7%	8,102	5.5%
Auditory and Communicative - Individuals served	626	16.0%	427	14.9%	771	19.0%	14,980	10.1%
Physical - Individuals served	782	20.0%	536	18.7%	648	16.0%	29,034	19.7%
Intellectual and Learning disability - Individuals served	1,144	29.3%	949	33.0%	1,451	35.7%	49,354	33.4%
Psychosocial and psychological	1,154	29.5%	791	27.5%	1,039	25.6%	46,178	31.3%
Total individuals served	3,909	100.0%	2,873	100.0%	4,060	100.0%	147,648	100.0

Data source: RSA-911

Table 3.3.c CO-C Employment Rate by Type of Impairment - FFYs 2014-2016

Type of Impairment	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Visual - Employment rate		56.2%		66.5%		65.6%		64.7%
Auditory and Communicative -		52.6%		68.1%		79.5%		76.7%

Type of Impairment	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Employment rate								
Physical - Employment rate		33.2%		45.9%		49.1%		51.3%
Intellectual and Learning disability - Employment rate		51.0%		65.2%		67.2%		56.9%
Psychosocial and psychological – Employment rate		36.1%		52.7%		52.0%		49.6%
Total served - Employment rate		43.6%		58.7%		62.7%		56.0%

Data source: RSA-911

Table 3.4.a CO-C Elapsed Time from Application to Eligibility for All Individuals Served - FFYs 2014-2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 60 days	4,916	72.7%	6,030	83.7%	5,577	89.9%	171,607	82.6%
61 – 90 days	897	13.3%	603	8.4%	344	5.5%	17,315	8.3%
91 – 120 days	385	5.7%	251	3.5%	139	2.2%	8,398	4.0%
121 – 180 days	297	4.4%	196	2.7%	77	1.2%	6,202	3.0%
181 – 365 days	209	3.1%	104	1.4%	60	1.0%	3,473	1.7%
More than 1 year	59	0.9%	17	0.2%	7	0.1%	660	.3%
Total eligible	6,763	100.0%	7,201	100.0%	6,204	100.0%	207,655	100.0%

Data source: RSA-911

Table 3.4.b CO-C Elapsed Time from Eligibility to IPE for All Individuals Served - FFYs 2014-2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 90 days	2,476	63.3%	1,847	64.3%	2,673	65.8%	111,220	75.1%
More than 90 days	1,433	36.7%	1,026	35.7%	1,387	34.2%	36,864	24.9%
Total served	3,909	100.0%	2,873	100.0%	4,060	100.0%	148,084	100.0%

Data source: RSA-911

Table revised from version used on-site

Table 3.4.c CO-C Elapsed Time IPE to Closure for All Individuals Served - FFY 2014-2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months	12	0.3%	337	11.7%	334	8.2%	4,867	3.3%
4 – 6 months	52	1.3%	755	26.3%	1,116	27.5%	18,624	12.6%
7 – 9 months	307	7.9%	290	10.1%	818	20.1%	18,240	12.3%
10 – 12 months	411	10.5%	114	4.0%	544	13.4%	15,762	10.6%
13 - 24 months	1,454	37.2%	323	11.2%	708	17.4%	37,939	25.6%
25 – 36 months	694	17.8%	438	15.2%	87	2.1%	18,934	12.8%
37 – 60 months	555	14.2%	400	13.9%	270	6.7%	19,177	13.0%
More than 5 years	424	10.8%	216	7.5%	183	4.5%	14,541	9.8%
Total served	3,909	100.0%	2,873	100.0%	4,060	100.0%	148,084	100.0%

Data source: RSA-911

Table 3.5.a CO-C SOC Codes for All Individuals Served with Employment Outcomes - FFY 2014-2016

Standard Occupational Classification (SOC) Codes	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Architecture and Engineering Occupations (17-0000)	10	.6%	7	.4%	10	.4%	577	.7%
Arts, Design, Entertainment, Sports, and Media (27-0000)	29	1.7%	21	1.2%	32	1.3%	885	1.1%
Building and Grounds Cleaning and Maintenance (37-0000)	97	5.7%	137	8.1%	159	6.2%	6,923	8.4%
Business and Financial Operations Occupations (13-0000)	20	1.2%	19	1.1%	27	1.1%	1,248	1.5%
Community and Social Services Occupations (21-0000)	55	3.2%	58	3.4%	68	2.7%	2,300	2.8%
Computer and Mathematical Occupations (15-0000)	17	1.0%	18	1.1%	27	1.1%	874	1.1%
Constructive and Extraction Occupations (47-0000)	45	2.6%	31	1.8%	45	1.8%	1,722	2.1%
Education, Training, and Library Occupations (25-0000)	41	2.4%	48	2.8%	63	2.5%	2,434	2.9%
Farming, Fishing, and Forestry Occupations(45-0000)	11	.6%	13	.8%	13	.5%	425	.5%
Food Preparation and Serving Related Occupations (35-0000)	194	11.4%	192	11.4%	275	10.8%	9,434	11.4%
Healthcare Practitioners and Technical Occupations (29-0000)	37	2.2%	28	1.7%	44	1.7%	2,238	2.7%
Healthcare Support Occupations (31-0000)	53	3.1%	33	2.0%	46	1.8%	2,722	3.3%
Homemaker*	112	6.6%	74	4.4%	108	4.2%	1,803	2.2%

Standard Occupational Classification (SOC) Codes	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Installation, Maintenance, and Repair Occupations (49-0000)	53	3.1%	41	2.4%	59	2.3%	4,981	6.0%
Legal Occupations (23-0000)	2	.1%	4	.2%	6	.2%	191	.2%
Life, Physical, and Social Science Occupations (19-0000)	9	.5%	7	.4%	8	.3%	374	.5%
Management Occupations (11-0000)	46	2.7%	27	1.6%	52	2.0%	2,050	2.5%
Military Specific Occupations (55-0000)	2	.1%	1	.1%	1	.0%	92	.1%
Office and Administrative Support Occupations (19-0000)	361	21.2%	359	21.3%	602	23.7%	15,218	18.4%
Personal Care and Service Occupations (39-0000)	107	6.3%	110	6.5%	189	7.4%	4,073	4.9%
Production Occupations (51-0000)	81	4.8%	71	4.2%	156	6.1%	6,888	8.3%
Protective Service Occupations (33-0000)	22	1.3%	15	.9%	30	1.2%	1,376	1.7%
Randolph-Sheppard vending facility clerk*							8	.0%
Randolph-Sheppard vending facility operator*	1	.1%	1	.1%	1	.0%	76	.1%
Sales and Related Occupations (41-0000)	107	6.3%	110	6.5%	133	5.2%	6,552	7.9%
Transportation and Material Moving Occupations (53-0000)	188	11.0%	257	15.2%	391	15.4%	7,284	8.8%
Unpaid Family Worker*	4	.2%	4	.2%			18	.0%
Total employment outcomes	1,704	100.0%	1,686	100.0%	2,545	100.0%	82,766	100.0%

Data source: RSA-911

Note: Occupations marked with an asterisk are VR specific occupations and are not part of the SOC.

Table 3.5.b CO-C Median Hourly Earnings for Individuals with Employment Outcomes by SOC - FFYs 2014-2016

Standard Occupational Classification (SOC) Codes	2014 Median Hourly Earnings	2015 Median Hourly Earnings	2016 Median Hourly Earnings	2016 National Agency Type Median Hourly Earnings
Architecture and Engineering Occupations (17-0000)	\$21.39	\$34.38	\$37.79	\$19.00
Arts, Design, Entertainment, Sports, and Media (27-0000)	\$12.80	\$15.00	\$12.73	\$12.03
Building and Grounds Cleaning and Maintenance (37-0000)	\$8.56	\$8.80	\$9.00	\$9.00
Business and Financial Operations Occupations (13-0000)	\$17.76	\$13.50	\$16.50	\$15.34
Community and Social Services Occupations (21-0000)	\$13.00	\$14.00	\$13.93	\$13.50
Computer and Mathematical Occupations (15-0000)	\$19.23	\$19.10	\$16.00	\$16.00
Constructive and Extraction Occupations (47-0000)	\$12.15	\$12.00	\$15.00	\$12.70
Education, Training, and Library Occupations (25-0000)	\$12.36	\$13.63	\$12.67	\$13.00
Farming, Fishing, and Forestry Occupations(45-0000)	\$8.00	\$10.00	\$10.00	\$10.00
Food Preparation and Serving Related Occupations (35-0000)	\$8.25	\$8.50	\$8.67	\$8.36
Healthcare Practitioners and Technical Occupations (29-0000)	\$18.00	\$18.53	\$18.59	\$16.12
Healthcare Support Occupations (31-0000)	\$11.50	\$12.00	\$11.00	\$10.43
Homemaker*				
Installation, Maintenance, and Repair Occupations	\$10.50	\$10.00	\$11.50	\$9.80

Standard Occupational Classification (SOC) Codes	2014 Median Hourly Earnings	2015 Median Hourly Earnings	2016 Median Hourly Earnings	2016 National Agency Type Median Hourly Earnings
(49-0000)				
Legal Occupations (23-0000)	\$36.50	\$21.63	\$17.13	\$17.00
Life, Physical, and Social Science Occupations (19-0000)	\$14.90	\$16.00	\$19.69	\$15.00
Management Occupations (11-0000)	\$18.33	\$16.20	\$15.00	\$15.00
Military Specific Occupations (55-0000)	\$12.50	\$9.23	\$25.24	\$13.17
Office and Administrative Support Occupations (19-0000)	\$8.75	\$9.00	\$9.90	\$10.00
Personal Care and Service Occupations (39-0000)	\$8.60	\$9.00	\$9.00	\$9.00
Production Occupations (51-0000)	\$9.00	\$9.00	\$8.50	\$10.00
Protective Service Occupations (33-0000)	\$10.85	\$10.00	\$11.00	\$10.25
Randolph-Sheppard vending facility clerk*				\$10.91
Randolph-Sheppard vending facility operator*	\$23.08	\$8.40	\$10.00	\$12.68
Sales and Related Occupations (41-0000)	\$8.50	\$9.00	\$9.24	\$9.00
Transportation and Material Moving Occupations (53-0000)	\$8.76	\$8.76	\$9.00	\$10.00
Unpaid Family Worker*				
Total employment outcomes	\$9.50	\$9.23	\$10.00	\$10.00

Data source: RSA-911

Note: Occupations marked with an asterisk are VR specific occupations and are not part of the SOC.

Table 4.1 (CO-C) Case Status Information, Outcomes, and Quality Employment Measures for Individuals with Disabilities under Age 25 at Exit—FFYs 2014–2016

Individuals with Disabilities under Age 25 at Exit	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total cases closed	1,945		2,668		2,108		86,272	
Exited as an applicant	118	6.07%	73	2.74%	95	4.51%	10,776	12.49%
Exited during or after trial work experience/extended evaluation	10	0.51%	5	0.19%	7	0.33%	687	0.80%
Exited without employment after IPE, before services	44	2.26%	10	0.37%	4	0.19%	16,390	19.00%
Exited from order of selection waiting list	359	18.46%	92	3.45%		0.00%	972	1.13%
Exited without employment after eligibility, before IPE	312	16.04%	1,505	56.41%	633	30.03%	3,865	4.48%
Exited with employment	594	30.54%	668	25.04%	877	41.60%	29,391	34.07%
Exited without employment	508	26.12%	315	11.81%	492	23.34%	24,191	28.04%
Employment rate	53.90%		67.96%		64.06%		54.85%	
Supported employment outcomes	22	3.70%	84	12.57%	139	15.85%	3,965	13.49%
Competitive employment outcomes	577	97.14%	666	99.70%	874	99.66%	28,670	97.55%
Average hourly earnings for competitive employment	\$9.54		\$9.54		\$9.77		\$10.12	

Individuals with Disabilities under Age 25 at Exit	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
outcomes								
Average hours worked per week for competitive employment outcomes	\$27.63		\$26.20		\$25.47		\$29.12	
Competitive employment outcomes at 35 or more hours per week	171	28.79 %	149	22.31 %	197	22.46 %	10,346	35.20%
Competitive employment outcomes meeting SGA	280	47.14 %	291	43.56 %	360	41.05 %	14,616	49.73%
Competitive employment outcomes with employer-provided medical insurance	71	11.95 %	55	8.23%	81	9.24%	3,866	13.15%

Table 4.2.a (CO-C) VR Services for Individuals with Disabilities under Age 25 at Exit-FYs 2014-2016

Training Services	2014	2014 Percent	2015	2015 Percent	2016	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of individuals served	1102		983		1369		53,582	
College or university training	0	0.00%	1	0.10%	1	0.10%	852	1.60%
Four-year or university training	67	6.10%	41	4.20%	38	2.80%	5,289	9.90%
Junior or community college training	24	2.20%	17	1.70%	12	0.90%	4,482	8.40%
Occupational or vocational training	30	2.70%	3	0.30%	6	0.40%	5,067	9.50%
On-the-job training	10	0.90%	14	1.40%	10	0.70%	1,329	2.50%
Apprenticeship training	2	0.20%	0	0.00%	1	0.10%	42	0.10%
Basic academic remedial or literacy training	1	0.10%	3	0.30%	0	0.00%	1,198	2.20%
Job readiness training	85	7.70%	87	8.90%	91	6.60%	16,251	30.30%
Disability-related skills training	44	4.00%	69	7.00%	81	5.90%	1,272	2.40%
Miscellaneous training	187	17.00%	101	10.30%	99	7.20%	4,918	9.20%
Assessment	428	38.80%	499	50.80%	576	42.10%	29,430	54.90%

Training Services	2014	2014 Percent	2015	2015 Percent	2016	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Diagnosis and treatment of impairment	89	8.10%	79	8.00%	62	4.50%	10,630	19.80%
Vocational rehab counseling and guidance	930	84.40%	981	99.80%	1369	100.00%	36,168	67.50%
Job search assistance	310	28.10%	504	51.30%	394	28.80%	19,183	35.80%
Job placement assistance	262	23.80%	456	46.40%	308	22.50%	16,389	30.60%
On-the-job supports-short term	232	21.10%	380	38.70%	153	11.20%	7,651	14.30%
On-the-job supports-SE	29	2.60%	90	9.20%	197	14.40%	4,547	8.50%
Information and referral services	26	2.40%	130	13.20%	108	7.90%	14,113	26.30%
Benefits counseling	29	2.60%	33	3.40%	9	0.70%	1,974	3.70%
Customized employment services	31	2.80%	1	0.10%	3	0.20%	449	0.80%
Transportation	134	12.20%	104	10.60%	96	7.00%	15,830	29.50%
Maintenance	159	14.40%	101	10.30%	78	5.70%	10,436	19.50%
Rehabilitation technology	34	3.10%	56	5.70%	54	3.90%	3,781	7.10%
Reader services	1	0.10%	1	0.10%	2	0.10%	30	0.10%
Interpreter services	12	1.10%	12	1.20%	21	1.50%	607	1.10%
Personal attendant	0	0.00%	3	0.30%	0	0.00%	84	0.20%

Training Services	2014	2014 Percent	2015	2015 Percent	2016	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
services								
Technical assistance services	2	0.20%	3	0.30%	2	0.10%	254	0.50%
Other services	96	8.70%	92	9.40%	104	7.60%	9,840	18.40%

Table 4.3.a (CO-C) Outcomes by Impairment for Individuals under Age 25 at Exit- FFYs 2014-2016

Type of Impairment	2014	2014 Percent	2015	2015 Percent	2016	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Visual - Employment outcomes	5	0.84%	10	1.50%	15	1.71%	524	1.78%
Visual - Without employment outcomes	12	2.36%	11	3.49%	10	2.03%	535	2.21%
Auditory and Communicative - Employment outcomes	53	8.92%	71	10.63%	100	11.40%	1618	5.51%
Auditory and Communicative - Without employment outcomes	71	13.98%	31	9.84%	44	8.94%	1176	4.86%
Physical - Employment outcomes	42	7.07%	47	7.04%	50	5.70%	2339	7.96%
Physical - Without employment outcomes	30	5.91%	28	8.89%	49	9.96%	2054	8.49%
Intellectual and	361	60.77%	382	57.19%	553	63.06%	18636	63.45%

Type of Impairment	2014	2014 Percent	2015	2015 Percent	2016	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Visual - Individuals served	17	1.54%	21	2.14%	25	1.83%	1,059	1.98%
Auditory and Communicative - Individuals served	124	11.25%	102	10.38%	144	10.52%	2,794	5.22%
Physical - Individuals served	72	6.53%	75	7.63%	99	7.23%	4,393	8.20%
Intellectual and Learning disability - Individuals served	625	56.72%	541	55.04%	816	59.61%	33,099	61.81%
Psychosocial and psychological	264	23.96%	244	24.82%	285	20.82%	12,208	22.80%
Total individuals served	1,102	100.00 %	983	100.00 %	1,369	100.00 %	53,553	100.00 %

Table 4.3.c (CO-C) Employment Rate by Type of Impairment for Individuals under Age 25 at Exit- FFYs 2014-2016

Type of Impairment	2014	2015	2016	2016 National Agency Type Percent
Visual - Employment rate	29.40%	47.60%	60%	49.48%
Auditory and Communicative - Employment rate	42.70%	69.60%	69.40%	57.91%
Physical - Employment rate	58.30%	62.70%	50.50%	53.24%

Type of Impairment	2014	2015	2016	2016 National Agency Type Percent
Intellectual and Learning disability - Employment rate	57.80%	70.60%	67.80%	56.30%
Psychosocial and psychological – Employment rate	50.40%	64.80%	55.80%	51.23%
Total served - Employment rate	53.90%	67.60%	64.10%	54.84%

Table 4.4.a (CO-C) Elapsed Time from Application to Eligibility for Individuals with Disabilities under Age 25 at Exit—FFYs 2014–2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 60 days	1,457	80.19%	2,329	89.92%	1,884	93.92%	61,119	81.70%
61 – 90 days	181	9.96%	148	5.71%	70	3.49%	6,367	8.51%
91 – 120 days	81	4.46%	57	2.20%	23	1.15%	3,214	4.30%
121 – 180 days	54	2.97%	31	1.20%	17	0.85%	2,441	3.26%
181 – 365 days	37	2.04%	22	0.85%	11	0.55%	1,410	1.88%
More than 1 year	7	0.39%	3	0.12%	1	0.05%	258	0.34%
Total eligible	1,817		2,590		2,006		74,809	

Table 4.4.b (CO-C) Elapsed Time from Eligibility to IPE for Individuals with Disabilities under Age 25 at Exit Served—FFYs 2014–2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months	805	73.05%	766	77.92%	1,016	74.21%	40,612	75.79%
4-6 months	158	14.34%	153	15.56%	233	17.02%	7,589	14.16%
7-9 months	66	5.99%	33	3.36%	85	6.21%	2,473	4.62%

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
10-12 months	36	3.27%	18	1.83%	23	1.68%	1,107	2.07%
More than 12 months	37	3.36%	13	1.32%	12	0.88%	1,801	3.36%
Total served	1,102		983		1,369		53,582	

Note: Table revised from version used on-site

Table 4.4.c (CO-C) Elapsed Time from IPE to Closure for Individuals with Disabilities under Age 25 at Exit Served—FFYs 2014–2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months	4	0.36%	165	16.79%	115	8.40%	1,319	2.46%
4 – 6 months	26	2.36%	330	33.57%	384	28.05%	4,769	8.90%
7 – 9 months	143	12.98%	112	11.39%	337	24.62%	5,556	10.37%
10 – 12 months	145	13.16%	42	4.27%	200	14.61%	5,217	9.74%
13 - 24 months	461	41.83%	125	12.72%	254	18.55%	14,948	27.90%
25 – 36 months	162	14.70%	119	12.11%	23	1.68%	8,479	15.82%
37 – 60 months	122	11.07%	74	7.53%	43	3.14%	8,846	16.51%
More than 5 years	39	3.54%	16	1.63%	13	0.95%	4,448	8.30%
More than 10		0.00%		0.00%		0.00%		0.00%

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
years								
Total served	1,102		983		1,369		53,582	

Table 4.5.a (CO-C) Standard Occupational Classification (SOC) Codes for Individuals with Disabilities under Age 25 at Exit Served with Employment Outcomes—FFYs 2014–2016

SOC	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Architecture and Engineering Occupations (17-0000)	2	0.34%		0.00%		0.00%	172	0.59%
Arts, Design, Entertainment, Sports, and Media (27-0000)	4	0.67%	1	0.15%	2	0.23%	287	0.98%
Building and Grounds Cleaning and Maintenance (37-0000)	41	6.90%	47	7.04%	44	5.02%	2,125	7.23%
Business and Financial Operations Occupations (13-0000)	1	0.17%	3	0.45%	2	0.23%	275	0.94%
Community and Social Services Occupations (21-0000)	3	0.51%	1	0.15%	5	0.57%	293	1.00%
Computer and Mathematical Occupations (15-0000)	2	0.34%	3	0.45%	1	0.11%	235	0.80%
Constructive and Extraction Occupations (47-0000)	21	3.54%	14	2.10%	14	1.60%	518	1.76%
Education, Training, and Library Occupations (25-0000)	7	1.18%	10	1.50%	10	1.14%	562	1.91%
Farming, Fishing, and Forestry Occupations (45-	3	0.51%	8	1.20%	6	0.68%	172	0.59%

SOC	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0000)								
Food Preparation and Serving Related Occupations (35-0000)	108	18.18%	114	17.07%	137	15.62%	4,862	16.55%
Healthcare Practitioners and Technical Occupations (29-0000)	4	0.67%	6	0.90%	5	0.57%	612	2.08%
Healthcare Support Occupations (31-0000)	21	3.54%	8	1.20%	15	1.71%	956	3.25%
Homemaker*		0.00%	2	0.30%	3	0.34%	50	0.17%
Installation, Maintenance, and Repair Occupations (49-0000)	22	3.70%	20	2.99%	18	2.05%	2,183	7.43%
Legal Occupations (23-0000)		0.00%	1	0.15%		0.00%	22	0.07%
Life, Physical, and Social Science Occupations (19-0000)	4	0.67%		0.00%	1	0.11%	115	0.39%
Management Occupations (11-0000)	7	1.18%		0.00%	3	0.34%	360	1.23%
Military Specific Occupations (55-0000)	2	0.34%	1	0.15%		0.00%	48	0.16%
Office and Administrative Support Occupations (43-0000)	138	23.23%	147	22.01%	234	26.68%	5,594	19.04%
Personal Care and Service Occupations (39-0000)	52	8.75%	56	8.38%	103	11.74%	1,665	5.67%
Production	28	4.71%	20	2.99%	50	5.70%	2,625	8.94%

SOC	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Occupations (51-0000)								
Protective Service Occupations (33-0000)	5	0.84%	6	0.90%	6	0.68%	420	1.43%
Randolph-Sheppard Vending Facility Clerk*		0.00%		0.00%		0.00%	1	0.00%
Randolph-Sheppard Vending Facility Operator*		0.00%		0.00%		0.00%	1	0.00%
Sales and Related Occupations (41-0000)	37	6.23%	63	9.43%	49	5.59%	2,856	9.72%
Transportation and Material Moving Occupations (53-0000)	80	13.47%	137	20.51%	169	19.27%	2,367	8.06%
Unpaid Family Worker*	2	0.34%		0.00%		0.00%	2	0.01%
Total employment outcomes	594		668		877		29,378	

Note: Occupations marked with an asterisk are VR specific occupations and are not part of the SOC.

Table 4.5.b (CO-C) Standard Occupational Classification (SOC) Codes Median Hourly Earnings for Individuals with Disabilities under Age 25 at Exit Served with Employment Outcomes—FFYs 2014–2016

SOC	2014	2015	2016	2016 National Agency Type
Architecture and Engineering Occupations (17-0000)	\$21.95			\$16.08
Arts, Design, Entertainment, Sports, and Media (27-0000)	\$10.43	\$15.00	\$10.00	\$11.00
Building and Grounds Cleaning and Maintenance (37-0000)	\$8.50	\$9.00	\$9.00	\$8.60
Business and Financial Operations Occupations (13-0000)	\$10.15	\$10.00	\$24.04	\$12.00
Community and Social Services Occupations (21-0000)	\$10.70	\$16.25	\$12.60	\$12.25
Computer and Mathematical Occupations (15-0000)	\$14.61	\$18.20	\$16.00	\$13.00
Constructive and Extraction Occupations (47-0000)	\$11.00	\$10.75	\$12.75	\$11.00
Education, Training, and Library Occupations (25-0000)	\$9.89	\$9.73	\$13.83	\$11.26
Farming, Fishing, and Forestry Occupations (45-0000)	\$8.00	\$9.20	\$10.50	\$10.00
Food Preparation and Serving Related Occupations (35-0000)	\$8.25	\$8.37	\$8.75	\$8.27
Healthcare Practitioners and Technical Occupations (29-0000)	\$12.00	\$10.94	\$10.00	\$12.00
Healthcare Support Occupations (31-0000)	\$10.25	\$9.52	\$11.00	\$10.00
Homemaker*				
Installation, Maintenance, and Repair Occupations (49-0000)	\$10.00	\$9.75	\$9.00	\$9.00
Legal Occupations (23-0000)		\$27.25		\$13.04
Life, Physical, and Social Science Occupations (19-0000)	\$13.08		\$13.50	\$13.50
Management Occupations (11-0000)	\$10.00		\$13.00	\$13.00
Military Specific Occupations (55-0000)	\$12.50	\$9.23		\$12.00
Office and Administrative Support Occupations (43-0000)	\$8.00	\$8.50	\$9.00	\$9.00
Personal Care and Service Occupations (39-0000)	\$8.50	\$8.63	\$9.00	\$8.75
Production Occupations (51-0000)	\$9.13	\$8.65	\$8.50	\$9.76

SOC	2014	2015	2016	2016 National Agency Type
Protective Service Occupations (33-0000)	\$10.00	\$10.00	\$10.50	\$10.00
Randolph-Sheppard Vending Facility Clerk*				\$8.00
Randolph-Sheppard Vending Facility Operator*				\$8.25
Sales and Related Occupations (41-0000)	\$8.15	\$8.50	\$9.00	\$9.00
Transportation and Material Moving Occupations (53-0000)	\$8.23	\$8.52	\$9.00	\$9.00
Unpaid Family Worker*				
Total employment outcomes	\$8.50	\$8.72	\$9.00	\$9.00

Note: Occupations marked with an asterisk are VR specific occupations and are not part of the SOC.

Table 4.6 (CO-C) Source of Referral for Individuals with Disabilities under Age 25 at Exit—FFYs 2014–2016

Referral Sources	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
American Indian VR Services Program		0.00%		0.00%		0.00%	41	0.05%
Centers for Independent Living		0.00%	2	0.08%	3	0.14%	71	0.08%
Child Protective Services		0.00%	3	0.11%	1	0.05%	106	0.12%
Community Rehabilitation Programs	115	5.91%	177	6.64%	206	9.80%	3,047	3.54%
Consumer Organizations or Advocacy Groups		0.00%	5	0.19%	7	0.33%	178	0.21%
Educational Institutions (elementary/secondary)	1,006	51.72%	1,465	54.95%	1,121	53.30%	45,619	52.96%
Educational Institutions (post-secondary)	48	2.47%	89	3.34%	49	2.33%	3,034	3.52%
Employers	2	0.10%	1	0.04%	2	0.10%	53	0.06%
Faith Based Organizations		0.00%		0.00%	1	0.05%	64	0.07%
Family/Friends	7	0.36%	53	1.99%	69	3.28%	4,041	4.69%

Referral Sources	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Intellectual and Developmental Disabilities Providers		0.00%		0.00%		0.00%	1,652	1.92%
Medical Health Provider (Public or Private)	100	5.14%	106	3.98%	110	5.23%	1,896	2.20%
Mental Health Provider (Public or Private)		0.00%		0.00%		0.00%	1,936	2.25%
One-stop Employment/Training Centers	15	0.77%	19	0.71%	22	1.05%	1,054	1.22%
Other Sources	293	15.06%	223	8.36%	100	4.76%	6,099	7.08%
Other State Agencies	3	0.15%	12	0.45%	16	0.76%	636	0.74%
Other VR State Agencies	13	0.67%	10	0.38%	9	0.43%	261	0.30%
Public Housing Authority		0.00%	1	0.04%	1	0.05%	15	0.02%
Self-referral	293	15.06%	460	17.25%	363	17.26%	14,829	17.21%
Social Security Administration (Disability Determination Service or District office)	9	0.46%	6	0.23%	3	0.14%	328	0.38%
State Department of Correction/Juvenile Justice	21	1.08%	18	0.68%	10	0.48%	522	0.61%
State Employment Service Agency		0.00%		0.00%		0.00%	67	0.08%
Veteran's Administration	1	0.05%	4	0.15%		0.00%	13	0.02%
Welfare Agency (State or local government)	19	0.98%	11	0.41%	10	0.48%	555	0.64%
Worker's Compensation		0.00%	1	0.04%		0.00%	28	0.03%

Table 4.7 (CO-C) Reason for Closure Codes for Individuals with Disabilities under Age 25 at Exit—FFYs 2014–2016

Reason for Closure	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Achieved employment outcome	594	31.15%	668	25.61%	877	42.31%	29,393	35.55%
Unable to locate or contact	586	30.73%	566	21.70%	359	17.32%	18,723	22.65%
Transportation not feasible or available	2	0.10%	2	0.08%	2	0.10%	114	0.14%
Does not require VR services	9	0.47%	3	0.12%	3	0.14%	579	0.70%
Extended services not available	5	0.26%	6	0.23%	5	0.24%	87	0.11%
All other reasons	72	3.78%	144	5.52%	99	4.78%	6,857	8.29%
Extended employment		0.00%		0.00%	1	0.05%	62	0.07%
Individual in institution, other than a prison or jail	5	0.26%	11	0.42%	4	0.19%	179	0.22%
Individual is incarcerated in a prison or jail	18	0.94%	11	0.42%	13	0.63%	390	0.47%
Disability too significant to benefit from VR services	9	0.47%	5	0.19%	7	0.34%	501	0.61%
No longer interested in receiving services or further services	603	31.62%	1,190	45.63%	701	33.82%	25,623	30.99%
Death	4	0.21%	2	0.08%	2	0.10%	168	0.20%

Table 5.1.a (CO-C) Supported Employment Outcomes for All Individuals with Disabilities—FFYs 2014–2016

All Individuals with Disabilities with Supported Employment Outcomes	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Supported employment outcomes	133	7.81%	314	18.62%	537	21.10%	9673	11.67%
Average hourly wage for supported employment outcomes	\$9.22		\$9.25		\$9.22		\$9.07	
Average hours worked per week for supported employment outcomes	20.34		17.8		17.52		22.48	
Competitive supported employment outcomes	122	91.73%	314	100.00%	537	100.00%	9099	94.07%
Average hourly earnings for competitive supported employment outcomes	\$9.35		\$9.25		\$9.22		\$9.30	
Average hours worked per week for competitive supported employment outcomes	21.31		17.8		17.52		22.23	

All Individuals with Disabilities with Supported Employment Outcomes	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Competitive supported employment outcomes at 35 or more hours per week	25	18.80%	30	9.55%	49	9.12%	1335	13.80%
Competitive supported employment outcomes meeting SGA	37	27.82%	58	18.47%	89	16.57%	2276	23.53%
Competitive supported employment outcomes with employer-provided medical insurance	9	6.77%	10	3.18%	16	2.98%	338	3.49%

Table revised from version used on-site

**Table 5.1.b (CO-C) Supported Employment Outcomes for Individuals with Disabilities
under
Age 25 at Exit—FFYs 2014–2016**

Individuals under Age 25 with Disabilities with Supported Employment Outcomes	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Supported employment outcomes	22	3.70%	84	12.57%	139	15.85%	3965	13.49%
Average hourly wage for supported employment outcomes	\$8.25		\$8.52		\$8.90		\$8.77	
Average hours worked per week for supported employment outcomes	18.25		14.8		14.71		21.92	
Competitive supported employment outcomes	19	86.36%	84	100.00%	139	100.00%	3750	94.58%
Average hourly earnings for competitive supported employment outcomes	\$8.33		\$8.52		\$8.90		\$8.94	
Average hours worked per week for competitive supported	17.84		14.8		14.71		21.75	

Individuals under Age 25 with Disabilities with Supported Employment Outcomes	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
employment outcomes								
Competitive supported employment outcomes at 35 or more hours per week	2	9.09%	2	2.38%	5	3.60%	489	12.33%
Competitive supported employment outcomes meeting SGA	2	9.09%	6	7.14%	9	6.47%	821	20.71%
Competitive supported employment outcomes with employer-provided medical insurance	1	4.55%	1	1.19%	1	0.72%	215	5.42%

Table revised from version used on-site

**Table 5.2.a (CO-C) Select VR and Supported Employment Services Provided for
Individuals with Disabilities
with Supported Employment Outcomes- FFYs 2014-2016**

Training Services	2014	2014 Percent	2015	2015 Percent	2016	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of individuals served	133		314		537		9673	
College or university training	0	0.00%	0	0.00%	0	0.00%	32	0.30%
Four-year or university training	3	2.30%	1	0.30%	0	0.00%	116	1.20%
Junior or community college training	3	2.30%	1	0.30%	1	0.20%	124	1.30%
Occupational or vocational training	17	12.80%	0	0.00%	0	0.00%	423	4.40%
On-the-job training	5	3.80%	3	1.00%	5	0.90%	239	2.50%
Apprenticeship training	3	2.30%	0	0.00%	0	0.00%	7	0.10%
Basic academic remedial or literacy training	1	0.80%	0	0.00%	0	0.00%	78	0.80%
Job readiness training	21	15.80%	44	14.00%	35	6.50%	1,928	19.90%
Disability-related skills training	5	3.80%	27	8.60%	29	5.40%	153	1.60%
Miscellaneous training	14	10.50%	13	4.10%	9	1.70%	804	8.30%
Assessment	69	51.90%	174	55.40%	281	52.30%	5,992	61.90%
Diagnosis and treatment of impairment	23	17.30%	55	17.50%	78	14.50%	1,987	20.50%
Vocational rehab counseling and guidance	123	92.50%	314	100.00%	537	100.00%	6,718	69.50%
Job search assistance	30	22.60%	135	43.00%	257	47.90%	4,766	49.30%
Job placement assistance	40	30.10%	172	54.80%	278	51.80%	4,358	45.10%
On-the-job supports-short term	59	44.40%	89	28.30%	48	8.90%	2,911	30.10%
On-the-job supports-SE	60	45.10%	220	70.10%	425	79.10%	6,821	70.50%
Information and referral services	0	0.00%	47	15.00%	40	7.40%	2,005	20.70%

Training Services	2014	2014 Percent	2015	2015 Percent	2016	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Benefits counseling	27	20.30%	28	8.90%	16	3.00%	1,233	12.70%
Customized employment services	31	23.30%	3	1.00%	7	1.30%	98	1.00%
Transportation	17	12.80%	67	21.30%	118	22.00%	2,769	28.60%
Maintenance	35	26.30%	53	16.90%	102	19.00%	2,324	24.00%
Rehabilitation technology	2	1.50%	7	2.20%	11	2.00%	568	5.90%
Reader services	0	0.00%	0	0.00%	0	0.00%	1	0.00%
Interpreter services	0	0.00%	1	0.30%	1	0.20%	89	0.90%
Personal attendant services	0	0.00%	1	0.30%	0	0.00%	11	0.10%
Technical assistance services	0	0.00%	1	0.30%	0	0.00%	28	0.30%
Other services	14	10.50%	32	10.20%	53	9.90%	1,674	17.30%

**Table 5.2.b (CO-C) Select VR and Supported Employment Services Provided for
Individuals with Disabilities
under Age 25 at Exit with Supported Employment Outcomes- FFYs 2014-2016**

Training Services	2014	2014 Percent	2015	2015 Percent	2016	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of individuals served	22		84		139		3,965	
College or university training	0	0.00%	0	0.00%	0	0.00%	15	0.40%
Four-year or university training	1	4.50%	0	0.00%	0	0.00%	51	1.30%
Junior or community college training	1	4.50%	0	0.00%	0	0.00%	69	1.70%
Occupational or vocational training	3	13.60%	0	0.00%	0	0.00%	183	4.60%
On-the-job training	1	4.50%	1	1.20%	0	0.00%	122	3.10%
Apprenticeship training	1	4.50%	0	0.00%	0	0.00%	4	0.10%
Basic academic remedial or literacy	0	0.00%	0	0.00%	0	0.00%	55	1.40%

Training Services	2014	2014 Percent	2015	2015 Percent	2016	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
training								
Job readiness training	5	22.70%	25	29.80%	19	13.70%	1,154	29.10%
Disability-related skills training	2	9.10%	8	9.50%	13	9.40%	80	2.00%
Miscellaneous training	4	18.20%	3	3.60%	3	2.20%	438	11.00%
Assessment	14	63.60%	55	65.50%	76	54.70%	2,653	66.90%
Diagnosis and treatment of impairment	2	9.10%	10	11.90%	5	3.60%	751	18.90%
Vocational rehab counseling and guidance	22	100.00%	84	100.00%	139	100.00%	2,785	70.20%
Job search assistance	6	27.30%	42	50.00%	73	52.50%	1,857	46.80%
Job placement assistance	10	45.50%	52	61.90%	86	61.90%	1,794	45.20%
On-the-job supports-short term	12	54.50%	37	44.00%	16	11.50%	1,310	33.00%
On-the-job supports-SE	8	36.40%	57	67.90%	123	88.50%	2,742	69.20%
Information and referral services	0	0.00%	14	16.70%	12	8.60%	883	22.30%
Benefits counseling	4	18.20%	13	15.50%	1	0.70%	451	11.40%
Customized employment services	4	18.20%	0	0.00%	2	1.40%	40	1.00%
Transportation	2	9.10%	21	25.00%	26	18.70%	1,120	28.20%
Maintenance	7	31.80%	12	14.30%	15	10.80%	834	21.00%
Rehabilitation technology	1	4.50%	3	3.60%	3	2.20%	208	5.20%
Reader services	0	0.00%	0	0.00%	0	0.00%	1	0.00%
Interpreter services	0	0.00%	0	0.00%	0	0.00%	37	0.90%
Personal attendant services	0	0.00%	1	1.20%	0	0.00%	5	0.10%
Technical assistance services	0	0.00%	0	0.00%	0	0.00%	10	0.30%
Other services	3	13.60%	12	14.30%	14	10.10%	715	18.00%

Table 5.3.a (CO-C) Elapsed Time from Application to Eligibility for All Individuals with Disabilities Who Achieved Supported Employment Outcomes—FFYs 2014–2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 60 days	114	85.71%	281	89.49%	505	94.04%	8,277	85.57%
61 – 90 days	9	6.77%	21	6.69%	21	3.91%	633	6.54%
91 – 120 days	4	3.01%	9	2.87%	5	0.93%	291	3.01%
121 – 180 days	2	1.50%	1	0.32%	3	0.56%	250	2.58%
181 – 365 days	3	2.26%	2	0.64%	3	0.56%	169	1.75%
More than 1 year	1	0.75%		0.00%		0.00%	53	0.55%
Total eligible	133		314		537		9,673	

Table 5.3.b (CO-C) Elapsed Time from Application to Eligibility for Individuals with Disabilities under Age 25 at Exit Who Achieved Supported Employment Outcomes—FFYs 2014–2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 60 days	15	68.18%	74	88.10%	133	95.68%	3,284	82.82%
61 – 90 days	4	18.18%	8	9.52%	1	0.72%	292	7.36%
91 – 120 days	1	4.55%	1	1.19%		0.00%	149	3.76%
121 – 180 days	1	4.55%		0.00%	5	3.60%	125	3.15%
181 – 365 days	1	4.55%	1	1.19%		0.00%	87	2.19%

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
More than 1 year		0.00%		0.00%		0.00%	28	0.71%
Total eligible	22		84		139		3,965	

Table 5.4.a (CO-C) Elapsed Time from Eligibility to IPE for All Individuals with Disabilities Who Achieved Supported Employment Outcomes—FFYs 2014–2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months	98	73.68%	233	74.20%	393	73.18%	7,843	81.08%
4-6 months	20	15.04%	58	18.47%	101	18.81%	1,113	11.51%
7-9 months	8	6.02%	13	4.14%	29	5.40%	356	3.68%
10-12 months	4	3.01%	2	0.64%	10	1.86%	150	1.55%
More than 12 months	3	2.26%	8	2.55%	4	0.74%	211	2.18%
Total served	133		314		537		9,673	

Note: Table revised from version used on-site

Table 5.4.b(CO-C) Elapsed Time from Eligibility to IPE for Individuals with Disabilities under Age 25 at Exit Who Achieved Supported Employment Outcome—FFYs 2014–2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months	17	77.27%	56	66.67%	88	63.31%	3,004	75.76%
4-6 months	3	13.64%	19	22.62%	38	27.34%	556	14.02%
7-9 months	1	4.55%	5	5.95%	9	6.47%	190	4.79%
10-12 months		0.00%	1	1.19%	3	2.16%	85	2.14%

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
More than 12 months	1	4.55%	3	3.57%	1	0.72%	130	3.28%
Total served	22		84		139		3,965	

Note: Table revised from version used on-site

Table 5.5.a (CO-C) Elapsed Time from IPE to Closure for All Individuals with Disabilities Who Achieved Supported Employment Outcomes—FFYs 2014–2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months		0.00%	58	18.47%	59	10.99%	246	2.54%
4 – 6 months	4	3.01%	126	40.13%	194	36.13%	1,555	16.08%
7 – 9 months	28	21.05%	37	11.78%	92	17.13%	1,713	17.71%
10 – 12 months	33	24.81%	9	2.87%	75	13.97%	1,251	12.93%
13 - 24 months	41	30.83%	27	8.60%	89	16.57%	2,558	26.44%
25 – 36 months	11	8.27%	33	10.51%	6	1.12%	1,024	10.59%
37 – 60 months	14	10.53%	17	5.41%	16	2.98%	911	9.42%
More than 5 years	2	1.50%	7	2.23%	6	1.12%	415	4.29%
More than 10 years		0.00%		0.00%		0.00%		0.00%
Total served	133		314		537		9,673	

Table 5.5.b (CO-C) Elapsed Time from IPE to Closure for Individuals with Disabilities under Age 25 at Exit Who Achieved Supported Employment Outcomes—FFYs 2014–2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months		0.00%	10	11.90%	10	7.19%	65	1.64%
4 – 6 months	1	4.55%	28	33.33%	39	28.06%	464	11.70%
7 – 9 months	5	22.73%	9	10.71%	24	17.27%	612	15.44%
10 – 12 months	7	31.82%	5	5.95%	24	17.27%	472	11.90%
13 - 24	5	22.73%	14	16.67%	35	25.18%	1,134	28.60%

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
months								
25 – 36 months	2	9.09%	12	14.29%	1	0.72%	549	13.85%
37 – 60 months	2	9.09%	5	5.95%	6	4.32%	526	13.27%
More than 5 years		0.00%	1	1.19%		0.00%	143	3.61%
More than 10 years		0.00%		0.00%		0.00%		0.00%
Total served	22		84		139		3,965	

Table 6.1 Colorado-Combined (CO-C) VR Resources and Expenditures—FFYs 2014–2016

VR Resources and Expenditures	2014	2015	2016*
Total program expenditures	\$51,993,005	\$45,375,239	\$18,530,665
Federal expenditures	\$40,918,495	\$35,710,313	\$11,469,316
State agency expenditures (4 th quarter)	\$11,074,510	\$9,664,926	\$7,061,349
State agency expenditures (latest/final)	\$11,074,510	\$9,664,926	\$7,061,349
Federal formula award amount	\$40,918,495	\$41,576,303	\$42,317,015
MOE penalty from prior year	\$0	\$0	\$1,174,669
Federal award amount relinquished during reallocation	\$0	\$0	\$0
Federal award amount received during reallocation	\$0	\$0	\$0
Federal funds transferred from State VR agency	\$0	\$0	\$0
Federal funds transferred to State VR agency	\$0	\$0	\$0
Federal award amount (net)	\$40,918,495	\$41,576,303	\$41,142,346
Federal award funds deobligated	\$0	\$0	\$0
Federal award funds used	\$40,918,495	\$41,576,303	\$41,142,346
Percent of formula award amount used	100.00%	100.00%	97.22%
Federal award funds matched but not used	\$0	-\$5,865,990	-\$15,051,822

* Indicates the award is currently in an open status. Therefore, data is either not currently available or not final.

Table 6.1 VR Resources and Expenditures—Descriptions, Sources and Formulas

VR Resources and Expenditures	Source/Formula
Total program expenditures	The sum of the Federal and non-Federal expenditures. Source/Formula: Table 6.1: Federal expenditures plus State expenditures (latest/final)
Federal expenditures	The cumulative amount of disbursements from Federal funds. Source/Formula: SF-425 line 10e from latest/final report
State expenditures (4 th quarter)	The cumulative amount of disbursements and unliquidated obligations from State funds through September 30 th of the award period. Source/Formula: SF-425 line 10j from 4 th quarter report
State expenditures (latest/final)	The cumulative amount of disbursements and unliquidated obligations from State funds as reported on the agency's latest or final SF-425 report. Final reports do not include unliquidated obligations. Source/Formula: SF-425 line 10j from latest/final report
Federal formula award amount	The amount of the Federal funds available to the agency based on the formula mandated in the Rehabilitation Act. Formula/Source: Federal formula award calculation
MOE penalty from prior year	The amount of the Maintenance of Effort (MOE) deficit from the previous FFY which resulted in a MOE penalty against the current FFY. Source/Formula: Table 6.2: MOE difference from prior year
Federal award amount relinquished during reallotment	Amount of Federal award voluntarily relinquished through the reallotment process. Formula/Source: RSA-692
Federal award received during reallotment	Amount of funds received through the reallotment process. Source/Formula: RSA-692
Federal funds transferred from State VR agency	Amount of award funds transferred from State VR agencies (Blind to General or General to Blind). Formula/Source: Agency transfer request documentation
Federal funds transferred to State VR agency	Amount of award funds transferred to State VR agencies (Blind to General or General to Blind). Formula/Source: Agency transfer request documentation
Federal award amount (net)	Federal award amount available after accounting for adjustments to award (e.g., MOE penalties, relinquishment, reallotment and transfers). Formula/Source: Federal formula award calculation, RSA-692, agency documentation, SF-425 : Federal formula calculation minus MOE penalty minus funds relinquished in reallotment plus funds received in reallotment plus funds transferred from agency minus funds transferred to agency

VR Resources and Expenditures	Source/Formula
Federal award funds deobligated	Federal award funds deobligated at the request of the agency or as part of the award closeout process. These funds may include matched or unmatched Federal funds. Source/Formula: Agency deobligation request documentation, G5 closeout reports
Federal award funds used	Amount of Federal award funds expended. Source/Formula: Federal formula calculation, RSA-692, agency documentation, SF-425 lesser of the 4 th quarter or latest/final: Federal award amount (net) (calculation above) minus Federal award funds deobligated
Percent Federal formula award used	Percent of Federal formula award funds used. Source/Formula: Federal award funds used (calculation above) divided by Federal formula award amount
Federal award funds matched but not used	This represents unused Federal award funds for which the agency provided match. Source/Formula: Table 6.2 Federal award funds matched (actual) minus Table 6.1 Federal award funds used

Table 6.2 Colorado-Combined (CO-C) Non-Federal Share and Maintenance of Effort—FFYs 2014–2016

Non-Federal Share (Match) and Maintenance of Effort (MOE)	2014	2015	2016*
Match required per net award amount	\$11,074,510	\$11,096,642	\$11,135,095
Match provided (actual)	\$11,074,510	\$9,664,926	\$7,061,349
Match difference**	\$0	\$1,431,716	\$4,073,746
Federal funds matched (actual)	\$40,918,495	\$35,710,313	\$26,090,524
Percent Federal funds matched	100.00%	85.89%	63.42%
Match from State appropriation	\$6,383,131	\$5,167,856	\$3,122,915
Percent match from State appropriation	57.60%	53.40%	44.20%
Match from Third-Party Cooperative Arrangements (TPCA)	\$4,353,175	\$4,306,619	\$3,747,336
Percent match from TPCAs	39.40%	44.50%	53.1%
Match from Randolph-Sheppard program	\$338,204	\$190,451	\$191,098
Percent match from Randolph-Sheppard Program	3.00%	2.00%	2.70%
Match from interagency transfers			
Percent match from interagency transfers	0.00%	0.00%	0.00%
Match from other sources			
Percent match from other sources	0.00%	0.00%	0.00%
MOE required	\$10,974,315	\$10,839,595	\$11,074,510
MOE: Establishment/construction expenditures	\$0	\$0	\$0
MOE actual	\$11,074,510	\$9,664,926	\$7,061,349
MOE difference**	-\$100,195	\$1,174,669	\$4,013,161

* Indicates the award is currently in an open status. Therefore, data is either not currently available or not final.

** A positive amount indicates a deficit. A negative amount indicates a surplus.

Table 6.2 Non-Federal Share and Maintenance of Effort—Descriptions, Sources and Formulas

Non-Federal Share (Match) and Maintenance of Effort (MOE)	Source/Formula
Match required per net award amount	Non-Federal funds required based upon the net amount of the Federal award. Source/Formula: (Table 6.1 Federal award amount net divided by 0.787) multiplied by 0.213
Match provided (actual)	Amount of match (non-Federal share) provided, by the agency. Source/Formula: SF-425 line 10j lesser of the 4 th quarter or latest/final
Match difference**	The difference between match required to access the net Federal award funds and the actual amount of match provided by agency. Source/Formula: SF-425 lesser of the 4 th quarter or latest/final: ((Federal formula award amount divided by 0.787) multiplied by 0.213) minus SF-425 line 10j
Federal funds matched (actual)	Total amount of Federal funds the agency was able to match based upon the non-Federal share reported. The maximum amount of Federal funds the agency can access is limited to the Federal grant award amount. Source/Formula: (Match provided actual divided by .213) multiplied by .787
Percent of Federal funds matched	Percent of Federal funds matched. Source/Formula: Federal funds matched divided by Federal award amount net
Match from State appropriation	Match amount from State appropriation. Source/Formula: Data provided by State
Percent match from State appropriation	Match amount from State appropriation expressed as a percentage of total match provided. Source/Formula: Match from State appropriation divided by SF-425 line 10j
Match from TPCAs	Match amount from Third-Party Cooperative Arrangements (TPCAs). Source/Formula: Data provided by State
Percent match from TPCAs	Match amount from Third-Party Cooperative Arrangements (TPCAs) expressed as a percentage of total match provided. Source/Formula: Match from TPCAs divided by SF-425 line 10j

Non-Federal Share (Match) and Maintenance of Effort (MOE)	Source/Formula
Match from Randolph-Sheppard program	Match amount from Randolph-Sheppard program. Source/Formula: Data provided by State
Percent match from Randolph-Sheppard Program	Match amount from Randolph-Sheppard program expressed as a percentage of total match provided. Source/Formula: Match from Randolph-Sheppard Program divided by SF-425 line 10j
Match from interagency transfers	Match amount from interagency transfers. Source/Formula: Data provided by State
Percent match from interagency transfers	Match amount from interagency transfers expressed as a percentage of total match provided. Source/Formula: Match from interagency transfers divided by SF-425 line 10j
Match from other sources	Match amount from all sources of match not previously listed. Source/Formula: Data provided by State
Percent match from other sources	Match amount from all other sources expressed as a percentage of total match provided. Source/Formula: Match from other sources divided by SF-425 line 10j
Maintenance of Effort (MOE) required	Maintenance of effort (MOE) is the level of non-Federal expenditures established by the State's non-Federal expenditures two years prior, i.e. Recipient Share of Expenditures. Source/Formula: SF-425 4 th quarter or latest/final report: line 10j minus line 12a
MOE: Establishment / construction expenditures	Non-Federal share of expenditures for construction of facilities for community rehabilitation program (CRP) purposes and the establishment of facilities for community rehabilitation purposes. Source/Formula: SF-425 latest/final report: line 12a
MOE actual	Non-Federal share provided by agency minus establishment/construction expenditures for CRPs. Source/Formula: SF:425: Match provided actual minus establishment/construction expenditures

Non-Federal Share (Match) and Maintenance of Effort (MOE)	Source/Formula
MOE difference**	The difference between MOE required and the actual MOE provided. Source/Formula: MOE required minus MOE actual

** A positive amount indicates a deficit. A negative amount indicates a surplus.

Table 6.3 Colorado-Combined (CO-C) Program Income and Carryover—FFYs 2014–2016

Program Income and Carryover	2014	2015	2016*
Program income received	\$999,401	\$1,012,248	\$3,499,117
Program income disbursed	\$999,401	\$1,012,248	\$3,499,117
Program income transferred	\$0	\$17,265	\$32,269
Program income used for VR program	\$999,401	\$994,983	\$3,466,848
Federal grant amount matched	\$40,918,495	\$41,576,303	\$41,142,346
Federal expenditures and unobligated funds 9/30	\$11,783,152	\$6,685,175	\$11,469,316
Carryover amount	\$0	\$5,289,954	\$19,239,410
Carryover as percent of award	0.00%	12.72%	46.76%

* Indicates the award is currently in an open status. Therefore, data is either not currently available or not final.

Table 6.3 Program Income and Carryover—Descriptions, Sources and Formulas

Program Income and Carryover	Source/Formula
Program income received	Total amount of Federal program income received by the grantee. Source/Formula: SF-425 latest/final line 10l
Program income disbursed	Amount of Federal program income disbursed, including transfers. Source/Formula: SF-425 latest/final: line 10m plus line 10n
Program income transferred	Amount of Federal program income transferred to other allowable programs. Source/Formula: SF-425 latest/final: line 12e plus line 12f plus line 12g plus line 12h
Program income used for VR program	Amount of Federal program income utilized for the VR program. Source/Formula: SF-425 latest/final: Program income expended minus program income transferred
Federal grant amount matched	Federal funds an agency is able to draw down based upon on reported non-Federal share not to exceed net award amount. Source/Formula: Table 6.2 Federal funds matched actual
Federal expenditures and unobligated funds 9/30	Federal funds expended by 9/30 of the FFY of appropriation. This does not include unliquidated obligations. Source/Formula: SF-425 4 th quarter: line 10e
Carryover amount	The amount of Federal funds matched that the grantee did not liquidate, by 9/30 of the FFY of appropriation. This includes any unliquidated Federal obligations as of 9/30. Source/Formula: G5 Reports run as of 9/30 of the FFY of appropriation.
Carryover as percent of award	Amount of carryover expressed as a percentage of total Federal funds available. Source//Formula: G5, SF-425 latest/final: Carryover amount divided by Federal net award amount.

Table 6.4 Colorado-Combined (CO-C) RSA-2 Expenditures—FFYs 2014–2016*

RSA-2 Expenditures	2014	2015	2016
Total expenditures	\$40,360,715	\$46,650,788	\$50,686,642
Administrative costs	\$6,132,247	\$6,941,663	\$7,204,236
Administration as Percent expenditures	15.19%	14.88%	14.21%
Purchased services expenditures	\$18,058,842	\$23,509,089	\$27,023,406
Purchased services as a Percent expenditures	44.74%	50.39%	53.31%
Services to groups	\$1,300,552	\$1,440,299	\$1,717,603
Services to groups percentage	3.22%	3.09%	3.39%

*Expenditures for RSA-2 data represent current FFY expenditures and carryover from prior FFY. Therefore, these figures may differ from the expenditures in Tables 6.1, 6.2, and 6.3 which are from SF-425 reports.

Table 6.4- RSA-2 Expenditures—Descriptions, Sources and Formulas

RSA-2 Expenditures	Sources/Formula
Total expenditures	All expenditures from Federal, State and other rehabilitation funds (including VR, supported employment, program income, and carryover from previous FFY). This includes unliquidated obligations. Source: RSA-2: Schedule 1.4
Administrative costs	Total amount expended on administrative costs under the VR program. Source/Formula: RSA-2: Schedule 1.1
Administration as percent of expenditures	Administrative costs expressed as a percentage of all expenditures. Source/Formula: Administrative costs divided by total expenditures
Purchased services expenditures	Expenditures made for services purchased by the agency. Source/Formula: RSA-2: Schedule 1.2.B
Purchased services as a percent of expenditures	Purchased services expressed as a percentage of total expenditures. Source/Formula: Purchased services expenditures divided by total expenditures

RSA-2 Expenditures	Sources/Formula
Services to groups	Expenditures made by the agency for the provision of VR services for the benefit of groups of individuals with disabilities. Source/Formula: RSA-2: Schedule 1.3
Services to groups percentage	Services to groups expressed as a percentage of total expenditures. Source/Formula: Services to groups divided by total expenditures

APPENDIX B: DOCUMENTATION REVIEW RESULTS

Data Element	Number with required documentation	Number without required documentation	Percent with required documentation	Percent without required documentation
Date of Application	30	0	100	0
Date of Eligibility Determination	30	0	100	0
Date of IPE	30	0	100	0
Start Date of Employment in Primary Occupation at Exit or Closure	19	11	63.3	33.3
Weekly Earnings at Exit or Closure	30	0	0	0
Employment Status at Exit or Closure	19	11	0	0
Type of Exit or Closure	30	0	0	0
Date of Exit or Closure	30	0	0	0

Summary	Number (of 30)	Percent (of 30)
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Summary	Number (of 30)	Percent (of 30)
Files with all required documentation	19	
Files with documentation for four or more data elements examined were missing or the paper file was inconsistent from the electronic file.	18	60
Files with no required documentation	0	0

APPENDIX C: AGENCY RESPONSE

A. Overview

This appendix contains CO DVR's responses to recommendations and corrective actions identified in the monitoring, along with CO DVR's requests for technical assistance to address them, and RSA's responses, as appropriate.

For corrective actions to improve program and fiscal performance, as well as to improve administration of the VR program, CO DVR must develop a corrective action plan for RSA's review and approval that includes specific steps the agency will take to complete each corrective action, the timetable for completing those steps, and the methods the agency will use to evaluate whether the corrective action has been resolved. RSA anticipates that the corrective action plan can be developed and submitted online using the RSA website at rsa.ed.gov within 45 days from the issuance of this report. RSA is available to provide technical assistance to enable CO DVR to develop the plan and undertake the corrective actions.

For recommendations to improve program and fiscal performance as well as to improve administration of the VR program, CO DVR will report to the review team, on a quarterly basis, progress on the implementation of recommendations.

B. Agency Responses

Recommendations

2.1 Quality of Employment Outcomes

- 2.1.1 Improve the quality of employment outcomes for individuals being served, including youth with disabilities, and individuals with the most significant disabilities who require supports to achieve their vocational goal;
- 2.1.2 Develop goals and strategies targeting the quality of employment outcomes;
- 2.1.3 Review the nature and scope of the delivery of VR services that correlate to employment outcomes that can lead to a career, or advancement in employment, and identify potential barriers to access or use of these services on the part of VR program consumers; and
- 2.1.4 Identify effective strategies for employing labor market information at the field level and through the work of the business outreach specialists to assist VR consumers in finding career path employment opportunities.

Agency Response: DVR appreciates RSA's recommendations and values the feedback regarding the quality of employment outcomes obtained by all of our clients. DVR has several initiatives underway to address quality outcomes in the areas of effective use of labor market information and analysis of service and outcome correlations. DVR will continue efforts to improve the quality of client employment outcomes as recommended.

Technical Assistance: CO DVR does not request technical assistance.

3.1 Quality of Employment Outcomes

- 3.1.1 Continue to evaluate the reasons behind the low number of youth receiving postsecondary education and training; and
- 3.1.2 Continue to develop and implement strategies to address the focus on short term services and a lack of postsecondary education among youth in order to provide more meaningful opportunities for training and other services necessary for youth to achieve employment outcomes in a competitive integrated setting.

Agency Response: DVR appreciates RSA's recommendation regarding youth and post-secondary education's impact on the quality of their employment outcomes. DVR will continue to evaluate policies, practices and potential barriers, looking for opportunities to cultivate appropriate educational pathways for youth.

Technical Assistance: CO DVR does not request technical assistance.

3.2 Provision of Pre-employment Transition Services

- 3.2.1 Continue to analyze 34 CFR §361.48(a) to identify pre-employment transition coordination and authorized activities CO DVR may already be providing in relation to potentially eligible students with disabilities throughout the State that could count toward the 15 percent reserve; and
- 3.2.2 Develop and implement strategies based on the estimated number of all eligible and potentially eligible students with disabilities throughout the State so that required, authorized, and coordination activities can be provided concurrently and counted toward the 15 percent reserve.

Agency Response: DVR appreciates RSA's recommendation and technical assistance provided while on site regarding tracking of coordination and authorized activities for Pre-Employment Transition Services and will continue to refine our projection models and coordination of tracking activities to fully utilize the 15 percent reserve.

Technical Assistance: CO DVR does not request technical assistance.

4.1 Quality of Employment Outcomes for Individuals in Supported Employment

- 4.1.1 Develop strategies to improve its performance on indicators measuring the quality of employment outcomes for individuals pursuing a vocational goal with supports, including improvement in wages, hours worked, and benefits received, as appropriate;
- 4.1.2 Collaborate with CRPs with which it contracts, including those that employ the IPS model, to implement these strategies; and
- 4.1.3 Develop strategies, including cross-training as necessary, to blend the approaches of the IPS model with traditional VR processes to ensure a smooth hand off from the CRP to the VR counselor, and to improve the quality of referrals to CO DVR.

Agency Response: Again, DVR appreciates RSA's recommendation and will strive to improve the quality of employment outcomes for all of our clients. DVR has established the necessary organizational structure to maximize our ability to collaborate effectively with our partners, including area Mental Health Centers using the IPS model and will continue to improve the referral and hand-off processes ensuring a shared focus on the eventual quality of the employment outcome achieved as the result of IPS interventions.

Technical Assistance: CO DVR does not request technical assistance.

Corrective Actions to Improve Performance

2.1 Timely Determination of Eligibility

Corrective Action Steps:

- 2.1.1 Submit the action steps that CO DVR will take, including timelines, to ensure that eligibility determinations are made in a timely manner pursuant to 34 CFR §361.41(b)(1).

Agency Response: DVR agrees with this finding and has already taken significant steps to ensure that Colorado clients are able to obtain timely eligibility determinations. These action steps will be submitted as requested. DVR is proud of its progress in this area having experienced year-over-year improvement during and beyond the time period covered by this monitoring report (FFY 17 showed eligibility timeliness rate of 90.12%). We do feel it is important to note that the federal regulations [34 CFR 361.41 (b)(1)(i)] allow for appropriate extensions of the time period for determining eligibility, and the analysis in section 2.1 does not address those circumstances. For example, in FFY 16, in addition to the 89.9% of eligibility decisions that were made in 60 days or less, another 2.8% of eligibility decisions were made after the 60th day but were accompanied by a documented extension, resulting in 92.7% of FFY 16 eligibility decisions being made in compliance with the regulations.

RSA Response: RSA recognizes CO DVR's improved performance in this area but maintains the finding as written, as it is based on data over the three-year period reviewed from FFY 2014 to FFY 2016. In addition, RSA recognizes that VR agencies may utilize extensions beyond the 60-day timeframe when the circumstances warrant and when both the counselor and individual with a disability agree to the extension.

Technical Assistance: CO DVR does not request technical assistance.

2.2 Timely Development of the IPE

Corrective Action Steps:

- 2.2.1 Submit the action steps that CO DVR will take, including timelines, to ensure that IPEs are developed in a timely manner pursuant to 34 CFR §361.45(e) as required by 34 CFR §361.45(a)(1).

Agency Response: DVR also agrees with this finding and continues to strengthen counselor practices to ensure that Colorado clients are able to establish IPEs in a timely manner. DVR further appreciates RSA's recognition of the Order of Selection challenge experienced and of our performance management efforts in this area. In addition to those considerations, DVR would like to again point out that federal regulations provide exceptions for circumstances when the counselor and client agree that additional time is necessary to prepare an appropriate plan [34 CFR 361.45 (e)] and these circumstances are not taken into account in the data analysis. Nevertheless, DVR action steps to accomplish increased timeliness of plan development will be submitted as requested.

RSA Response: RSA recognizes that CO DVR is working to improve its performance in this area but maintains the finding as written, as it is based on data over the three-year period reviewed from FFY 2014 to FFY 2016. In addition, RSA recognizes that VR agencies may utilize extensions beyond the 90-day timeframe when the circumstances warrant and when both the counselor and individual with a disability agree to the extension.

Technical Assistance: CO DVR does not request technical assistance.

5.1 Prior Approval

Corrective Action Steps:

5.1.1 Develop and implement policies and procedures, as well as a written internal control process, including a monitoring component, to ensure ongoing compliance with the prior approval requirements.

Agency Response: DVR appreciates recent TAC 18-02 and associated training opportunities and will develop and implement the appropriate policies and procedures as requested.

RSA Response: RSA stands ready to review the policies and procedures on prior approval as they are developed and would be pleased to provide any technical assistance if CO DVR determines that it needs such assistance in the future.

Technical Assistance: CO DVR does not request technical assistance.