

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



**U.S. Department of Education
Office of Special Education and
Rehabilitative Services
Rehabilitation Services Administration**

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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 Florida Division of Vocational Rehabilitation (FDVR) 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 program 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 24, 2017 through April 28, 2017, is described in detail in the [FFY 2017 Vocational Rehabilitation Program Monitoring and Technical Assistance Guide](#).

B. Summary of Observations and Findings

RSA's review of FDVR 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 FDVR's performance to the national performance for all agencies of similar type (i.e., FDVR's performance is compared to general agencies in States that have a general and blind agency). This is for comparison only; there are no requirements for VR agencies to meet or exceed national performance levels.

Observations

RSA observed that:

- FDVR submitted inaccurate data through the annual RSA-911 report for FFYs 2015 and 2016.
- From FFY 2014 to FFY 2016, the percentage of individuals accepted for services who received no services has remained high when compared to the national performance for agencies of similar type;
- Due to inconsistencies in the supervisor and administrative staff reviews across each area and among the district offices within FDVR's regional areas, along with the limitations of the agency's case management system, FDVR's internal controls did not identify accurate, timely service delivery that is supported by the required documentation;
- From FFY 2014 through FFY 2016, FDVR reported a decline in employment outcomes and maintained a lower average wage rate when compared to the national performance for similar agencies in FFY 2016;
- The percentage of youth with disabilities who exited with employment remained below the national performance for similar agencies from FFY 2014 to FFY 2015; and
- FDVR reported that it has typically not opened cases for individuals with severe and persistent mental illness, as no funding mechanism was identified for long-term funding for extended supported employment services.

Findings

RSA found that:

- Eligibility determinations were not made within the required 60-day Federal time frame from the date of application;
- Individualized plans for employment (IPEs) were not developed within the 90-day Federal time frame from the date of eligibility determination;
- FDVR did not have written State-wide policies in place to ensure accurate data collection;
- FDVR did not meet personnel cost allocation requirements in accordance with 2 CFR §200.430;
- FDVR did not comply with the prior approval requirements in accordance with 2 CFR §200.407 and §200.439;

- FDVR did not meet obligation and expenditure requirements in 2 CFR §200.71 and 34 CFR §76.707. FDVR did not assign obligations and expenditures to the correct Federal award in accordance with 34 CFR §§361.12, 2 CFR §§200.77, 200.302, 200.303(a), 200.309, and 34 CFR §76.702;
- FDVR did not comply with third-party cooperative arrangement (TPCA) requirements in 34 CFR §361.28, including match requirements for the VR program in 34 CFR §361.60.
- FDVR's process for funding the VR program's proportionate amount of the one-stop system's infrastructure costs did not satisfy the requirements in 34 CFR §361.13 and §361.715; and

C. Summary of Technical Assistance

During the review process, RSA provided the below technical assistance to FDVR.

- RSA recommended that the practice of using the same form for both the referral and application process should be discontinued and that FDVR should create two distinct forms.
- RSA clarified that the date reported for the approval of the IPE should reflect the date the VR counselor and individual sign the plan as opposed to the date the supervisor pre-approves the drafted IPE.
- RSA explained the service record should contain supporting documentation that the individual retained employment in the same position, earning the same level of wage and hours as reported when employment was first obtained, and that the individual was stable in his or her employment prior to closure of the record, in accordance with section 102(a) of the Rehabilitation Act and 34 CFR §361.56.
- RSA clarified that the IPE should not reflect all services under an IPE starting upon the approval of the plan, but rather reflect the time when the services are expected to be provided.
- RSA and FDVR discussed the statutory and regulatory requirements of the SEA agreement, as described in 34 CFR §361.22(b), and the need for FDVR to incorporate the requirements into the final SEA agreement.
- RSA clarified that under section 101(a)(11)(D) of the Rehabilitation Act and 34 CFR §361.22, VR agencies are required to develop policies and procedures for coordinating with educational officials to facilitate the provision of VR services, including pre-employment transition services.
- RSA provided clarification regarding the requirements for providing pre-employment transition services throughout the on-site visit, including during meetings with VR counselors and technicians responsible for these services. RSA recommended that FDVR provide additional training to support agency staff.
- RSA advised FDVR to develop a forecasting methodology to reserve the necessary funds for all required pre-employment transition service activities for students with disabilities across the State.
- RSA provided recommendations to FDVR on the draft policies and procedures governing students and youth with disabilities developed by the agency during the monitoring process.
- RSA reviewed and provided feedback to FDVR regarding its supported employment policies.

- RSA provided technical assistance to FDVR that any costs for VR services provided prior to a consumer entering into a supported employment placement must be paid for with title I VR funding and may not be paid for with title VI Supported Employment program funding, which may only be used after the individual has obtained the supported employment placement and is receiving services during the 24-month ongoing support period.
- RSA informed FDVR that program income includes any payments received by the VR agency from financial participation of consumers for the provision of its services, in accordance with 34 CFR §361.63(b) and the SF-425 instructions for the VR program (RSA-PD-15-05).
- RSA informed FDVR that refunds received by the agency should be posted to the year from which the refund was derived, including those from closed grant awards. RSA provided the repayment instructions to FDVR.
- RSA provided technical assistance related to the increasing non-Federal share amounts reported as match, and the potential maintenance of effort implications.
- RSA advised FDVR of the requirements involving representation on the State Workforce Development Board by the lead State officials with primary responsibility for programs authorized under the Rehabilitation Act, as amended by title IV of WIOA.

As a result of the monitoring process, FDVR and RSA identified the need for additional technical assistance in the areas below.

- RSA will review and continue to provide feedback on FDVR's draft policies for pre-employment transition services until they are finalized.
- RSA will review and continue to provide feedback on FDVR's draft policies for supported employment until they are finalized.
- FDVR requested guidance on how to establish an infrastructure funding agreement (IFA) in situations where VR is not co-located with a one-stop center.
- FDVR requested technical assistance on how to establish a data sharing agreement without a SWIS agreement currently in place to ensure unemployment insurance data can be obtained for those outside the State of Florida.
- FDVR requested guidance on how to establish an infrastructure funding agreement (IFA) in situations where VR is not co-located with a one-stop center.

D. Review Team Participants

Members of the RSA review team included Christyne Cavataio, Jim Doyle, Samuel Pierre , and Beth Settle (Vocational Rehabilitation Program Unit); Craig McManus (Fiscal Unit); Jason Hunter (Technical Assistance Unit); and Rimal Desai (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 FDVR for the cooperation and assistance extended throughout 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 FDVR 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 measure 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 individualized plan for employment (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 FDVR with that of all general VR agencies.

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 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;
- VR agency managers and supervisors;
- VR counselors;
- VR agency personnel; and
- Representatives of the SRC, the CAP, and other VR program stakeholders.

In addition to a review of the RSA-911 and RSA-113 data provided by the VR agency, RSA conducted a review of 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 FDVR, and the method it uses to maintain records. RSA used the information obtained through the review of service records to assess FDVR'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 of Performance Data and Internal Controls

RSA reviewed FDVR'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 OOS, and who received services through the VR program. The data used in this review were provided by FDVR to RSA on the Quarterly Cumulative Caseload Report (RSA-113) and the Case Service Report (RSA-911).

The VR Process

The total number of applicants for VR services decreased slightly from 31,378 individuals in FFY 2014 to 29,292 individuals in FFY 2016, although the number of individuals determined eligible during this same period increased significantly from 11,638 individuals to 32,103 individuals. While FDVR continues to remain under an OOS, the number of individuals on a waiting list decreased dramatically, from 14,214 individuals in FFY 2014 to 557 individuals in FFY 2016. At the time of the on-site review, FDVR reported the agency's waiting list was approximately 250 individuals with about one month wait time for priority category III. It should be noted that despite the significant increase in the number of individuals determined eligible for VR services and the significant decrease in the number of individuals on a waiting list, the number of individuals with an IPE receiving services decreased from 49,947 individuals in FFY 2014 to 43,284 individuals in FFY 2016.

The total number of individuals whose cases were closed decreased from 34,848 individuals in FFY 2014 to 29,423 individuals in FFY 2016. During this time, the percentage of individuals whose cases were closed after receiving VR services decreased from 69.2 percent, or 24,128 individuals, in FFY 2014, to 45.4 percent, or 13,345 individuals, in FFY 2016. Conversely, the percentage of individuals whose cases were closed after being determined eligible but before an IPE was signed or services were received increased from 8.4 percent, or 2,924 individuals, in

FFY 2014 to 34.1 percent, or 10,036 individuals, in FFY 2016, which is higher than the national performance for general agencies of 27 percent for FFY 2016.

Employment Outcomes

The employment rate increased from 29.9 percent in FFY 2014 to 40.8 percent in FFY 2016. Despite the increase, the employment rate in FFY 2016 remained significantly below the national performance of 57.2 percent for general agencies. During this period, the number of individuals who exited without employment after receiving services decreased from 16,917 individuals, or 48.5 percent, to 7,898 individuals, or 26.8 percent. Additionally, the number of individuals who exited with employment after receiving services also decreased from 7,211 individuals, or 20.7 percent, in FFY 2014, to 5,447 individuals, or 18.5 percent, in FFY 2016, which is significantly below 33.6 percent for the national performance for general agencies. Of those individuals closed with an employment outcome, the percentage of individuals who achieved a supported employment outcome increased from 1,539 individuals, or 21.3 percent of all employment outcomes, in FFY 2014, to 1,644 individuals, or 30.2 percent, which is significantly higher than the national performance for similar agencies of 13 percent for FFY 2016.

From FFY 2014 to FFY 2016, FDVR reported a slight increase in the average hourly earnings for those who achieved competitive employment, from \$10.84 to \$11.05, which is below the national performance for general agencies of \$12.37 for FFY 2016. In addition, the average hours worked per week for those individuals competitively employed decreased from 30.12 hours in FFY 2014 to 28.85 hours in FFY 2016, which is below the national performance for general agencies of 30.4 hours per week for FFY 2016.

VR Services Provided

From FFY 2014 to FFY 2016, the number of individuals who received VR services decreased from 24,128 individuals to 13,345 individuals. In addition, the percentage of individuals who received any single service decreased for all but one service category, job placement assistance. It should be noted that FDVR provided the RSA review team a copy of revised data that reported a higher percentage of individuals who received services in FFYs 2015 and 2016, indicating that there had previously been a reporting error. Since this information was not included with FDVR's annual RSA-911 report, RSA could not verify or include this information in the tables included under Appendix A.

The number and percentage of individuals who receive college or university training decreased from 962 individuals, or 4 percent, in FFY 2014 to 134 individuals, or 1.0 percent, in FFY 2016, which is above the national performance of 0.4 percent for FFY 2016. The number and percentage of individuals who received four-year college or university training decreased from 187, or 0.8 percent, in FFY 2014, to 17 individuals, or 0.1 percent, in FFY 2016, which is significantly below the national performance for general agencies of 6.2 percent for FFY 2016. Similarly, from FFY 2014 to FFY 2016, the number and percentage of individuals who attended junior or community college decreased from 1,497 individuals, or 6.2 percent, to 68 individuals, or 0.5 percent, which is significantly lower than the national performance of 4.4 percent. During the monitoring process, FDVR explained the reason for a higher number and percentage of individuals attending college or university training, or graduate school, compared to four-year

college or university training, or undergraduate school, was most likely due to coding errors by the counselors.

From FFY 2014 through FFY 2016, FDVR reported no individuals received services in several training service categories. Specifically, during the three-year period reviewed, FDVR's data demonstrate that services were not provided for apprenticeship training, job readiness training, and disability-related skills training. In addition, FDVR did not report any individuals receiving career services, VR counselling and guidance, and information and referral services. Additional services identified as not being provided included reader services and personal assistant services (FFYs 2015 and 2016).

Select Measures for All Individuals Served by Impairment Type

The percentage of individuals served from FFY 2014 through FFY 2016 diagnosed with psychosocial or psychological disorders has remained fairly consistent, increasing slightly from 42 percent in FFY 2014 to 42.8 percent in FFY 2016, which is higher than the national performance of 35.9 percent in FFY 2016. Individuals served with intellectual and learning disabilities also remained fairly consistent, increasing slightly from 24.6 percent for FFY 2014 to 25.6 percent for FFY 2016, compared to 29.8 percent for the national performance for similar agencies. Individuals served with physical disabilities decreased slightly from FFY 2014 to FFY 2016, from 25.5 percent to 22.9 percent. FDVR also demonstrated a slight increase in individuals served with auditory and communicative disabilities, from 6.7 percent for FFY 2014 to 7.7 percent for FFY 2016, compared to 12.5 percent for the national performance for similar agencies. Finally, the percentage of individuals served with a visual impairment has decreased slightly, from 1.2 percent in FFY 2014 to 0.9 percent in FFY 2016, which is slightly higher than the national performance of 0.4 percent for FFY 2016.

The employment rate for individuals with auditory and communicative impairments has increased, from 46.9 percent for FFY 2014 to 58.7 percent for FFY 2016, compared to the national employment rate for this population in similar agencies of 81.5 percent. The employment rate for individuals with intellectual and learning disabilities also increased from FFY 2014 to FFY 2016, from 27.1 percent to 43.2 percent, which is significantly lower than the national employment rate of 57.1 percent for general agencies. The employment rate also increased for individuals who were served with visual impairments, from 38.7 percent in FFY 2014 to 42.1 percent in FFY 2016, which remains lower than the national employment rate for general agencies of 56.2 percent for FFY 2016. Additionally, the employment rate for those served with psychosocial and psychological disorders increased from 27.6 percent in FFY 2014 to 38.3 percent in FFY 2016, which is significantly lower than the national employment rate for general agencies of 50.5 percent for FFY 2016. Finally, the employment rate increased for all individuals served with physical impairments from 31.5 percent in FFY 2014, to 36.8 percent in FFY 2016, which is significantly below the national employment rate of 54.3 percent for similar agencies for FFY 2016.

Length of Time in Stages of the VR Process

The percentage of individuals served who were determined eligible within 60 days from the date of application decreased from 69.4 percent in FFY 2014 to 67 percent in FFY 2016 for all

individuals whose service records were closed. The percent remains well below the national performance for similar agencies of 84.4 percent for FFY 2016. FDVR reported its case management system does not have the ability to report if an extension to the eligibility determination was agreed upon within the 60-day time frame.

The percentage of individuals for whom an IPE was developed within 90 days increased from 70.6 percent in FFY 2014 to 75.1 percent in FFY 2016 for all individuals whose service records were closed, slightly higher than the national performance for similar agencies of 72.8 percent in FFY 2016. The calculation for the 90-day time frame does not include any time an individual may have been on a waiting list as a result of the agency closing one or more priority categories.

Standard Occupational Codes for Individuals Who Achieved Employment Outcomes

A review of the Standard Occupational Classification (SOC) codes for all individuals served with an employment outcome demonstrated that the most common types of occupations for individuals achieving employment in FFY 2016 were in office and administrative support occupations (20.2 percent), food preparation and serving related occupations (15.2 percent) and building and grounds cleaning and maintenance (11.6 percent). Although these three occupational fields represent 47 percent of all FDVR's employment outcomes in FFY 2016, the median hourly earnings for these occupations rank among the lowest earning occupations. Individuals employed in food preparation and serving related occupations earned median hourly wages of \$8.55, compared to the national median for similar agencies of \$9.00. Those who were employed in building and grounds cleaning and maintenance occupations in FFY 2016 earned median hourly wages of \$8.98, below the national median of \$9.15 for similar agencies. Finally, individuals employed in the office and administrative support occupations earned median hourly wages of \$9.10, compared to the national median hourly wages of \$10.00 for similar agencies.

Service Record Reviews

During the on-site portion of the review, RSA conducted a service record review of 30 service records comprised of service records for individuals whose cases were closed prior to September 30, 2016, after receiving services. The service record review was conducted to verify and ensure that the documentation in the case service record was accurate, complete, and supported the data entered into the RSA-911 with respect to date of application, date of eligibility determination, date of IPE, start date of employment in primary occupation at exit or closure, hourly wage at exit or closure, employment status at exit or closure, type of exit or closure, and date of exit or closure.

FDVR was notified approximately four weeks before the on-site portion of the review began so that the cases could be made available to the review team. The service record reviews were conducted by two RSA representatives and two FDVR administrative staff. Each case service record was maintained in the agency's electronic case management system and accompanied by a hard copy file. The service record review involved jointly reviewing two case service records and randomly assigning the four reviewers seven case service records each. In addition, two cases were randomly chosen to compare the results from each reviewer for an interrater reliability check.

Of the 30 cases requested, 14 case service records were closed as employed and 16 of the records were closed as not employed after receiving services. FDVR was unable to produce one of the case files because it was misplaced before the RSA review team arrived; therefore, 29 case service records were reviewed. Of the 29 case service records reviewed, 14 service records, or 47 percent, contained a verified 60-day eligibility date with supporting documentation. In addition, three, or 10 percent of the case service records, contained the necessary supporting documentation for the date of the IPE. Also, six case service records, or 43 percent, included the start date of employment for the individual's primary occupation. Finally, 13 case service records, or 43 percent, included the proper documentation to support the date of closure, as reported in the RSA-911 report.

Following the case service record review, FDVR explained that the inconsistency between the dates in its case management system and the supporting documentation can be attributed to the prior approval required by supervisors before the VR counselor can make an eligibility determination, review the IPE with the individual, or close an individual's case, among other status changes. As a result, the system will report the date the supervisor provided his or her approval. This process was especially problematic with the date of the IPE, which often had a date weeks, or in some cases, more than a month, before the individual actually reviewed and signed the IPE.

In addition, FDVR provided an overview of its internal control procedures. While each area has implemented a process to review case service records using the same form, the scope and focus of the case reviews varied from area to area causing inconsistent results. Additionally, the different reviews focused on meeting the 60-day eligibility determination or 90-day IPE development time frames and supporting eligibility determination decisions or the services included in an IPE, rather than verifying that the case service record contained the required supporting documentation.

C. Analysis of Performance and Observations

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

2.1 Data Accuracy

Observation: FDVR submitted inaccurate data through the annual RSA-911 report for FFYs 2015 and 2016.

Prior to the on-site portion of the review, RSA provided and discussed the performance tables that were developed using the data reported by FDVR through the RSA-911 report. During these discussions, RSA discussed concerns with the data reported for FFYs 2015 and 2016, specifically related to the significant decrease in the reported VR services provided. For example, RSA discussed with FDVR the following data that demonstrated a significant drop in VR services in FFY 2016:

- Of the 13,345 individuals who received services and whose case service records were closed, 144 individuals, or 1.0 percent, received college or university training, and 17 individuals, or 0.1 percent, received four-year college or university training;
- FDVR reported 68 individuals, or 0.5 percent, received junior or community college, and 180 individuals, or 1.3 percent, received occupational or vocational training; and
- No individuals reportedly received apprenticeship training, job readiness training, disability-related skills training, vocational rehabilitation counseling and guidance, or on-the-job supports for supported employment.

During the on-site portion of the monitoring process, RSA was provided revised data tables from FDVR that reported a higher percentage of services provided for individuals who received VR services and had their case service records closed during FFYs 2015 and 2016. FDVR reported that the errors in the reports were a result of a programming issue with the data collected through the agency's case management system and reported through the RSA-911 report. The reporting issue was identified as a result of RSA's monitoring process. FDVR reported this error was corrected and data reported for future reports would be accurate.

2.2 Exiting the VR System

Observation: From FFY 2014 to FFY 2016, the percentage of individuals accepted for services who received no services has remained high when compared to the national performance for agencies of similar type. The percentage of individuals who exited the VR system without employment, after eligibility, but before an IPE was developed, increased from FFY 2014 to FFY 2016. As a result, the percentage of individuals with disabilities eligible for VR services who receive services has declined, allowing fewer individuals to become competitively employed in integrated employment.

FDVR implemented an OOS in FFY 2008 and closed all priority categories. In FFY 2010, FDVR opened priority categories I and II and began serving individuals from its waiting list for priority category III. and closed priority category III in FFY 2010. Soon after the start of FFY 2014, FDVR closed priority category II, and by February of 2014, closed priority category I, due to a lack of financial resources. By the end of FFY 2014, FDVR reported 14,214 individuals on its waiting list. In June 2014, FDVR received additional State funding and began serving eligible individuals under priority category I. In February 2015, FDVR was able to open priority category II and began serving eligible individuals on the waiting list. By the end of FFY 2016, FDVR reported the majority of individuals on the waiting list under priority category III had been contacted and had an IPE developed, reducing the number of individuals on the waiting list to 557 individuals, with the average wait time of three months. At the time of the on-site portion of the review, FDVR reported approximately 250 individuals remain on the waiting list for priority category III with about a 30-day waiting period.

From FFY 2014 to FFY 2016, the percentage of individuals who were accepted for VR services who received no VR services increased from 31.2 percent to 34.7 percent, compared to the national performance of 24.7 percent for general agencies. During this same period, the number of individuals who exited without an employment outcome after eligibility, but before an IPE was signed or services were received increased from 2,924 individuals, or 8.4 percent, in FFY 2014, to 10,036 individuals, or 34.1 percent, in FFY 2016.

FDVR believes the high number and percentage of eligible individuals who were accepted for VR services but received no services before their cases were closed was primarily due to the delay in services while on the waiting list. Many of these individuals were no longer interested in services or could not be located, and their cases were closed.

2.3 Internal Controls

Observation: FDVR provided an overview and documentation related to the processes in place as part of the agency's internal controls for the timeliness of eligibility and IPE development, as well as a review of each case record prior to moving to a new status during the progression of VR services. Due to inconsistencies in the supervisor and administrative staff reviews across each area and among the district offices within FDVR's regional areas, along with the limitations of the agency's case management system, FDVR's internal controls failed to identify accurate, timely service delivery that is supported by the required documentation.

FDVR has a number of internal controls in place to improve the timeliness of eligibility determinations and the development of IPEs, and to ensure the required agency procedures are met by all VR counselors. Regional area managers conduct reviews of case service records to identify any noncompliance and to examine areas of quality assurance to ensure VR counselors are following FDVR's policies and procedures. The regional area managers reviewed case service records at various points in the VR process, including case records at application, eligibility, after the development of an IPE, and prior to the case closure. Each regional area manager reviewed the case service record using the same form, but the review process was applied inconsistently across areas.

Due to the limitations of FDVR's case management system and its inability to provide real-time reports to managers and administrative personnel, staff members are limited to receiving monthly reports. The case management system also has limited ability for checking for errors or providing timely alerts to both the VR counselors and management personnel to notify the appropriate staff. In addition, the processes implemented by the district supervisors and regional area managers are applied inconsistently across the State, resulting in varying levels of compliance.

FDVR has developed a pilot that uses a consistent and strict internal controls process to achieve a higher level of compliance. This pilot was initiated in one of the areas prior to the on-site portion of the review. The pilot uses an approach that is consistently applied throughout each district office in the area. Action plans are developed for any VR counselor that does not meet a high level of compliance until performance has been improved to a satisfactory level. At the time of the on-site review, FDVR was in the process of training all area managers and district supervisors on these internal controls procedures to ensure consistency across the State.

2.4 Employment Outcomes

Observation: From FFY 2014 through FFY 2016, FDVR reported a decline in employment outcomes and maintained a lower average wage rate when compared to the national performance for similar agencies in FFY 2016. The number of individuals who were determined eligible and received services under an IPE significantly declined from 49,947 to 43,284, from FFY 2014 to

FFY 2016, respectively. During this same period, the number of individuals who received services and whose cases were closed decreased from 24,128 individuals to 13,345 individuals. Of these individuals, the number of individuals with disabilities who achieved an employment outcome decreased from 7,211 individuals to 5,034 individuals. Of those individuals who achieved an employment outcome, the average hourly wage of \$11.05 remains below \$12.37, the national performance for VR agencies of similar type for FFY 2016.

From FFY 2014 to FFY 2016, FDVR demonstrated a reduction in the percentage of individuals who exited the program after receiving services, from 69.2 percent to 45.4 percent, compared to the national performance of 58.8 percent for similar agencies. In addition, the percentage of individuals accepted for services who received no services increased, from 31.2 percent in FFY 2014 to 34.7 percent in FFY 2016, significantly higher than the national performance of 24.7 percent for similar agencies. As a result, a lower number and percentage of individuals determined eligible for services were receiving services and had the opportunity to achieve competitive employment in an integrated setting. Of individuals who were determined eligible and received VR services and whose cases were closed in FFY 2016, 59.2 percent were closed without achieving an employment outcome, or an employment rate of 40.8 percent, compared to the national employment rate of 57.2 percent for agencies of similar type. This represented a significant improvement from FFY 2014, when the employment rate was 29.9 percent, with 16,917 cases closed after receiving services without employment.

Of those who achieved an employment outcome after receiving services from FFY 2014 through FFY 2016, the average hourly wage rate increased slightly, from \$10.84 per hour in FFY 2014 to \$11.05 per hour in FFY 2016, compared to the national hourly wage of \$12.37 for similar agencies. In addition, the average hours worked per week declined slightly, from 30.12 hours per week to 28.85 hours, which was below the national performance for FFY 2016 of 30.4 hours worked per week.

Due to the coding errors reported by FDVR regarding reported services provided to individuals for FFYs 2015 and 2016, it is difficult to determine to what extent the provision of VR services may have contributed to the number and quality of the employment outcomes achieved during this period. It was noted in FFY 2016 that 41 percent of individuals who received services after the development of an IPE received services for 12 months or less.

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 FDVR:

2.1 Data Accuracy

- 2.1.1 Develop internal control processes to ensure the accuracy and validity of data reported through the RSA-911 prior to submitting the data to RSA;

- 2.1.2 Review the outcomes of the available case management reports involving VR services provided to all individuals to identify common coding errors; and
- 2.1.3 Once FDVR has identified possible coding issues, train all staff tasked with entering information into the case management system on the appropriate definitions in accordance with PD 16-04.

2.2 Exiting the VR System

- 2.2.1 Develop strategies to maintain contact with and provide information and referral services for eligible individuals on the waiting list;
- 2.2.2 Develop information and resources for individuals on the waiting list that would provide available services through the State's one-stop system and other resources that may be available to individuals with disabilities throughout the State; and
- 2.2.3 Provide a system for assessing the approximate time eligible individuals may be on a waiting list, and provide updates and available resources to keep the individuals engaged in the VR system.

2.3 Internal Controls

- 2.3.1 Expand written internal control policies and procedures for the accuracy and validity of data reported through the RSA-911, specifically for maintaining verifying documentation in an individual's case file regarding eligibility determination, development of the IPE, services provided, and service record closure;
- 2.3.2 Evaluate the piloted internal control procedures for each regional area after implementation to assess compliance; and
- 2.3.3 After evaluating the effectiveness of the new process in each regional area, provide additional training to staff based on areas identified as needed.

2.4 Employment Outcomes

- 2.4.1 Develop measurable goals and strategies to improve the agency's employment rate; and
- 2.4.2 Evaluate the decline in services and determine if necessary services are being provided to assist individuals with achieving quality employment, including job search and placement services.

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 Untimely Eligibility Determination

Issue: Was FDVR determining eligibility within the required 60-day Federal time frame from the date of application.

Requirement: Pursuant to 34 CFR §361.41(b)(1), eligibility determinations are to be made 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 control of the designated State unit (DSU) and the individual and DSU 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: As part of the monitoring process, RSA analyzed the length of time FDVR took to make eligibility determinations for VR applicants during FFYs 2014 through 2016. According to the data submitted by FDVR through the RSA-911 report, the following information was reported:

- Of the 27,764 individuals determined eligible, 19,261 individuals, or 69.4 percent of those whose service records were closed in FFY 2014, had an eligibility determination made within the required 60-day period;
- Of the total individuals served in FFY 2014, 62.38 percent, or 5,750 individuals of the 9,217 individuals under the age of 25 years old at exit whose service records were closed, had an eligibility determination made within the required 60-day period;
- In FFY 2015, 66.7 percent, or 15,660 individuals of the 23,473 individuals who were determined eligible and whose service records were closed, had an eligibility determination within the required 60-day time frame;
- Of the total individuals served in FFY 2015, 62.25 percent, or 5,069 individuals of the 8,143 individuals under the age of 25 years old at exit whose service records were closed had an eligibility determination made within the required 60-day period;
- In FFY 2016, of the 24,473 individuals who were determined eligible and whose service records were closed, 16,397 individuals were determined eligible within the 60-day eligibility time frame, or 67.0 percent, compared to 84.4 percent for the national performance for similar agencies; and
- Of the total individuals served in FFY 2016, 61.98 percent, or 5,338 individuals of the 8,612 individuals under the age of 25 years old at exit whose service records were closed, had an eligibility determination made within the required 60-day period, compared to the 82.89 percent for the national performance for similar agencies.

FDVR indicated that untimely eligibility determinations were identified as an area of concern prior to the monitoring process and discussed the increased focus and approach to improve the agency's performance in this area. In addition, FDVR reported that there are limitations in its case management system to monitor this information in real time and to track any eligibility extensions made in accordance with 34 CFR §361.41(b)(1).

Conclusion: FDVR did not make eligibility determinations within the required 60-day period for service records closed during the period of FFYs 2014 through 2016. As a result of the analysis, RSA determined that the agency was not in compliance with the eligibility determination requirements in 34 CFR §361.41(b)(1).

Corrective Action Steps:

RSA requires that FDVR:

- 2.1.1 Assess and evaluate VR counselor performance and identify effective practices that ensure timely eligibility determinations are made within 60 days from the date of application, including the use of case management tools for, and supervisory review of, timely eligibility determinations, tracking and monitoring; and
- 2.1.2 Develop procedures for VR counselors and supervisors to track and monitor timely and untimely eligibility determinations.

2.2 Untimely Development of the IPE

Issue: Was FDVR developing IPEs within the 90-day Federal time frame from the date of eligibility determination.

Requirement: In accordance with 34 CFR §361.45(a)(1), an IPE must be developed and implemented in a timely manner for each individual determined to be eligible for VR services, or if the DSU is operating under an OOS, for each eligible individual to whom the State unit is able to provide VR services. In addition, 34 CFR §361.45(e) requires that an IPE must be developed as soon as possible, but not later than 90 days after the date of determination of eligibility, unless the State unit and the eligible individual agree to the extension of that deadline to a specific date by which the IPE must be completed.

Analysis: RSA analyzed the length of time it took for FDVR to develop IPEs for individuals determined eligible for VR services. During the three-year period covered under the review, FDVR operated under an OOS that required the assignment of some individuals to a waiting list before an IPE was developed and the individual was served. RSA took into account the delay some individuals experienced as a result of being placed on a waiting list before being served. The number of individuals and percentages reported for each fiscal year is based on the time the individual was determined eligible until the IPE was approved, or if placed on a waiting list, from the date the individual was moved off a waiting list until the date the IPE was approved. The data reported by FDVR on the RSA-911 showed that:

- In FFY 2014, 17,039 of the 24,128 individuals served whose service records were closed, or 70.9 percent, had an IPE developed within the required 90-day period;
- Of these individuals, 72.92 percent, or 5,656 of the 7,756 individuals under the age of 25 at exit whose service records were closed, had an IPE developed within the required 90-day period in FFY 2014;
- Of the total individuals served who achieved supported employment and whose service records were closed in FFY 2014, 82.78 percent had an IPE developed within the required 90-day period;

- In FFY 2015, of the 13,478 individuals served whose service records were closed, 9,349 individuals or 69.4 percent had an IPE developed within the 90-day required time period;
- Of these individuals, 72.92 percent, or 3,271 of the 4,486 individuals under the age of 25 at exit whose service records were closed, had an IPE developed within the required 90-day period for FFY 2015;
- Of the total individuals served who achieved supported employment and whose service records were closed in FFY 2015, 81.95 percent, or 1,058 of the 1,291 individuals, had an IPE developed within the required 90-day period;
- In FFY 2016, of the 13,478 individuals served whose service records were closed, 10,025 individuals, or 75.1 percent, had an IPE developed within the 90-day required time period;
- Of these individuals, 77.98 percent, or 3,538 of the 4,537 individuals under the age of 25 at exit whose service records were closed, had an IPE developed within the required 90-day period for FFY 2016; and
- Of the total individuals served who achieved supported employment and whose service records were closed in FFY 2016, 85.52 percent, or 1,406 of the 1,644 individuals, had an IPE developed within the required 90-day period.

RSA requested additional information and supporting documentation that would support when the VR counselor and the individual agreed upon an extension, in accordance with 34 CFR §361.46(e). Due to the limitations of the current case management system and the extensive number of individual case service records during this period of time, FDVR was not able to produce this information.

Conclusion: FDVR did not develop IPEs within the required 90-day period for individuals served whose service records were closed during the period of FFYs 2014 through 2016. As a result of the analysis, RSA determined that FDVR was not in compliance with the development of IPEs in a timely manner pursuant to 34 CFR §361.45(a)(1) and within the required 90-day period in 34 CFR §361.45(e).

Corrective Action Steps:

RSA requires that FDVR:

- 2.2.1 Assess and evaluate current procedures for tracking and monitoring counselor performance and efficient practices used by high performing VR counselors and supervisors to ensure timely IPE development, including the use of case management tools for, and supervisory review of, timely IPE development; and
- 2.2.2 Develop goals and strategies to improve VR counselor performance specific to timely IPE development.

2.3 Internal Controls and Monitoring

Issue: Does FDVR have written Statewide policies in place to ensure accurate data collection.

Requirements: VR agencies must employ methods of administration for the proper and efficient administration of the VR portion of the State plan and carry out all functions required by the VR

program, including procedures to ensure accurate data collection and financial responsibilities, in accordance with 34 CFR §361.12. In addition, 2 CFR §200.303 requires that VR agencies develop an internal controls process to provide a reasonable assurance regarding the achievement of objectives in the effectiveness and efficiency of operations, reliability of reporting for internal and external use, established and implemented as a measure of checks and balances to ensure proper expenditures of funds, including the evaluation and monitoring of compliance with statutes, regulations and the terms and conditions of Federal awards.

RSA's PD-16-04, issued on September 27, 2016, and revised on June 14, 2017, clarifies that, in accordance with 34 CFR §361.47, VR agencies must maintain verifying documentation in an individual's case service record, particularly regarding the eligibility determination, development of the IPE, VR services provided, and service record closure. The internal controls developed and implemented by the agency must extend beyond tracking of the data reported through the RSA-911, but also must include the necessary supporting documentation in accordance with 34 CFR §361.47.

Analysis: During the on-site portion of the review process, RSA requested 30 case service records for review. The case service records selected included 14 cases where the individual successfully achieved an employment outcome prior to closure and 16 cases that were closed after the individual received VR services but did not achieve an employment outcome. FDVR was unable to produce one of the 30 case service records requested due to issues with the transferring of the case file from the district office to headquarters.

Of the eight data elements reviewed for the 30 case service records, FDVR achieved at least an 80 percent or higher compliance rating on two of the eight elements with no elements meeting a 90 percent compliance level. Four of the eight elements reviewed failed to reach a 50 percent compliance level. Specifically, 10 percent, or three out of 30 case service records reviewed, included the supporting documentation to verify the date of the IPE as reported on the RSA-911 report. In addition, six of the 14 case service records, or 43 percent, contained the appropriate supporting documentation for the start date of employment. Similarly, 43 percent, or 13 of the 30 case service records, included supporting documentation verifying the date of closure. Finally, 47 percent, or 14 of the 30 case service records reviewed, did not have supporting documentation verifying the date of the eligibility determination.

FDVR described the internal control procedures used for each area and used on a statewide level. According to FDVR, supervisors within each district office must review five case service records for any VR counselor who does not have independent status, or approximately 90 percent of all rehabilitation counselors. This review must be completed for each caseload every six months. In addition, FDVR also performs case service record reviews at a Statewide level using a panel of specialized staff. The panel is tasked with reviewing between 10 and 15 case service records from each district office. The intent is to ensure each district supervisor is reviewing case service records consistently across the State. Despite the current procedures in place, FDVR was unable to demonstrate sufficient internal controls to support the data reported through the RSA-911 report as a result of the case service record review.

Conclusion: In accordance with 34 CFR §361.12, FDVR must implement policies and procedures that ensure the proper and efficient administration of the VR program, including

those necessary to carry out all functions for which the VR agency is responsible. FDVR must develop and implement policies and procedures for collecting accurate data and for verifying the accuracy and reliability of the data through the required supporting documentation. In addition, FDVR must monitor and evaluate performance through the agency's internal controls, in accordance with 2 CFR §200.303. Based on the conduct of the service record review and FDVR's existing procedures, RSA determined that FDVR was not in compliance with the requirements in 34 CFR §361.12 or 2 CFR §200.303.

Corrective Action Steps:

RSA requires that FDVR:

- 2.3.1 Develop policies and procedures to obtain and maintain supporting documentation in an individual's case service record pursuant to the requirements of 34 CFR §361.47 and PD-16-04;
- 2.3.2 Implement internal controls to ensure all supporting documentation is maintained within each case service record, in accordance with 2 CFR §200.303; and
- 2.3.3 Develop and implement internal control procedures to ensure that case service records contain the required supporting documentation for data elements submitted through the RSA-911 report.

G. Technical Assistance

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

- During the on-site portion of the review, RSA reviewed 29 case service records in coordination with FDVR staff. As a result of this review, significant case management issues were identified and discussed with FDVR's administrative team, including:
 - Supervisors must review and approve an IPE prior to the VR counselor meeting and reviewing the plan with the individual. If the supervisor approves the IPE, the supervisor enters the date he or she approved the plan in the case management system, allowing the VR counselor to set up a time to review the IPE with the individual. Although the case management system also captures the date the VR counselor and individual both signed the IPE, the date reported to RSA through the RSA-911 report is the date the supervisor initially provided his or her approval. This creates a discrepancy between the date of the IPE reported to RSA and the date the plan was signed and approved by the VR counselor and individual. RSA clarified that the date reported for the IPE being approved should reflect the date the VR counselor and individual sign the plan as opposed to the date the supervisor pre-approves the drafted IPE.
 - When the VR counselor contacted the individual and verified that the individual was still employed following a minimum of 90 days, the case service record often did not indicate whether the individual was still employed in the same position, earning the same level of wage and hours as reported when employment was first obtained, or if the individual was stable in his or her employment prior to the case record being closed, in accordance with

section 102(a) of the Rehabilitation Act and 34 CFR §361.56. In addition, VR counselors did not document any request to obtain supporting documentation, such as a pay stub, verifying the individual's employment data. RSA clarified that the case service record should contain supporting documentation of these requirements.

- FDVR uses the same form as its referral and application form when an individual applies for VR services, allowing the individual to sign and date the form only once. In addition, the agency indicated it uses its judgement to determine whether the form was submitted as a referral or an application. RSA recommended that the practice of using the same form for both the referral and application process should be discontinued and that FDVR should create two distinct forms.
- A majority of the IPEs reviewed identified that each of the services included in an individual's plan started on the date the plan was approved in the system. For example, a plan would identify an individual beginning training, supported employment services and transferring to extended services for 60 days all on the date the plan was approved. RSA clarified that the date reported for the IPE being approved should reflect the date the VR counselor and individual sign the plan as opposed to the date the supervisor pre-approves the drafted IPE.

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 pre-employment transition services for students with disabilities, and transition services for 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 Rehabilitation Act 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 Rehabilitation 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 the Individuals with Disabilities Education Act (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) agreement placeholder memorandum;
- Sample third-party cooperative arrangement 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 State Plan;
- Federal Financial Report (SF-425) reporting procedures, especially as those procedures relate to the proper accounting and reporting of expenditures with funds reserved under section 110(d)(1) of the Rehabilitation Act for the provision of pre-employment transition services for students with disabilities;
- Supporting documentation for expenditures incurred with funds reserved for the provision of pre-employment transition services and reported in line 12b of the SF-425; and
- Updated procedures for tracking expenditures for the provision of pre-employment transition services for: 1) purchased services and services provided by VR agency personnel; and 2) related procedures to exclude administrative costs from expenditures paid with funds reserved under section 110(d)(1) for the provision of pre-employment transition services (section 110(d)(2) of the Rehabilitation Act prohibits such costs from being paid for with funds reserved under section 110(d)(1)).

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;
- Educational agencies; and
- Service providers.

B. Overview

Transition Service Delivery Structure

Transition services and pre-employment transition services are provided by VR counselors, VR Analysts, and technicians. Students and youth with disabilities can be referred to FDVR by school personnel, families, or community rehabilitation providers (CRPs). In addition, students and youth with disabilities can also self-refer by completing a referral form.

Outreach

Outreach for pre-employment transition services begins at age 14 and the provision of services begins at age 15. Forty percent of FDVR caseloads include youth with disabilities. Services are provided throughout the 67 county school districts. FDVR assigns VR counselors, analysts, and technicians to each of the 67 county school districts in Florida. FDVR conducts outreach seminars within the school districts throughout the State to engage individual schools. In

addition, FDVR distributes flyers and other information within each school district promoting the provision of pre-employment transition services and VR services to students and youth with disabilities.

SEA Agreement

During the on-site portion of the review, FDVR reported its SEA agreement was in the process of being developed in collaboration with Florida Division of Blind Services (FDBS) and with the assistance of the Workforce Innovation Technical Assistance Center (WINTAC). The Florida Department of Education (FDOE) entered into a joint memorandum between FDVR, FDBS, and the Bureau of Exceptional Education and Student services (BEES). At the time of the on-site portion of the review, FDVR reported that it was in the process of negotiating the minimum age for providing pre-employment transition services with FDBS, but had not come to agreement on the age.

Planning for the Delivery of Pre-Employment Transition Services and Transition Services for Students and Youth with Disabilities

At the time of the on-site portion of the review, FDVR reported that it had not completed a new comprehensive Statewide needs assessment (CSNA) to fully evaluate the need for pre-employment transition services in the State. FDVR reported that it will include elements regarding pre-employment transition services in its next CSNA and identified several areas that will be evaluated, including:

- Identifying effective strategies to expand the provision of pre-employment transition services;
- Meeting the 15 percent reserve requirement;
- Making pre-employment transition services available to all students with a disability, including those on an order of selection waiting list;
- Determining the actions needed to demonstrate the amount of reserve funds remaining in order to use those funds for authorized pre-employment transition activities;
- Identifying activities that may be paid with pre-employment transition services reserve funds; and
- Ensuring agency policies and procedures are consistent with statutory changes outlined in the Rehabilitation Act, including section 113 of the Rehabilitation Act.

Provision of Pre-Employment Transition Services

FDVR provides pre-employment transition services throughout the 67 counties in the State through CRPs. VR counselors and technicians work directly with students with disabilities for the coordination of pre-employment transition services purchased through CRPs. In addition, VR counselors provide limited pre-employment transition services, including career counseling, counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education, and instruction in self-advocacy, but only after the student has applied for VR services.

FDVR provides the five required pre-employment transition services, in accordance with section 113(b) of the Rehabilitation Act and 34 CFR §361.48(a)(2). The provision of these services is tracked through a separate module within its case management system and through the agency's accounting system. FDVR reported pre-employment transition services can be tracked through its rehabilitation electronic billing application (REBA) by inserting a "Y" at the start of the agency's service codes. In addition, FDVR tracks pre-employment transition services for students with disabilities who are potentially eligible through the module Student Transition Activities Record (STAR). All required data elements for students with disabilities receiving pre-employment transition services, including any purchased required activity. Once a student decides to apply for VR services, the student's case service record is closed in STAR and a new case service record is opened in the case management system.

Pre-Employment Transition Coordination Activities

FDVR and RSA reviewed the provision of pre-employment transition coordination activities available to students with disabilities in accordance with 34 CFR §361.48(a)(4). FDVR reported the provision of coordination activities, but the agency had not implemented a method to track these activities. During the on-site portion of the review, FDVR reported the agency was working with the designated State agency to implement a system that would allow staff to track their time when attending Individualized Educational Plan (IEP) meetings and other allowable pre-employment transition coordination activities.

Provision of Individualized Transition Services

Students and youth who have been determined eligible for VR services and can be served under the order of selection must have an IPE within the 90-day statutory time requirement. VR counselors provide service-related activities including assessments, job search and placement activities, soft skills training, benefits counseling, and VR counseling and guidance activities.

Activities to groups

FDVR and RSA reviewed the provision of group transition services available to students and youth who may not have applied for VR services under section 103(b) of the Rehabilitation Act and 34 CFR §361.49(a)(7). FDVR had not implemented group transition services at the time of the on-site monitoring review. FDVR identified that this was an area in which they would require further technical assistance in the future.

Transition policies and procedures

FDVR had not implemented transition services or pre-employment transition services policies at the time of the on-site visit, but provided RSA with draft policies for review. Although FDVR had not implemented its updated draft policies at the time of the monitoring visit, it has provided staff training on the Federal requirements related to the provision of pre-employment transition services for all VR counselors and technicians working with students with disabilities. Further technical assistance will be required in this area.

C. Analysis of Performance and Observations

RSA's review and analysis of the performance of FDVR in this focus area resulted in the following observations. Recommendations to the observations are in section D of this focus area.

3.1 Employment Outcomes for Youth with Disabilities under Age 25 at Exit

Observation: The percentage of youth with disabilities who exited with employment remained below the national performance for general agencies from FFY 2014 to FFY 2016. The number of youth with disabilities who exited with employment remained consistent at 21.01 percent in FFY 2014 and 21.25 percent in FFY 2016, but was below the national performance for similar agencies at 31.89 percent for FFY 2016. In addition, the number of youth with disabilities who exited without employment decreased from 60.51 percent in FFY 2014 to 31.34 percent in FFY 2016, but remained higher than the national performance for similar agencies of 26.19 percent for FFY 2016. As a result, the employment rate increased from 26.67 percent in FFY 2014 to 40.40 percent in FFY 2016, but remained below the national performance for similar agencies of 54.91 percent for FFY 2016.

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 FDVR:

3.1 Youth with Disabilities:

- 3.1.1 Analyze the provision of services and employment outcomes achieved by youth with disabilities, and determine if VR services provided are aligned with labor market demands in the State of Florida;
- 3.1.2 Identify career pathways available for youth with disabilities through participation in work-based learning experiences while they are still enrolled in an educational program; and
- 3.1.3 Explore relevant education and training programs, as well as training and employment opportunities with employers, including customized employment.

E. Findings and Corrective Actions to Improve Performance

RSA's review of the transition service including pre-employment transition service of the VR program in this focus area did not result in the identification of findings or corrective actions.

F. Technical Assistance

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

State Educational Agency (SEA) Agreement

In order to meet the requirements of the WIOA amendments to the Rehabilitation Act, FDVR has begun revising its formal interagency agreement to ensure the statutory requirements of the final SEA agreement are included, pursuant to section 101(a)(11)(D) of the Rehabilitation Act. At the time of the on-site review, FDVR had been using a joint memorandum as a place holder for the SEA agreement while the agreement was developed.

During the on-site portion of the review, RSA and FDVR discussed the statutory and regulatory requirements of the SEA agreement, as described in 34 CFR §361.22(b), and the need for FDVR to incorporate the requirements into the final SEA agreement, including:

- The provision of consultation and technical assistance to educational agencies through alternative means;
- Coordination necessary to satisfy documentation requirements set forth in 34 CFR part 397 with regard to students and youth seeking subminimum wage employment;
- An assurance that neither the SEA nor LEA will enter into a contract or other arrangement with an entity, as defined in 34 CFR §397.5(d), for the purpose of operating a program under which a youth with a disability is engaged in work compensated at subminimum wage; and
- The construction clause in section 101(c) of the Rehabilitation Act.

In addition, RSA clarified that under section 101(a)(11)(D) of the Rehabilitation Act and 34 CFR §361.22, VR agencies are required to develop policies and procedures for coordinating with educational officials to facilitate the provision of VR services, including pre-employment transition services.

Availability of Required Services

In preparation for the review, FDVR provided RSA with several documents describing pre-employment transition services available through the agency's service providers. These documents included lists of available pre-employment transition services delineated by the five required service activities. Several of the service categories were not consistent with the five required activities for pre-employment transition services. For example, both documents identified supported employment, individual career planning, and books and supplies for career counseling and exploration services. Other services identified included comprehensive vocational evaluations, on-the-job evaluations, Discovery I and II, and miscellaneous training services.

In addition, documentation provided by FDVR indicated that only four out of five required activities were made available in SFY 2015 to SFY 2016. None of the documents identified the availability of counseling opportunities for enrollment in comprehensive transition to postsecondary educational programs at institutions of higher education. Although peer mentoring was listed as an available service, the data provided indicated no individuals had received this service during SFYs 2015 and 2016. FDVR reported staff working with students and youth with disabilities directly provide both the counseling in postsecondary education at institutions for higher education and peer mentoring, as needed. Since these services are being provided by the

staff, FDVR reported these services would not be represented in the data or as a service provided by CRPs.

In addition, FDVR staff provided inconsistent information about the availability of the required activities throughout the State during an on-site discussion with VR counselors and technicians, depending upon the regional area. In most of the regional areas, the VR counselors, technicians, and analysts reported that work readiness training was available in their local areas, but in some areas, this was the only required activity available. In addition, most of the staff reported that no peer mentoring or other self-advocacy services were available at that time.

RSA clarified section 113(b) of the Rehabilitation Act and 34 CFR §361.48(a)(2), which itemizes the required activities that may be provided to students with disabilities and must be made available statewide. RSA also discussed and provided examples of pre-employment transition services described in the preamble of the final regulations (81 FR 55694 - 55695 (August 19, 2016)).

Training

During the on-site portion of the monitoring process, RSA observed that there seemed to be a lack of uniform understanding and delivery of pre-employment transition services throughout the State by FDVR staff. RSA noted that the counselors interviewed while on site demonstrated a varying scope of understanding of the changes WIOA made to the Rehabilitation Act and its impact on transition services, including pre-employment transition services.

For example, the VR counselors and technicians indicated that the referral process is not the same in all areas of the State for FDVR's transition program. Furthermore, some technicians were unable to identify the five required activities as pre-employment transition services during counselor interviews. Although RSA provided clarifications of the requirements for pre-employment transition services during the meetings with VR counselors and technicians, FDVR staff would benefit from additional training related to the delivery of pre-employment transition services to address the lack of understanding exhibited through the examples in this paragraph.

Authorized Activities under Pre-Employment Transition Services

Authorized activities, described in section 113(c) of the Rehabilitation Act and 34 CFR §361.48(a)(3), may be provided to improve the transition of students with disabilities from school to postsecondary education or to obtain an employment outcome. The authorized activities must support the provision of or arrangement for the required activities under section 113(b) of the Rehabilitation Act and may be provided only if funds reserved under section 110(d)(1) of the Rehabilitation Act remain after the provision of required activities.

During the on-site portion of the review, FDVR indicated that its efforts have been focused on making the five required activities under pre-employment transition services available throughout the State to students with disabilities who are eligible or potentially eligible for VR services. FDVR reported that it had not begun to provide authorized activities throughout the State. Policies should be developed and implemented consistent with the statutory and regulatory requirements related to the provision of the nine authorized activities. Prior to initiating

authorized activities, FDVR must develop a forecasting methodology to reserve the necessary funds for all required pre-employment transition service activities for students with disabilities across the State.

Policies Regarding Pre-Employment Transition Services, Transition Services, and other VR Services

Section 113 of the Rehabilitation Act requires that policies be developed governing the provision of pre-employment transition services. In addition, in accordance with 34 CFR §361.50(a), VR agencies are required to develop and maintain written policies regarding the nature and scope of VR services specified in 34 CFR §361.48, which includes pre-employment transition services and transition services. The policies must ensure that the provision of services is based on the rehabilitation needs of each individual and is consistent with the individual's informed choice.

At the time of the on-site portion of the review, FDVR had not established written policies regarding the provision of pre-employment transition services; FDVR submitted draft policies and procedures governing youth with disabilities during the monitoring process. The draft policies submitted included chapters for transition services, including pre-employment transition services, and will require further technical assistance to ensure that they meet all requirements of the Rehabilitation Act.

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, 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, covered in this focus area included:

- 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, RSA and FDVR 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 (TPCAs) and/or cooperative agreements with employers, State agencies, private nonprofit organizations, and other groups that fund extended services;
- TPCAs 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 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;
- Entities with which the VR agency has TPCAs; and
- Entities with which the VR agency has arrangements to fund extended services.

B. Overview

FDVR provides supported employment services to youth and adults throughout the State, primarily through contracts with CRPs. In addition, youth have supported employment opportunities through TPCAs and a large and growing network of Project Search sites. Currently, there are 23 Project Search sites across the State, with another 15 additional sites slated to begin during the 2017-2018 school year. However, particularly in the rural areas of the State, VR counselors provide job development and supported employment services when CRP resources are scarce.

Discovery pilots are now available across the State, and consumers whose plans indicate supported employment as a service and outcome receive 20 to 30 hours of intensive employment exploration through a contract with CRPs to determine a comprehensive employment blueprint for the future. In addition to Discovery, supported employment contracts are established using benchmarks to include career planning, placement, stabilization, transition to extended services, and outcomes.

Extended supported employment services are provided through a variety of avenues. These include State general revenue funds, Medicaid Waiver, some CRP with United Way funds, Plan to Achieve Self Support (PASS) plans, and natural supports. Individuals with severe and persistent mental illness are not adequately being provided supported employment services, as there is no long-term funding source available. FDVR continues to coordinate with local mental health agencies to address this service gap.

FDVR's engagement in supported employment for all individuals with disabilities has increased, from 21.34 percent in FFY 2014 to 30.18 percent in FFY 2016. These percentages are in contrast to a FFY 2016 national performance for general agencies of 13.03 percent. Since the implementation of WIOA, the agency has invested considerable resources in programming for supported employment services, particularly for youth under age 25. FDVR's FFY 2016 percentage of youth under age 25 in supported employment was 37.64 percent, which was more than the national performance of 17.94 percent.

C. Analysis of Performance and Observations

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

4.1 Lack of Supported Employment Service Consideration for Those with Severe and Persistent Mental Illness

Observation: FDVR reported that it has typically not opened cases for individuals with severe and persistent mental illness, as no funding mechanism was identified for long-term funding for extended supported employment services. As a result, FDVR stated many individuals with severe and persistent mental illness did not receive VR or supported employment services.

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 FDVR:

4.1 Lack of Supported Employment Services for Individuals with Severe and Persistent Mental Illness

- 4.1.1 Revise policies governing supported employment services to be consistent with WIOA, to include taking applications for, and providing supported employment services to, appropriate individuals with severe and persistent mental illness, regardless of long-term funding arrangements; and
- 4.1.2 Develop a plan for the provision of training for management and field staff regarding new policies to include serving those with severe and persistent mental illness regardless of the arrangements for long-term funding.

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 findings or corrective actions to improve performance.

F. Technical Assistance

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

During the review, RSA reviewed and provided technical assistance to FDVR regarding its supported employment policies, such as areas that needed to be removed or added as a result of the changes to the Rehabilitation Act, as amended by WIOA. The draft versions of the policies developed in FFY 2016 were not inclusive of all new requirements and included outdated provisions, such as transitional employment. Conversations with several field staff, including a supervisor and TPCA contract monitor who recently worked in the field, made it clear that staff are not aware of some of the new requirements in VR regulations as a result of WIOA. For example, three field staff interviewed were unfamiliar with the extension of supported employment from 18 months to 24 months. In addition, several staff indicated that they were unaware of the requirement for agencies to provide extended support services to youth with the most significant disabilities with a supported employment outcome. RSA recommends that FDVR obtain further technical assistance, including from the WINTAC, as it develops and implements revised supported employment policies. In addition, RSA recommends that FDVR develop a training plan for staff responsible for supported employment services.

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; FDVR 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 FDVR'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 Rehabilitation 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. If 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 FDVR (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 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 FDVR 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 TPCAs and procedures for issuing authorizations for purchased client services.

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 FDVR's internal control policies and procedures for the allocation and expenditure of VR and Supported Employment program funds. One source of this information is a field services operating procedure related to client service authorizations, which described internal controls including a sufficient segregation of duties between VR Counselors, Technicians, and Unit Supervisors for the request, generation, and approval of purchased services authorizations, as well as the review and approval of vendor invoices. The agency directed RSA to a Florida statutory provision that exempts it from competitive solicitation

requirements under certain circumstances, including contracts for services provided to persons with mental or physical disabilities by not-for-profit corporations that have obtained exemptions under section 501(c)(3) of the United States Internal Revenue Code. However, FDVR has an Employment Services Provider Monitoring Guidebook that describes contract monitoring to ensure providers perform contracted services. The guidebook identifies the objectives of monitoring, roles and responsibilities of a Contract Monitor, annual risk valuation, components of programmatic monitoring, and the contract monitoring methodology.

FDVR neither has policies for submitting requests for prior approval of cost items to RSA, the Federal awarding agency, nor had it submitted any such prior approval requests during the period of time between implementation of Uniform Guidance and the on-site monitoring visit.

FDOE requires all agencies to utilize a sampling methodology to allocate personnel costs for individuals who work on more than one cost objective. There are two sets of instructions, one for employees and one for managers. The instructions identify the three months during the year when affected employees must track their time, and describe the process and methodology for completing the personnel activity reports in the time-tracker program. The manner in which personnel allocation percentages from sampled months are adjusted to budgeted costs is described in another section of this focus area.

Over 99 percent of FDVR's non-Federal share reported for the VR program was expended from its State appropriation, from FFY 2014 through FFY 2016. The remaining portion of non-Federal share was generated from TPCAs. FDVR provided a template for its TPCA contracts, terms and conditions, disclosure statement for legal and ethical matters, as well as sample TPCAs that have been implemented with cooperating agencies across the State. For the Supported Employment program, 100 percent of the non-Federal share was expended from FDVR's State appropriation in FFYs 2015 and 2016.

FDVR neither implemented any establishment projects during the three-year review period, nor did it provide any policies or procedures for establishment or construction of CRPs.

Match, Maintenance of Effort, and Federal Funds

During FFY 2014 through FFY 2016, FDVR experienced a steady increase in the amount of State appropriations it received from the Florida legislature, increasing from \$38,238,867 in FFY 2014 to \$40,879,024 in FFY 2016. These funds were expended as non-Federal share for the VR program, enabling the agency to fully match its Federal VR formula allotment and mostly offset a \$4,339,681 maintenance of effort (MOE) penalty in FFY 2014 when it sought and received \$4,300,000 in FFY 2014 VR reallocation funds. On the other hand, the steady increase in non-Federal expenditures has resulted in a VR program MOE level in FFY 2016 that is at its highest in recent years. RSA discussed the MOE increase onsite with the agency, and it is aware of the need to annually monitor its MOE status while accounting for any variation in State appropriations received from the legislature.

Agency Expenditure Data

During FFY 2014 through FFY 2016, FDVR operated under an OOS with a waiting list. FDVR has actively managed the waiting list and experienced a reduction in the number of individuals on the waiting list, resulting in an increase in the annual total VR and Supported Employment program expenditures, from \$158,262,664 in FFY 2014 to \$180,906,009 in FFY 2016, as reported on the agency's RSA-2 reports. In addition, the amount of Federal VR carryover has increased from a low of \$8,817,070 in FFY 2014 (6.20 percent of the award) up to \$44,397,580 in FFY 2016 (29.22 percent of the award), as reported on SF-425 reports and the G5 grants management system.

FDVR was unable to utilize \$18,107,690 of its FFY 2016 VR reserve funds for pre-employment transition services and requested that these funds be deobligated from its award.

Program Income

The amount of program income that FDVR earned varied from \$8,972,800 in FFY 2014, decreasing to \$6,889,709 in FFY 2015, then increasing to \$9,484,539 in FFY 2016. FDVR consistently transfers between \$2.6 and \$3.2 million in Social Security Administration VR reimbursement program income from the VR program to the State Independent Living Services program.

C. 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.

5.1 Personnel Cost Allocation and Reconciliation Not Consistent with Requirements

Issue: Does FDVR meet personnel cost allocation requirements in accordance with 2 CFR §200.430. This area of review is included on page 53 and 54 of the MTAG.

Requirement: In accordance with Uniform Guidance in 2 CFR §200.430(i)(1)(vii), charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed and must support the distribution of the employee's salaries or wages among specific activities or cost objectives if the employee works on more than one Federal award. In addition, 2 CFR §200.431(i)(1)(viii)(C) indicates that budget estimates, determined before the services are performed, alone do not qualify as support for charges to Federal awards, but may be used for interim accounting purposes as long as the non-Federal entity's system of internal controls includes processes to review after-the-fact interim charges made to a Federal award based on budget estimates, and that necessary adjustments must be made such that the final amount charged to the Federal award is accurate, allowable, and properly allocated.

Analysis: The Florida Department of Education (FDOE), the designated State agency (DSA) for FDVR, developed and implemented managerial and employee instructions for tracking, allocating, and reporting personnel costs for all agencies under its purview, including FDVR. RSA's review of the managerial instructions revealed a methodology in which the three months of October, February and April are selected as reporting months throughout the year. Employees who work on multiple cost objectives track their time spent on each cost objective for each month through personnel activity reports (PARs). The agency utilizes PAR data from the three reporting months to budget and allocate personnel costs for the other nine months and charge the costs to fund sources. Data from PARs collected from October and February are used to adjust budget estimates from previous months with after-the-fact data and allocate and charge personnel costs to cost objectives and Federal awards. However, data from April PARs are utilized for allocating personnel costs for the future months of May and June. This practice represents the use of budget estimates as support for charges to Federal awards and does not result in an after-the-fact review of the May and June estimates. Therefore, the use of April PARs to allocate and charge personnel costs to Federal awards for May and June is not consistent with Uniform Guidance requirements for allocating and charging personnel time.

Conclusion: As a result of this analysis, FDVR did not satisfy the personnel cost allocation requirements in the Uniform Guidance at 2 CFR §200.430(i), because the agency was improperly charging salary expenses for staff working on the VR and other programs based upon budget estimates, which were also not reconciled to actual costs after the fact. Unallowable costs charged to the VR program that were inconsistent with the Uniform Requirements represent questioned VR program costs.

Corrective Action Steps:

RSA requires that FDVR:

5.1.1 Cease charging personnel and fringe expenditures to the VR award based upon budget estimates, and ensure interim accounting of budget estimates are reconciled with after-the-fact personnel allocation data; and

5.1.2 Revise and implement managerial Personnel Activity Reporting System instructions to correctly allocate personnel costs, including fringe, to the correct funding source based upon an after-the-fact reconciliation of budget estimates consistent with Uniform Guidance.

5.2 Prior Approval Not Obtained

Issue: Does FDVR obtain prior written approval from RSA before purchasing items requiring prior approval in accordance with 2 CFR §§200.407 and 200.439. This area of review is included on page 53 of the MTAG.

Requirement: 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 nonallocability. For example, 2 CFR §200.439(b)(1) states that capital expenditures for general purpose equipment, buildings, and land are unallowable as direct charges, except with the prior written approval of the Federal awarding or pass through entity. The Uniform Guidance provisions at 2 CFR §200.62(a) and §200.303(a) also require that the agency have a process, and establish and maintain effective internal control over the Federal award, which provides reasonable assurance that the non-Federal entity is managing the Federal award in 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 part 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 grant award notifications for Federal fiscal year (FFY) 2015 awards necessitating implementation of these requirements in FFY 2016. The special clause stated, in pertinent part, “that the prior approval requirements listed in the Uniform Administrative Requirements, Cost 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 part 200 subpart E).” In addition, information regarding the requirements in 2 CFR part 200 was communicated to grantees via RSA’s listserv on September 23, 2015.

Analysis: RSA requested the agency’s written policies, procedures, or processes that ensure the agency was meeting the prior approval requirements. While the agency provided policies and procedures for prior approval that identified authorization levels requiring approval for purchased services within FDVR and the State, it did not have prior approval policies or procedures consistent with those identified in Uniform Guidance at 2 CFR §200.407 that require approval from RSA as the Federal awarding agency. To determine whether the lack of processes resulted in non-compliance with the prior approval requirements, RSA requested and reviewed a list of items purchased by the agency. The items purchased met the definition of equipment in accordance with 2 CFR §200.33 and §200.439, exceeding the State’s capitalization threshold of \$1,000 for Operating Capital Outlay expenditures. As a result, it was determined that the agency required prior approval from RSA as the Federal awarding agency before purchasing the equipment, but prior approval was not sought or obtained. In addition, without written policies the agency does not have a process to determine the allowability of such costs as is required in 2 CFR §200.302(b)(7).

Conclusion: As a result of the analysis, FDVR did not meet the prior approval requirements pursuant to the Uniform Guidance (2 CFR §200.407) or the requirement to have written procedures for determining the allowability of costs in accordance with Subpart E – Cost Principles within Uniform Guidance (2 CFR §200.302(b)(7)).

Corrective Action Steps:

5.2.1 RSA requires that FDVR 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.

5.3 Obligations and Expenditures Not Properly Assigned to Correct Period of Performance

Issue: Does FDVR meet obligation and expenditure requirements in 2 CFR §200.71 and 34 CFR §76.707. Does FDVR assign obligations and expenditures to the correct Federal award in accordance with 34 CFR §361.12, 2 CFR §§200.77, §200.302, 200.303(a), 200.309, and 34 CFR §76.702. This area of monitoring is included on pages 52 and 53 of the MTAG.

Requirement: As a recipient of Federal VR and Supported Employment funds, FDVR must have procedures that ensure the proper and efficient administration of its VR and Supported Employment programs and enable FDVR to carry out all required functions, including financial reporting (34 CFR §361.12). In accordance with the Uniform Guidance in 2 CFR §200.302(a), a State’s financial management systems, including records documenting compliance with Federal statutes, regulations, and the terms and conditions of the award, must be sufficient to permit the preparation of reports required by general and program specific terms and conditions; and the tracing of funds to a level of expenditures adequate to establish that such funds have been used according to the Federal statutes, regulations, and the terms and conditions of the Federal award. The Uniform Guidance requires the financial management system of each non-Federal entity to provide for the identification, in its accounts, of all Federal awards received and expended and the Federal programs under which they were received (2 CFR §200.302(b)). In addition, EDGAR provisions at 34 CFR §76.702 require States to use fiscal control and fund accounting procedures that ensure proper disbursement of and accounting for Federal funds.

Each grant award has a defined “period of performance,” which is the time during which the non-Federal entity may incur new obligations to carry out the work authorized under the Federal award (2 CFR §200.77). A non-Federal entity may only charge to the Federal award allowable costs incurred during the period of performance (2 CFR §200.309, see also EDGAR 34 CFR §§76.703 and 76.709). Grantees must implement internal controls necessary to ensure obligations and expenditures for a Federal award are assigned, tracked, recorded, and reported within the applicable period of performance for that Federal award, thereby ensuring the grantees are managing the award in compliance with Federal requirements (2 CFR §200.303(a)). The proper assignment of Federal and non-Federal funds to the correct period of performance is necessary for FDVR to correctly account for VR and Supported Employment funds so that RSA can be assured that the agency has satisfied requirements for, among other things, match (34 CFR §361.60), maintenance of effort (MOE) (34 CFR §361.62), and the reservation and expenditure of VR funds for the provision of pre-employment transition services (34 CFR §361.65(a)(3)).

An obligation means “orders placed for property and services, contracts and subawards made, and similar transactions during a given period that require payment by the non-Federal entity during the same or a future period” (2 CFR §200.71). For expenditures to be allowable under the Federal award, agencies must demonstrate that the obligation occurred within the period of performance of the Federal award. EDGAR regulations at 34 CFR §76.707 explain when a State incurs an obligation for various kinds of services and property. Expenditures must be for payment of actual obligations. Obligations must be charged to a Federal award, and must occur within the appropriate period of performance. Therefore, in order to properly account for and liquidate expenditures, grantees must be able to assign an obligation to a Federal award based upon the date the obligation was made (34 CFR §§76.703 and 76.709).

Analysis: During the on-site visit, RSA reviewed the procedures that FDVR uses for purchasing services from CRPs, referred to as providers. FDVR engages in contracts with providers for the provision of various VR services. FDVR has multiple systems that it uses to manage VR service records as well as the authorization and electronic billing for the payment of purchased services. RSA’s review of Attachment A of the contract template revealed that the VR services are broken out into four categories – pre-placement services, employment services, supported employment services, and on-the-job training services – provided to applicants and recipients of VR services through a benchmark system. Each service category is broken down into multiple steps, or benchmarks, and discussion with FDVR staff and a review of the written payment procedures indicate that providers are reimbursed by FDVR when the benchmarks are reached. Specifically, the procedures indicate that when services are to be initiated, a referral is created in the Contract Referral application, bridging the case management system and the electronic billing system. Providers must accept, reject, or request additional referral information within 15 business days of the referral date. When a provider accepts a referral, it begins to render services to a consumer. In accordance with EDGAR provisions at 34 CFR §76.707, obligations for personal services provided by a contractor are made when the State enters into a binding written commitment to obtain the services. The contract referral process and acceptance of the referral by the provider sufficiently constitutes this commitment, and is the date for which the obligation for these benchmark services is determined.

Further discussion with the FDVR staff and review of written procedures indicate that providers continue providing VR services until a benchmark is achieved. At this time the provider submits a notification of approval (NOA) through the electronic billing system into the Contract Referral application. VR Counselors review and, if appropriate, approve the NOA, which permits the provider to generate and submit an invoice for the services rendered and benchmark achieved in the electronic billing system. The provider’s submission of the invoice after completion of the benchmark is considered the service date. FDVR’s contract managers review and audit the submitted invoice in the electronic billing system, and approval of an invoice will generate an authorization in the case management system. Supervisors review, approve and sign authorizations, which are batched and are sent for processing to FDOE Financial Payments. FDVR confirmed that the generation of the authorization after invoice approval is what identifies the obligation start date for VR services provided under contract through the benchmark system. However, EDGAR provisions at 34 CFR §76.707 require the obligation for VR services to occur at the referral date, when the commitment to provide VR services has been made. This disconnect between referral date and the NOA, invoice and authorization date – when FDVR’s systems and processes identify an obligation start date – results in a significant time lapse. In one

such review of a sample summary invoice, the time gap between the provider referral acceptance date and the achievement of the benchmark and resulting invoice submission and authorization generation process was in excess of six months and spanned across Federal fiscal years.

As a result, FDVR has not accurately accounted for the date it incurs obligations from binding commitments for VR services through benchmark contracts, and therefore cannot ensure the liquidation of those expenditures are assigned and charged to the correct FFY VR and Supported Employment awards and the appropriate periods of performance established for award funds.

Conclusion: Based upon RSA's analysis, it has determined that FDVR is not in compliance with the Federal requirements in 34 CFR §361.12, 34 CFR §76.702, and 2 CFR §200.302 to accurately account for and report obligations and ensure expenditures are paid from the correct Federal award for both the VR and Supported Employment awards. Additionally, the agency did not have sufficient internal controls to ensure that: 1) obligations and expenditures assigned to a FFY were only for allowable costs under the DSU's approved State plan; 2) all obligation dates were correctly recorded in the agency's accounting system; and 3) all obligations and expenditures were accurately reported on the appropriate Federal Financial Reports for the appropriate awards.

RSA is concerned that FDVR's financial management system does not meet Federal requirements because the agency is not able to ensure:

- Accurate data collection and financial accountability, as required by 34 CFR §361.12;
- The proper disbursement of and accounting for Federal funds, as required by 34 CFR §76.702; and
- Obligations and expenditures are assigned and liquidated within the period of performance of the Federal award in accordance with the award's terms and conditions, as required by 34 CFR §76.707 and 2 CFR §200.302.

As a recipient of Federal VR and Supported Employment funds, FDVR must have procedures in place that ensure proper and efficient administration of its VR program, and that enable FDVR to carry out all required functions. The methods of administration must ensure accurate data collection and financial accountability (34 CFR §361.12 and 2 CFR §200.302).

Corrective Action Steps:

RSA requires that FDVR:

- 5.3.1 Make requisite changes to its financial data collection and analysis process to bring it into compliance so that FDVR can:
 - Ensure all Federal and non-Federal obligations (including contracts and contracts with CRPs maintained in the case management and electronic billing systems) are properly accounted for and obligated to the correct FFY award in the agency's financial management system;

- Account for and accurately liquidate all expenditures from the correct FFY award, commensurate with the period of performance for the corresponding obligations based on when they were assigned;
 - Accurately report obligations and liquidations on the SF-425 report for the corresponding period of performance for Federal awards;
- 5.3.2 Update and implement policies and procedures to accurately account for and report all obligations and expenditures to the correct period of performance, ensuring the policies address:
- The assignment of obligations to the appropriate FFY award and the liquidation of such funds based upon the assignment of the obligation;
 - The obligation of contract services in the financial management system to ensure liquidations are based upon the FFY in which the contracts were obligated; and
- 5.3.3 Develop and implement a written internal control process, including a monitoring component, to ensure ongoing compliance with Federal requirements for the areas mentioned in corrective actions 5.3.1 and 5.3.2.

5.4 Third-Party Cooperative Arrangements – Unallowable Match

Issue: Does FDVR meet third-party cooperative arrangement (TPCA) requirements in 34 CFR §361.28, including match requirements for the VR program in 34 CFR §361.60. This area of review is included on page 55 of the MTAG.

Requirement: VR regulations permit VR agencies to enter into a TPCA for providing or contracting for the provision of VR services with another State agency or a local public agency that is providing part or all of the non-Federal share in accordance with requirements at 34 CFR §361.28(a).

The review period of FFY 2017 monitoring activities and documentation includes FFYs 2014 through 2016. Since the VR implementing regulations at 34 CFR §361.28 existed prior to the publication of the current regulations governing the VR program, which became effective on September 19, 2016 ([81 FR 55629](#)), and prior to the implementation of Uniform Guidance for RSA's formula award programs on October 1, 2015, the requirements related to the non-Federal share provided by a cooperating agency under a TPCA for this FFY 2017 monitoring period are based upon preamble language for the 1997 final VR regulations, published on February 11, 1997 (62 FR 6307, 6333):

"Third-party in-kind contributions.' which are a permissible source of State matching funds under the Education Department General Administrative Regulations (EDGAR), are defined in 34 CFR 80.3 as "property or services which benefit a federally assisted project or program and which are contributed by non-Federal third parties without charge to the grantee...."

However, it is RSA's policy not to allow the use of third-party in-kind contributions to meet the State matching requirement under the VR program in the absence of specific statutory authority. Where the Rehabilitation Act permits the use of in-kind expenditures

as match for certain programs, that authority is expressed [(e.g., the Independent Living Services For Older Individuals Who Are Blind program under section 752(f)(4) of the Rehabilitation Act)]. Thus, 34 CFR §361.60(b)(2) specifies that these contributions may not be used as part of the DSU's non-Federal share under the program. This provision is consistent with the definition of "State and local funds" under 34 CFR §361.76 of the current regulations and with the current regulatory prohibition on the use of in-kind contributions as match in 34 CFR §361.24(c).

Nevertheless, this prohibition has no effect on a DSU's ability to enter into third-party cooperative arrangements under 34 CFR 361.28 of the regulations for providing VR services with another public agency that is furnishing part or all of the non-Federal share under the program. **As long as the third party is contributing funds to support VR services, those dollars may be used as part of the DSU's non-Federal share (e.g., staff salaries paid by the third party that are allowable matching expenditures).**" (emphasis added)

In light of this history, certified expenditures for staff time would NOT be considered in-kind contributions. Therefore, certified staff time provided by another public agency under a TPCA would be considered an allowable source of match. However, certified expenditures for staff time, absent a TPCA, would NOT be an allowable source of match.

While some State or local cooperating agencies may provide cash to the VR agency as non-Federal share under a TPCA, when certified expenditures are included as non-Federal share they must represent the expenditure of the public cooperating agency's funds on allowable goods or services that are specifically identified in the approved TPCA contract and budget. Additionally, the expenditure must occur within the period of time that the approved TPCA contract is in force. The most common example of a certified expenditure in a TPCA is the expenditures the cooperating agency makes in salary and wages to the cooperating agency staff members who directly provide the VR services to applicants and recipients of VR services. However, certified expenditures may not include third-party in-kind contributions (34 CFR §361.60(b)(2)), or expenditures made for goods or services prior to the implementation, or outside the scope, of the TPCA contract.

In addition, the current regulations governing the VR program ([81 FR 55629](#)), published on August 19, 2016, became effective on September 19, 2016. The final VR regulations added a paragraph (c) to 34 CFR §361.28, further clarifying non-Federal share provided by cooperating agencies through TPCAs, stating:

(c) The cooperating agency's contribution toward the non-Federal share required under the arrangement, as set forth in paragraph (a) of this section, may be made through:

(1) Cash transfers to the designated State unit;

(2) Certified personnel expenditures for the time cooperating agency staff spent providing direct vocational rehabilitation services pursuant to a third-party cooperative arrangement that meets the requirements of this section. Certified personnel expenditures may include the

allocable portion of staff salary and fringe benefits based upon the amount of time cooperating agency staff directly spent providing services under the arrangement; and

(3) other direct expenditures incurred by the cooperating agency for the sole purpose of providing services under this section pursuant to a third-party cooperative arrangement that—

(i) Meets the requirements of this section;

(ii) Are verifiable as being incurred under the third-party cooperative arrangement; and

(iii) Do not meet the definition of third-party in-kind contributions under 2 CFR 200.96.

The Uniform Guidance requires the financial management system of each non-Federal entity to provide for the following (1) identification, in its accounts, of all Federal awards received and expended and the Federal programs under which they were received (2 CFR §200.302(b)). In addition, EDGAR provisions at 34 CFR §76.702 require States to use fiscal control and fund accounting procedures that ensure proper disbursement of and accounting for Federal funds.

Analysis: FDVR implemented 24 TPCAs during FFYs 2016 and 2017 with secondary schools under which Employment Specialists employed at the schools provide VR services to students with disabilities. A review of Attachment A (Scope of Services) of the contract language revealed under section C.1 (Manner of Service(s) Provision) that FDVR will reimburse the school district at a fixed price of \$31,480 for each Employment Specialist providing services under the TPCA. In turn, the school district shall provide a non-Federal match requirement to FDVR in the amount of \$8,520 for each Employment Specialist providing services under the TPCA, as required in section C.2 of Attachment A related to school district responsibilities. Adding these two portions reveal that the total Federal and non-Federal amounts identified in the TPCA contract is \$40,000 across all agreements. RSA requested information about how the \$40,000 was determined and received documentation in the form of two 2010-2011 Education Information and Accountability Services data reports related to Florida public school teacher salaries as well as a broader look at persons employed fulltime in each school district. Correspondence and on-site discussions with FDVR staff indicated that FDVR program staff reviewed the information from these data reports and made comparisons between the paraprofessional and teacher positions, which resulted in the decision to use \$40,000 as the fixed price amount of Federal and non-Federal amounts to be used in the TPCA contracts. In addition, further language in section C.2 for school district responsibilities indicated that each Employment Specialist shall spend 100 percent of his or her time during school hours providing employment services under the TPCA to students who are FDVR students under IPE. Refer to the recommendations under section 3 for further programmatic information about the services provided under these TPCAs.

RSA requested additional budget documentation related to the TPCAs and received information for 11 counties that house TPCAs. The documents, titled Cost Analysis For Non-Competitively Procured Agreements In Excess or Category II, identified costs for categories under the TPCAs including cooperating agency staff salary, benefits, travel, equipment, and other costs. A second column identified the amount of those costs allocated to the TPCA agreement as a percentage of

total costs for each category. Regardless of the amount of the salary of Employment Specialists who provide the VR services under the arrangements, which ranged across the 11 documents, RSA's review of the TPCA documentation revealed that the \$40,000 represented various percentages of cooperating agency staff salary, benefits, travel, equipment, and other costs under the TPCA, many of which were below 100 percent of cooperating agency costs, despite the requirement in the contract that 100 percent of the Employment Specialists' time be spent providing VR services to students who are receiving services from FDVR. As a result, the fixed amount of \$40,000 was not identified as funds that support salary and fringe based upon cooperating agency staff time spent on services under the program, as the cooperating agencies did not retain any supporting documentation that would reflect internal controls for tracking and accounting for staff time spent on the program. Furthermore, there is no documentation identifying the portion of time allocated as non-Federal share intended to be used as match for the program, or for the Federal portion to be reimbursed by FDVR. Therefore, without any internal controls or supporting documentation of staff time spent on the TPCA program, these funds do not represent the expenditure of the cooperating agency's funds on allowable goods or services that are specifically identified in the approved TPCA contract or budget identifying costs for Employment Specialists to directly provide VR services.

VR provisions at 34 CFR §361.28(c), implemented on September 19, 2016, require the non-Federal share to consist of cash transfers or certified expenditures of staff time directly providing VR services. In addition, preamble language outlined earlier in this section supports these requirements for TPCAs implemented prior to September 19, 2016. However, a review of the 24 TPCAs' contract language and implementation of the arrangements did not indicate that FDVR was receiving either a direct transfer of cash from the cooperating agencies, or the tracking and recording of certified expenditures of cooperating agency staff time spent directly providing VR services under the arrangements. The process of assigning a fixed price to all TPCAs is not consistent with the TPCA provisions because the 21.3 percent portion of the \$40,000 (or \$8,520) reported as match is neither a cash transfer nor is it tied to certified salary expenditures of staff time, which is inconsistent with the TPCA regulatory provisions. As a result, FDVR is unable to ensure that the \$40,000 identified as Federal and non-Federal costs within the TPCAs has been spent on allowable activities under the TPCA, or that the \$8,520 identified as non-Federal share is allowable as match under the VR program.

Conclusion: As a result of this analysis, FDVR did not meet the VR requirements in 34 CFR §361.28 or 34 CFR §361.60, related to non-Federal share under TPCAs and the VR program, because it did not implement internal controls to document and track cooperating agency staff time spent working on the TPCA that could have been certified as match for the VR program.

Corrective Action Steps:

RSA requires that FDVR:

5.4.1 cease disbursing Federal VR funds under TPCAs and reporting as match under the VR program any non-Federal funds that do not meet the requirements of 34 CFR §361.28, §361.60, or Uniform Guidance requirements at 2 CFR §200.302 and EDGAR provisions at 34 CFR §76.702 that require FDVR to use fiscal control and fund accounting procedures that ensure proper disbursement of and accounting for Federal funds; and

5.4.2 develop and implement internal controls to ensure that FDVR has fiscal control and fund accounting procedures that ensure proper disbursement of and accounting for Federal funds, in accordance with 34 CFR §76.702 and 2 CFR §200.302(b).

D. Technical Assistance

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

- RSA provided technical assistance to FDVR that any costs for VR services provided prior to a consumer entering into a supported employment placement must be paid for with title I VR funding and may not be paid for with title VI Supported Employment program funding, which may only be used after the individual has obtained the supported employment placement and is receiving services during the 24-month ongoing support period.
- RSA informed FDVR that program income includes any payments received by the VR agency from financial participation of consumers for the provision of its services, in accordance with 34 CFR §361.63(b) and the SF-425 instructions for the VR program (RSA-PD-15-05).
- RSA informed FDVR that refunds received by the agency should be posted to the year from which the refund was derived, including those from closed grant awards. RSA provided the repayment instructions to FDVR.
- RSA provided technical assistance related to the increasing non-Federal share amounts reported as match, and the potential maintenance of effort implications. FDVR has not participated in reallocation in recent years, and RSA informed FDVR of the timing of MOE deficit assessment and penalty determinations, as well as the requirements surrounding reallocation.

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.

Through this focus area, RSA:

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

This focus area consists of the following topical areas: Governance, Unified State Plans, One-Stop Operations, and Performance Accountability. To gather information pertinent to these topics, RSA reviewed the Program Year (PY) 2016 Unified 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 directors for FDVR and FDDBS, VR agency senior leaders, regional area managers and district supervisors.

B. Overview

Governance

FDVR is represented on the State Workforce Development Board (SWDB) by the Chancellor for the Career and Adult Education, FDOE. The Commissioner of FDOE designated the Chancellor for Career and Adult education to serve as the representative for both FDVR and FDBS. In addition, the Chancellor also serves as the representative for Florida's adult education program. FDVR reported the designation of the Chancellor to serve as the representative for both VR agencies works well for the agencies and is necessary due to the strict Florida Sunshine laws. Specifically, communication between multiple members of the SWDB is restricted as a result of the Sunshine law that requires the necessary public notification.

Florida is comprised of 24 Local Workforce Development Boards (LWDBs). FDVR maintains representation on each of the LWDBs as a voting member, using a district supervisor from the local area office. As an active member on each LWDB, FDVR provides the lead on all accessibility-related issues, including accessibility of the one-stop centers, both programmatically and physically.

Unified State Plans

FDVR reported a high level of representation during the development of the Florida Unified State Plan. Florida submitted a Unified State Plan for PY 2016 through PY 2019 on April 1, 2016, reviewed by representatives of the Departments of Education and Labor, and approved on June 30, 2016.

The SWDB created a task force for the development of the Unified State plan involving all core and other optional partners. The task group assigned specialized areas to various members belonging to organizations that specialized in specific areas. For example, the representative for the Florida Department of Economic Opportunity (DEO) was responsible for developing the labor market information (LMI) used throughout the plan for purposes of the strategic planning. The task force met on a regular basis, at least once per month, during the first six months prior to submission of the Unified State plan. As a result, FDVR believes the plan integrated the agency's VR goals into the Unified State plan's strategies and operational elements.

The task force continued to meet regularly following the approval of the Unified State plan with all core partners along with other representatives from the combined partner programs. Although the initial plan was a Unified State plan involving only the core partner programs, FDVR believes other optional programs will be integrated into the plan when the State submits its two-year modification in spring 2018.

The task force was in the process of developing a tracking system to identify the progress made toward the goals and strategies established in the State Plan. At the time of the on-site portion of the review, the task force was designing a system to ensure accountability by each partner involved in the plan and the goals established by the State.

Throughout this process, FDVR continued to work with its SRC while developing the VR portion of the State Plan. The SRC conducted four public meetings throughout the State to obtain

input from the public in addition to the public input obtained for the Unified State Plan. The VR portion of the State Plan was approved June 30, 2016 with the approval of the Florida Unified State plan.

One-Stop Delivery System

VR services are delivered throughout the State through its district offices and through the one-stop centers. Florida contains 24 local workforce development areas, which include 77 full service centers, 25 satellite offices and 1 business center. FDVR is co-located in 11 one-stop centers across the State. For all other locations, FDVR described having a strong presence in each center and often meets with individuals who may be interested in applying for services at the center in a designated common area that can be made available for the VR counselor's use as needed.

FDVR has maintained an active role as the lead agency for all accessibility-related matters involving the one-stop centers throughout the State. This involves the evaluation and certification of the local one-stop centers to ensure each center is both programmatically and physically accessible to all individuals with disabilities. In addition, FDVR, in conjunction with FDBS, has provided extensive disability-related training to the staff at each center on areas that range from the intake of an individual who walks in for services to independent job search using the assistive technology available on the computers at the centers.

The chief elected official for the Florida Workforce Development agency identified CareerSource as the administrative entity, grant recipient and fiscal agent for the local one-stop centers.

Performance Accountability

Pursuant to section 116(d)(2) of WIOA and 34 CFR §361.160, the *Annual Statewide Performance Report Template* must be submitted to the Departments of Education and Labor using aggregated data collected by each of the six core programs. In Florida, the entity responsible for assembling and submitting this report is DEO. In order for VR agencies to collect the required data needed for the annual report, RSA amended its RSA-911 report, as described in PD-16-04. FDVR reported a substantial amount of work was still underway with the agency's case management system at the time of the on-site portion of the review. At the time this draft monitoring report was issued to the agency for review, FDVR had not submitted its PY 2017 data for the first or the second quarter.

A MOU has been established between FDVR and the other core and optional one-stop partners in Florida to ensure individuals are referred to other State agencies, when appropriate. Currently, individuals can be identified as being co-enrolled with other one-stop partners if the individual obtained services through one of the one-stop centers using the data submitted and compiled by DEO. The State's workforce partners are working together to employ an integrated data system that will provide real-time information, including the progress for each individual receiving services from all of the one-stop partners participating in the MOU.

C. Analysis of Performance and Observations

RSA's review of the performance of FDVR in this focus area did not result in the identification of the following observations or recommendations.

D. 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.

6.1 Funding Mechanism for One-Stop Infrastructure Costs Not Consistent with Requirements

Issue: Whether FDVR's process for funding the VR program's proportionate amount of the one-stop system's infrastructure costs satisfies 34 CFR §361.13 and 34 CFR §361.715.

Requirement: Pursuant to 34 CFR §361.13(b)(1)(ii), the designated State unit (DSU) for the VR program – FDVR, in Florida – must have a full-time director who is responsible for the day-to-day operations of the VR program. As such, the DSU has the sole responsibility to allocate and expend VR funds (34 CFR §§361.13(b)(1)(v), 361.13(c)(1)(iv), and 361.13(c)(2)). Moreover, the DSU has sole responsibility for the VR program's participation as a partner in the one-stop service delivery system (34 CFR §§361.13(c)(1)(v) and 361.13(c)(2)).

As a required one-stop partner, pursuant to joint one-stop regulations at 34 CFR §361.400(b)(4), a VR agency must contribute toward the one-stop system's infrastructure costs in a manner that is based on:

- a reasonable cost allocation methodology by which infrastructure costs are charged to each partner based on proportionate use and relative benefit received;
- Federal cost principles; and
- any local administrative cost requirements in the Federal law authorizing the partner's program. (This is further described in 34 CFR §361.700) (34 CFR §361.420(b)(2)).

Infrastructure costs are non-personnel costs necessary for the general operations of the one-stop centers (34 CFR §361.700(a)). These costs may be funded under either the local funding mechanism or the State funding mechanism (34 CFR §361.710). Under the local funding mechanism, the Local Workforce Development Board (LWDB), chief elected officials, and one-stop partners negotiate in an effort to determine the method(s) of calculating amounts each partner will contribute toward one-stop infrastructure funding, consistent with 34 CFR §361.715. Pursuant to 34 CFR §361.705, the Governor of each State develops and issues guidance for use by local areas in their efforts to determine partner contributions to fund one-stop infrastructure costs, including timelines for local areas to notify the Governor when the local partners are not able to reach consensus, thereby triggering the State funding mechanism described in 34 CFR §361.730. Only under the State funding mechanism will the Governor calculate and implement

the statutory statewide program caps for determining infrastructure cost contributions from one-stop partner programs in local areas operating under the State funding mechanism. For purposes of the VR program, when the State funding mechanism is triggered, the statutory cap on infrastructure cost contributions is set forth in 34 CFR §361.738(c)(3)(i). Conversely, there are no caps for the VR program's contributions for infrastructure costs under the local funding mechanism, so long as the costs are allowable and proportionate to the VR program's use of the one-stop center and relative benefit received by the program (34 CFR §361.720(b)).

Pursuant to 34 CFR §361.755, each local area's Memorandum of Understanding (MOU) (described in 34 CFR §361.500) must include an infrastructure funding agreement (IFA), regardless of whether the one-stop centers' infrastructure costs are funded under the local funding mechanism or the State funding mechanism. The U.S. Departments of Education and Labor provided extensive guidance regarding the funding of the one-stop system's infrastructure costs in both the joint one-stop regulations ([Federal Register notice 81 FR 55791](#)), published August 19, 2016, and in technical assistance circular (RSA-TAC-17-03), published January 18, 2017.

Analysis: During its on-site monitoring process, RSA requested sample MOUs from Florida's 24 local workforce areas to assess FDVR's progress in implementing the joint one-stop requirements for purposes of the VR program, including those regarding funding the one-stop system's infrastructure costs. While the agency provided RSA a few sample MOUs that satisfied some of the one-stop MOU requirements identified in 34 CFR §§361.500 and 361.755, the MOUs did not contain an infrastructure or shared services budget or a final IFA identifying the infrastructure costs of local area one-stop partners, including FDVR, as required by 34 CFR §361.755. Rather, for purposes of the VR program, the MOU included a section on infrastructure costs that stated: "Division of Vocational Rehabilitation will transfer its total statewide infrastructure cost contribution, minus funds already committed through MOUs containing lease agreements, to the Department of Economic Opportunity for disbursement to local area workforce boards, as it deems appropriate."

During on-site discussions, FDVR executive staff members informed RSA that, because of the MOU language just cited, FDVR participated in the development of local MOUs, which did not result in an IFA that clearly identified infrastructure costs, cost allocation methodologies, and resulting partner contributions reflective of proportionate use and relative benefits received by the VR program, as FDVR is required to do under the local funding mechanism. Instead, FDVR contributed the amount of the statutory VR program cap amount for infrastructure costs under the State funding mechanism (specifically, 0.75 percent of the VR allotment), less any existing lease costs. However, according to the information RSA gathered as part of its on-site monitoring process, none of Florida's 24 local workforce areas failed to reach consensus on the infrastructure costs, meaning that the State funding mechanism was not triggered in any of the State's 24 local areas. Therefore, the statutory cap the VR program could contribute to the funding of infrastructure costs under the State funding mechanism (34 CFR §361.738(c)(3)(i)) was not applicable and should not have been used for determining FDVR's contribution under the VR program for the funding of infrastructure costs. According to the information RSA reviewed during the on-site monitoring process, all 24 local areas were still in the process of negotiating and finalizing the local funding mechanism for determining infrastructure cost contributions from each of the partners, which would have required negotiations about what each

partner – including FDVR – would contribute and the costs that would be included in the total infrastructure costs (34 CFR §361.715). Since FDVR did not negotiate the terms of the IFA for purposes of the VR program’s contributions for funding the one-stop system’s infrastructure costs, FDVR did not satisfy its role as a one-stop partner to negotiate the IFA, as required by 34 CFR §361.715. As such, there is not sufficient information to determine whether FDVR paid its proportionate share of the costs.

Additionally, each of the three sample MOUs that RSA reviewed were signed by the Commissioner of FDOE, the designated State agency (DSA) for FDVR, not FDVR itself. During on-site discussions, FDVR informed RSA that only FDOE (as the DSA) has the authority to negotiate local agreements, sign MOUs, and commit Federal funding – not FDVR. Such restriction is inconsistent with Federal requirements that FDVR is the entity designated in the State to administer the VR program on behalf of FDOE. As such, FDVR must remain solely responsible for the expenditure and allocation of VR funds. Furthermore, FDVR must remain solely responsible for its role as a one-stop partner. None of these functions may be delegated to another entity or individual, including the head of FDOE (34 CFR §361.13(c)). Since FDVR did not perform its function as a one-stop partner by negotiating the IFAs or MOUs, as it was required to do under the local funding mechanism, FDVR is not in compliance with the non-delegable functions of a DSU for the VR program set forth in 34 CFR §§361.13(b)(1)(v) and 361.13(c).

With respect to FDVR’s transfer of funds to the Florida Department of Economic Opportunity, it is important to note that there is no prohibition against FDVR utilizing the Department of Economic Opportunity as a centralized office for the payment of bills stemming from FDVR’s proportionate share of the infrastructure costs. Such streamlining of administrative functions at the State level is permissible. However, at all times, FDVR must remain responsible for determining how much it will contribute toward the infrastructure costs and negotiating what costs will be included in the total infrastructure costs. Only then can FDVR ensure it is retaining sole responsibility for the allocation and expenditure of VR funds and for its role as a one-stop partner, as required by 34 CFR §§361.13(b)(1)(v) and 361.13(c)(1)(iv) and (v). Given the transfer of funds made in accordance with the MOU, it is unclear whether FDVR maintained responsibility for its non-delegable functions as a DSU.

Conclusion: As a result of this analysis, FDVR did not meet the joint one-stop requirements in 34 CFR part 361, subpart F, related to MOU and infrastructure cost requirements, because it did not participate in local funding mechanism negotiations resulting in an IFA that clearly identified VR’s proportionate share of infrastructure costs. Rather, it used its funding amount under the State funding mechanism even though the State funding mechanism had not been triggered, and local negotiations were being finalized in each local area in the State. In addition, FDVR did not satisfy the non-delegable functions as the DSU for the VR program, as set forth in 34 CFR §361.13.

Corrective Action Steps:

RSA requires that FDVR:

- 6.1.1 Retain sole responsibility for its non-delegable functions as a DSU, as required by 34 CFR §361.13;
- 6.1.2 Cease using statutory program caps associated with the State funding mechanism to determine VR infrastructure cost contributions when the State funding mechanism has not been triggered; and
- 6.1.3 Develop and implement procedures to participate in local area negotiations with the LWDB, chief elected officials, and one-stop partners to develop a local MOU with IFA, and in an effort to determine the cost allocation methodology(ies) of calculating amounts each partner will contribute toward one-stop infrastructure costs.

E. Technical Assistance

During the course of monitoring activities, FDVR requested additional technical assistance as described in the following areas.

- FDVR seeks technical assistance on how to establish a data sharing agreement without a SWIS agreement currently in place to ensure unemployment insurance data can be obtained for those outside the State of Florida; and
- FDVR requested guidance on how to establish an infrastructure funding agreement (IFA) in situations where VR is not co-located with a one-stop center.

Additional Technical Assistance

FDVR and FDBS, which administer the VR program – one of the core partner workforce development programs that are authorized under the Rehabilitation Act, as amended by title IV of WIOA, are both housed in the Florida Department of Education, which also houses the Florida Career and Adult Education program – another core partner program in the workforce development system that is authorized under title II of WIOA. The Florida Department of Education is overseen by a Secretary, with each of the programs housed within that Department administered by a chancellor or director specific to that program. During RSA’s on-site monitoring of the VR program, RSA learned that FDVR and FDBS are both represented on the State Workforce Development Board (State Board) by the Chancellor of the Career and Adult Education Program, who also represents the Adult Education and Family Literacy Act (AEFLA) program authorized under title II 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)). In other words, one representative cannot represent both programs, as is done in Florida.

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) 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.

In addition to the provisions in 20 CFR §679.110(b)(3)(iii)(A)(1)(i) through (iii), which would require a single, unique representative for the Adult Education program and a single, unique representative for the VR program, the Chancellor of the Career and Adult Education program is not directly involved with the administration of the VR program at all. As such, the Chancellor of Career and Adult Education cannot be reasonably expected to speak on behalf of the VR program or commit it to any chosen course of action. Only the VR director of either FDVR or FDBS can meet the requirements of 20 CFR §679.120(a). Enforcement with this requirement is with the Department of Labor.

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)). In other words, neither the FDVR nor the FDBS director have the authority to delegate to the Chancellor of Career and Adult Education the authority to represent the VR program on the Florida State Board. Enforcement of this matter falls under the jurisdiction of DOL.

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 FL-G 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	31,378	100%	28,402	100%	29,292	100%	305,977	100%
Total eligible individuals	11,638	n/a	29,774	n/a	32,103	n/a	306,015	n/a
Agency implementing order of selection	Yes	n/a	Yes	n/a	Yes	n/a	-	n/a
Individuals on order of selection waiting list at year-end	14,214	n/a	5,939	n/a	557	n/a	3,973	n/a
Individuals in plan receiving services	49,947	n/a	39,031	n/a	43,284	n/a	471,489	n/a
Percent accepted for services who received no services	31.2%		33.6%	n/a	34.7%	n/a		24.70%
Exited as applicants	6,394	18.3%	5,679	19.1%	4,890	16.6%	37,688	12.9%
Exited trial experience/extended evaluation	690	2.0%	546	1.8%	60	.2%	1,972	.7%
Exited with employment	7,211	20.7%	5,034	17.0%	5,447	18.5%	97,912	33.6%

Performance category	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Exited without employment	16,917	48.5%	8,444	28.4%	7,898	26.8%	73,307	25.2%
Exited from OOS waiting list	712	2.0%	438	1.5%	1092	3.7%	2,649	.9%
Exited without employment outcomes, after eligibility, before an IPE was signed or before receiving services	2,924	8.4%	9,557	32.2%	10,036	34.1%	77,897	27.0%
Total received services	24,128	69.2%	13,478	45.4%	13,345	45.4%	171,219	58.8%
Employment rate		29.9%		37.4%		40.8%		57.2%
Competitive employment outcomes	7,156	99.2%	4,945	98.2%	5,328	97.8%	95,703	97.7%
Supported employment outcomes	1,539	21.3%	1,291	25.6%	1,644	30.2%	12,755	13.0%
Average hourly earnings for competitive employment outcomes	\$10.84	n/a	\$11.13	n/a	\$11.05	n/a	\$12.37	n/a
Average hours worked for competitive employment outcomes	30.12	n/a	29.61	n/a	28.85	n/a	30.4	n/a
Median hourly earnings for competitive employment outcomes	\$9.08	n/a	\$9.49	n/a	\$9.50	n/a	\$10.00	n/a
Median hours worked for competitive employment outcomes	30	n/a	30	n/a	30	n/a	32.0	n/a
Quarterly median earnings	\$3,848	n/a	\$3,770	n/a	\$3,575	n/a	\$4,160.00	n/a

Data sources: RSA-911, RSA 113

Table 3.2.a FL-G VR Training Services Provided for Individuals Served - FFFYs 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	24,128		13,478		13,345		171,219	
College or university training	962	4.0%	119	0.9%	134	1.0%	630	0.4%
Four-year or university training	187	0.8%	16	0.1%	17	0.1%	10,694	6.2%
Junior or community college training	1,497	6.2%	72	0.5%	68	0.5%	7,517	4.4%
Occupational or vocational training	2,610	10.8%	201	1.5%	180	1.3%	19,665	11.5%
On-the-job training	813	3.4%	118	0.9%	164	1.2%	4,861	2.8%
Apprenticeship training	0	0.0%	0	0.0%	0	0.0%	223	0.1%
Basic academic remedial or literacy training	144	0.6%	7	0.1%	4	0.0%	1,693	1.0%
Job readiness training	0	0.0%	0	0.0%	0	0.0%	21,666	12.7%
Disability-related skills training	0	0.0%	0	0.0%	0	0.0%	2,025	1.2%
Miscellaneous training	1,146	4.7%	96	0.7%	131	1.0%	14,361	8.4%

Data source: RSA-911

Table 3.2.b FL-G VR Career Services Provided for Individuals Served - FFFYs 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	24,128	100%	13,478	100%	13,345	100%	171,219	100%
Assessment	6,667	27.6%	420	3.1%	629	4.7%	109,501	64.0%
Diagnosis and treatment of impairment	18,395	76.2%	1,581	11.7%	2262	17.0%	55,283	32.3%
Vocational rehab counseling and guidance	0	0.0%	0	0.0%	0	0.0%	99,604	58.2%
Job search assistance	2,766	11.5%	448	3.3%	618	4.6%	46,231	27.0%
Job placement assistance	3,697	15.3%	2,092	15.5%	2,416	18.1%	56,528	33.0%
On-the-job supports-short term	106	0.4%	28	0.2%	31	0.2%	17,268	10.1%
On-the-job supports-SE	854	3.5%	654	4.9%	826	6.2%	20,943	12.2%
Information and referral services	0	0.0%	0	0.0%	0	0.0%	27,036	15.8%
Benefits counseling	565	2.3%	0	0.0%	3	0.0%	8,229	4.8%
Customized employment services	3,708	15.4%	264	2.0%	283	2.1%	965	0.6%

Data source: RSA-911

Table 3.2.c FL-G VR Other Services Provided for Individuals Served - FFFYs 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	24,128	100%	13,478	100%	13,345	100%	171,219	
Transportation	7,680	31.8%	1,769	13.1%	1,839	13.8%	45,632	26.7%
Maintenance	926	3.8%	131	1.0%	124	0.9%	38,337	22.4%
Rehabilitation technology	2,212	9.2%	221	1.6%	576	4.3%	23,667	13.8%
Reader services	0	0.0%	0	0.0%	0	0.0%	49	0.0%
Interpreter services	547	2.3%	143	1.1%	242	1.8%	2,964	1.7%
Personal attendant services	16	0.1%	0	0.0%	2	0.0%	200	0.1%
Technical assistance services	117	0.5%	21	0.2%	9	0.1%	710	0.4%
Other services	7,282	30.2%	1,254	9.3%	1,354	10.1%	42,323	24.7%

Data source: RSA-911

Table 3.3.a FL-G Outcomes by Type of Impairment - FFFYs 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	111	1.5%	64	1.3%	53	1.0%	414	.4%
Visual - Without employment outcomes	176	1.0%	92	1.1%	73	0.9%	323	.4%
Auditory and Communicative - Employment outcomes	759	10.5%	372	7.4%	600	11.0%	17,462	17.8%
Auditory and Communicative - Without employment outcomes	861	5.1%	410	4.9%	422	5.3%	3,956	5.4%
Physical - Employment outcomes	1,942	26.9%	1,220	24.2%	1,124	20.6%	19,838	20.3%
Physical - Without employment outcomes	4,221	25.0%	2,114	25.0%	1,929	24.4%	16,668	22.7%
Intellectual and Learning disability - Employment outcomes	1,608	22.3%	1,253	24.9%	1,481	27.2%	29,140	29.8%
Intellectual and Learning disability - Without employment outcomes	4,321	25.5%	2,161	25.6%	1,946	24.6%	21,885	29.9%
Psychosocial and psychological - Employment outcomes	2,791	38.7%	2,125	42.2%	2,189	40.2%	31,033	31.7%
Psychosocial and psychological - Without employment outcomes	7,335	43.4%	3,667	43.4%	3,528	44.7%	30,471	41.6%
Total served - Employment outcomes	7,211	100.0%	5,034	100.0%	5,447	100.0%	97,887	100.0%
Total served - Without employment outcomes	16,914	100.0%	8,444	100.0%	7,898	100.0%	73,303	100.0%

Data source: RSA-911

Table 3.2.b FL-G All Individuals Served by Type of Impairment FFFYs 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	287	1.2%	156	1.2%	126	0.9%	737	.4%
Auditory and Communicative - Individuals served	1,620	6.7%	782	5.8%	1,022	7.7%	21,418	12.5%
Physical - Individuals served	6,163	25.5%	3,334	24.7%	3,053	22.9%	36,506	21.3%
Intellectual and Learning disability - Individuals served	5,929	24.6%	3,414	25.3%	3,427	25.6%	51,025	29.8%
Psychosocial and psychological	10,126	42.0%	5,792	43.0%	5,717	42.8%	61,504	35.9%
Total individuals served	24,125	100.0%	13,478	100.0%	13,345	100.0%	171,190	100.0

Data source: RSA-911

Table 3.3.c FL-G Employment Rate by Type of Impairment - FFFYs 2014-2016

Type of Impairment	2014 Percent	2015 Percent	2016 Percent	2016 National Agency Type Percent
Visual - Employment rate	38.7%	41.0%	42.1%	56.2%
Auditory and Communicative - Employment rate	46.9%	47.6%	58.7%	81.5%
Physical - Employment rate	31.5%	36.6%	36.8%	54.3%
Intellectual and Learning disability - Employment rate	27.1%	36.7%	43.2%	57.1%
Psychosocial and psychological – Employment rate	27.6%	36.7%	38.3%	50.5%
Total served - Employment rate	29.9%	37.3%	40.8%	57.2%

Table 3.4.a FL-G Elapsed Time from Application to Eligibility for All Individuals Served - FFFYs 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	19,261	69.4%	15,660	66.7%	16,397	67.0%	212,423	84.4%
61 – 90 days	4,096	14.8%	3,623	15.4%	3,923	16.0%	20,734	8.2%
91 – 120 days	2,093	7.5%	2,017	8.6%	2,163	8.8%	9,125	3.6%
121 – 180 days	1,575	5.7%	1,452	6.2%	1,394	5.7%	5,898	2.3%
181 – 365 days	656	2.4%	626	2.7%	532	2.2%	2,979	1.2%
More than 1 year	83	0.3%	95	0.4%	64	0.3%	606	.2%
Total eligible	27,764	100.0%	23,473	100.0%	24,473	100.0%	251,765	100.0%

Data source: RSA-911

Table 3.4.b FL-G Elapsed Time from Eligibility to IPE for All Individuals Served - FFFYs 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	17,039	70.6%	9,349	69.4%	10,025	75.1%	124,709	72.8%
More than 90 days	7,089	29.4%	4,129	30.6%	3,320	24.9%	46,510	27.2%
Total served	24,128	100.0%	13,478	100.0%	13,345	100.0%	171,219	100.0%

Data source: RSA-911

Table 3.4.c FL-G 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	109	0.5%	228	1.7%	376	2.8%	7,480	4.4%
4 – 6 months	910	3.8%	587	4.4%	1,462	11.0%	29,922	17.5%
7 – 9 months	1,596	6.6%	522	3.9%	1,862	14.0%	23,352	13.6%
10 – 12 months	1,998	8.3%	636	4.7%	1,717	12.9%	18,257	10.7%
13 - 24 months	6,207	25.7%	3,826	28.4%	2,454	18.4%	40,055	23.4%
25 – 36 months	4,807	19.9%	2,971	22.0%	1,841	13.8%	20,011	11.7%
37 – 60 months	6,180	25.6%	3,271	24.3%	2,184	16.4%	19,381	11.3%
More than 5 years	2,321	9.6%	1,437	10.7%	1,449	10.9%	12,761	7.5%
Total served	24,128	100.0%	13,478	100.0%	13,345	100.0%	171,219	100.0%

Data source: RSA-911

Table 3.5.a FL-G SOC Codes for All Individuals Served with Employment Outcomes - FFY 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)	24	.3%	32	.6%	36	.7%	656	.7%
Arts, Design, Entertainment, Sports, and Media (27-0000)	87	1.2%	66	1.3%	67	1.2%	1,025	1.0%
Building and Grounds Cleaning and Maintenance (37-0000)	675	9.4%	484	9.6%	634	11.6%	9,941	10.2%
Business and Financial Operations Occupations (13-0000)	109	1.5%	66	1.3%	56	1.0%	1,351	1.4%
Community and Social Services Occupations (21-0000)	137	1.9%	90	1.8%	92	1.7%	2,697	2.8%
Computer and Mathematical Occupations (15-0000)	94	1.3%	75	1.5%	78	1.4%	1,180	1.2%
Constructive and Extraction Occupations (47-0000)	272	3.8%	115	2.3%	136	2.5%	2,834	2.9%
Education, Training, and Library Occupations (25-0000)	191	2.6%	124	2.5%	157	2.9%	3,015	3.1%
Farming, Fishing, and Forestry Occupations(45-0000)	35	.5%	22	.4%	24	.4%	570	.6%
Food Preparation and Serving Related Occupations (35-0000)	1,021	14.2%	741	14.7%	830	15.2%	11,974	12.2%
Healthcare Practitioners and Technical Occupations (29-0000)	236	3.3%	251	5.0%	140	2.6%	2,557	2.6%
Healthcare Support Occupations (31-0000)	404	5.6%	266	5.3%	228	4.2%	4,036	4.1%
Homemaker*	3	.0%	0	0%	0	0%	296	.3%
Installation, Maintenance, and Repair Occupations (49-0000)	247	3.4%	172	3.4%	164	3.0%	3,722	3.8%
Legal Occupations (23-0000)	26	.4%	12	.2%	14	.3%	239	.2%
Life, Physical, and Social Science	15	.2%	10	.2%	11	.2%	451	.5%

SOC	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Occupations (19-0000)								
Management Occupations (11-0000)	143	2.0%	92	1.8%	94	1.7%	2,417	2.5%
Military Specific Occupations (55-0000)	6	.1%	3	.1%	2	.0%	37	.0%
Office and Administrative Support Occupations (19-0000)	1,319	18.3%	939	18.7%	1,099	20.2%	16,146	16.5%
Personal Care and Service Occupations (39-0000)	412	5.7%	314	6.2%	249	4.6%	6,382	6.5%
Production Occupations (51-0000)	215	3.0%	147	2.9%	164	3.0%	7,461	7.6%
Protective Service Occupations (33-0000)	201	2.8%	135	2.7%	128	2.3%	1,624	1.7%
Randolph-Sheppard vending facility clerk*	0	0%	0	0%	0	0%	0	0%
Randolph-Sheppard vending facility operator*	0	0%	0	0%	0	0%	0	0%
Sales and Related Occupations (41-0000)	722	10.0%	476	9.5%	509	9.3%	8,555	8.7%
Transportation and Material Moving Occupations (53-0000)	617	8.6%	402	8.0%	535	9.8%	8,716	8.9%
Unpaid Family Worker*							28	.0%
Total employment outcomes	7,211	100.0%	5,034	100.0%	5,447	100.0	97,910	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 FL-G Median Hourly Earnings for Individuals with Employment Outcomes by SOC - FFYs2014-2016

SOC	2014 Number	2015 Number	2016 Number	2016 National Agency Type Number
Architecture and Engineering Occupations (17-0000)	\$12.50	\$14.00	\$18.36	\$20.00
Arts, Design, Entertainment, Sports, and Media (27-0000)	\$12.50	\$10.75	\$12.00	\$12.50
Building and Grounds Cleaning and Maintenance (37-0000)	\$8.48	\$8.75	\$8.98	\$9.15
Business and Financial Operations Occupations (13-0000)	\$14.38	\$14.83	\$15.00	\$16.83
Community and Social Services Occupations (21-0000)	\$13.00	\$13.35	\$14.00	\$13.90
Computer and Mathematical Occupations (15-0000)	\$14.39	\$14.05	\$12.92	\$16.03
Constructive and Extraction Occupations (47-0000)	\$11.50	\$11.93	\$12.25	\$13.00
Education, Training, and Library Occupations (25-0000)	\$12.00	\$13.21	\$12.67	\$13.54
Farming, Fishing, and Forestry Occupations(45-0000)	\$9.50	\$10.20	\$9.96	\$10.15
Food Preparation and Serving Related Occupations (35-0000)	\$8.23	\$8.27	\$8.55	\$9.00
Healthcare Practitioners and Technical Occupations (29-0000)	\$15.00	\$16.00	\$17.00	\$19.00
Healthcare Support Occupations (31-0000)	\$10.00	\$10.00	\$11.03	\$10.65
Homemaker*				
Installation, Maintenance, and Repair Occupations (49-0000)	\$10.93	\$10.66	\$11.60	\$11.76
Legal Occupations (23-0000)	\$13.80	\$13.53	\$14.08	\$17.00
Life, Physical, and Social Science	\$12.50	\$15.30	\$12.50	\$15.00

SOC	2014 Number	2015 Number	2016 Number	2016 National Agency Type Number
Occupations (19-0000)				
Management Occupations (11-0000)	\$12.50	\$13.13	\$12.50	\$16.00
Military Specific Occupations (55-0000)	\$9.06	\$10.83	\$10.27	\$10.00
Office and Administrative Support Occupations (19-0000)	\$9.00	\$9.00	\$9.10	\$10.00
Personal Care and Service Occupations (39-0000)	\$8.75	\$9.00	\$9.00	\$9.19
Production Occupations (51-0000)	\$9.00	\$9.00	\$9.10	\$10.00
Protective Service Occupations (33-0000)	\$9.50	\$10.00	\$9.50	\$10.91
Randolph-Sheppard vending facility clerk*				
Randolph-Sheppard vending facility operator*				
Sales and Related Occupations (41-0000)	\$8.33	\$8.53	\$9.00	\$9.48
Transportation and Material Moving Occupations (53-0000)	\$9.00	\$9.00	\$9.00	\$10.00
Unpaid Family Worker*				
Total employment outcomes	\$9.00	\$9.31	\$9.50	\$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 (FL-G) 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	9,400	100%	8,306	100%	8,627	100%	97,326	100%
Exited as an applicant	0	0.00%	0	0.00%	0	0.00%	10,445	10.73%
Exited during or after trial work experience/extended evaluation	183	1.95%	163	1.96%	15	0.17%	710	0.73%
Exited without employment after IPE, before services	205	2.18%	144	1.73%	102	1.18%	2,787	2.86%
Exited from order of selection waiting list	270	2.87%	91	1.10%	103	1.19%	580	0.60%
Exited without employment after eligibility, before IPE	985	10.48%	3,422	41.20%	3,870	44.86%	26,275	27.00%
Exited with employment	2,069	22.01%	1,617	19.47%	1,833	21.25%	31,041	31.89%
Exited without employment	5,688	60.51%	2,869	34.54%	2,704	31.34%	25,488	26.19%
Employment rate	26.67%	n/a	36.05%	n/a	40.40%	n/a	54.91%	n/a
Supported employment outcomes	592	6.30%	534	6.43%	690	8.00%	5,568	5.72%
Competitive employment outcomes	2,049	21.80%	1,604	19.31%	1,818	21.07%	30,879	31.73%
Average hourly earnings for competitive employment outcomes	9.65	n/a	10.08	n/a	10.22	n/a	10.31	n/a
Average hours worked per week for competitive employment outcomes	28.27	n/a	28.44	n/a	27.68	n/a	28.83	n/a
Competitive employment outcomes at 35 or more hours per week	593	6.31%	520	6.26%	558	6.47%	10,972	11.27%
Competitive employment outcomes meeting SGA	988	10.51%	848	10.21%	832	9.64%	15,965	16.40%

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
Competitive employment outcomes with employer- provided medical insurance	403	4.29%	317	3.82%	292	3.38%	4,181	4.30%

Table 4.2.a (FL-G) VR Services for Individuals with Disabilities under Age 25 at Exit- FFFYs 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	7757	100%	4486	100%	4537	100%	56,529	100%
College or university training	511	6.60%	76	1.70%	89	2.00%	217	0.40%
Four-year or university training	62	0.80%	3	0.10%	6	0.10%	4,759	8.40%
Junior or community college training	697	9.00%	46	1.00%	43	0.90%	3,700	6.50%
Occupational or vocational training	907	11.70%	69	1.50%	71	1.60%	7,389	13.10%
On-the-job training	334	4.30%	57	1.30%	87	1.90%	2,350	4.20%
Apprenticeship training	0	0.00%	0	0.00%	0	0.00%	72	0.10%
Basic academic remedial or literacy training	71	0.90%	3	0.10%	1	0.00%	1,199	2.10%
Job readiness training	0	0.00%	0	0.00%	0	0.00%	9,356	16.60%
Disability-related skills training	0	0.00%	0	0.00%	0	0.00%	733	1.30%
Miscellaneous training	359	4.60%	34	0.80%	58	1.30%	7,283	12.90%
Assessment	2521	32.50%	144	3.20%	217	4.80%	34,386	60.80%
Diagnosis and treatment of impairment	6368	82.10%	238	5.30%	381	8.40%	12,093	21.40%
Vocational rehab counseling and guidance	0	0.00%	0	0.00%	0	0.00%	31,103	55.00%
Job search assistance	879	11.30%	150	3.30%	263	5.80%	16,078	28.40%
Job placement assistance	1081	13.90%	713	15.90%	782	17.20%	19,602	34.70%
On-the-job supports-short term	97	1.30%	26	0.60%	30	0.70%	6,477	11.50%
On-the-job supports-SE	363	4.70%	277	6.20%	389	8.60%	9,365	16.60%
Information and referral services	0	0.00%	0	0.00%	0	0.00%	8,416	14.90%
Benefits counseling	117	1.50%	0	0.00%	0	0.00%	1,985	3.50%
Customized employment services	1797	23.20%	145	3.20%	180	4.00%	398	0.70%
Transportation	2042	26.30%	480	10.70%	522	11.50%	11,822	20.90%
Maintenance	179	2.30%	29	0.60%	29	0.60%	10,231	18.10%

Training Services	2014	2014 Percent	2015	2015 Percent	2016	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Rehabilitation technology	288	3.70%	26	0.60%	46	1.00%	2,970	5.30%
Reader services		0.00%		0.00%		0.00%	22	0.00%
Interpreter services	126	1.60%	24	0.50%	45	1.00%	691	1.20%
Personal attendant services	10	0.10%	0	0.00%	2	0.00%	68	0.10%
Technical assistance services	5	0.10%	1	0.00%	1	0.00%	82	0.10%
Other services	1685	21.70%	282	6.30%	329	7.30%	12,803	22.60%

Table 4.3.a FL-G Outcomes by Type of Impairment for Individuals with Disabilities under Age 25 at Exit- FFFYs 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	7	0.34%	4	0.25%	6	0.33%	83	0.27%
Visual - Without employment outcomes	15	0.26%	9	0.31%	11	0.41%	78	0.31%
Auditory and Communicative - Employment outcomes	90	4.35%	68	4.21%	85	4.64%	1,840	5.93%
Auditory and Communicative - Without employment outcomes	187	3.29%	88	3.07%	101	3.74%	1,161	4.56%
Physical - Employment outcomes	173	8.36%	125	7.73%	128	6.98%	2,496	8.04%
Physical - Without employment outcomes	451	7.93%	228	7.95%	224	8.28%	2,012	7.89%
Intellectual and Learning disability - Employment outcomes	1,123	54.28%	842	52.07%	989	53.96%	18,991	61.19%
Intellectual and Learning disability - Without employment outcomes	3,212	56.47%	1,580	55.07%	1,368	50.59%	14,904	58.48%
Psychosocial and psychological - Employment outcomes	676	32.67%	578	35.75%	625	34.10%	7,628	24.58%
Psychosocial and psychological - Without employment outcomes	1,821	32.01%	964	33.60%	1,000	36.98%	7,331	28.76%
Total served - Employment outcomes	2,069	100.00%	1,617	100.00%	1,833	100.00%	31,038	100.00%
Total served - Without employment outcomes	5,688	100.00%	2,869	100.00%	2,704	100.00%	25,486	100.00%

Table 4.3.b FL-G All Individuals Served by Type of Impairment for Individuals with Disabilities under Age 25 at Exit- FFFYs 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 - Individuals served	22	0.28%	13	0.29%	17	0.37%	161	0.28%
Auditory and Communicative - Individuals served	277	3.57%	56	3.48%	186	4.10%	3,001	5.31%

Type of Impairment	2014	2014 Percent	2015	2015 Percent	2016	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Physical - Individuals served	624	8.04%	353	7.87%	352	7.76%	4,508	7.98%
Intellectual and Learning disability - Individuals served	4,335	55.89%	2,422	53.99%	2,357	51.95%	33,895	59.97%
Psychosocial and psychological	2,497	32.19%	,542	34.37%	1,625	35.82%	14,959	26.46%
Total individuals served	7,757	100.00%	4,486	100.00%	4,537	100.00%	56,524	100.00%

Table 4.3.c FL-G Employment Rate by Type of Impairment for Individuals with Disabilities under Age 25 at Exit- FFFYs 2014-2016

Type of Impairment	2014	2015	2016	2016 National Agency Type Percent
Visual - Employment rate	31.80%	30.80%	35.30%	51.55%
Auditory and Communicative - Employment rate	32.50%	43.60%	45.70%	61.31%
Physical - Employment rate	27.70%	35.40%	36.40%	55.37%
Intellectual and Learning disability - Employment rate	25.90%	34.80%	42%	56.03%
Psychosocial and psychological – Employment rate	27.10%	37.50%	38.50%	50.99%
Total served - Employment rate	27%	36%	40%	54.91%

Table 4.4.a FL-G 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	5750	62.38%	5069	62.25%	5338	61.98%	71426	82.89%
61 – 90 days	1659	18.00%	1446	17.76%	1590	18.46%	7648	8.88%
91 – 120 days	865	9.38%	797	9.79%	880	10.22%	3405	3.95%
121 – 180 days	679	7.37%	579	7.11%	608	7.06%	2280	2.65%
181 – 365 days	239	2.59%	231	2.84%	183	2.12%	1166	1.35%
More than 1 year	25	0.27%	21	0.26%	13	0.15%	246	0.29%
Total eligible	9217		8143		8612		86171	

Table 4.4.b FL-G 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	5,656	72.92%	3,271	72.92%	3,538	77.98%	39,529	69.93%
4-6 months	1,556	20.06%	952	21.22%	799	17.61%	8,989	15.90%
7-9 months	337	4.35%	160	3.57%	151	3.33%	3,334	5.90%
10-12 months	130	1.68%	57	1.27%	28	0.62%	1,909	3.38%
More than 12 months	77	0.99%	46	1.03%	21	0.46%	2,768	4.90%

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total served	7,756		4,486		4,537		56,529	

Table 4.4.c FL-G Elapsed Time from IPE to Closure for Individuals with Disabilities under Age 25 at Exit Served—FFFYs 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	27	0.35%	64	1.43%	95	2.09%	1,857	3.29%
4 – 6 months	151	1.95%	154	3.43%	330	7.27%	6,383	11.29%
7 – 9 months	371	4.78%	167	3.72%	495	10.91%	6,521	11.54%
10 – 12 months	511	6.59%	184	4.10%	588	12.96%	5,995	10.61%
13 - 24 months	1853	23.89%	1167	26.01%	948	20.89%	15,587	27.57%
25 – 36 months	1689	21.77%	985	21.96%	673	14.83%	8,330	14.74%
37 – 60 months	2341	30.18%	1264	28.18%	902	19.88%	7,953	14.07%
More than 5 years	814	10.49%	501	11.17%	506	11.15%	3,903	6.90%
More than 10 years	0	0.00%	0	0.00%	0	0.00%	0	
Total served	7757	100%	4486	100%	4537	100%	56,529	100%

Table 4.5.a FL-G Standard Occupational Classification (SOC) Codes for Individuals with Disabilities under Age 25 at Exit Served with Employment Outcomes—FFFYs 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)	14	0.68%	13	0.80%	14	0.76%	153	0.49%
Arts, Design, Entertainment, Sports, and Media (27-0000)	26	1.26%	25	1.55%	25	1.36%	286	0.92%
Building and Grounds Cleaning and Maintenance (37-0000)	153	7.39%	143	8.84%	157	8.57%	2966	9.56%
Business and Financial Operations Occupations (13-0000)	28	1.35%	19	1.18%	14	0.76%	247	0.80%
Community and Social Services Occupations (21-0000)	14	0.68%	15	0.93%	14	0.76%	293	0.94%
Computer and Mathematical Occupations (15-0000)	30	1.45%	19	1.18%	22	1.20%	296	0.95%
Constructive and Extraction Occupations (47-0000)	32	1.55%	22	1.36%	24	1.31%	749	2.41%
Education, Training, and Library Occupations (25-0000)	35	1.69%	33	2.04%	51	2.78%	645	2.08%
Farming, Fishing, and Forestry Occupations (45-0000)	7	0.34%	8	0.49%	6	0.33%	246	0.79%
Food Preparation and Serving Related Occupations (35-0000)	429	20.73%	304	18.80%	374	20.40%	5612	18.08%
Healthcare Practitioners and Technical Occupations (29-0000)	37	1.79%	39	2.41%	34	1.85%	467	1.50%
Healthcare Support Occupations (31-0000)	95	4.59%	54	3.34%	58	3.16%	1116	3.60%
Homemaker*		0.00%		0.00%		0.00%	11	0.04%
Installation, Maintenance, and Repair Occupations (49-0000)	85	4.11%	75	4.64%	74	4.04%	1373	4.42%
Legal Occupations (23-0000)	6	0.29%	7	0.43%	4	0.22%	24	0.08%
Life, Physical, and Social Science Occupations (19-0000)	4	0.19%	4	0.25%	2	0.11%	102	0.33%
Management Occupations (11-0000)	20	0.97%	26	1.61%	21	1.15%	283	0.91%
Military Specific Occupations (55-0000)	5	0.24%	3	0.19%	1	0.05%	32	0.10%

SOC	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Office and Administrative Support Occupations (43-0000)	374	18.08%	284	17.56%	376	20.51%	4939	15.91%
Personal Care and Service Occupations (39-0000)	147	7.10%	122	7.54%	84	4.58%	2469	7.95%
Production Occupations (51-0000)	58	2.80%	39	2.41%	53	2.89%	2501	8.06%
Protective Service Occupations (33-0000)	67	3.24%	35	2.16%	44	2.40%	403	1.30%
Randolph-Sheppard Vending Facility Clerk*		0.00%		0.00%		0.00%		0.00%
Randolph-Sheppard Vending Facility Operator*		0.00%		0.00%		0.00%		0.00%
Sales and Related Occupations (41-0000)	233	11.26%	177	10.95%	176	9.60%	3405	10.97%
Transportation and Material Moving Occupations (53-0000)	170	8.22%	151	9.34%	205	11.18%	2414	7.78%
Unpaid Family Worker*		0.00%		0.00%		0.00%	7	0.02%
Total employment outcomes	2069		1617		1833		31039	

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

SOC	2014	2015	2016	2016 National Agency Type
Architecture and Engineering Occupations (17-0000)	\$10.50	\$12.00	\$17.00	\$16.58
Arts, Design, Entertainment, Sports, and Media (27-0000)	\$10.79	\$10.94	\$12.00	\$11.30
Building and Grounds Cleaning and Maintenance (37-0000)	\$8.00	\$8.50	\$8.75	\$9.00
Business and Financial Operations Occupations (13-0000)	\$11.75	\$14.65	\$14.50	\$14.40

SOC	2014	2015	2016	2016 National Agency Type
Community and Social Services Occupations (21-0000)	\$10.25	\$12.00	\$13.46	\$12.00
Computer and Mathematical Occupations (15-0000)	\$13.51	\$12.40	\$12.50	\$14.41
Constructive and Extraction Occupations (47-0000)	\$9.28	\$10.00	\$10.30	\$11.67
Education, Training, and Library Occupations (25-0000)	\$10.00	\$12.97	\$11.00	\$10.95
Farming, Fishing, and Forestry Occupations (45-0000)	\$10.00	\$11.20	\$8.50	\$10.00
Food Preparation and Serving Related Occupations (35-0000)	\$8.00	\$8.20	\$8.50	\$8.75
Healthcare Practitioners and Technical Occupations (29-0000)	\$11.50	\$12.00	\$14.34	\$13.00
Healthcare Support Occupations (31-0000)	\$9.50	\$10.00	\$10.33	\$10.50
Homemaker*				
Installation, Maintenance, and Repair Occupations (49-0000)	\$10.00	\$10.00	\$11.88	\$10.00
Legal Occupations (23-0000)	\$17.85	\$12.00	\$13.00	\$13.06
Life, Physical, and Social Science Occupations (19-0000)	\$14.25	\$15.50	\$42.48	\$14.00
Management Occupations (11-0000)	\$12.00	\$12.90	\$12.00	\$12.30
Military Specific Occupations (55-0000)	\$8.75	\$10.83	\$11.54	\$10.00
Office and Administrative Support Occupations (43-0000)	\$8.09	\$8.75	\$9.00	\$9.00
Personal Care and Service Occupations (39-0000)	\$8.08	\$8.37	\$9.00	\$9.00
Production Occupations (51-0000)	\$8.49	\$8.53	\$9.50	\$10.00
Protective Service Occupations (33-0000)	\$9.75	\$10.00	\$10.00	\$10.12
Randolph-Sheppard Vending Facility Clerk*				

SOC	2014	2015	2016	2016 National Agency Type
Randolph-Sheppard Vending Facility Operator*				
Sales and Related Occupations (41-0000)	\$8.00	\$8.50	\$9.00	\$9.00
Transportation and Material Moving Occupations (53-0000)	\$8.16	\$8.27	\$8.50	\$9.33
Unpaid Family Worker*				
Total employment outcomes	\$8.43	\$9.00	\$9.00	\$9.35

Table 4.6 FL-G Source of Referral Codes 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%	25	0.03%
Centers for Independent Living	9	0.10%	9	0.11%	12	0.14%	71	0.07%
Child Protective Services	2	0.02%		0.00%	2	0.02%	72	0.07%
Community Rehabilitation Programs	11	0.12%	63	0.76%	71	0.82%	1772	1.84%
Consumer Organizations or Advocacy Groups	1	0.01%	35	0.42%	74	0.86%	328	0.34%
Educational Institutions (elementary/secondary)	5655	60.16%	4665	56.16%	4860	56.33%	54828	56.83%
Educational Institutions (post-secondary)	202	2.15%	406	4.89%	454	5.26%	3049	3.16%
Employers	1	0.01%	4	0.05%	4	0.05%	98	0.10%

Referral Sources	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Faith Based Organizations	2	0.02%	10	0.12%	13	0.15%	88	0.09%
Family/Friends	20	0.21%	191	2.30%	368	4.27%	4182	4.33%
Intellectual and Developmental Disabilities Providers	88	0.94%	77	0.93%	62	0.72%	860	0.89%
Medical Health Provider (Public or Private)	103	1.10%	119	1.43%	105	1.22%	2316	2.40%
Mental Health Provider (Public or Private)	102	1.09%	125	1.50%	143	1.66%	2184	2.26%
One-stop Employment/Training Centers	41	0.44%	42	0.51%	49	0.57%	638	0.66%
Other Sources	524	5.57%	374	4.50%	407	4.72%	7376	7.64%
Other State Agencies	205	2.18%	114	1.37%	93	1.08%	877	0.91%
Other VR State Agencies	28	0.30%	33	0.40%	49	0.57%	263	0.27%
Public Housing Authority		0.00%	1	0.01%	1	0.01%	103	0.11%
Self-referral	2349	24.99%	1980	23.84%	1788	20.73%	14897	15.44%
Social Security Administration (Disability Determination Service or District office)	31	0.33%	38	0.46%	50	0.58%	275	0.29%
State Department of Correction/Juvenile Justice	23	0.24%	15	0.18%	12	0.14%	1429	1.48%
State Employment Service Agency	1	0.01%		0.00%	7	0.08%	153	0.16%
Veteran's Administration		0.00%		0.00%	1	0.01%	27	0.03%
Welfare Agency (State or local government)	2	0.02%	5	0.06%	2	0.02%	543	0.56%
Worker's Compensation		0.00%		0.00%		0.00%	30	0.03%

Table 4.7FL-G Reason for Closure Codes for Individuals with Disabilities under Age 25 at Exit—FFFYs 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	2069	22.19%	1617	19.63%	1833	21.40%	31041	32.60%
Unable to locate or contact	2289	24.55%	2106	25.57%	1627	18.99%	21811	22.91%
Transportation not feasible or available	12	0.13%	7	0.08%	10	0.12%	163	0.17%
Does not require VR services		0.00%		0.00%		0.00%	587	0.62%
Extended services not available		0.00%		0.00%		0.00%	95	0.10%
All other reasons	555	5.95%	506	6.14%	367	4.28%	10353	10.87%
Extended employment	1	0.01%		0.00%		0.00%	65	0.07%
Individual in institution, other than a prison or jail	11	0.12%	15	0.18%	8	0.09%	183	0.19%
Individual is incarcerated in a prison or jail	41	0.44%	38	0.46%	26	0.30%	617	0.65%
Disability too significant to benefit from VR services	35	0.38%	30	0.36%	8	0.09%	635	0.67%
No longer interested in receiving services or further services	4295	46.06%	3902	47.37%	4679	54.62%	29510	30.99%
Death	16	0.17%	16	0.19%	9	0.11%	156	0.16%

Table 5.1.a FL-G 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	1,539	21.34%	1,291	25.65%	1,644	30.18%	2,755	13.03%
Average hourly wage for supported employment outcomes	\$ 9.37		\$9.54		\$9.69		\$9.67	
Average hours worked per week for supported employment outcomes	25.05		24.16		24.24		22.68	
Competitive supported employment outcomes	1,521	98.83%	1,283	99.38%	1,629	99.09%	12,714	99.68%
Average hourly earnings for competitive supported employment outcomes	\$9.40		\$9.57		\$9.71		\$9.68	
Average hours worked per week for competitive supported employment outcomes	25.16		24.17		24.25		22.67	
Competitive supported employment outcomes at 35 or more hours per week	294	19.10%	250	19.36%	303	18.43%	2,008	15.74%
Competitive supported employment outcomes meeting SGA	534	34.70%	441	34.16%	502	30.54%	3,555	27.87%
Competitive supported employment outcomes with employer-provided medical insurance	294	19.10%	250	19.36%	303	18.43%	782	6.13%

Table 5.1.b FL-G 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	592	28.61%	534	33.02%	690	37.64%	5,568	17.94%
Average hourly wage for supported employment outcomes	\$8.90		\$8.90		\$ 9.24		\$9.29	
Average hours worked per week for supported employment outcomes	23.67		23		23.2		22.19	
Competitive supported employment outcomes	587	99.16%	530	99.25%	685	99.28%	5,557	99.80%
Average hourly earnings for competitive supported employment outcomes	\$8.91		\$8.91		\$9.25		\$9.30	
Average hours worked per week for competitive supported employment outcomes	23.78		23.33		23.21		22.19	
Competitive supported employment outcomes at 35 or more hours per week	80	13.51%	77	14.42%	106	15.36%	771	13.85%
Competitive supported employment outcomes meeting SGA	168	28.38%	153	28.65%	181	26.23%	1,452	26.08%
Competitive supported employment outcomes with employer-provided medical insurance	73	12.33%	60	11.24%	60	8.70%	243	4.36%

Table 5.2.a FL-G Select VR and Supported Employment Services Provided for Individuals with Disabilities with Supported Employment Outcomes- FFFYs 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 SE	1539		1291		1644		12755	
College or university training	47	3.10%	2	0.20%	7	0.40%	16	0.10%
Four-year or university training	9	0.60%		0.00%		0.00%	135	1.10%
Junior or community college training	45	2.90%	3	0.20%	3	0.20%	164	1.30%
Occupational or vocational training	84	5.50%	10	0.80%	11	0.70%	933	7.30%
On-the-job training	120	7.80%	22	1.70%	30	1.80%	487	3.80%
Apprenticeship training	0	0.00%	0	0.00%	0	0.00%	8	0.10%
Basic academic remedial or literacy training	8	0.50%		0.00%		0.00%	113	0.90%
Job readiness training	0	0.00%	0	0.00%	0	0.00%	1,857	14.60%
Disability-related skills training	0	0.00%	00	0.00%	0	0.00%	345	2.70%
Miscellaneous training	81	5.30%	12	0.90%	20	1.20%	1,313	10.30%
Assessment	464	30.10%	42	3.30%	60	3.60%	8,390	65.80%
Diagnosis and treatment of impairment	1075	69.90%	128	9.90%	235	14.30%	2,446	19.20%
Vocational rehab counseling and guidance	0	0.00%	0	0.00%	0	0.00%	5,542	43.40%
Job search assistance	653	42.40%	150	11.60%	184	11.20%	6,198	48.60%
Job placement assistance	565	36.70%	414	32.10%	479	29.10%	5,706	44.70%
On-the-job supports-short term	34	2.20%	7	0.50%	7	0.40%	1,116	8.70%
On-the-job supports-SE	603	39.20%	589	45.60%	744	45.30%	7,967	62.50%
Information and referral services	0	0.00%	0	0.00%	0	0.00%	2,316	18.20%
Benefits counseling	80	5.20%		0.00%	1	0.10%	1,228	9.60%
Customized employment services	131	8.50%	10	0.80%	17	1.00%	156	1.20%
Transportation	606	39.40%	295	22.90%	329	20.00%	3,762	29.50%

Training Services	2014	2014 Percent	2015	2015 Percent	2016	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Maintenance	54	3.50%	19	1.50%	18	1.10%	3,452	27.10%
Rehabilitation technology	142	9.20%	36	2.80%	81	4.90%	575	4.50%
Reader services	0	0.00%	0	0.00%	0	0.00%	2	0.00%
Interpreter services	62	4.00%	19	1.50%	46	2.80%	248	1.90%
Personal attendant services	0	0.00%	0	0.00%	0	0.00%	4	0.00%
Technical assistance services	4	0.30%	0	0.00%	0	0.00%	5	0.00%
Other services	626	40.70%	240	18.60%	254	15.50%	2,585	20.30%

Table 5.2.b FL-G Select VR and Supported Employment Services Provided for Individuals with Disabilities under Age 25 at Exit with Supported Employment Outcomes- FFFYs 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 SE	592		534		690		5,568	
College or university training	22	3.70%	2	0.40%	6	0.90%	9	0.20%
Four-year or university training	6	1.00%	0	0.00%	0	0.00%	71	1.30%
Junior or community college training	18	3.00%	2	0.40%	3	0.40%	99	1.80%
Occupational or vocational training	29	4.90%	1	0.20%	8	1.20%	470	8.40%
On-the-job training	74	12.50%	15	2.80%	21	3.00%	289	5.20%
Apprenticeship training	0	0.00%	0	0.00%	0	0.00%	4	0.10%
Basic academic remedial or literacy training	6	1.00%	0	0.00%	0	0.00%	101	1.80%
Job readiness training	0	0.00%	0	0.00%	0	0.00%	1,048	18.80%
Disability-related skills training	0	0.00%	0	0.00%	0	0.00%	175	3.10%
Miscellaneous training	31	5.20%	5	0.90%	12	1.70%	807	14.50%
Assessment	208	35.10%	23	4.30%	25	3.60%	3,663	65.80%

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	429	72.50%	24	4.50%	64	9.30%	954	17.10%
Vocational rehab counseling and guidance	0	0.00%	0	0.00%	0	0.00%	2,412	43.30%
Job search assistance	293	49.50%	64	12.00%	103	14.90%	2,870	51.50%
Job placement assistance	194	32.80%	165	30.90%	161	23.30%	2,409	43.30%
On-the-job supports-short term	33	5.60%	7	1.30%	7	1.00%	522	9.40%
On-the-job supports-SE	288	48.60%	260	48.70%	360	52.20%	3,681	66.10%
Information and referral services	0	0.00%	0	0.00%	0	0.00%	976	17.50%
Benefits counseling	29	4.90%	0	0.00%	0	0.00%	422	7.60%
Customized employment services	58	9.80%	4	0.70%	13	1.90%	63	1.10%
Transportation	214	36.10%	115	21.50%	138	20.00%	1,378	24.70%
Maintenance	13	2.20%	4	0.70%	10	1.40%	1,188	21.30%
Rehabilitation technology	22	3.70%	2	0.40%	9	1.30%	213	3.80%
Reader services	0	0.00%		0.00%	0	0.00%	1	0.00%
Interpreter services	10	1.70%	1	0.20%	3	0.40%	68	1.20%
Personal attendant services	0	0.00%	0	0.00%	0	0.00%	1	0.00%
Technical assistance services	1	0.20%	0	0.00%	0	0.00%	1	0.00%
Other services	225	38.00%	73	13.70%	88	12.80%	1,113	20.00%

**Table 5.3.a FL-G 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	1097	71.28%	914	70.80%	1120	68.13%	10,918	85.60%

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
61 – 90 days	219	14.23%	189	14.64%	243	14.78%	903	7.08%
91 – 120 days	105	6.82%	77	5.96%	134	8.15%	387	3.03%
121 – 180 days	77	5.00%	67	5.19%	98	5.96%	309	2.42%
181 – 365 days	37	2.40%	37	2.87%	43	2.62%	185	1.45%
More than 1 year	4	0.26%	7	0.54%	6	0.36%	53	0.42%
Total SE	1539		1291		1644		12,755	

Table 5.3.b FL-G 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	398	67.23%	364	68.16%	445	64.49%	4,664	83.76%
61 – 90 days	94	15.88%	84	15.73%	37	5.36%	442	7.94%
91 – 120 days	52	8.78%	37	6.93%	13	1.88%	204	3.66%
121 – 180 days	26	4.39%	30	5.62%	114	16.52%	145	2.60%
181 – 365 days	20	3.38%	15	2.81%	77	11.16%	75	1.35%
More than 1 year	2	0.34%	4	0.75%	4	0.58%	38	0.68%
Total SE	592		534		690		5,568	100.00%

Table 5.4.a FL-G 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	1,274	82.78%	1,058	81.95%	1,406	85.52%	9,812	76.93%
4-6 months	204	13.26%	191	14.79%	190	11.56%	1,752	13.74%
7-9 months	43	2.79%	30	2.32%	42	2.55%	592	4.64%
10-12 months	11	0.71%	8	0.62%	3	0.18%	262	2.05%
More than 12 months	7	0.45%	4	0.31%	3	0.18%	337	2.64%
Total SE	1,539		1,291		1,644		12,755	

Table 5.4.b FL-G 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	464	78.38%	414	77.53%	565	81.88%	3,853	69.20%
4-6 months	95	16.05%	100	18.73%	100	14.49%	963	17.30%
7-9 months	23	3.89%	13	2.43%	22	3.19%	350	6.29%
10-12 months	6	1.01%	4	0.75%	1	0.14%	165	2.96%
More than 12 months	4	0.68%	3	0.56%	2	0.29%	37	4.26%
Total SE	592		534		690		5,568	

Table 5.5.a FL-G 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	3	0.19%	2	0.15%	15	0.91%	450	3.53%
4 – 6 months	61	3.96%	53	4.11%	116	7.06%	2,520	19.76%
7 – 9 months	168	10.92%	95	7.36%	234	14.23%	2,363	18.53%
10 – 12 months	188	12.22%	91	7.05%	292	17.76%	1,820	14.27%
13 - 24 months	453	29.43%	387	29.98%	391	23.78%	3,118	24.45%
25 – 36 months	238	15.46%	250	19.36%	193	11.74%	1,118	8.77%
37 – 60 months	308	20.01%	275	21.30%	237	14.42%	872	6.84%
More than 5 years	120	7.80%	138	10.69%	166	10.10%	494	3.87%
More than 10 years		0.00%		0.00%		0.00%		0.00%
Total SE	1,539		1,291		1,644		12,755	

Table 5.5.b FL-G 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
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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	1	0.17%		0.00%	3	0.43%	150	2.69%
4 – 6 months	5	0.84%	13	2.43%	30	4.35%	871	15.64%
7 – 9 months	36	6.08%	32	5.99%	72	10.43%	952	17.10%
10 – 12 months	61	10.30%	32	5.99%	130	18.84%	831	14.92%
13 - 24 months	170	28.72%	146	27.34%	190	27.54%	1,511	27.14%
25 – 36 months	103	17.40%	106	19.85%	86	12.46%	576	10.34%
37 – 60 months	167	28.21%	139	26.03%	110	15.94%	469	8.42%
More than 5 years	49	8.28%	66	12.36%	69	10.00%	208	3.74%
More than 10 years		0.00%		0.00%		0.00%		0.00%
Total SE	592		534		690		5,568	

Fiscal Data Tables for Focus Area VI

State Vocational Rehabilitation Services Program Federal Fiscal Year (FFY) 2017 Monitoring and Technical Assistance Guide

Table 6.1 Florida-General (FL-G) VR Resources and Expenditures—FFFYs 2014–2016

VR Resources and Expenditures	2014	2015	2016*
Total program expenditures	\$180,562,568	\$166,803,557	\$119,545,617
Federal expenditures	\$142,102,741	\$127,798,344	\$78,419,033
State agency expenditures (4 th quarter)	\$38,459,827	\$39,005,213	\$41,126,584
State agency expenditures (latest/final)	\$38,459,827	\$39,005,213	\$41,126,584
Federal formula award amount	\$142,142,422	\$144,117,852	\$151,955,969
MOE penalty from prior year	\$4,339,681	\$0	\$0
Federal award amount relinquished during reallocation	\$0	\$0	\$0
Federal award amount received during reallocation	\$4,300,000	\$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)	\$142,102,741	\$144,117,852	\$151,955,969
Federal award funds deobligated	\$0	\$16,319,508	\$0
Federal award funds used	\$142,102,741	\$127,798,344	\$151,955,969
Percent of formula award amount used	99.97%	88.68%	100.00%
Federal award funds matched but not used	\$0	\$16,319,508	\$0

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

Table 6.1 Florida-General (FL-G) 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-

VR Resources and Expenditures	Source/Formula
	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
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 Florida-General (FL-G) 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	\$38,459,827	\$34,588,370	\$41,126,584
Match provided (actual)	\$38,459,827	\$39,005,213	\$41,126,584
Match difference**	\$0	-\$4,416,843	\$0
Federal funds matched (actual)	\$142,102,741	\$144,117,852	\$151,955,969
Percent Federal funds matched	100.00%	100.00%	100.00%
Match from State appropriation	38,238,867	38,766,191	40,879,024
Percent match from State appropriation	99.43%	99.39%	99.40%
Match from Third-Party Cooperative Arrangements (TPCA)	195,960	214,040	222,560
Percent match from TPCAs	0.51%	0.55%	0.54%
Match from Randolph-Sheppard program			
Percent match from Randolph-Sheppard Program	0.00%	0.00%	0.00%
Match from interagency transfers			
Percent match from interagency transfers	0.00%	0.00%	0.00%
Match from other sources	25,000	25,000	25,000
Percent match from other sources	0.06%	0.06%	0.06%
MOE required	\$29,971,437	\$30,127,473	\$38,459,827
MOE: Establishment/construction expenditures	\$0	\$0	\$0
MOE actual	\$38,459,827	\$39,005,213	\$41,126,584
MOE difference**	-\$8,488,390	-\$8,877,740	-\$2,666,757

* 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 Florida-General (FL-G) 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
Match from Randolph-Sheppard program	Match amount from Randolph-Sheppard program. Source/Formula: Data provided by State

Non-Federal Share (Match) and Maintenance of Effort (MOE)	Source/Formula
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, minus establishment/construction expenditures for CRPs, established by the State's non-Federal expenditures two years prior, i.e. Recipient Share of Expenditures. Source/Formula: (For FFY two year prior) SF-425 4 th quarter or latest/final report: line 10j minus line 12a. If non-Federal share is added in the prior carryover year, the additional amount is added to the MOE required. If an agency increases their Establishment/Construction expenditures in the prior carryover year, the increase is deducted from the FFY's total non-Federal share for MOE purposes.
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

Non-Federal Share (Match) and Maintenance of Effort (MOE)	Source/Formula
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. NOTE: If non-Federal share is added in the prior carryover year, the additional amount is added to the MOE actual. If an agency increases their Establishment/Construction expenditures in the prior carryover year, the increase is deducted from the FFY's total non-Federal share for MOE purposes.
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 Florida-General (FL-G) Program Income and Carryover—FFYs 2014–2016

Program Income and Carryover	2014	2015	2016*
Program income received	\$8,972,800	\$6,889,709	\$9,484,539
Program income disbursed	\$8,972,800	\$6,889,709	\$9,484,539
Program income transferred	\$2,615,183	\$2,735,475	\$3,169,815
Program income used for VR program	\$6,357,617	\$4,154,234	\$6,314,724
Federal grant amount matched	\$142,102,741	\$144,117,852	\$151,955,969
Federal expenditures 9/30	\$112,368,054	\$79,881,868	\$78,419,033
Carryover amount	\$8,817,070	\$41,029,788	\$44,397,580
Carryover as percent of award	6.20%	28.47%	29.22%

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

Table 6.3 Florida-General (FL-G) 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 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 Florida-General (FL-G) RSA-2 Expenditures—FFYs 2014–2016*

RSA-2 Expenditures	2014	2015	2016
Total expenditures	\$158,262,664	\$154,039,707	\$180,906,009
Administrative costs	\$12,803,286	\$15,696,112	\$15,872,997
Administration as Percent expenditures	8.09%	10.19%	8.77%
Purchased services expenditures	\$98,899,758	\$90,408,782	\$99,572,286
Purchased services as a Percent expenditures	62.49%	58.69%	55.04%
Services to groups	\$0	\$0	\$0
Services to groups percentage	0.00%	0.00%	0.00%

*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 Florida-General (FL-G) - 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
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

*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.

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	25	5	83%	17%
Date of Eligibility Determination	14	16	47%	53%
Date of IPE	3	27	10%	90%
Start Date of Employment in Primary Occupation at Exit or Closure	6	8	43%	57%
Weekly Earnings at Exit or Closure	11	3	79%	21%
Employment Status at Exit or Closure	11	3	79%	21%
Type of Exit or Closure	26	4	87%	13%
Date of Exit or Closure	13	17	43%	57%

Summary	Number (of 30)	Percent (of 30)
Files with all required documentation	0	0%
Files with documentation for four or data elements examined	14	47%
Files with no required documentation	0	0

APPENDIX C: AGENCY RESPONSE

A. Overview

This appendix contains FDVR's responses to recommendations and corrective actions identified in the monitoring, along with FDVR'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, FDVR 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 FDVR 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, FDVR will report to the review team, on a quarterly basis, progress on the implementation of recommendations.

B. Agency Responses

Recommendations

2.1 Data Accuracy

- 2.1.1 Develop internal control processes to ensure the accuracy and validity of data reported through the RSA-911 prior to submitting the data to RSA;
- 2.1.2 Review the outcomes of the available case management reports involving VR services provided to all individuals to identify common coding errors; and
- 2.1.3 Once FDVR has identified possible coding issues, train all staff tasked with entering information into the case management system on the appropriate definitions in accordance with PD 16-04.

Agency Response: FDVR will continue to develop a system to validate data and data definitions to improve consistency across the agency. FDVR is in the process of completing development of an edit check tool, which will run monthly for internal review. In addition, FDVR is developing a change log that reflects changes in the RIMS case management system that effect the RSA-911. An analysis to identify services that are not accurately tracked in data collection systems will be incorporated and appropriate action (training, system modifications) will be taken to address common errors. Training for staff responsible for entering information in the case

management system on the appropriate definitions in accordance with PD 16-04 will be provided through a web-based approach to allow access as needed for existing and new staff during onboarding.

Technical Assistance: FDVR does not request technical assistance.

2.2 Exiting the VR System

- 2.2.1 Develop strategies to maintain contact with and provide information and referral services for eligible individuals on the waiting list;
- 2.2.2 Develop information and resources for individuals on the waiting list that would provide available services through the State's one-stop system and other resources that may be available to individuals with disabilities throughout the State; and
- 2.2.3 Provide a system for assessing the approximate time eligible individuals may be on a waiting list, and provide updates and available resources to keep the individuals engaged in the VR system.

Agency Response: FDVR has developed a process with several strategies to maintain contact with individuals on the waiting list and to assist them with resources to address employment barriers while waiting to be released. Strategies include: "Information and Referral Resource Guide," direct contact (phone calls using a script), and/or letters. Additionally, the agency will be investigating the ability to auto-populate local resources on template letters sent to individuals when informed of placement on the waiting list.

FDVR has a tool to permit estimates of how many individuals will be on the waiting list into the future. Enhancements for projecting time on waiting lists will be explored.

Technical Assistance: FDVR does not request Technical Assistance.

2.3 Internal Controls

- 2.3.1 Expand written internal control policies and procedures for the accuracy and validity of data reported through the RSA-911, specifically for maintaining verifying documentation in an individual's case file regarding eligibility determination, development of the IPE, services provided, and service record closure;
- 2.3.2 Evaluate the piloted internal control procedures for each regional area after implementation to assess compliance; and
- 2.3.3 After evaluating the effectiveness of the new process in each regional area, provide additional training to staff based on areas identified as needed.

Agency Response: FDVR is in the process of redesigning the casework quality assurance process. The process will include case and data verification at the local and state levels. FDVR will evaluate the effectiveness of the piloted internal control procedures and develop training for FDVR based on a review of internal management reports and compliance reviews.

RSA Response: RSA appreciates the efforts underway to improve the agency's internal controls.

Technical Assistance: FDVR does not request technical assistance.

2.4 Employment Outcomes

- 2.4.1 Develop measurable goals and strategies to improve the agency's employment rate; and
- 2.4.2 Evaluate the decline in services and determine if necessary services are being provided to assist individuals with achieving quality employment, including job search and placement services.

Agency Response: FDVR implemented VRWorks, which strengthens the agency's focus on employment and career pathways. The agency will explore opportunities to collaborate with local workforce boards to increase employment opportunities for individuals with disabilities.

FDVR has also initiated a business relations program, which is consistent with improving the agency's employment rate using measurable goals and strategies by:

- a) Increasing the number of employers engaged as business partners
- b) Increasing referrals of qualified applicants to business partners
- c) Preparing ready-to-work applicants for in-demand careers and jobs currently available

FDVR also implemented a strategy for tracking and reviewing cases identified as statistical outliers, including those where significant time has passed without the provision of services.

Technical Assistance: FDVR is currently in a Technical Assistance Agreement with WINTAC to expand the depth of training staff to utilize the Career Index Plus.

3.1 Youth with Disabilities:

- 3.1.1 Analyze the provision of services and employment outcomes achieved by youth with disabilities, and determine if VR services provided are aligned with labor market demands in the State of Florida;
- 3.1.2 Identify career pathways available for youth with disabilities through participation in work-based learning experiences while they are still enrolled in an educational program; and
- 3.1.3 Explore relevant education and training programs, as well as training and employment opportunities with employers, including customized employment.

Agency Response: FDVR will track the service mix over time and complete statistical analysis of what services worked and changes over time. The results will compare service delivery to in-demand skills and occupations.

FDVR is collaborating with LEAs to assure work-based learning experiences (WBLE) supplement, but do not supplant student transition services available under IDEA. VR uses

evidence-informed models, like Project SEARCH, to enhance student outcomes. FDVR is collaborating with Institutions of Higher Education (IHEs) to provide WBLE to students with the most significant disabilities through Inclusive Postsecondary Education (IPSE) Programs. Many VR and IPSE collaborations meet the requirements to become a Comprehensive Transition Program, specifically designed to serve students with intellectual disabilities.

FDVR is participating on the IPSE Credential Workgroup and Steering Committee, which will explore career pathways and related credentialing requirements that lead to employment and to identify enhancements for IPSE programming.

FDVR collaborates with Department of Economic Opportunity and local CareerSource Centers to support participation in certificate programs that enhance employability, and is developing targeted industry entry-level opportunities for students with disabilities who are enrolled in educational programs.

In addition, FDVR has worked with national leaders to develop ongoing training on customized employment for VR providers and has implemented customized employment services, including discovery. FDVR continues to build capacity for these sustainable services.

RSA Response: RSA appreciates FDVR's continued efforts to collaborate with other local and State agencies and community providers to increase the number and quality of employment outcomes for youth with disabilities.

Technical Assistance: FDVR continues to work with WINTAC on these initiatives through the Intensive Technical Assistance Agreement.

4.1 Absence of Finalized Policies and Procedures Reflecting the Changes from WIOA

- 4.1.1 Revise policies governing supported employment services to be consistent with WIOA;
- 4.1.2 Continue to receive technical assistance from the WINTAC and RSA regarding the revision of outdated supported employment policies;
- 4.1.3 Develop a plan for the provision of training on the new policies and procedures to all agency staff and management; and
- 4.1.4 Develop and implement a protocol by which FDVR can review the new policies to track the effect of service delivery policies on agency performance.

Agency Response: FDVR is revising existing Supported Employment policies to ensure that all requirements contained in WIOA are reflected therein. FDVR's Field Service Operating Procedures will be updated to provide guidance on the new Supported Employment policy.

The WINTAC provided informal technical assistance and guidance during the development of the new Supported Employment policies. WINTAC will be asked to review before the policies are submitted to RSA. FDVR's Supported Employment policies will be submitted to RSA for a final review upon completion of the internal review process.

FDVR will develop a plan to deliver training on all policies and procedures to staff, and has formed a workgroup composed of subject matter experts to review the new policies and develop a system to track the effect of those policies and the agency's performance.

RSA Response: RSA appreciates the steps the agency has taken to implement its policies and train staff.

Technical Assistance: FDVR will continue to work with WINTAC through the Technical Assistance Agreement.

4.2 Lack of Supported Employment Service Consideration for Those with Severe and Persistent Mental Illness

- 4.2.1 Revise policies governing supported employment services to be consistent with WIOA, to include taking applications for, and providing supported employment services to, appropriate individuals with severe and persistent mental illness, regardless of long-term funding arrangements; and
- 4.2.2 Develop a plan for the provision of training for management and field staff regarding new policies to include serving those with severe and persistent mental illness regardless of the arrangements for long-term funding.

Agency Response: FDVR revised existing Supported Employment policies to be inclusive of individuals with severe and persistent mental illness when Supported Employment services are appropriate. FDVR's updated policy clarifies the assumption that funding for extended services will be available for individuals who require Supported Employment.

FDVR will revise existing Field Service Operating Procedures to include the presumption for the availability of extended services (e.g. natural resources, employer supports, SSI/SSDI benefits, private pay, etc.) so that supported employment cases may advance for individuals even if at time of application there is not a specific extended service known.

Additionally, FDVR is piloting an innovative program called Individual Placement and Support in the South Florida area, which utilizes employment as a treatment modality for individuals with severe and persistent mental illness. This program is a partnership between FDVR and community mental health centers. It has proved successful in working with this population.

FDVR will develop a plan to deliver training on all policies and procedures to staff.

RSA Response: RSA appreciates the actions underway to address these recommendations.

Technical Assistance: FDVR does not request technical assistance.

Corrective Actions to Improve Performance

2.1 Untimely Eligibility Determination

- 2.1.1 Assess and evaluate VR counselor performance and identify effective practices that ensure timely eligibility determinations are made within 60 days from the date of application, including the use of case management tools for, and supervisory review of, timely eligibility determinations, tracking and monitoring; and
- 2.1.2 Develop procedures for VR counselors and supervisors to track and monitor timely and untimely eligibility determinations.

Agency Response: FDVR enhanced system controls in the RIMS case management system by changing the timing of when counselors and supervisors receive the eligibility determination alert in RIMS. RIMS generates an alert for counselors and supervisors notifying them an eligibility determination is required. This alert is now generated at 30 days from the application signature date, rather than 50 days. The Division amended its referral and application policy to reflect a separation in referral and application forms. In addition, the updated policy addresses application completion during the initial appointment with the counselor. FDVR updated existing Field Service Operating Procedure (FSOP) related to eligibility determination. The procedural change outlines required steps to request and document additional eligibility determination extensions.

FVDR has implemented a revised monthly coaching report for counselors and support staff to address timely case process with a focus on compliance with federal mandates. Current data for FFY 17 indicates a 9.5% increase in eligibility determinations within the required 60 days and a 95.2% compliance rate for the current FFY.

RSA Response: RSA appreciates FDVR's efforts to ensure that all applicants meet the mandatory 60-day eligibility determination requirement.

Technical Assistance: FDVR does not request technical assistance.

2.2 Untimely Development of the IPE

- 2.2.1 Assess and evaluate current procedures for tracking and monitoring counselor performance and efficient practices used by high performing VR counselors and supervisors to ensure timely IPE development, including the use of case management tools for, and supervisory review of, timely IPE development; and
- 2.2.2 Develop goals and strategies to improve VR counselor performance specific to timely IPE development.

Agency Response: FVDR has implemented a revised monthly coaching report for counselors and support staff to address timely case process with a focus on compliance with federal mandates. In addition, FDVR is investigating opportunities for training on rapid engagement from Susan Foley at University of Massachusetts - Boston.

The agency's focus on improving quality case management is evidenced with an overall 91.6% compliance of the 90-day IPE development in FFY 2017, which demonstrates a 10.5% increase from FFY 2016.

RSA Response: RSA appreciates FDVR's efforts to ensure that all eligible individuals have an IPE developed within the mandatory 90-day time frame.

Technical Assistance: FDVR does not request technical assistance.

2.3 Internal Controls and Monitoring

- 2.3.1 Develop policies and procedures to obtain and maintain supporting documentation in an individual's case service record pursuant to the requirements of 34 CFR §361.47 and PD-16-04;
- 2.3.2 Implement internal controls to ensure all supporting documentation is maintained within each case service record, in accordance with 2 CFR §200.303; and
- 2.3.3 Develop and implement internal control procedures to ensure that case service records contain the required supporting documentation for data elements submitted through the RSA-911 report.

Agency Response: FDVR is in the process of reviewing all promulgated administrative rules. As part of this process, the rules are being simplified, related sections of the policy manual are being rewritten, and Field Services Operating Procedures (FSOPs) are being written. The goal of the policy changes and the FSOPs in particular, is to give FDVR staff clear instructions on how to fulfill their responsibilities, including documentation and data collection.

FDVR is in the process of redesigning the casework quality assurance process. The process will include case and data verification at the local and state levels.

FDVR will research policies used by other VR and similar agencies to develop internal policies and procedures.

Technical Assistance: FDVR does not request technical assistance.

5.1 Personnel Cost Allocation and Reconciliation Not Consistent with Requirements

- 5.1.1 Cease charging personnel and fringe expenditures to the VR award based upon budget estimates, and ensure interim accounting of budget estimates are reconciled with after-the-fact personnel allocation data; and
- 5.1.2 Revise and implement managerial Personnel Activity Reporting System instructions to correctly allocate personnel costs, including fringe, to the correct funding source based upon an after-the-fact reconciliation of budget estimates consistent with Uniform Guidance.

Agency Response: FDVR complies with the Florida Department of Education's Substitute Time Distribution System, approved by US Department of Education (USDOE) and implemented July

1, 2013. FDVR defers to the Florida Department of Education to assist in developing a corrective action plan for findings 5.1.1 and 5.1.2. The Florida Department of Education will consult with USDOE to identify a resolution.

RSA Response: RSA will work with Florida and the Department's indirect cost group, as appropriate, to assist FDVR in the resolution of these corrective actions.

Technical Assistance: Florida Department of Education is seeking technical assistance through USDOE.

5.2 Prior Approval Not Obtained

5.2.1 RSA requires that FDVR 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: FDVR developed and implemented a process to ensure ongoing compliance with the prior approval requirements. FDVR has submitted approval requests using this process for capital expenditures on equipment and travel for SRC members. The FDVR process appears to be accepted by RSA as approvals have been granted on requested prior approvals.

RSA Response: RSA thanks FDVR for its response and its efforts made thus far related to prior approval requirements.

Technical Assistance: FDVR does not request technical assistance.

5.3 Obligations and Expenditures Not Properly Assigned to Correct Period of Performance

5.3.1 Make requisite changes to its financial data collection and analysis process to bring it into compliance so that FDVR can:

- Ensure all Federal and non-Federal obligations (including contracts and contracts with CRPs maintained in the case management and electronic billing systems) are properly accounted for and obligated to the correct FFY award in the agency's financial management system;
- Account for and accurately liquidate all expenditures from the correct FFY award, commensurate with the period of performance for the corresponding obligations based on when they were assigned;
- Accurately report obligations and liquidations on the SF-425 report for the corresponding period of performance for Federal awards;

5.3.2 Update and implement policies and procedures to accurately account for and report all obligations and expenditures to the correct period of performance, ensuring the policies address:

- The assignment of obligations to the appropriate FFY award and the liquidation of such funds based upon the assignment of the obligation;

- The obligation of contract services in the financial management system to ensure liquidations are based upon the FFY in which the contracts were obligated; and
- 5.3.3 Develop and implement a written internal control process, including a monitoring component, to ensure ongoing compliance with Federal requirements for the areas mentioned in corrective actions 5.3.1 and 5.3.2.

Agency Response: FDVR agrees with the findings related to financial data collection, reporting of obligations and expenditures and internal control processes. Due to the complexities of this specific finding as related to Florida financial system requirements as well as Federal requirements, the FDVR is requesting intensive technical assistance through an on-site visit by RSA.

RSA Response: RSA will provide technical assistance to the extent that it can to assist FDVR in completing these corrective actions. RSA will also work with FDVR to identify additional technical assistance resources to assist the agency.

Technical Assistance: FDVR requests on-site technical assistance from RSA to assist in the development of corrective action plan for findings 5.3.1, 5.3.2 and 5.3.

5.4 Third-Party Cooperative Arrangements – Unallowable Match

- 5.4.1 Cease disbursing Federal VR funds under TPCAs and reporting as match under the VR program any non-Federal funds that do not meet the requirements of 34 CFR §361.28, §361.60, or Uniform Guidance requirements at 2 CFR §200.302 and EDGAR provisions at 34 CFR §76.702 that require FDVR to use fiscal control and fund accounting procedures that ensure proper disbursement of and accounting for Federal funds; and
- 5.4.2 Develop and implement internal controls to ensure that FDVR has fiscal control and fund accounting procedures that ensure proper disbursement of and accounting for Federal funds, in accordance with 34 CFR §76.702 and 2 CFR §200.302(b).

Agency Response: FDVR's Third Party Cooperative Arrangements (TPCAs) for the 2017-2018 school year expire on June 30, 2018. Beginning July 1, 2018, FDVR will implement a fee for service contract, which will require School Boards to create and/or expand Work-Based Learning Experiences for students. FDVR will establish fees payments for each completed benchmark per student receiving services under the Contract. The TPCA approach will no longer be utilized by FDVR after July 1, 2018.

FDVR provided our fiscal control procedures during the on-site monitoring visit that were already developed and implemented.

Technical Assistance: FDVR does not request technical assistance.

6.1 Funding Mechanism for One-Stop Infrastructure Costs Not Consistent with Requirements

- 6.1.1 Retain sole responsibility for its non-delegable functions as a DSU, as required by 34 CFR §361.13;
- 6.1.2 Cease using statutory program caps associated with the State funding mechanism to determine VR infrastructure cost contributions when the State funding mechanism has not been triggered; and
- 6.1.3 Develop and implement procedures to participate in local area negotiations with the LWDB, chief elected officials, and one-stop partners to develop a local MOU, and in an effort to determine the cost allocation methodology(ies) of calculating amounts each partner will contribute toward one-stop infrastructure costs.

Agency Response: FDVR has been involved in the creation and negotiation of the MOUs throughout the process. The draft report characterizes the DSU's role in the creation of these agreements as hands-off and relying on the DSA, which is not accurate. The DSU developed a MOU template and worked with the LWDBs to reach the final language that was acceptable to all parties. This process was coordinated and managed through the FDVR contracting unit. It is correct that the agreements were ultimately signed by the Commissioner of Education, as head of the DSA, on behalf of FDVR. Existing agreements will be added to or amended to include the DSU Director's signature and MOUs and IFAs will be negotiated, approved, and signed by the DSU.

FDVR is no longer using the described process to calculate infrastructure costs. FDVR is working with the individual LWDBs to negotiate and develop IFAs specific to the LWDB and their infrastructure costs. The IFAs are being drafted in compliance with the guidance provided in RSA-TAC-17-03. Upon completion, the IFAs are being incorporated by amendment into the associated LWDB MOUs.

RSA Response: RSA acknowledges FDVR's role in the development of local area MOUs, and has revised the body of the finding to reflect FDVR's activities, focusing on the requirements and actions necessary for FDVR to ensure infrastructure cost requirements, and a resulting IFA, are part of the negotiations and MOU development, respectively, in the future.

Technical Assistance: FDVR does not request technical assistance.