

**FISCAL YEAR 2017
MONITORING REPORT
ON THE
OPPORTUNITIES FOR OHIOANS WITH
DISABILITIES
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 the State Supported Employment Services program (Supported Employment program) administered by Opportunities for Ohioans with Disabilities (OOD) 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 September 18 through 22, 2017, is described in detail in the [FFY 2017 Vocational Rehabilitation Program Monitoring and Technical Assistance Guide](#).

B. Summary of Observations and Findings to Improve Performance

RSA's review of OOD 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.

Observations

- The quality of employment outcomes achieved by individuals with disabilities served by OOD may be affected, in part, by a lack of training services, including postsecondary education and vocational training.
- Individuals under the age of 25 are exiting from the VR system prior to receiving services.
- The number of youth with disabilities who exited without employment after eligibility and before an IPE trended higher than the national average; and both the overall employment rate and employment rate by disability types are significantly lower than the combined agency national performance.

Findings

- OOD was not in compliance with section 102(a)(6) of the Rehabilitation Act and 34 CFR §361.41(b)(1) because OOD did not make eligibility determinations within the required 60-day period for all individuals whose service records were closed in FFY 2016.
- OOD was not in compliance with section 102(b)(3)(F) of the Rehabilitation Act and 34 CFR §361.45(e), because OOD did not develop IPEs within the 90-day time frame following the determination of eligibility during the review period as reported in the RSA-911.
- OOD was not in compliance with Section 113 of the Rehabilitation Act and 34 CFR §361.48(a)(1) that require 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.
- OOD did not meet the prior approval requirements in 2 CFR §200.407.
- OOD did not satisfy the requirements in 34 CFR §361.12, 34 CFR §76.702, and 2 CFR §200.302 to accurately account for and report the financial results of all Federally-assisted activities. Additionally, the agency did not have sufficient internal controls to ensure the accurate submission of the required financial reports.

C. Summary of Technical Assistance

During the review process, RSA provided technical assistance covering the following topics to OOD:

- The use of standard occupational classification (SOC) codes for individuals who achieved employment outcomes;

- The differences between the definitions of a student and youth with a disability and the scope of these definitions;
- The requirements for the State educational agency (SEA) agreement;
- The provision of pre-employment transition services, including required, authorized, and pre-employment transition coordination activities;
- The ability to charge transportation costs to the funds reserved for the provision of pre-employment transition services;
- Development of a system to report all students with disabilities in receipt of pre-employment transition services;
- Amending agreements to describe how the agency and its community rehabilitation programs (CRPs) will capture the required data elements for individuals receiving pre-employment transition services;
- Supported Employment program draft policies and online supported employment certification curriculum;
- Requirements under the Uniform Guidance for prior approval;
- Monitoring of vendor provided VR services per contractual arrangements;
- SF-425 financial report submission process; and
- Maintenance of effort (MOE) penalty process.

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

- Best practices in the application of flat fees for purchased services;
- Alignment of SOC codes with the data collection and reporting of other workforce partners that do not use SOC codes;
- The development of data sharing agreements with higher education and secondary education agencies to ensure the collection and accurate reporting of skills attainment and credential attainment in the workforce development system; and
- Measuring and accounting for the common performance measures in partnership with the Governor's Office of Workforce Transformation (OWT).

D. Review Team Participants

Members of the RSA review team included Sandy DeRobertis, April Trice, and Ed West (VR Program Unit); Andy Kerns (Data Collection and Analysis Unit); Arseni Popov (Fiscal Unit); and Joseph Doney (Technical Assistance 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 OOD for the cooperation and assistance extended throughout the monitoring process. RSA also appreciates the participation of others, such as the Independent Commission (IC), the Client Assistance Program (CAP), advocates, and other stakeholders in the monitoring process.

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

A. Nature and Scope

Through implementation of this focus area, RSA assessed the achievement of quality employment outcomes by individuals with disabilities served in the VR program by conducting an in-depth and integrated analysis of core VR program data and review of individual case service records. The analysis represents a broad overview of the VR program administered by OOD 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 (i.e., FYs 2014-2016). Consequently, the tables do not provide complete information that could otherwise be derived from examining open service records. The analysis includes the number of individuals participating in the various stages of the VR process; the number and quality of employment outcomes; the services provided to eligible individuals; the types of disabilities experienced by individuals receiving services; and the amount of time individuals are engaged in the various stages of the VR process, including eligibility determination, development of the IPE, and the provision of services. RSA also reviewed policies and procedures related to internal controls necessary for the verification of data and compared the performance of OOD with that of all VR agencies of similar type (i.e., combined 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 (PY) 2016 Combined State Plan describing goals and priorities pertaining to the performance of the VR program.

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

- The VR agency director;
- VR agency managers and supervisors;
- VR counselors;
- VR agency personnel;
- Ohio Mental Health and Addiction Services (OhioMHAS);
- Ohio Department of Developmental Disabilities (DODD) staff;
- Ohio Department of Education (ODE) staff;

- Ohio Department of Job and Family Services (ODJFS) staff;
- Representatives of community rehabilitation providers (CRPs);
- National Technical Assistance Center on Transition (NTACT) staff;
- Workforce Innovation Technical Assistance Center (WINTAC) staff; and
- Representatives of the IC, 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 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 OOD and the method it uses to maintain records. RSA used the information obtained through the review of service records to assess OOD's internal controls for the accuracy and validity of RSA-911 data.

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

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

B. Overview

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

VR Process

Applicants for VR services increased from 22,512 in FFY 2014 to 22,642 in FFY 2016, and the number of eligible individuals decreased from 23,937 in FFY 2014 to 23,175 in FFY 2016. OOD released 4,233 individuals from the agency's order of selection (OOS) waiting list in FFY 2014 and 708 individuals in FFY 2015. In February 2015, the agency rescinded its long-standing OOS policy and opened all categories of individuals with disabilities to be served. The percentage of individuals with IPEs receiving services increased by 13.8 percentage points during the review period. Concurrently, 6.3 percent fewer individuals whose cases were closed without an employment outcome, after eligibility, before an IPE was signed or before receiving services, exited without receiving services.

Employment Outcomes

The number of annual employment outcomes reported by OOD on the RSA-911 increased by 2,063, or 45.04 percentage points, during the review cycle from 4,580 in FFY 2014 to 6,643 in FFY 2016, including 6,060 competitive employment outcomes in FFY 2016, while the number

of individuals who exited without employment increased by 534, or 8.80 percentage points, from 6,069 in FFY 2014 to 6,603 in FFY 2016. OOD provided revised competitive employment outcome data during the review that resulted in a corresponding increase in the percentage of consumers exiting with competitive employment outcomes. The revised number and percentage of competitive employment outcomes provided by OOD for FFY 2014, FFY 2015, and FFY 2016, respectively, are as follows: 4,400 (96.9 percent), 5,504 (97.2 percent), and 6,363 (95.8 percent).

From data reported by OOD on the RSA-911, the agency's employment rate increased by 7.2 percentage points from 43.0 percent in FFY 2014 to 50.2 percent in FFY 2016. The average earnings for competitive employment outcomes increased by \$1.02 per hour from \$10.16 in FFY 2014 to \$11.18 in FFY 2016, and the median wage for competitive employment outcomes increased from \$8.50 to \$9.00 per hour.

VR Services Provided

The total number of individuals whose service records were closed by OOD after receiving services increased by 2,597, or 24.39 percentage points, from 10,649 in FFY 2014 to 13,246 in FFY 2016. This significant increase in individuals served resulted in notable increases in training, career, and other support services provided. The percentage of individuals receiving training services increased by 2.1 percent from 5,890 individuals in FFY 2014 to 6,013 individuals in FFY 2016. The percentage of individuals receiving career services increased by 19.98 percent from 26,826 individuals in FFY 2014 to 32,185 individuals in FFY 2016. Finally, the percentage of individuals receiving other support services increased by 24.3 percent from 10,649 in FFY 2014 to 13,246 in FFY 2016.

The number of individuals whose service records were closed and who received diagnostic and treatment services decreased from 2,637, or 24.8 percent, in FFY 2014 to 1,789, or 13.5 percent, in FFY 2016, which was substantially less than the performance of 29.5 percent for all combined agencies in FFY 2016. OOD's management informed RSA that diagnostic and treatment services are offered to individuals served by OOD at significantly higher numbers than reported because, they are provided by OOD's referral partner agencies, and because VR counselors frequently code diagnostic and treatment services as assessment services on the RSA 911. OOD reported an increase in assessment services provided to individuals from 9,561(89.8 percent) in 2014 to 11,492, (86.8 percent), in FFY 2016, which is substantially higher than the performance for all combined agencies of 57.2 percent in FFY 2016.

The number of individuals whose service records were closed after receiving college or occupational training decreased significantly from 1,406 in FFY 2014 to 888 in FFY 2016, or a decrease of 36.8 percent. In FFY 2016, 21 individuals, or 0.2 percent, received on-the job training, down from 36 individuals, or 0.3 percent, in FFY 2014. The number of individuals receiving basic academic remedial or literacy training decreased from 61, or 0.6 percent, in FFY 2014 to 19, or 0.1 percent, in FFY 2016. The percentage of individuals receiving on the job supports – Supported Employment increased from 0 in FFY 2014 to 0.2 percent in FFY 2016, significantly less than the performance for all combined agencies in FFY 2016 of 7.8 percent.

Select Measures for All Individuals Whose Service Records Were Closed after Receiving Services by Impairment Type

The number of individuals with visual disabilities whose service records were closed after receiving services and who exited with employment outcomes increased by 56.77 percent from 421 in FFY 2014 to 660 in FFY 2016. Comparatively, the number of individuals with visual impairments who exited without employment outcomes decreased by 9.9 percent from 353 in FFY 2014 to 318 in FFY 2016. The employment rate for individuals with visual disabilities increased by 13.1 percentage points from 54.4 percent in FFY 2014 to 67.5 percent in FFY 2016.

The number of individuals with auditory and communicative disabilities whose service records were closed after receiving services and who exited with employment outcomes nearly tripled from 322 in FFY 2014 to 924 in FFY 2016. Comparatively, of the individuals who did not achieve employment outcomes, the number with auditory and communicative disabilities increased by 17.57 percent from 239 in FFY 2014 to 281 in FFY 2016. The employment rate for individuals with auditory and communicative disabilities increased markedly by 19.3 percentage points from 57.4 percent in FFY 2014 to 76.7 percent in FFY 2016.

The number of individuals with physical disabilities whose service records were closed after receiving services and who exited with employment outcomes increased by 35.3 percent from 793 in FFY 2014 to 1,073 in FFY 2016. Comparatively, the number of individuals with physical disabilities whose service records were closed after receiving services and who exited without employment outcomes increased by 14.09 percent from 1,036 in FFY 2014 to 1,182 in FFY 2016. The employment rate for individuals with physical disabilities increased by 4.2 percentage points from 43.4 percent in FFY 2014 to 47.6 percent in FFY 2016.

The number of individuals with learning and intellectual disabilities whose service records were closed after receiving services and who exited with employment outcomes increased by 51.29 percent from 1,316 in FFY 2014 to 1,991 in FFY 2016. Comparatively, the number of individuals with learning and intellectual disabilities whose service records were closed after receiving services and who exited without employment outcomes increased by 17.57 percent from 239 in FFY 2014 to 281 in FFY 2016. The employment rate for individuals with learning and intellectual disabilities decreased by 1.7 percentage points from 48.7 percent in FFY 2014 to 47.1 percent in FFY 2016.

The number of individuals with psychological and psychosocial disabilities whose service records were closed after receiving services and who exited with an employment outcome increased by 15.52 percent from 1,727 in FFY 2014 to 1,995 in FFY 2016. Comparatively, the number of individuals with psychological and psychosocial disabilities whose service records were closed after receiving services and who exited without an employment outcome decreased by 15.33 percent from 3,052 in FFY 2014 to 2,584 in FFY 2016. The employment rate for individuals with psychological and psychosocial disabilities increased by 7.5 percentage points from 36.1 percent in FFY 2014 to 43.6 percent in FFY 2016.

Length of Time in Stages of the VR Process

Of all individuals whose service records were closed, the percentage of individuals whose eligibility was determined within 60 days of application increased by 24.6 percentage points

from FFY 2014 (60.3 percent) to FFY 2016 (84.9 percent). The percentage of individuals whose IPEs were developed within 90 days from the date on which eligibility was determined increased by 10.7 percent from 53.2 percent in FFY 2014 to 63.9 percent in FFY 2016. The elapsed time from IPE to closure for all individuals served by OOD within 0 to 24 months was 85 percent in FFY 2016 compared to the national performance for combined agencies of 63 percent.

SOC Codes for Individuals Who Achieved Employment Outcomes

A review of OOD's employment outcomes by SOC Codes during FFY 2016 showed that a majority of individuals achieved employment in five occupational categories: Transportation and Material Moving (6.9 percent); Office and Administrative Support (21.8 percent); Building and Grounds Cleaning and Maintenance (12.3 percent); Food Preparation and Serving (15.4 percent); and Production Occupations (8.8 percent). These clusters of employment outcomes represented 65.2 percent of all employment outcomes for individuals whose service records were closed in FFY 2016. The average wage within these clusters ranged between \$8.35 and \$10.00 per hour. A review of employment outcome data for all combined agencies showed that a majority of individuals achieved employment in the same wage range as OOD within the same five occupational categories: Transportation and Material Moving (8.8 percent); Office and Administrative Support (18.4 percent); Building and Grounds Cleaning and Maintenance (8.4 percent); Food Preparation and Serving (11.4 percent); and Production Occupations (8.3 percent). However, the clusters of employment outcomes represented 55.3 percent of all employment outcomes for all combined agencies. Average wages within these clusters ranged between \$8.36 and \$10.00 per hour.

Internal Controls:

OOD's quality assurance (QA) system monitors internal controls relating to case record reviews and record deficiencies. The QA system is housed in the agency's Division of Fiscal Management. The QA manager is assigned to coordinate quarterly reviews of case records and address statewide issues and policy changes. The agency's current QA processes apply primarily to a case review of the VR process and provision of services in the service record. OOD regularly reviews its QA policies and procedures to enhance internal guidelines and ensure that staff maintains high quality and compliant services in accordance with Federal and State laws.

Service Record Review

RSA conducted a service record review of 30 of OOD's closed service records. This review involved two teams of two reviewers. Each team consisted of one RSA representative and one OOD Rehabilitation Program Specialist. Each team reviewed the same two service records initially to obtain the required data. The teams then compared their results for interrater reliability. In both cases there was a 100 percent match of the data recorded and extracted from the paper/electronic case files. The two teams reviewed the remaining 28 service records. Service records reviewed were obtained from statewide caseloads. Of the 30 service records reviewed, 19 service records were closed after the individuals achieved employment outcomes. In 26 service records reviewed, 100 percent of the required documentation was present and accurate. In 97 percent of all reviewed cases, the service record closure letters were sent to the individuals on September 30, 2016.

The results of the Service Record Review are located in Appendix B of this report. To summarize, OOD was found to have a high quality of accuracy in documenting the required elements. Overall, of the required elements examined, OOD was 97 percent accurate in its documentation.

C. Performance Observations

RSA's review and analysis of the performance of OOD in this focus area resulted in the following observation:

2.1 Quality of Employment Outcomes

Observation: The quality of employment outcomes achieved by individuals with disabilities served by OOD may be affected, in part, by a lack of training services, including postsecondary education and vocational training.

- OOD reported 6,643 employment outcomes in FFY 2016, an increase of 2,063 employment outcomes, or 45.04 percent, in comparison to 4,580 in FFY 2014. The agency's employment rate likewise increased to 50.2 percent in FFY 2016 from 43 percent in FFY 2014, amounting to a 7.2 percentage point increase in its employment rate during the review period. However, despite these significant improvements, OOD's employment rate continued to trend below the national performance for combined agencies of 56 percent in FFY 2016.
- In addition, the average competitive employment outcome hourly wage and weekly hours worked by OOD's participants whose cases were closed with competitive employment in FFY 2016, \$11.18 and 27.75 hours, are below the national average for combined VR Agencies of \$11.84 and 30.3, respectively.
- OOD data show that relatively few individuals with disabilities received training services during the review period.
- The number of individuals whose service records were closed and were reported on the RSA-911 to have received four-year college or university training decreased from 508 individuals (4.8 percent) in FFY 2014 to 424 individuals (3.2 percent) in FFY 2016, or 5.4 percentage points below the national percentage for combined agencies of 8.8 percent in FFY 2016. The average number of youth with disabilities who received four-year college or university training decreased from 4.2 percent in FFY 2014 to 2.9 percent in FFY 2016, which is seven percentage points lower than the national performance for combined agencies of 9.9 percent. However, OOD's VR counselors and managers informed RSA that most consumers receiving four-year college or university training are not reported on the RSA-911 because the agency's VR counselors tend only to report training paid for with VR dollars. In FFY 2014, no individuals received junior or community college training, compared to 72 individuals (0.5 percent) in FFY 2016, which was below the national performance of 6.6 percent for all combined agencies. The number of youth with disabilities who received junior or community college training increased slightly from 0 in FFY 2014 to 0.50 percent for FFY 2016, which is 7.9 percentage points lower than the national performance of 8.4 percent for combined agencies. However, OOD's VR counselors and managers informed RSA that, similar to

the reporting of four-year college training, most of their consumers receiving junior or community college training are not reported on the RSA-911 because the agency's VR counselors tend only to report training paid for with VR dollars.

- OOD closed 898 individuals (8.4 percent) in FFY 2014 who received occupational or vocational training, decreasing to 392 individuals (3.0 percent) in FFY 2016, which was significantly below the performance for all combined agencies of 10.1 percent in FFY 2016. The number of youth with disabilities who received occupational or vocational training decreased from 4.50 percent during FFY 2014 to 1.60 percent for FFY 2016, which is 6.9 percentage points lower than the national performance for combined agencies of 8.4 percent.
- Only 0.2 percent (21 individuals) whose cases were closed in FFY 2014 received on-the-job training, a decrease from 36 individuals (0.3 percent) in FFY 2014, compared to the national performance of 1.9 percent for all combined agencies in FFY 2016. The number of youth with disabilities who received on-the-job training decreased from 0.50 percent during FFY 2014 to 0.20 percent for FFY 2016, which is 2.3 percentage points lower than the national performance for combined agencies of 2.5 percent.
- The median hours worked for competitive employment outcomes remained at 25 hours per week for FFY 2014 through FFY 2016, compared to the national performance of 30 hours per week for all combined agencies in FFY 2016. OOD management stated that benefits counseling is provided to assist individuals in deciding on a full-time or part-time employment goal.
- Service decreases were noted in career services, including on-the-job training, apprenticeship training, basic academic remedial or literacy training, and disability-related skills training for youth.

RSA was informed by a few stakeholders and some counselors that training cases receive a higher level of scrutiny and need a more rigorous justification in order to be approved. RSA was also informed that goals that require more than basic skill preparation are sometimes scrutinized and unsupported by some managers.

During the on-site review, RSA learned of the high quality and focused activity of the Division of Employer & Innovation Services. This Division provides the interface between OOD and the business community with a focus on business engagement and developing partnerships. The Division also targets high wage and high demand industry opportunities for VR consumers. This service is a key component for increasing the quality of employment outcomes and for assisting individuals with disabilities to gain access to higher paying positions in high demand industries.

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 OOD:

2.1 Quality of Employment Outcomes

- 2.1.1 Develop strategies to identify barriers and opportunities to expand training and career services for adults and youth; and
- 2.1.2 Evaluate whether the training and career services provided adequately promote the maximization of employment outcomes.

E. Findings and Corrective Actions to Improve Performance

RSA's review of the performance of the VR program in this focus area resulted in the identification of the following 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 Eligibility Determination

Issue: Did OOD consistently process eligibility determinations within the 60-day time frame following application during the review period as reported in the RSA-911.

Requirement: Under 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: The percentage of individuals for whom an eligibility determination was processed within the mandated 60-day time frame increased from 53 percent in FFY 2014 to 64 percent in FFY 2016, below the national performance for combined agencies of 75 percent. For youth under age 25 who exited the VR Program, 59 percent in FFY 2014 had an eligibility determination processed within the 60-day time frame. OOD's performance increased to 82 percent in FFY 2016, equal to the national performance for combined agencies of 82 percent. For youth under age 25 at exit who achieved a supported employment outcome, 73 percent of such individuals achieved an eligibility determination within 60 days of application in FFY 2014, increasing to 81 percent in FFY 2016, compared to a national performance for combined agencies of 86 percent.

OOD State FFY 2016 data showed the agency's improvement to 26 days in processing eligibility determinations, well within the 60-day time frame. OOD has policies that address the 60-day standard and documentation procedures for those individuals who require an extension of the time frame. OOD informed RSA that the agency added an "Activity Due" notification to the case management system at 30 days to serve as a reminder for counselors and supervisors of the time that has elapsed since application. In addition, supervisors and counselors receive a report to track time that has elapsed from application to eligibility.

Conclusion: OOD was not in compliance with section 102(a)(6) of the Rehabilitation Act and 34 CFR §361.41(b)(1) because OOD did not make eligibility determinations within the required 60-day period for all individuals whose service records were closed in FFY 2016.

Corrective Action Steps:

RSA requires that OOD:

- 2.1.1 Comply with 34 CFR §361.41(b)(1) by making eligibility determinations within the required 60-day period;
- 2.1.2 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; and
- 2.1.3 Develop procedures for VR counselors and supervisors to track and monitor timely and untimely eligibility determinations.

2.2 Development of IPEs Not Meeting the 90-Day Time Standard

Issue: Was OOD in compliance with Section 102(b)(3)(F) of the Rehabilitation Act and 34 CFR §361.45(e), by developing IPEs within the 90-day time frame following the determination of eligibility during the review period as reported in the RSA-911.

Requirement: Section 102(b)(3)(F) of the Rehabilitation Act mandates that the IPE be developed as soon as possible but no later than 90 days after the date of determination of eligibility unless the DSU and the eligible individual agree to an extension of that time frame to a specific date by which the IPE will be completed.

Analysis: The percentage of individuals for whom an IPE was developed within the mandated 90-day time frame increased from 53 percent in FFY 2014 to 64 percent in FFY 2016, below the national performance for combined agencies of 75 percent. For youth under age 25 who exited the VR Program, 58 percent of these individuals in FFY 2014 had IPE's developed within the 90-day time frame. OOD's performance increased to 68 percent in FFY 2016, below the national performance for combined agencies of 76 percent. For youth under age 25 at exit who achieved a Supported Employment outcome, 65 percent of such individuals had an IPE developed within the 90-day time frame in FFY 2014, increasing to 79 percent in FFY 2016, equal to the national performance for combined agencies of 79 percent.

Prior to the enactment of WIOA, OOD had established a 120-day agency time standard. OOD State FFY 2016 data showed the agency's improvement to 87 percent, adhering to the 90-day time standard. OOD has policies that address the 90-day standard and documentation procedures for those individuals who require extension of the time frame. RSA was informed that an "Activity Due" notification was added to the case management system at forty-five days to serve as a reminder for counselors and supervisors of the time that has elapsed since eligibility determination. In addition, supervisors and counselors receive a report to track the time that has elapsed from eligibility to IPE.

Conclusion: As the FFY 2016 performance data demonstrate, OOD did not develop IPEs for each eligible individual whose service record was closed within 90 days following the date of eligibility determination. As a result of the analysis, OOD did not develop IPEs in a timely manner pursuant to 34 CFR §361.45(a)(1) and within the required 90-day period pursuant to 34 CFR §361.45(e).

Corrective Action Steps:

RSA requires that OOD:

- 2.2.1 Comply with 34 CFR §361.45(a)(1) and (e) to ensure IPEs are developed within the 90-day Federal time frame from date of application;
- 2.2.2 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
- 2.2.3 Develop goals and strategies to improve VR counselor performance specific to timely IPE development.

F. Technical Assistance

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

SOC Codes

The RSA review team provided technical assistance regarding the appropriate use of SOC codes to identify the employment goal on the IPE and the employment outcome actually achieved. OOD reported the use of SOC codes on the IPE is problematic because these are not used by any other Ohio workforce development agency. RSA provided technical assistance that focused on OOD continuing to work with each consumer individually centering on informed choice as required by section 102(d) and 34 CFR §361.52, which require that VR agencies develop written policies to ensure that individuals are able to exercise informed choice in the selection of employment goals and the services needed to achieve those goals.

OOD did not request additional technical assistance in this area.

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

A. Nature and Scope

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

- SEA and local educational agency (LEA) agreements;
- Policies related to the provision of transition services, including 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 Combined 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;
- Updated policies or procedures for tracking expenditures for the provision of pre-employment transition services;
- OOD Pre-Employment Transition Services Fact Sheet and student information form; and
- OOD Pre-Employment Transition Services Agreement.

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;
- Representatives of educational agencies;
- Representatives of the IC and the CAP; and
- Service providers.

B. Overview

Transition Service Delivery

OOD provides transition services, including pre-employment transition services, through a progressive service delivery model designed to engage students and youth in career development activities that may lead to competitive integrated employment opportunities. These services are provided through the Ohio Transition Support Partnership (OTSP), which is an interagency agreement between OOD and the ODE, VR counselors, contractors, and CRPs. Transition services are provided in group settings and on an individualized basis. Services are purchased under OOD's VR fee schedule. The following describes the agency's progressive service delivery model:

- Career Development Activities—VR counselors assist students and youth to identify career development activities that may be beneficial as students and youth begin to explore work opportunities in their respective communities. Services may include: (a)

interest assessments, (b) interviewing or job shadowing, (c) work-based observations, (d) volunteer experiences, (e) research on demand jobs, and (f) educational and training opportunities;

- Summer Youth Career Exploration—Students and youth, at least 15 years of age, assess employment options through career exploration experiences. Upon completion of services, students and youth should be able to articulate a desire to work, understand basic employer expectations, and be aware of their strengths and limitations. Services may include: (a) strengths and limitations assessments, (b) business tours, (c) employer presentations, and (d) budgeting and time management training;
- Summer Youth Work Experience—Students and youth participate in a five week, 20 hours per week, work-based learning experience. During the first week, students and youth participate in soft skills training and job readiness activities. In the remaining four weeks students and youth are placed at competitive integrated worksites and paid minimum wage for actual hours worked. Upon completion of this phase, students and youth should be able to understand the job seeking process, demonstrate appropriate work behaviors, and identify several areas of occupational interest; and
- Non-Permanent Job Development—OOD and CRPs assist students and youth with obtaining non-permanent employment, including summer and part-time employment. This service is intended to assist students and youth to build their work history while in high school and assist those individuals who may need additional on-the-job supports (e.g., career development and training activities). Students and youth are paid at least minimum wage by an employer and placed in a competitive integrated worksite. Lastly, students and youth may receive short-term job coaching, as well as job development support.

All transition services and activities are shared with the students' individualized education program (IEP) planning team to eliminate duplication of services with other providers and to assist students and youth with formulating their education and employment goals.

OOD reported that students and youth may be referred to transition services, including pre-employment transition services, by their teachers, school personnel, family members, or representatives. At the time of the RSA on-site visit, OOD was developing pre-employment transition request forms for eligible and potentially eligible students and youth. The request forms include demographic information such as: (a) a student's or youth's name, (b) telephone number, (c) social security number (if available) or participant ID, (d) date of birth, (e) address, (f) disability type(s), and (g) school(s) attended. Lastly, OOD reported that students and youth may apply for VR services online or by submitting a paper application.

OOD indicated its plans to update its website to include transition services and pre-employment transition services information and materials (i.e., OOD—Transition Specific Services, Request for Pre-Employment Transition Services for Potentially Eligible Students, OOD—Transition Guidance, and other information and fact sheets).

Outreach

OOD ensures that all required activities as described in section 113(b) of the Act and 34 CFR §361.48(a)(2) are made available to or arranged for students with disabilities statewide, except

for students who are potentially eligible for pre-employment transition services. At the time of the on-site visit, potentially eligible students were required to apply for VR services prior to receiving pre-employment transition services. Currently, the agency is finalizing agreements with its Centers for Independent Living and the Community Centers for the Deaf. OOD believes those organizations, which have an extensive history working with individuals with different types of disabilities and impairments, will enhance outreach services to potentially eligible students with disabilities. OOD reported that pre-employment transition services were made available to or arranged for potentially eligible students beginning on October 1, 2017.

There are 611 public school and 93 career technical planning districts in Ohio, excluding public charter schools and community schools. OOD assigns at least one VR counselor to each of these 704 districts to provide transition services and pre-employment transition services. OOD reported that its VR counselors are active in attending staff and IEP meetings and attend job fairs. Others have presented at conferences and seminars and serve on interagency workgroups. In addition, OOD's Transition Unit, which consists of a supervisor, a program administrator, and two rehabilitation program specialists, participates in meetings to educate personnel across the State about transition and pre-employment transition services. The transition unit also provides agency-wide training, technical assistance, and issues guidance related to the implementation of transition services and pre-employment transition services.

OOD indicated that it will continue to target students and youth with disabilities by educating public and charter school districts about transition and pre-employment transition services. OOD also placed emphasis on identifying students and youth by increasing opportunities to collaborate with community schools, ODE, the DODD, the OhioMHAS, the ODJFS, and the Ohio Department of Medicaid (ODM). OOD is also developing joint guidance with ODE to strengthen Project Search programs throughout the State of Ohio.

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

OOD completed its CSNA and WIOA State Plan in FFY 2015 and 2016, respectively. OOD contracted with Kent State University, as a complement to the Ohio Longitudinal Transition Study (OLTS), to assess: (a) the characteristics of youth with disabilities receiving various types of rehabilitation services, (b) the characteristics of youth with disabilities experiencing employment outcomes, (c) the characteristics of youth experiencing postsecondary education outcomes, and (d) predictors of employment and supported employment outcomes and postsecondary education after controlling for other factors. Research was conducted by analyzing two databases: (a) OOD's VR case closure records (2012 and 2013) for transition age youth (14-24) who received a purchased service from OOD, and (b) the OLTS survey of high school special education students who received services between 2006 and 2013, at graduation, and one year after exiting high school.

Survey findings revealed that OOD primarily purchased assessments and training for its youth with disabilities. In addition, college and university training only accounted for five percent of services received by youth, and these services were disproportionately focused on individuals with physical and sensory disabilities. Youth with psychosocial disabilities, males, and African American youth were less likely to receive college or university training. The survey also

revealed that African American youth were less likely to report inclusion in technical and general education programs to assist them in preparing for postsecondary opportunities. In regard to employment settings and opportunities, females and African American youth entered full-time employment at a lesser rate than Caucasian males. Similarly, youth with cognitive disabilities tended to be disproportionately placed in part-time employment settings. Lastly, youth participating in career-technical education, general education, and work study programs were strong predictors of postsecondary, full-time employment success.

At the time of the RSA visit, the agency was finalizing its agreements with the Centers for Independent Living and the Community Centers for the Deaf to assist in providing services to youth and students who have hearing and visual impairments and cognitive and developmental disabilities. OOD reported that it is committed to expanding its provider community to ensure students and youth will continue to have access to and receive transition services and pre-employment transition services statewide.

State Educational Agency (SEA) Agreement

OOD and ODE work collaboratively to provide transition services and pre-employment transition services to youth and students with disabilities. At the time of the onsite visit, OOD and ODE were finalizing the interagency agreement, pending review by ODE's Office of Legal Counsel. Both OOD and ODE attended NTACTION's Capacity Building Institute in May 2017, where the implementation of SEA and LEA agreements was discussed. In addition, OOD and ODE utilized the WINTAC's and NTACTION's Interagency Agreement Toolkit Guide to ensure that the interagency agreement included the regulatory and statutory changes in the Rehabilitation Act. The interagency agreement includes the roles and responsibilities, including financial responsibilities of OOD and ODE, the personnel responsible for providing transition services and pre-employment transition services, and the section 511 requirements. Lastly, OOD and ODE sought technical assistance from the NTACTION to assist them in developing a technical assistance plan to align their policies and procedures to address duplication of services and service gaps.

Transition Policies and Procedures

OOD's Transition Unit is responsible for developing and implementing the agency's transition policies and procedures. RSA reviewed OOD's transition services procedure, 80-VR-11-12. Topics covered in the procedure include: (a) VR procedures, (b) the five required pre-employment transition services activities defined in section 113(f) of the Rehabilitation Act and 34 CFR §361.48(a)(2), (c) outreach, (d) application and intake processes, (e) determining eligibility and order of selection, (f) comprehensive assessment and IPE, and (g) employment outcomes. OOD's procedures also reference responsible parties for payment of VR programs and services, training, and OOD's service delivery processes.

OOD also developed policies and procedures that describe the 90-day time frame for development of the IPE. Students and youth who have been determined eligible for VR services and can be served under an order of selection must have an IPE within the 90-day statutory time requirement. In the event an IPE is not developed within the 90-day time frame, an extension must be initiated by the VR counselor or contractor and approved by his or her supervisor. A case status report is distributed to aid VR counselors and contractors in meeting the 90-day IPE requirement.

Order of Selection

Prior to the on-site review, RSA reviewed description (M) of the VR services portion of the WIOA Combined State Plan for Ohio. OOD eliminated all waiting lists for VR services in February 2015 and has sufficient resources to meet the demand for students and youth with disabilities to receive VR services, if needed. OOD foresees that all priority categories will remain open through FFY 2018, unless the agency determines that circumstances require a change in the implementation of the order of selection.

Provision of Pre-Employment Transition Services

During the onsite visit, RSA and OOD discussed pre-employment transition services provisions as described in the Rehabilitation Act. OOD provides pre-employment transition services to students with disabilities who are: (a) enrolled in secondary school (including home school or other alternative secondary education program, postsecondary education program, or other recognized educational program and have not exited, graduated, or withdrawn from the school setting), and are at least 14 years of age but not older than 21; and (b) have a documented disability in their IEP, medical records, or a doctor's note; or qualify as an individual with a disability for the purposes of section 504.

In FFYs 2014 and 2015, OOD served 3,235 and 3,742 students with disabilities between 14-18 years of age, respectively. The number served increased in FFY 2016 to 5,075 students with disabilities between 14 and 18 years of age, and as of September 21, 2017, OOD served 4,556 students with disabilities in this age range.

Required Activities

OOD, in collaboration with its CRPs, provides the five required activities described in section 113(b) of the Rehabilitation Act and 34 CFR §361.48(a)(2) in both group settings and on an individual basis. However, as previously discussed, these activities are not made available to students with disabilities who are potentially eligible as described in section 113(a) of the Rehabilitation Act and 34 CFR §361.48(a)(1). RSA and OOD discussed the following five required activities and the types of services and activities provided to students with disabilities in the State of Ohio:

- Job Exploration Counseling—Administration of vocational interest inventories; discussion of labor market information in occupational handbooks and web-based career exploration activities (e.g., the U.S. Department of Labor (DOL)), worksite visits, review of wage and hour information for occupations, and job interview techniques);
- Work-Based Learning Experiences—Students participate in worksite tours and job shadowing experiences at community businesses obtaining first-hand knowledge of work settings, including: duties, personnel, daily expectations of productivity/output, shifts, accommodations, compensation, unwritten rules of work, etc. In addition, students learn to display appropriate worksite behaviors and begin applying the knowledge and tools they have learned. They learn the importance of networking and begin to document resources identified within their networks;
- Counseling on Opportunities for enrollment in Comprehensive Transition or postsecondary Educational Programs—Students participate in university and/or college

tours, discussion of college majors and course offerings with academic advisors, and discussion of career opportunities with career counselors;

- Workplace Readiness Training—Counseling on appropriate work-related behaviors, financial and benefits counseling (i.e., Supplemental Security Income (SSI)/Social Security Disability Insurance (SSDI) planning and budgeting), and soft skills and interpersonal skills training (e.g., time management, communication, problem-solving, teamwork); and
- Instruction in Self-Advocacy—Postsecondary self-advocacy training (e.g., speaking to professors, working with disability support services), and advising students on how to request accommodations.

Authorized Activities

OOD and RSA reviewed the statutory and regulatory requirements related to the provision of the nine authorized activities as described in section 113(c) of the Rehabilitation Act and 34 CFR §361.48(a)(3). At the time of the onsite visit, OOD's efforts were focused on providing the five required activities in section 113(b) of the Rehabilitation Act and 34 CFR §361.48(a)(2). During the on-site visit as previously discussed, OOD was planning to update its website to include transition services and pre-employment transition services information and materials (i.e., OOD—Transition Specific Services, Request for Pre-Employment Transition Services for Potentially Eligible Students, OOD—Transition Guidance, and other information and fact sheets). In addition, OOD has updated its brochures and postcards to include pre-employment transition language.

Pre-Employment Transition Coordination Activities

OOD communicated that it maintains interagency agreements with ODE, the DODD, the OhioMHAS, the ODJFS, and the ODM. OOD sponsors four job fairs each October in recognition of National Disability Employment Awareness Month for OOD job seekers. OOD also participates in Transition Expos throughout the state in partnership with school districts, State Support Teams and OhioMeansJobs centers for students with disabilities. OOD assigns at least one VR counselor to each public school district to provide transition services and pre-employment transition services. OOD reported that its VR counselors also actively attend staff and IPE meetings and job fairs. Others have presented at conferences and seminars and serve on interagency workgroups.

Provision of Group Transition Services

OOD and RSA discussed 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). OOD had not implemented group transition services at the time of the on-site monitoring visit.

Provision of Individualized Transition Services

Students and youth who have been determined eligible for VR services and can be served under an order of selection must have an IPE within the 90-day statutory time requirement. In the event an IPE is not developed within the 90-day time frame, an active time extension must be initiated by the VR counselor or contractor and approved by his or her manager or supervisor. VR counselors and OOD's other providers are encouraged to work with students and youth to

identify their interests and abilities, employment goals, and the services needed to achieve their employment goals. Service-related activities include assessments, training, college and on-the-job training, job search and placement services, benefits counseling, job readiness training, and disability-related training.

C. Analysis of Performance and Observations

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

3.1 Individuals under the Age of 25 Exiting the VR system

Observation: Individuals under the age of 25 are exiting from the VR system prior to receiving services.

- The percentage of youth who exited without employment after eligibility, before an IPE was 31.22 percent, 24.98 percent, and 23.76 percent, in FFYs 2014, 2015, and 2016, respectively, significantly higher than the national performance.
- The percentage of youth with disabilities who exited as an applicant in FFY 2016 was 6.66 percent, which is 5.83 percentage points lower than the national performance for combined agencies of 12.49 percent.
- The percentage of youth with disabilities who exited without employment after an IPE and before services increased from 4.69 percent in FFY 2014 to 6.62 percent in FFY 2016, which is 12.38 percentage points lower than the national performance for combined agencies of 19.00 percent.

3.2 Employment Rate for Youth with Disabilities under age 25

Observation: The number of youth with disabilities who exited without employment after eligibility and before an IPE trended higher than the national average; and both the overall employment rate and employment rate by disability types are significantly lower than the combined agency national performance.

- The percentage of youth with disabilities who exited without employment increased by 6.46 percentage points during the review cycle from 27.02 percent in FFY 2014 to 33.48 percent in FFY 2016, which is 5.44 percentage points higher than the national performance for combined agencies of 28.04 percent.
- The employment rate for youth with disabilities increased by 2.73 percentage points during the review cycle from 44.10 in FFY 2014 to 46.83 percent in FFY 2016, which is 8.02 percentage points lower than the national performance for combined agencies of 54.85 percent.
 - The employment rate for youth with visual disabilities who exited from the VR program during FFY 2016 was 41.10 percent, which is 8.38 percentage points lower than the national performance for combined agencies of 49.48 percent.
 - The employment rate for youth with auditory and communicative disabilities who exited from the VR program during FFY 2016 was 50.00 percent, which is 7.91

percentage points lower than the national performance for combined agencies of 57.91 percent.

- The employment rate for youth with physical disabilities who exited from the VR program during FFY 2016 was 46.70 percent, which is 6.54 percentage points lower than the national performance for combined agencies of 53.24 percent.
- The employment rate for youth with intellectual and learning disabilities who exited from the VR program during FFY 2016 was 47.50 percent, which is 8.8 percentage points lower than the national performance for combined agencies of 56.30 percent.
- The employment rate for youth with psychosocial and psychological disabilities who exited from the VR program during FFY 2016 was 45.80, which is 5.43 percentage points lower than the national performance for combined agencies of 51.23 percent.

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 OOD:

3.1 Individuals under the Age of 25 Exiting the VR System

- 3.1.1 Conduct surveys or cold-calls to identify the barriers or factors related to the exit of youth with disabilities without employment after eligibility and before an IPE;
- 3.1.2 Engage students and youth in the group transition process as described in section 103(b)(7) of the Rehabilitation Act and 34 CFR §361.49(a)(7); and
- 3.1.3 Continue to distribute case status reports to VR counselors and other CRPs to improve agency performance in the elapsed time from application to eligibility determination for individuals with disabilities under age 25 at exit (0-60 day standard) and the elapsed time from eligibility determination to IPE development for individuals with disabilities under age 25 at exit (90-day standard).

3.2 Employment Rate for Youth with Disabilities under Age 25

- 3.2.1 Identify and assess barriers to increase the employment rate for youth, particularly those with visual, auditory and communicative, physical, intellectual and learning, psychosocial and psychological disabilities, and develop strategies to improve performance in this area;
- 3.2.2 Develop and implement a plan to enhance VR counselor skills to assist youth with the aforementioned disabilities; and
- 3.2.3 Identify strategies to increase training and other services, including postsecondary education, to increase employment outcomes among underrepresented groups of youth with disabilities.

E. Findings and Corrective Actions to Improve Performance

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

3.1 Availability of Pre-Employment Transition Services to Potentially Eligible Students with Disabilities

Issue: Was OOD in compliance with section 113(a) of the Act and 34 CFR §361.48(a)(1), by making pre-employment transition services available to students with disabilities who are potentially eligible for VR services.

Requirement: Section 113(a) of the Rehabilitation Act mandates that with the funds reserved under section 110(d), and any funds made available from State, local, or private funding sources, each State must ensure that the DSU, in collaboration with the local educational agencies involved, provide or arrange for the provision of pre-employment transition services for all students with disabilities in need of such services who are eligible or potentially eligible for services under the Rehabilitation Act, meaning all students with disabilities regardless of whether they have applied and been determined eligible for VR services (34 CFR §361.48(a)(1)).

Analysis: At the time of the on-site visit, all students with disabilities were required to apply for VR services prior to receiving pre-employment transition services. The agency reported that it was finalizing agreements with its Centers for Independent Living and the Community Centers for the Deaf. OOD believes those organizations, which have an extensive history working with individuals with different types of disabilities and impairments, will enhance outreach services to potentially eligible students with disabilities. OOD reported that pre-employment transition services were made available to or arranged for potentially eligible students on October 1, 2017. OOD is seeking technical assistance in tracking pre-employment transition services, including for potentially eligible students with disabilities, in its case management system.

Conclusion: As a result of the analysis, RSA determined that OOD was not in compliance with Section 113 of the Rehabilitation Act and 34 CFR §361.48(a)(1) that require 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.

Corrective Action Steps:

RSA requires that OOD:

- 3.1.1 Ensure that the agency will comply with 34 CFR §361.48(a)(1), which clarifies that all students with disabilities, regardless of whether or not they have applied or been determined eligible for the VR program, are potentially eligible to receive pre-employment transition services; and

- 3.1.2 Submit the actions that the agency will implement, including timelines, to ensure that its case management system has the ability to track those students who are potentially eligible, pursuant to section 113(a) of the Rehabilitation Act and 34 CFR §361.48(a)(1).

F. Technical Assistance

Provision of Pre-Employment Transition Services

RSA clarified that required, authorized, and pre-employment transition coordination activities may be provided or arranged for concurrently so long as OOD can demonstrate that it has identified the number of potential students with disabilities eligible for pre-employment transition services, and the funds necessary to provide the required activities.

RSA clarified that travel costs incurred directly as a result of providing VR services constitute a service-related cost, not an administrative cost, for the purposes of the VR program. OOD may use funds reserved for the provision of pre-employment transition services to pay for those travel costs incurred by staff, including lodging and meals, as a direct result of providing pre-employment transition services to students with disabilities, that are proportional to the time spent directly providing or arranging for the provision of pre-employment transition services. However, to the extent the VR counselor or partner is performing other duties, OOD is not permitted to charge the portion of travel costs, etc., for those other activities, to the funds reserved for the provision of pre-employment transition services. OOD requested and received technical assistance regarding the allowability of the use of the pre-employment transition services reserved funds for transportation costs to assist students with disabilities to access pre-employment transition services.

RSA clarified that OOD is required to develop a system to report all students with disabilities in receipt of pre-employment transition services. Specifically, State agencies are required to identify all pre-employment transition services received by a student, the total amount expended for the service, the parties responsible for providing the service, and the dates of service as described in the RSA-911 Policy Directive (PD) 16-04 and the Uniform Guidance 2 CFR §200.302.

RSA reviewed OOD's Contract and Agreement template. The template referenced subtopics, including the nature of contract and relationship of parties, nondiscrimination in employment, record keeping and audits, compensation for services, and confidentiality. RSA also reviewed the following interagency agreements and addenda's: (a) the Interagency Agreement between OOD and OhioMHAS, (b) the Interagency Agreement between OOD and DODD, (c) the Interagency Agreement between OOD and the DODD and the ODM, (d) OOD Amendment to Contract and Agreement- Amends Contract #14S1364VR-13, and (e) OOD Amendment to Contract and Agreement- Amends Contract # TN: 16S2132VR-15. Technical assistance was provided to OOD in amending its agreements to describe how the agency and its CRPs will capture the required data elements for individuals receiving pre-employment transition services, including, but not limited to: (a) unique identifier, (b) social security number (if available), (c) date of birth, (d) race-required if student is in elementary school or secondary education, (e) student with a disability, (f) start date of pre-employment transition services, and (g) the specific pre-employment transition services.

Pre-Employment Transition Services to Potentially Eligible Students with Disabilities

RSA provided technical assistance to OOD in identifying and assessing barriers or factors that prevent OOD from serving students with disabilities who are potentially eligible for pre-employment transition services. This included working with OOD's contractors and others to revise its case management system to track students with disabilities who are potentially eligible and other activities under the provision of pre-employment transition services. Subsequent to this technical assistance, OOD revised its case management system in October 2017 to track students with disabilities who are potentially eligible.

Finally, RSA recommended that OOD consider consulting with the WINTAC to assist the agency with forecasting and planning activities for the requirements related to the provision of the nine authorized activities as described in section 113(c) of the Rehabilitation Act and 34 CFR §361.48(a)(3) of the VR program regulations.

OOD did not request additional technical assistance.

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 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 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, the RSA team and OOD 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;

- Interagency vocational service delivery agreements or memorandums of understanding with State agencies, including OhioMHAS, the ODJFS, the DODD and the ODM for supported employment, including extended services;
- Intra-State transfer vouchers from DODD to OOD;
- Memorandums of understanding with business and industry, including the Ohio Business Leadership Network;
- Interagency data sharing agreements with State Agencies, including OhioMHAS, DODD and ODM;
- Governor Kasich's Employment First Executive Order (2012-05K);
- Employment First Taskforce joint guidance;
- DODD Employment First Job Seeker's Guide;
- WIOA Section 511 career counseling and information and referral services' summary reports; 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 with exclusive or substantial supported employment caseloads;
- VR agency supported employment coordinators and staff; and
- Entities with which the VR agency has arrangements to fund extended services.

B. Overview

RSA reviewed a draft policy revision to OOD's supported employment policy that was last updated on December 31, 2006, prior to the publication of the revised regulations. OOD provided several other documents that describe its supported employment policies, practices and procedures, including the current and previous interagency agreements with OhioMHAS, DODD, ODM, ODJFS and ODE.

Interagency agreement with OhioMHAS

The interagency agreement between OOD and OhioMHAS does not include any exchange of funds or costs between the parties. The agreement is designed to facilitate evidence-based supported employment and extended services in local employment settings in accordance with the principles of the Dartmouth Community Mental Health Program model, for Ohioans with substance use, emotional or behavioral disorders, or severe and persistent mental illness. In this individual placement and support model, a trained employment support professional develops and matches an individual to a job in business and trains the individual on the job until he or she meets employer criteria and has developed social integration skills. The job coach facilitates transition to long term supports through the local mental health agency for the individual and the employer.

Interagency agreement with DODD and ODM

The interagency agreement commencing July 1, 2017 and concluding June 30, 2019 between OOD, DODD and ODM includes an interagency transfer agreement of up to \$3,174,993 from DODD to OOD that is used as State match for the State VR services program. The intra-State voucher is used primarily to fund 30 dedicated VR counselors, each of whom have an average caseload of 60 Ohioans with developmental disabilities whose goal is competitive integrated employment. VR counselors provide services to eligible individuals served by the partnership and work with local county boards of developmental disabilities to identify candidates for the program. They deliver individualized, person-centered career planning services to assist in the development of the IPE, including performance-based job development from approved providers. Ohio DODD in combination with local county boards of DD levy dollars are used to make extended services available.

OOD has targeted 1,100 competitive integrated employment outcomes for this agreement. OOD targeted 725 competitive integrated employment outcomes for the prior two-year agreement. OOD's management and VR counselors reported that the outcome goals for FFY 2016 and FFY 2017 were exceeded.

Interagency Employment First Initiative

Ohio is an Employment First State with an active taskforce of State agency representatives, including OOD, DODD, ODJFS, OhioMHAS and ODE. The taskforce is reported to meet regularly to align policies, funding, and planning for services and supports that prioritize competitive integrated employment for Ohioans with most significant disabilities. Employment First counselors and regional work incentive consultants work with local county boards of developmental disabilities to support individuals who are interested in moving from facility based initiatives (independent living programs, day treatment programs and sheltered/enclave employment) to competitive integrated employment within individualized mainstream community employment settings, which are consistent with each individual's unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice. OOD reports 5,339 individuals with developmental disabilities have applied for VR services through the Employment First initiative since its inception in October 2013. OOD likewise reports that more than 3,900 IPEs have been written.

Supported Employment Training for OOD and Partners, Including DODD, OhioMHAS Staff

OOD provides comprehensive training for its VR counselors and associated management and staff regarding supported employment, as well as for partner agencies, CRPs, and employers interested in supported employment. This curriculum includes a web-based course "Orientation to Supported Employment" and an in-person course, "Implementing Quality Employment First Practices."

Benefits Counseling

OOD's VR counselors provide general benefits counseling and guidance to all individuals interested in pursuing supported employment. Comprehensive benefits counseling and guidance is provided through CRP's regional work incentives consultants funded through OOD's interagency agreement with DODD. Topics covered in both general and comprehensive benefits counseling include:

- Reviewing the SSI program initiatives that allow recipients to work and retain benefits or to increase their level of work activity without the loss of SSI disability status or Medicaid, including the general (\$20) monthly exclusion, and the earned income (\$65) monthly exclusion;
- The Plan to Achieve Self Support (PASS) – Exclusion of income and other resources set aside to reach an approved work plan that will reduce or eliminate the consumer’s need for benefits provided under Social Security and SSI programs;
- The SSI Ticket to Work program assurance that as long as a beneficiary is “using a ticket” the Social Security Administration (SSA) will not initiate a continuing disability review to determine whether the beneficiary has medically improved and, therefore, is no longer considered disabled;
- The process for expedited reinstatement of benefits without filing a new application for individuals whose SSI benefits ended because of earnings; and
- The economic value analysis documents describing how OOD consumers who choose to work in lieu of continuing to exclusively rely on SSI benefits will earn 1.77 times his or her SSI cash award by securing, on average, 27 hours per week at the current wage scale (adjusted for inflation) achieved by Ohioans who achieve competitive employment outcomes.

Program and fiscal staff familiar with the interagency agreements and initiatives emphasized the importance of comprehensive benefits counseling. DODD provides programming, including independent living, day treatment and sheltered employment, to more than 30,000 working-age individuals, many of whom also receive SSI cash benefits and Medicaid. OOD provided benefits counseling to 31.4 percent of individuals with disabilities of all ages with supported employment outcomes, which is 18.7 percentage points above the performance for combined agencies of 12.7 percent. Likewise, OOD provided benefits counseling to 19.0 percent of those with supported employment outcomes that were under age 25 at exit.

C. Analysis of Performance and Observations

OOD achieved an average of 556 supported employment closures during the review period, constituting 12.2 percent of OOD’s total number of consumers exiting with an employment outcome. The percentage of competitive supported employment outcomes achieved by OOD rose from 92.33 percent in FFY 2014 to 99.88 percent in FFY 2016. Of OOD’s consumers achieving competitive supported employment outcomes in FFY 2016, 12.86 percent met substantial gainful activity, which is 10.67 percentage points below the performance for combined agencies of 23.53 percent.

The average gross weekly earnings for consumers closed by OOD with competitive supported employment outcomes for FFY 2016 was \$167.49, or 99.3 percent of \$168.69, the FFY 2016 standard SSI weekly cash benefit for individuals who live in their own house (Source: 2016 SSA Annual Report).

OOD reported that the agency’s heightened focus on both benefits counseling and life planning provides for informed choice by the vast majority of the agency’s supported employment consumers who secure employment at an income level that is just below that which is permitted

by SSA without losing their SSI disability status or Medicaid. Moving forward, OOD's executive staff projected that SSI recipients currently employed in supported employment will gain the confidence and self-awareness to choose to move towards full-time employment.

OOD achieved an average of 278 supported employment closures for individuals under age 25 during the review period, including 400 supported employment closures in FY 2016, which constituted 18.06 percent of OOD's total number of individuals under age 25 at exit with an employment outcome.

The percentage of competitive supported employment outcomes achieved for individuals under age 25 at exit rose from 90.12 percent in FFY 2014 to 100 percent in FFY 2016. Of consumers in FFY 2016 under age 25 at exit achieving competitive supported employment outcomes, 15 percent met substantial gainful activity.

The average gross weekly earnings for consumers under age 25 whose service records were closed by OOD with competitive supported employment outcomes for FFY 2016 was \$171.44, or 101.45 percent of \$168.69, the FFY 2016 standard SSI weekly cash benefit for individuals who live in their own house (Source: 2016 SSA Annual Report).

RSA's analysis and review of the performance of OOD's Supported Employment program did not result in the identification of observations and recommendations.

D. Findings and Corrective Actions to Improve Performance

RSA's review of the performance of OOD's Supported Employment program did not result in the identification of findings and corrective actions.

E. Technical Assistance

During the course of monitoring activities, RSA provided wide-ranging technical assistance to OOD with respect to the changes in this focus area including:

- Technical assistance on OOD's Supported Employment program draft policy (8-VR-11-03) and OOD's online supported employment certification curriculum with respect to the Rehabilitation Act's 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(2)) of the Rehabilitation Act and 34 CFR §363.4(a)(2)); and
- Technical assistance on OOD's Supported Employment program draft policy and supported employment certification curriculum with regard to the Rehabilitation Act's 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).

OOD did not request additional technical assistance.

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; OOD 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 OOD'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 part 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 (FAQs), 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 provided technical assistance to, and reviewed the

progress of, each State toward satisfying these requirements through other processes established by the State Monitoring and Program Improvement Division's 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 OOD (e.g., Federal Financial Reports (SF-425), Annual VR Program/Cost Report (RSA-2), and the VR services portion of the PY 2016 Unified or Combined State Plan). These data were organized into a fiscal profile for each State and shared with the VR agency and served as a reference for discussions regarding the areas covered within this focus area.

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

- A-133 audit findings and corrective actions;
- State/agency allocation/budget documents and annual fiscal reports;
- Agency policies, procedures, and forms (e.g., monitoring, personnel cost allocation, procurement, etc.);
- Documentation of obligations and expenditures, including contracts, purchase orders, invoices, etc.; and
- Grant award notifications, documentation of non-Federal share/match (e.g., interagency transfers, third-party cooperative arrangements (TPCAs), establishment projects, private donations), MOE, and program income documentation.

Prior to conducting the review, RSA provided OOD 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 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.

For purposes of the VR program, fiscal integrity is broadly defined as the proper and legal management of VR program funds to ensure that VR agencies effectively and efficiently manage funds to maximize employment outcomes for individuals with disabilities. Through the implementation of this focus area, RSA assessed the fiscal performance of the VR and supported employment programs and compliance with pertinent Federal statutory and regulatory requirements, including cost principles, governing financial resources, match (non-Federal share) and MOE, internal controls, prior approval, and fiscal planning.

In support of this focus area, RSA reviewed the following documents:

- State policies and procedures;

- Diagrams, organizational charts and other supporting documentation illustrating its relationship and position to other agencies, and the direction of supervisory reporting between agencies;
- Diagrams, tables, charts and supporting documentation identifying all programs from all funding sources that fall under the administrative purview of the agency, illustrating the number of full-time equivalent (FTE) staff working on each program;
- OOD's cash deposits, journal entries, cost reimbursement data;
- Personnel cost allocation;
- Internal Control Manual;
- A-133 Single State Audit and internal audit;
- SF-425 and RSA-2 reports for the period for VR and supported employment;
- Indirect cost rate agreements;
- Timesheets and semiannual certification; and
- Cooperative agreements and memoranda of understanding (MOUs).

B. Overview

OOD is responsible for the provision of VR and supported employment services to eligible individuals. RSA reviewed OOD's fiscal management of the VR and Supported Employment programs.

During the on-site review, OOD staff described systems the agency uses to authorize, account for and issue payment for VR and supported employment services.

RSA reviewed fiscal performance data from FFY 2014 through FFY 2016. The agency matched 100 percent of its grant award in FFY 2014 through State appropriations (52.25 percent), Randolph-Sheppard program (2.21 percent), interagency transfers (35.80 percent), and other sources (9.74 percent). In 2015, the agency matched 100 percent of its grant award through State appropriations (56.00 percent), Randolph-Sheppard program (2.73 percent), interagency transfers (30.95 percent), and other sources (10.33 percent). In FFY 2016, OOD also matched 100 percent of its grant award through State appropriations (53.21 percent), Randolph-Sheppard program (3.15 percent), interagency transfers (36.76 percent), and other sources (6.88 percent).

In FFY 2014, OOD reported \$29,635,959 in match (\$0 in excess of match required per net award amount); in FFY 2015, it reported \$28,351,709 in match (\$0 in excess of match required per net award amount); and in FFY 2016, OOD reported \$29,741,458 in match (\$0 in excess of match required per net award amount).

The agency reported \$37,646,483 in carryover after the fourth quarter for FFY 2014 (34.38 percent of the award). However, the agency's carryover has increased substantially from \$44,114,935 (42.11 percent of the award) in FFY 2015 to \$52,114,612 (47.42 percent of the award) in FFY 2016.

The agency relinquished \$18,215,538 in FFY 2014 (the original Federal formula award amount was \$127,715,538; the net Federal award amount was \$109,500,000), thus OOD used 85.74 percent of its formula award. In FFY 2015, OOD relinquished \$23,582,609 (the original Federal

formula award amount was \$128,337,515; the net Federal award amount was \$104,754,906); thus, OOD used 81.62 percent of its formula award. In FFY 2016, OOD relinquished \$18,386,969 (the original Federal formula award amount was \$129,344,935; the net Federal award amount was \$109,889,801); thus, OOD used 84.96 percent of its formula award. The amount of Federal award funds deobligated during FFYs 2014-2016 was \$0.

RSA reviewed fiscal performance data from FFY 2014 through FFY 2016. OOD was able to demonstrate that it had internal controls in place, and it accurately assigned costs to corresponding reporting periods and tracked expenditures during FFY 2014 through FFY 2016.

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 Prior Approval Requirements Not Met

Issue: Did OOD meet the prior approval requirements in 2 CFR §200.407. This area of monitoring is included on page 53 of the FFY 2017 Vocational Rehabilitation Program Monitoring and Technical Assistance Guide.

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 non-allocability. 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 at 2 CFR §200.62(a)(3) also requires the agency to have internal control over compliance requirements for Federal awards to demonstrate compliance with Federal statutes, regulations, and the terms and conditions of the Federal award.

On November 2, 2015, the Department of Education adopted the final regulations found in 2 CFR 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 the FFY 2016 Grant Award Notifications that stated, in pertinent part:

the prior approval requirements listed in the Uniform Administrative Requirements, Costs Principles, and Audit Requirements for Federal Awards (Uniform Guidance) (2 CFR part 200) are applicable to this award... Grantees are responsible for ensuring that prior approval, when required, is obtained prior to incurring the expenditure. Grantees should pay particular attention to the prior approval requirements listed in the Cost Principles (2 CFR 200 subpart E).

In addition, information regarding the requirements in 2 CFR part 200 was communicated to grantees via RSA's listserv on September 23, 2015.

Analysis: The RSA Financial Management Specialist requested the agency's written processes that ensured the agency was meeting the prior approval requirements. OOD informed RSA that no such processes had been developed, and that the agency had no policies and procedures regarding prior approval, including procedure for identifying times that require approval and the process for obtaining prior approval (2 CFR §200.407).

Conclusion: RSA determined that the agency was not in compliance with the prior approval requirements pursuant to the Uniform Guidance (2 CFR §200.407). The agency has begun the process of developing its policy for prior approval and provided RSA with the first prior approval request on October 10, 2017. The RSA Financial Management Specialist reviewed the request and communicated additional guidance and posed further questions on October 17, 2017.

Corrective Action Step:

RSA requires that OOD:

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

5.2 Inaccurate Financial Reporting

Issue: Does OOD accurately report the financial results of all Federally-assisted activities in accordance with 34 CFR §361.12, 34 CFR §76.702, and 2 CFR §200.302. This area of monitoring is included on pages 51-54 of the FFY 2017 Vocational Rehabilitation Program Monitoring and Technical Assistance Guide.

Requirement: In accordance with the Uniform Guidance at 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. In addition, 34 CFR §76.702 requires States to use fiscal control and fund accounting procedures that insure proper disbursement of and accounting for Federal funds (see also 34 CFR §361.12).

Analysis: RSA's review of OOD's SF-425 financial reports, for FFY 2014 through FFY 2016, identified the following issues.

- The U.S. Department of Education (Department) is OOD's cognizant Federal agency for indirect costs. According to the financial data submitted through OOD's SF-425s, OOD applied the Department approved indirect cost rates for FFY 2014 through FFY 2016. However, the agency submitted SF-425s that did not accurately reflect the application of the agency's approved indirect cost rate: the approved indirect cost rates for each reviewed FFY were not tied to their respective awards. The agency has been informed which specific

reports need revision (see Corrective Action Step 5.3.1). The agency is currently revising SF-425 reports for FFY 2014 through FFY 2016 to accurately reflect the application of the agency's approved indirect cost rate.

- Obligations that were not liquidated after the end of the performance period were not returned to the Department (Excess Cash) but rather were recycled in the following fiscal year via accounting adjustments. In accordance with Federal Cost Principles at 2 CFR §200.406(a), to the extent that such credits accruing to or received by the governmental unit relate to allowable costs, they shall be credited to the Federal award either as a cost reduction or cash refund, as appropriate. The basic requirement under 2 CFR §200.406 is that reductions that offset or reduce expenses allocable to Federal awards are credits. 2 CFR §200.406 requires that total allowable costs claimed under a grant program be net of all applicable credits. Therefore, an agency that has received an applicable credit but not reduced its allowable costs claimed under the Federal grant program has received an overpayment of Federal financial participation. The applicable credit must be applied to the FFY from which the initial cost expenditure was made. If the G5 system indicates the award is in a Closed Status, the grantee must return the applicable credit to the Department. Since the award is closed, no changes to Federal Financial Reports (FFR) are required. If the G5 system indicates the award is in a Liquidation or Suspension status, grantees may post Federal refunds directly to the award using the G5 Refund Function. For a Federal award in an Open Status the grantee should deposit the refund in its internal grant account for the FFY from which the funds were originally paid, which will create a downward accounting adjustment to the internal grant account for the award. The applicable credit must then be offset by disbursements to minimize any potential Federal Cash Management Improvement Act (CMIA) interest liability and ensure compliance with Single Audit requirements.

Conclusion: OOD did not satisfy the requirements in 34 CFR §361.12, 34 CFR §76.702, and 2 CFR §200.302 to accurately account for and report the financial results of all Federally-assisted activities. Additionally, the agency did not have sufficient internal controls to ensure the accurate submission of the required financial reports.

Corrective Action Steps:

RSA requires that OOD:

- 5.2.1 Revise the affected SF-425 financial reports (namely, H126A170052 – an interim report for reporting period ending 03/31/2017; H126A160052 – all interim reports; H126A150052 – final; and H126A140052 – final) to correct identified reporting errors; and
- 5.2.2 Implement internal controls to ensure that OOD accurately reports its approved indirect cost rate; and applicable credits are properly processed.

D. Technical Assistance

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

RSA provided technical assistance regarding prior approval, vendor monitoring, and SF-425 financial reports.

OOD has requested additional technical assistance regarding best practices in the application of flat fees for purchased services.

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

A. Nature and Scope

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

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

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

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

Through this focus area, RSA:

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

This focus area consists of the following topical areas: Governance, Unified or Combined State Plans, One-Stop Operations, and Performance Accountability. To gather information pertinent to these topics, RSA reviewed the PY 2016 Unified or Combined State Plan and sample MOUs and infrastructure funding agreements (IFAs) related to the one-stop service delivery system, as available. The review team met with the VR agency director, VR agency senior leaders, regional managers and supervisors.

B. Overview

Governance

OOD is represented on the Ohio State workforce development board (SWDB) by the OOD Executive Director. The OOD Executive Director serving as the VR State Director attends all SWDB meetings and plays an active role in workforce disability-related issues. The VR State Director reported that OOD has been active in reviewing and implementing disability-related issues involving accessibility, one-stop integration, and the VR service delivery system. OOD was an active member of the SWDB committees that formulated the WIOA Combined State Plan for Ohio and continues to play an active role in the plan's implementation.

Ohio is comprised of 20 local workforce development boards (LWDBs). OOD is represented on each LWDB by a regional manager or a supervisor assigned geographically. OOD reports that the LWDBs have been active in developing strategies for effectively serving individuals with disabilities and for coordinating programs and services among one-stop partner programs for these individuals in each local area. Communication flows from the OOD designee to the LWDBs to the OOD Executive Director who reports on implementation strategies to the SWDB's steering committee.

WIOA Combined State Plan for Ohio

OOD was an active member of the WIOA State Plan for the State of Ohio development process. The Governor's OWT was the lead in the development process and this group led active working committees to develop the WIOA State Plan. OOD was active in communicating and developing disability-related workforce plans including accessibility issues, one-stop integration, and VR service delivery issues. OOD management and the CAP Director reported that the State planning process was effective in developing a solid, unified, partner-driven WIOA State Plan that incorporates OOD goals and objectives. The public was informed of the draft WIOA State Plan via statewide public meetings where OOD received feedback and comments related to the order of selection process, pre-employment transition services, subminimum wage law changes, supported employment, competitive integrated employment, and performance standards. The OOD independent commission reported that this was an effective process that led to changes in the WIOA State Plan following public feedback.

OOD reported that the Governor's OWT created a statewide workgroup to begin evaluating the effective implementation of the WIOA State Plan. During the review process, OOD reported that this workgroup has not initiated any reports to date but has begun discussing common enrollment issues, performance standards, and certifications of the OhioMeansJobs centers, the American job centers (AJCs) in Ohio. OOD is well represented on this workgroup and input is sought from all partner agencies and all local areas. A report was generated and sent to the Governor by the end of 2017 that tracks progress towards implementation of the State's strategies for alignment among the core programs.

OOD reported that it completed its most recent CSNA in 2015. OOD reported that discussions have begun within the agency to revise and possibly update appropriate goals and priorities that align with the full WIOA State Plan in preparation for the FFY 2018 required modification.

OOD reported that the agency currently operates under the direction of an independent commission as mandated in State statute. The independent commission has not held regular meetings since November 2016 when Ohio Senate bill 144 was introduced to eliminate the independent commission structure and establish a State rehabilitation council. This bill has since been passed by the Ohio Legislature and signed by Governor Kasich.

One-Stop Delivery System

The ODJFS Office of Workforce Development (OWD) oversees the operation of Ohio's 30 main OhioMeansJobs centers (AJCs) located regionally and 88 satellite centers statewide. OOD staff members are located in 81 AJCs throughout the State. Access to VR services at the one-stop centers in urban locations is easily accomplished. OOD indicated that, in some very rural areas of the State, small satellite offices serve as local one-stop centers and have limited physical or programmatic accessibility. OOD has been successful in providing guidance and education to the State's workforce partners at the State and local levels regarding physical and programmatic accessibility.

OOD has successfully executed 20 MOUs with IFAs in all LWDBs. OOD is employing a calculation of full time equivalents (FTEs) or square foot usage in all locations. However, OOD should explore other methods of calculating its proportionate share of infrastructure costs if this aligns with its partner agencies.

As noted above, OOD has played an active role in leading and working with LWDBs to make all of the State's local one-stop centers fully accessible to individuals with disabilities. OOD has been involved in the evaluation and certification of local one-stop centers and has developed accessibility assessments for all of the AJCs.

Performance Accountability

In Ohio, the Governor's OWT is coordinating the submission of the WIOA Annual Statewide Performance Report Template, in accordance with 34 CFR §361.160. The OWT has established policy and performance workgroups that are developing the report template for the core partners that will encompass a performance matrix assessing workforce service integration. The performance workgroup is using the WIOA State Plan benchmarks as a starting point for developing the matrix and the core partners will be responsible for providing input into the performance benchmarks. OOD is an active participant in these workgroups and is working with the OWT to develop negotiated targets of performance after submission of this PY's performance report. OOD is using the RSA-911 data and reports from its case management system to assess its target performance numbers. However, OOD management indicated a concern that the benchmarks may not be in alignment with what the OWT is seeking to negotiate.

OOD implemented all changes in RSA-911 data reporting beginning with the start of PY 2017. OOD is working with the LWDB partners to facilitate co-enrollment of individuals and to insure services are coordinated at regularly scheduled meetings at the local levels. However, OOD reported that co-enrollment coordination is difficult to assess due to the lack of a common intake process across the core partners.

OOD successfully executed a MOU with the ODJFS OWD that effectively allows OOD to obtain wage record information on individuals served by the VR program. The MOU permits the OWD Division of Unemployment Insurance (UI) to share its wage and trade records of individuals served by OOD upon request. This cross-matching, data sharing agreement will be an effective tool in assisting OOD with defining its performance measures and assessing attainment of those performance measures. However, OOD reported that while data sharing is in place in Ohio, pre-employment transition services, school records for skills attainment and credential attainment will be difficult to obtain due to the limited nature of the data shared. Further, OOD is concerned that since the other workforce partners do not use SOC codes in their reporting structure, obtaining this information and linking it to OOD consumers who obtain employment outside of the State will be challenging.

C. Analysis of Performance and Observations

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

D. Findings and Corrective Actions to Improve Performance

RSA's review of the performance of OOD in this focus area did not result in the identification of findings and corrective actions.

E. Technical Assistance

OOD has requested additional technical assistance in the following areas.

OOD reports that SOC codes are a problematic data point because these are not kept by any other workforce development agency. SOC codes at second and fourth quarter after exit will be especially problematic and Federal and out-of-State numbers are not readily available. OOD requested technical assistance in developing methods to collect and report this data.

OOD requested technical assistance in accurately collecting and reporting levels of skills attainment and credential attainment in the workforce development system in preparation for being required to report these in the performance accountability measures beginning in PY 2018.

OOD has partnered with the OWT to review the common performance measures. The State is in the early stages of implementing the common performance measures. Long term technical assistance is indicated as OOD moves toward measuring and accounting for the common performance measures with OWT. It is recommended that OOD seek formal technical assistance from the WINTAC in its endeavors to collect and report on the required common performance measures.

APPENDIX A: PROGRAM AND FISCAL PERFORMANCE DATA TABLES

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

Table 3.1 OH-C Case Status Information, Exit Status, and Employment Outcomes for All Individuals - FFYs 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	22,512		21,797		22,642		263,064	
Total eligible individuals	23,937		23,016		23,175		247,467	
Agency implementing order of selection	Yes		No		No		-	
Individuals on order of selection waiting list at year-end	708		0		0		11,437	
Individuals in plan receiving services	24,590		25,874		26,657		454,801	
Percent accepted for services who received no services		34.9%		32.3%		28.5%		23.2%
Exited as applicants	3,444	15.3%	2,291	10.5%	1,781	8.2%	29,456	12.3%
Exited trial experience/extended evaluation			1	.0%	1	.0%	1,956	.8%
Exited with employment	4,580	20.4%	5,562	25.6%	6,643	30.7%	82,808	34.6%
Exited without employment	6,069	27.0%	6,477	29.8%	6,603	30.5%	65,276	27.3%
Exited from OOS waiting list	98	.4%	52	.2%			3,516	1.5%

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 outcomes, after eligibility, before an IPE was signed or before receiving services	8,250	36.8%	7,376	33.9%	6,596	30.5%	56,055	23.4%
Total received services	10,649	47.5%	12,039	55.3%	13,246	61.3%	148,084	61.9%
Employment rate		43.0%		46.2%		50.2%		55.9%
Competitive employment outcomes	4,267	93.2%	5,289	95.1%	6,060	91.2%	78,859	95.2%
Supported employment outcomes	300	6.6%	558	10.0%	809	12.2%	9,673	11.7%
Average hourly earnings for competitive employment outcomes	\$10.16		\$10.40		\$11.18		\$11.84	
Average hours worked for competitive employment outcomes	27.35		27.40		27.75		30.3	
Median hourly earnings for competitive employment outcomes	\$8.50		\$8.61		\$9.00		\$10.00	
Median hours worked for competitive employment outcomes	25.00		25.00		25.00		30.0	
Quarterly median earnings	\$2,977.00		\$2,925.00		\$3,120.00		\$3,900.00	

Data sources: RSA-911, RSA 113

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

Training Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of individuals served	10,649		12,039		13,246		148,084	
College or university training	0	0.0%	4	0.0%	6	0.0%	1,951	1.3%
Four-year or university training	508	4.8%	525	4.4%	424	3.2%	13,025	8.8%
Junior or community college training	0	0.0%	25	0.2%	72	0.5%	9,790	6.6%
Occupational or vocational training	898	8.4%	689	5.7%	392	3.0%	14,961	10.1%
On-the-job training	36	0.3%	29	0.2%	21	0.2%	2,840	1.9%
Apprenticeship training	0	0.0%	4	0.0%	0	0.0%	83	0.1%
Basic academic remedial or literacy training	61	0.6%	38	0.3%	19	0.1%	2,357	1.6%
Job readiness training	3,065	28.8%	3,285	27.3%	3,334	25.2%	30,291	20.5%
Disability-related skills training	393	3.7%	450	3.7%	593	4.5%	4,642	3.1%
Miscellaneous training	929	8.7%	1,222	10.2%	1,152	8.7%	11,595	7.8%

Data source: RSA-911

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

Career Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of individuals served	10,649		12,039		13,246		148,084	
Assessment	9,561	89.8%	10,688	88.8%	11,492	86.8%	84,756	57.2%
Diagnosis and treatment of impairment	2,637	24.8%	2,037	16.9%	1,789	13.5%	43,641	29.5%
Vocational rehab counseling and guidance	129	1.2%	365	3.0%	358	2.7%	95,439	64.4%
Job search assistance	2,018	19.0%	2,191	18.2%	2,456	18.5%	49,182	33.2%
Job placement assistance	7,353	69.0%	8,370	69.5%	8,883	67.1%	44,189	29.8%
On-the-job supports-short term	3,816	35.8%	4,676	38.8%	5,233	39.5%	20,412	13.8%
On-the-job supports-SE	0	0.0%	13	0.1%	22	0.2%	11,615	7.8%
Information and referral services	83	0.8%	85	0.7%	51	0.4%	33,306	22.5%
Benefits counseling	946	8.9%	1,430	11.9%	1,769	13.4%	8,715	5.9%
Customized employment services	283	2.7%	213	1.8%	132	1.0%	928	0.6%

Data source: RSA-911

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

Other Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of individuals served	10,649		12,039		13,246		148,084	
Transportation	4,427	41.6%	4,512	37.5%	4,331	32.7%	51,017	34.5%
Maintenance	2,134	20.0%	2,230	18.5%	2,436	18.4%	32,145	21.7%
Rehabilitation technology	1,115	10.5%	1,605	13.3%	2,190	16.5%	24,372	16.5%
Reader services	5	0.0%	6	0.0%	4	0.0%	151	0.1%
Interpreter services	194	1.8%	274	2.3%	267	2.0%	2,590	1.7%
Personal attendant services	24	0.2%	18	0.1%	27	0.2%	247	0.2%
Technical assistance services	170	1.6%	101	0.8%	45	0.3%	1,437	1.0%
Other services	1,341	12.6%	1,049	8.7%	777	5.9%	32,136	21.7%

Data source: RSA-911

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

Type of Impairment	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Visual - Employment outcomes	421	9.2%	510	9.2%	660	9.9%	5,241	6.3%
Visual - Without employment outcomes	353	5.8%	398	6.1%	318	4.8%	2,861	4.4%
Auditory and Communicative - Employment outcomes	322	7.0%	481	8.6%	924	13.9%	11,490	13.9%
Auditory and Communicative - Without employment outcomes	239	3.9%	279	4.3%	281	4.3%	3,490	5.4%
Physical - Employment outcomes	793	17.3%	1,022	18.4%	1,073	16.2%	14,906	18.0%
Physical - Without employment outcomes	1,036	17.1%	1,230	19.0%	1,182	17.9%	14,128	21.7%
Intellectual and Learning disability - Employment outcomes	1,316	28.7%	1,654	29.7%	1,991	30.0%	28,084	34.0%
Intellectual and Learning disability - Without employment outcomes	1,389	22.9%	1,879	29.0%	2,238	33.9%	21,270	32.7%
Psychosocial and psychological - Employment outcomes	1,727	37.7%	1,895	34.1%	1,995	30.0%	22,897	27.7%
Psychosocial and psychological - Without employment outcomes	3,052	50.3%	2,691	41.5%	2,584	39.1%	23,281	35.8%
Total served - Employment outcomes	4,579	100.0%	5,562	100.0%	6,643	100.0%	82,618	100.0%
Total served - Without employment outcomes	6,069	100.0%	6,477	100.0%	6,603	100.0%	65,030	100.0%

Data source: RSA-911

Table 3.3.b OH-C All Individuals Served by Type of Impairment FFYs 2014-2016

Type of Impairment	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Visual - Individuals served	774	7.3%	908	7.5%	978	7.4%	8,102	5.5%
Auditory and Communicative - Individuals served	561	5.3%	760	6.3%	1,205	9.1%	14,980	10.1%
Physical - Individuals served	1,829	17.2%	2,252	18.7%	2,255	17.0%	29,034	19.7%
Intellectual and Learning disability - Individuals served	2,705	25.4%	3,533	29.3%	4,229	31.9%	49,354	33.4%
Psychosocial and psychological	4,779	44.9%	4,586	38.1%	4,579	34.6%	46,178	31.3%
Total individuals served	10,648	100.0%	12,039	100.0%	13,246	100.0%	147,648	100.0

Data source: RSA-911

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

Type of Impairment	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Visual - Employment rate		54.4%		56.2%		67.5%		64.7%
Auditory and Communicative - Employment rate		57.4%		63.3%		76.7%		76.7%
Physical - Employment rate		43.4%		45.4%		47.6%		51.3%
Intellectual and Learning disability - Employment rate		48.7%		46.8%		47.1%		56.9%
Psychosocial and psychological – Employment rate		36.1%		41.3%		43.6%		49.6%
Total served - Employment rate		43.0%		46.2%		50.2%		56.0%

Data source: RSA-911

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

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 60 days	11,454	60.3%	14,207	73.0%	16,845	84.9%	171,607	82.6%
61 – 90 days	3,359	17.7%	2,790	14.3%	1,713	8.6%	17,315	8.3%
91 – 120 days	1,872	9.9%	1,292	6.6%	720	3.6%	8,398	4.0%
121 – 180 days	1,491	7.8%	799	4.1%	377	1.9%	6,202	3.0%
181 – 365 days	773	4.1%	350	1.8%	165	.8%	3,473	1.7%
More than 1 year	48	.3%	29	.1%	22	.1%	660	.3%
Total eligible	18,997	100.0%	19,467	100.0%	19,842	100.0%	207,655	100.0%

Data source: RSA-911

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

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 90 days	5,670	53.2%	6,783	56.3%	8,463	63.9%	111,220	75.1%
More than 90 days	4,979	46.8%	5,256	43.7%	4,783	36.1%	36,864	24.9%
Total served	10,649	100.0%	12,039	100.0%	13,246	100.0%	148,084	100.0%

Data source: RSA-911

Table 3.4.c OH-C Elapsed Time from IPE to Closure for All Individuals Served - FFYs 2014-2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months	508	4.8%	612	5.1%	691	5.2%	4,867	3.3%
4 – 6 months	1,905	17.9%	2,194	18.2%	2,857	21.6%	18,624	12.6%
7 – 9 months	1,727	16.2%	2,157	17.9%	2,602	19.6%	18,240	12.3%
10 – 12 months	1,430	13.4%	1,652	13.7%	1,772	13.4%	15,762	10.6%
13 - 24 months	2,991	28.1%	3,130	26.0%	3,258	24.6%	37,939	25.6%
25 – 36 months	1,049	9.9%	1,136	9.4%	1,104	8.3%	18,934	12.8%
37 – 60 months	711	6.7%	787	6.5%	680	5.1%	19,177	13.0%
More than 5 years	328	3.1%	371	3.1%	282	2.1%	14,541	9.8%
Total served	10,649	100.0%	12,039	100.0%	13,246	100.0%	148,084	100.0%

Data source: RSA-911

**Table 3.5.a OH-C Standard Occupational Classification (SOC) Codes for All Individuals Served with Employment Outcomes -
FFYs 2014-2016**

SOC	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Architecture and Engineering Occupations (17-0000)	14	.3%	32	.6%	28	.4%	577	.7%
Arts, Design, Entertainment, Sports, and Media (27-0000)	47	1.0%	37	.7%	42	.6%	885	1.1%
Building and Grounds Cleaning and Maintenance (37-0000)	614	13.4%	747	13.4%	817	12.3%	6,923	8.4%
Business and Financial Operations Occupations (13-0000)	38	.8%	52	.9%	65	1.0%	1,248	1.5%
Community and Social Services Occupations (21-0000)	128	2.8%	143	2.6%	158	2.4%	2,300	2.8%
Computer and Mathematical Occupations (15-0000)	37	.8%	58	1.0%	64	1.0%	874	1.1%
Constructive and Extraction Occupations (47-0000)	54	1.2%	35	.6%	56	.8%	1,722	2.1%
Education, Training, and Library Occupations (25-0000)	94	2.1%	101	1.8%	141	2.1%	2,434	2.9%
Farming, Fishing, and Forestry Occupations (45-0000)	6	.1%	11	.2%	13	.2%	425	.5%
Food Preparation and Serving Related Occupations (35-0000)	669	14.6%	847	15.2%	1,025	15.4%	9,434	11.4%
Healthcare Practitioners and Technical Occupations (29-0000)	83	1.8%	95	1.7%	147	2.2%	2,238	2.7%
Healthcare Support Occupations (31-0000)	149	3.3%	173	3.1%	170	2.6%	2,722	3.3%
Homemaker*	113	2.5%	138	2.5%	277	4.2%	1,803	2.2%

SOC	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Installation, Maintenance, and Repair Occupations (49-0000)	120	2.6%	129	2.3%	151	2.3%	4,981	6.0%
Legal Occupations (23-0000)	9	.2%	10	.2%	15	.2%	191	.2%
Life, Physical, and Social Science Occupations (19-0000)	15	.3%	20	.4%	14	.2%	374	.5%
Management Occupations (11-0000)	52	1.1%	78	1.4%	98	1.5%	2,050	2.5%
Military Specific Occupations (55-0000)	1	.0%	1	.0%	2	.0%	92	.1%
Office and Administrative Support Occupations (19-0000)	921	20.1%	1,217	21.9%	1,449	21.8%	15,218	18.4%
Personal Care and Service Occupations (39-0000)	345	7.5%	403	7.2%	428	6.4%	4,073	4.9%
Production Occupations (51-0000)	492	10.7%	505	9.1%	582	8.8%	6,888	8.3%
Protective Service Occupations (33-0000)	42	.9%	60	1.1%	70	1.1%	1,376	1.7%
Randolph-Sheppard vending facility clerk*							8	.0%
Randolph-Sheppard vending facility operator*	5	.1%	5	.1%	7	.1%	76	.1%
Sales and Related Occupations (41-0000)	278	6.1%	326	5.9%	367	5.5%	6,552	7.9%
Transportation and Material Moving Occupations (53-0000)	254	5.5%	339	6.1%	457	6.9%	7,284	8.8%
Unpaid Family Worker*							18	.0%
Total employment outcomes	4,580	100.0	5,562	100.0	6,643	100.0	82,766	100.0%

Data source: RSA-911

Table 3.5.b OH-C Standard Occupational Classification (SOC) Codes Median Hourly Earnings for All Individuals Served with Employment Outcomes - FFYs 2014-2016

SOC	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Architecture and Engineering Occupations (17-0000)	\$20.00		\$18.50		\$21.25		\$19.00	
Arts, Design, Entertainment, Sports, and Media (27-0000)	\$11.25		\$11.00		\$11.50		\$12.03	
Building and Grounds Cleaning and Maintenance (37-0000)	\$8.00		\$8.25		\$8.50		\$9.00	
Business and Financial Operations Occupations (13-0000)	\$13.41		\$16.00		\$19.23		\$15.34	
Community and Social Services Occupations (21-0000)	\$11.00		\$11.40		\$13.00		\$13.50	
Computer and Mathematical Occupations (15-0000)	\$14.43		\$15.33		\$16.96		\$16.00	
Constructive and Extraction Occupations (47-0000)	\$10.00		\$10.00		\$14.50		\$12.70	
Education, Training, and Library Occupations (25-0000)	\$12.48		\$13.18		\$15.00		\$13.00	
Farming, Fishing, and Forestry Occupations (45-0000)	\$9.11		\$8.50		\$9.00		\$10.00	
Food Preparation and Serving Related Occupations (35-0000)	\$7.97		\$8.11		\$8.13		\$8.36	
Healthcare Practitioners and Technical Occupations (29-0000)	\$17.00		\$15.50		\$20.00		\$16.12	
Healthcare Support Occupations (31-0000)	\$9.41		\$9.10		\$9.58		\$10.43	
Homemaker*								

SOC	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Installation, Maintenance, and Repair Occupations (49-0000)	\$10.00		\$10.00		\$10.00		\$9.80	
Legal Occupations (23-0000)	\$19.23		\$18.86		\$20.00		\$17.00	
Life, Physical, and Social Science Occupations (19-0000)	\$15.58		\$19.00		\$18.31		\$15.00	
Management Occupations (11-0000)	\$13.13		\$15.60		\$18.11		\$15.00	
Military Specific Occupations (55-0000)	\$8.11		\$10.83		\$21.40		\$13.17	
Office and Administrative Support Occupations (19-0000)	\$8.20		\$8.59		\$9.00		\$10.00	
Personal Care and Service Occupations (39-0000)	\$8.00		\$8.17		\$8.29		\$9.00	
Production Occupations (51-0000)	\$8.50		\$9.00		\$9.12		\$10.00	
Protective Service Occupations (33-0000)	\$9.00		\$9.27		\$10.00		\$10.25	
Randolph-Sheppard vending facility clerk*							\$10.91	
Randolph-Sheppard vending facility operator*	\$16.00		\$19.00		\$11.95		\$12.68	
Sales and Related Occupations (41-0000)	\$8.00		\$8.17		\$8.52		\$9.00	
Transportation and Material Moving Occupations (53-0000)	\$9.00		\$9.00		\$9.00		\$10.00	
Unpaid Family Worker*								
Total employment outcomes	\$8.27		\$8.52		\$9.00		\$10.00	

Data source: RSA-911

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

Individuals with Disabilities under Age 25 at Exit	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total cases closed	7,350		7,401		7,512		86,272	
Exited as an applicant	1,154	15.70%	728	9.84%	500	6.66%	10,776	12.49%
Exited during or after trial work experience/extended evaluation		0.00%	1	0.01%		0.00%	687	0.80%
Exited without employment after IPE, before services	345	4.69%	500	6.76%	497	6.62%	16,390	19.00%
Exited from order of selection waiting list	3	0.04%	4	0.05%		0.00%	972	1.13%
Exited without employment after eligibility, before IPE	2,295	31.22%	1,849	24.98%	1,785	23.76%	3,865	4.48%
Exited with employment	1,567	21.32%	1,839	24.85%	2,215	29.49%	29,391	34.07%
Exited without employment	1,986	27.02%	2,480	33.51%	2,515	33.48%	24,191	28.04%
Employment rate	44.10%		42.58%		46.83%		54.85%	
Supported employment outcomes	172	10.98%	263	14.30%	400	18.06%	3,965	13.49%
Competitive employment outcomes	1,465	93.49%	1,834	99.73%	2,211	99.82%	28,670	97.55%
Average hourly earnings for competitive employment outcomes	\$8.08		\$8.94		\$9.06		\$10.12	
Average hours worked per week for competitive employment outcomes	25.46		25.10		24.90		29.12	
Competitive employment outcomes at 35 or more hours per week	287	18.32%	337	18.33%	423	19.10%	10,346	35.20%
Competitive employment outcomes meeting SGA	443	28.27%	557	30.29%	612	27.63%	14,616	49.73%
Competitive employment outcomes with employer-provided medical insurance	131	8.36%	151	8.21%	170	7.67%	3,866	13.15%

Table 4.2. OH-C Select VR Services Provided for Individuals with Disabilities under Age 25 at Exit- FFYs 2014-2016

Training Services	2014	2014 Percent	2015	2015 Percent	2016	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of individuals served	3,553		4,319		4,729		53,582	
College or university training	0	0.00%	0	0.00%	1	0.00%	852	1.60%
Four-year or university training	151	4.20%	170	3.90%	135	2.90%	5,289	9.90%
Junior or community college training	0	0.00%	10	0.20%	22	0.50%	4,482	8.40%
Occupational or vocational training	161	4.50%	110	2.50%	77	1.60%	5,067	9.50%
On-the-job training	17	0.50%	12	0.30%	9	0.20%	1,329	2.50%
Apprenticeship training	0	0.00%	3	0.10%	0	0.00%	42	0.10%
Basic academic remedial or literacy training	28	0.80%	20	0.50%	4	0.10%	1,198	2.20%
Job readiness training	1,685	47.40%	2,105	48.70%	2,225	47.10%	16,251	30.30%
Disability-related skills training	52	1.50%	73	1.70%	59	1.20%	1,272	2.40%
Miscellaneous training	396	11.10%	506	11.70%	445	9.40%	4,918	9.20%
Assessment	3,130	88.10%	3,879	89.80%	4,379	92.60%	29,430	54.90%
Diagnosis and treatment of impairment	510	14.40%	445	10.30%	366	7.70%	10,630	19.80%
Vocational rehab counseling and guidance	52	1.50%	129	3.00%	130	2.70%	36,168	67.50%
Job search assistance	618	17.40%	740	17.10%	829	17.50%	19,183	35.80%
Job placement assistance	2,317	65.20%	2,813	65.10%	3,117	65.90%	16,389	30.60%
On-the-job supports-short term	1,436	40.40%	1,816	42.00%	2,131	45.10%	7,651	14.30%
On-the-job supports-SE	0	0.00%	5	0.10%	11	0.20%	4,547	8.50%
Information and referral services	45	1.30%	46	1.10%	19	0.40%	14,113	26.30%
Benefits counseling	210	5.90%	339	7.80%	375	7.90%	1,974	3.70%
Customized employment services	75	2.10%	65	1.50%	47	1.00%	449	0.80%

Training Services	2014	2014 Percent	2015	2015 Percent	2016	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Transportation	1,317	37.10%	1,525	35.30%	1,630	34.50%	15,830	29.50%
Maintenance	486	13.70%	551	12.80%	676	14.30%	10,436	19.50%
Rehabilitation technology	167	4.70%	223	5.20%	238	5.00%	3,781	7.10%
Reader services	3	0.10%	1	0.00%	3	0.10%	30	0.10%
Interpreter services	39	1.10%	62	1.40%	70	1.50%	607	1.10%
Personal attendant services	13	0.40%	8	0.20%	15	0.30%	84	0.20%
Technical assistance services	8	0.20%	9	0.20%	7	0.10%	254	0.50%
Other services	292	8.20%	225	5.20%	192	4.10%	9,840	18.40%

Table 4.3.a OH-C Outcomes by Type of Impairment for Individuals with Disabilities under Age 25 at Exit- FFYs 2014-2016

Type of Impairment	2014	2014 Percent	2015	2015 Percent	2016	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Visual - Employment outcomes	45	2.90%	58	3.20%	46	2.10%	524	1.78%
Visual - Without employment outcomes	67	3.40%	91	3.70%	66	2.60%	535	2.21%
Auditory and Communicative - Employment outcomes	65	4.10%	74	4.00%	115	5.20%	1618	5.51%
Auditory and Communicative - Without employment outcomes	77	3.90%	97	3.90%	115	4.60%	1176	4.86%
Physical - Employment outcomes	124	7.90%	177	9.60%	204	9.20%	2339	7.96%
Physical - Without employment outcomes	137	6.90%	226	9.10%	233	9.30%	2054	8.49%
Intellectual and Learning disability - Employment outcomes	830	53.00%	918	49.90%	1,146	51.70%	18636	63.45%
Intellectual and Learning disability - Without employment outcomes	888	44.70%	1,180	47.60%	1,268	50.40%	14463	59.81%
Psychosocial and psychological - Employment outcomes	503	32.10%	612	33.30%	704	31.80%	6254	21.29%
Psychosocial and psychological - Without employment outcomes	817	41.10%	886	35.70%	832	33.10%	5954	24.62%
Total served - Employment outcomes	1,567	100.00%	1,839	100.00%	2,215	100.00%	29,371	100.00%
Total served - Without employment outcomes	1,986	100.00%	2,480	100.00%	2,514	100.00%	24,182	100.00%

**Table 4.3.b OH-C All Individuals Served by Type of Impairment for Individuals with Disabilities under Age 25 at Exit- FFYs
2014-2016**

Type of Impairment	2014	2014 Percent	2015	2015 Percent	2016	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Visual - Individuals served	112	3.20%	149	3.40%	112	2.40%	1059	1.98%
Auditory and Communicative - Individuals served	142	4.00%	171	4.00%	230	4.90%	2,794	5.22%
Physical - Individuals served	261	7.30%	403	9.30%	437	9.20%	4,393	8.20%
Intellectual and Learning disability - Individuals served	1,718	48.40%	2,098	48.60%	2,414	51.00%	33,099	61.81%
Psychosocial and psychological	1,320	37.20%	1,498	34.70%	1,536	32.50%	12,208	22.80%
Total individuals served	3,553	100.00%	4,319	100.00%	4,729	100.00%	53,553	100.00%

Table 4.3.c OH-C Employment Rate by Type of Impairment for Individuals with Disabilities under Age 25 at Exit- FFYs 2014-2016

Type of Impairment	2014	2015	2016	2016 National Agency Type Percent
Visual - Employment rate	40.20%	38.90%	41.10%	49.48%
Auditory and Communicative - Employment rate	45.80%	43.30%	50.00%	57.91%
Physical - Employment rate	47.50%	44%	46.70%	53.24%
Intellectual and Learning disability - Employment rate	48.30%	43.80%	47.50%	56.30%
Psychosocial and psychological – Employment rate	38.10%	40.90%	45.80%	51.23%
Total served - Employment rate	44.10%	42.60%	46.80%	54.84%

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

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 60 days	3,665	59.15%	4,620	69.24%	5,715	81.50%	61,119	81.70%
61 – 90 days	1,102	17.79%	1,043	15.63%	714	10.18%	6,367	8.51%
91 – 120 days	587	9.47%	532	7.97%	324	4.62%	3,214	4.30%
121 – 180 days	515	8.31%	311	4.66%	165	2.35%	2,441	3.26%
181 – 365 days	313	5.05%	152	2.28%	84	1.20%	1,410	1.88%
More than 1 year	14	0.23%	14	0.21%	10	0.14%	258	0.34%
Total eligible	6,196		6,672		7,012		74,809	

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

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months	2,069	58.23%	2,690	62.28%	3,193	67.51%	40,612	75.79%
4-6 months	776	21.84%	997	23.08%	1,082	22.88%	7,589	14.16%
7-9 months	380	10.70%	336	7.78%	294	6.22%	2,473	4.62%
10-12 months	171	4.81%	159	3.68%	97	2.05%	1,107	2.07%
More than 12 months	157	4.42%	137	3.17%	64	1.35%	1,801	3.36%
Total served	3,553		4,319		4,730		53,582	

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

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months	149	4.19%	152	3.52%	182	3.85%	1,319	2.46%
4 – 6 months	534	15.03%	584	13.52%	690	14.59%	4,769	8.90%
7 – 9 months	491	13.82%	638	14.77%	703	14.86%	5,556	10.37%
10 – 12 months	462	13.00%	531	12.29%	600	12.68%	5,217	9.74%
13 - 24 months	1,089	30.65%	1,288	29.82%	1,374	29.05%	14,948	27.90%
25 – 36 months	464	13.06%	556	12.87%	616	13.02%	8,479	15.82%
37 – 60 months	294	8.27%	470	10.88%	445	9.41%	8,846	16.51%
More than 5 years	70	1.97%	100	2.32%	120	2.54%	4,448	8.30%
Total served	3,553		4,319		4,730		53,582	

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

SOC	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Architecture and Engineering Occupations (17-0000)	2	0.13%	7	0.38%	3	0.14%	172	0.59%
Arts, Design, Entertainment, Sports, and Media (27-0000)	10	0.64%	7	0.38%	8	0.36%	287	0.98%
Building and Grounds Cleaning and Maintenance (37-0000)	179	11.42%	228	12.40%	262	11.83%	2,125	7.23%
Business and Financial Operations Occupations (13-0000)	2	0.13%	9	0.49%	11	0.50%	275	0.94%
Community and Social Services Occupations (21-0000)	15	0.96%	8	0.44%	14	0.63%	293	1.00%
Computer and Mathematical Occupations (15-0000)	8	0.51%	11	0.60%	12	0.54%	235	0.80%
Constructive and Extraction Occupations (47-0000)	15	0.96%	9	0.49%	13	0.59%	518	1.76%
Education, Training, and Library Occupations (25-0000)	20	1.28%	13	0.71%	16	0.72%	562	1.91%
Farming, Fishing, and Forestry Occupations (45-0000)	4	0.26%	6	0.33%	4	0.18%	172	0.59%
Food Preparation and Serving Related Occupations (35-0000)	316	20.17%	395	21.48%	512	23.12%	4,862	16.55%
Healthcare Practitioners and Technical Occupations (29-0000)	12	0.77%	17	0.92%	25	1.13%	612	2.08%
Healthcare Support Occupations (31-0000)	43	2.74%	50	2.72%	49	2.21%	956	3.25%
Homemaker*	2	0.13%	3	0.16%	3	0.14%	50	0.17%
Installation, Maintenance, and Repair Occupations (49-0000)	38	2.43%	51	2.77%	50	2.26%	2,183	7.43%
Legal Occupations (23-0000)		0.00%		0.00%	1	0.05%	22	0.07%
Life, Physical, and Social Science Occupations (19-0000)	4	0.26%	5	0.27%	3	0.14%	115	0.39%
Management Occupations (11-0000)	6	0.38%	8	0.44%	6	0.27%	360	1.23%
Military Specific Occupations (55-0000)	1	0.06%	1	0.05%	1	0.05%	48	0.16%

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)	305	19.46%	408	22.19%	514	23.21%	5,594	19.04%
Personal Care and Service Occupations (39-0000)	201	12.83%	206	11.20%	227	10.25%	1,665	5.67%
Production Occupations (51-0000)	179	11.42%	159	8.65%	197	8.89%	2,625	8.94%
Protective Service Occupations (33-0000)	7	0.45%	7	0.38%	15	0.68%	420	1.43%
Randolph-Sheppard Vending Facility Clerk*		0.00%		0.00%		0.00%	1	0.00%
Randolph-Sheppard Vending Facility Operator*		0.00%		0.00%		0.00%	1	0.00%
Sales and Related Occupations (41-0000)	113	7.21%	118	6.42%	126	5.69%	2,856	9.72%
Transportation and Material Moving Occupations (53-0000)	85	5.42%	113	6.14%	143	6.46%	2,367	8.06%
Unpaid Family Worker*		0.00%		0.00%		0.00%	2	0.01%
Total employment outcomes	1567		1839		2215		29,378	

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

SOC	2014	2015	2016	2016 National Agency Type
Architecture and Engineering Occupations (17-0000)	\$14.11	\$13.92	\$13.60	\$16.08
Arts, Design, Entertainment, Sports, and Media (27-0000)	\$11.25	\$8.20	\$9.05	\$11.00
Building and Grounds Cleaning and Maintenance (37-0000)	\$8.00	\$8.13	\$8.25	\$8.60
Business and Financial Operations Occupations (13-0000)	\$12.50	\$10.52	\$14.43	\$12.00
Community and Social Services Occupations (21-0000)	\$10.00	\$9.40	\$11.47	\$12.25
Computer and Mathematical Occupations (15-0000)	\$8.83	\$17.00	\$11.00	\$13.00
Constructive and Extraction Occupations (47-0000)	\$10.00	\$8.75	\$8.50	\$11.00
Education, Training, and Library Occupations (25-0000)	\$9.00	\$10.00	\$9.58	\$11.26
Farming, Fishing, and Forestry Occupations (45-0000)	\$7.95	\$8.75	\$8.12	\$10.00
Food Preparation and Serving Related Occupations (35-0000)	\$7.95	\$8.11	\$8.13	\$8.27
Healthcare Practitioners and Technical Occupations (29-0000)	\$11.18	\$9.30	\$11.00	\$12.00
Healthcare Support Occupations (31-0000)	\$9.00	\$8.75	\$9.00	\$10.00
Homemaker*				
Installation, Maintenance, and Repair Occupations (49-0000)	\$9.00	\$8.52	\$9.00	\$9.00
Legal Occupations (23-0000)			\$12.00	\$13.04
Life, Physical, and Social Science Occupations (19-0000)	\$12.50	\$15.73	\$9.00	\$13.50
Management Occupations (11-0000)	\$9.00	\$13.10	\$10.46	\$13.00
Military Specific Occupations (55-0000)	\$8.11	\$10.83	\$14.00	\$12.00
Office and Administrative Support Occupations (43-0000)	\$7.97	\$8.12	\$8.26	\$9.00
Personal Care and Service Occupations (39-0000)	\$7.97	\$8.12	\$8.13	\$8.75
Production Occupations (51-0000)	\$8.00	\$8.52	\$9.00	\$9.76
Protective Service Occupations (33-0000)	\$8.52	\$10.00	\$9.00	\$10.00
Randolph-Sheppard Vending Facility Clerk*				8
Randolph-Sheppard Vending Facility Operator*				8.25

SOC	2014	2015	2016	2016 National Agency Type
Sales and Related Occupations (41-0000)	\$7.96	\$8.11	\$8.25	\$9.00
Transportation and Material Moving Occupations (53-0000)	\$8.00	\$8.13	\$8.50	\$9.00
Unpaid Family Worker*				
Total employment outcomes	\$8.00	\$8.13	\$8.25	\$9.00

Table 4.6 OH-C 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%	41	0.05%
Centers for Independent Living	2	0.03%	4	0.05%	1	0.01%	71	0.08%
Child Protective Services	13	0.18%	13	0.18%	35	0.47%	106	0.12%
Community Rehabilitation Programs	762	10.37%	402	5.45%	295	3.94%	3,047	3.54%
Consumer Organizations or Advocacy Groups	7	0.10%	18	0.24%	16	0.21%	178	0.21%
Educational Institutions (elementary/secondary)	2,679	36.46%	2,719	36.87%	2,990	39.90%	45,619	52.96%
Educational Institutions (postsecondary)	105	1.43%	99	1.34%	89	1.19%	3,034	3.52%
Employers		0.00%	3	0.04%	7	0.09%	53	0.06%
Faith Based Organizations	4	0.05%	11	0.15%	3	0.04%	64	0.07%
Family/Friends	152	2.07%	319	4.33%	419	5.59%	4,041	4.69%
Intellectual and Developmental Disabilities Providers	147	2.00%	514	6.97%	805	10.74%	1,652	1.92%
Medical Health Provider (Public or Private)	219	2.98%	168	2.28%	127	1.69%	1,896	2.20%
Mental Health Provider (Public or Private)	178	2.42%	417	5.65%	424	5.66%	1,936	2.25%
One-stop Employment/Training Centers	67	0.91%	72	0.98%	81	1.08%	1,054	1.22%
Other Sources	983	13.38%	772	10.47%	503	6.71%	6,099	7.08%
Other State Agencies	1	0.01%	9	0.12%	10	0.13%	636	0.74%
Other VR State Agencies	2	0.03%	4	0.05%	4	0.05%	261	0.30%
Public Housing Authority	3	0.04%	2	0.03%		0.00%	15	0.02%
Self-referral	1,895	25.79%	1,741	23.61%	1,613	21.52%	14,829	17.21%
Social Security Administration (Disability Determination Service or District office)	30	0.41%	8	0.11%	10	0.13%	328	0.38%
State Department of Correction/Juvenile Justice	64	0.87%	50	0.68%	45	0.60%	522	0.61%
State Employment Service Agency	1	0.01%	5	0.07%	4	0.05%	67	0.08%
Veteran's Administration		0.00%	2	0.03%		0.00%	13	0.02%

Referral Sources	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Welfare Agency (State or local government)	31	0.42%	21	0.28%	9	0.12%	555	0.64%
Worker's Compensation	2	0.03%	2	0.03%	4	0.05%	28	0.03%

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

Reason for Closure	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Achieved employment outcome	1,567	21.88%	1,839	25.36%	2,215	30.29%	29,393	35.55%
Unable to locate or contact	1,589	22.19%	1,023	14.11%	314	4.29%	18,723	22.65%
Transportation not feasible or available	14	0.20%	18	0.25%	6	0.08%	114	0.14%
Does not require VR services	46	0.64%	37	0.51%	58	0.79%	579	0.70%
Extended services not available	13	0.18%	15	0.21%	18	0.25%	87	0.11%
All other reasons	1,183	16.52%	736	10.15%	141	1.93%	6,857	8.29%
Extended employment	2	0.03%	10	0.14%	49	0.67%	62	0.07%
Individual in institution, other than a prison or jail	14	0.20%	13	0.18%	22	0.30%	179	0.22%
Individual is incarcerated in a prison or jail	81	1.13%	58	0.80%	50	0.68%	390	0.47%
Disability too significant to benefit from VR services	24	0.34%	56	0.77%	73	1.00%	501	0.61%
No longer interested in receiving services or further services	2,621	36.60%	3,436	47.38%	4,357	59.58%	25,623	30.99%
Death	8	0.11%	11	0.15%	10	0.14%	168	0.20%

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

All Individuals with Disabilities with Supported Employment Outcomes	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Supported employment outcomes	300	6.55%	558	10.03%	809	12.18%	9,673	11.67%
Average hourly wage for supported employment outcomes	\$8.35		\$8.53		\$8.62		\$9.07	
Average hours worked per week for supported employment outcomes	21.52		20.27		19.42		22.48	
Competitive supported employment outcomes	277	92.33%	557	99.82%	808	99.88%	9,099	94.07%
Average hourly earnings for competitive supported employment outcomes	\$8.39		\$8.53		\$8.62		\$9.30	
Average hours worked per week for competitive supported employment outcomes	21.8		20.27		19.43		22.23	
Competitive supported employment outcomes at 35 or more hours per week	22	7.33%	50	8.96%	65	8.03%	1,335	13.80%
Competitive supported employment outcomes meeting SGA	43	14.33%	90	16.13%	104	12.86%	2,276	23.53%
Competitive supported employment outcomes with employer-provided medical insurance	15	5.00%	17	3.05%	23	2.84%	338	3.49%

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

Individuals under Age 25 with Disabilities with Supported Employment Outcomes	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Supported employment outcomes	172	10.98%	263	14.30%	400	18.06%	3,965	13.49%
Average hourly wage for supported employment outcomes	\$8.24		\$8.49		\$8.65		\$8.77	
Average hours worked per week for supported employment outcomes	21.56		19.88		19.82		21.92	
Competitive supported employment outcomes	155	90.12%	262	99.62%	400	100.00%	3,750	94.58%
Average hourly earnings for competitive supported employment outcomes	\$8.29		\$8.49		\$8.65		\$8.94	
Average hours worked per week for competitive supported employment outcomes	21.89		19.88		19.82		21.75	
Competitive supported employment outcomes at 35 or more hours per week	12	6.98%	21	7.98%	39	9.75%	489	12.33%
Competitive supported employment outcomes meeting SGA	21	12.21%	41	15.59%	60	15.00%	821	20.71%
Competitive supported employment outcomes with employer-provided medical insurance	8	4.65%	7	2.66%	15	3.75%	215	5.42%

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

Training Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of SE	300		558		809		9673	
College or university training	0	0.00%	0	0.00%	0	0.00%	32	0.30%
Four-year or university training	2	0.70%	2	0.40%	0	0.00%	116	1.20%
Junior or community college training	0	0.00%	1	0.20%	3	0.40%	124	1.30%
Occupational or vocational training	7	2.30%	9	1.60%	4	0.50%	423	4.40%
On-the-job training	4	1.30%	1	0.20%	1	0.10%	239	2.50%
Apprenticeship training	0	0.00%	0	0.00%	0	0.00%	7	0.10%
Basic academic remedial or literacy training	7	2.30%	2	0.40%	0	0.00%	78	0.80%
Job readiness training	123	41.00%	176	31.50%	239	29.50%	1,928	19.90%
Disability-related skills training	0	0.00%	4	0.70%	4	0.50%	153	1.60%
Miscellaneous training	41	13.70%	52	9.30%	58	7.20%	804	8.30%
Assessment	241	80.30%	461	82.60%	694	85.80%	5,992	61.90%
Diagnosis and treatment of impairment	25	8.30%	31	5.60%	35	4.30%	1,987	20.50%
Vocational rehab counseling and guidance	7	2.30%	13	2.30%	7	0.90%	6,718	69.50%
Job search assistance	50	16.70%	53	9.50%	90	11.10%	4,766	49.30%
Job placement assistance	251	83.70%	489	87.60%	718	88.80%	4,358	45.10%
On-the-job supports-short term	270	90.00%	494	88.50%	716	88.50%	2,911	30.10%
On-the-job supports-SE	0	0.00%	8	1.40%	18	2.20%	6,821	70.50%
Information and referral services	2	0.70%	7	1.30%	3	0.40%	2,005	20.70%
Benefits counseling	42	14.00%	164	29.40%	254	31.40%	1,233	12.70%
Customized employment services	13	4.30%	8	1.40%	9	1.10%	98	1.00%
Transportation	101	33.70%	182	32.60%	231	28.60%	2,769	28.60%
Maintenance	40	13.30%	89	15.90%	158	19.50%	2,324	24.00%
Rehabilitation technology	5	1.70%	16	2.90%	27	3.30%	568	5.90%

Training Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Reader services	1	0.30%	0	0.00%	0	0.00%	1	0.00%
Interpreter services	3	1.00%	3	0.50%	12	1.50%	89	0.90%
Personal attendant services	1	0.30%	0	0.00%	0	0.00%	11	0.10%
Technical assistance services	1	0.30%	0	0.00%	0	0.00%	28	0.30%
Other services	22	7.30%	34	6.10%	22	2.70%	1,674	17.30%

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

Training Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of SE	172		263		400		3,965	
College or university training	0	0.00%	0	0.00%	0	0.00%	15	0.40%
Four-year or university training	2	1.20%	2	0.80%	0	0.00%	51	1.30%
Junior or community college training	0	0.00%	1	0.40%	3	0.80%	69	1.70%
Occupational or vocational training	2	1.20%	3	1.10%	1	0.30%	183	4.60%
On-the-job training	2	1.20%	1	0.40%	1	0.30%	122	3.10%
Apprenticeship training	0	0.00%	0	0.00%	0	0.00%	4	0.10%
Basic academic remedial or literacy training	5	2.90%	1	0.40%	0	0.00%	55	1.40%
Job readiness training	103	59.90%	136	51.70%	197	49.30%	1,154	29.10%
Disability-related skills training	0	0.00%	2	0.80%	2	0.50%	80	2.00%
Miscellaneous training	33	19.20%	40	15.20%	43	10.80%	438	11.00%
Assessment	134	77.90%	230	87.50%	352	88.00%	2,653	66.90%
Diagnosis and treatment of impairment	11	6.40%	14	5.30%	16	4.00%	751	18.90%
Vocational rehab counseling and guidance	4	2.30%	8	3.00%	5	1.30%	2,785	70.20%
Job search assistance	29	16.90%	35	13.30%	56	14.00%	1,857	46.80%
Job placement assistance	143	83.10%	226	85.90%	348	87.00%	1,794	45.20%
On-the-job supports-short term	153	89.00%	242	92.00%	358	89.50%	1,310	33.00%
On-the-job supports-SE	0	0.00%	2	0.80%	7	1.80%	2,742	69.20%
Information and referral services	2	1.20%	5	1.90%	3	0.80%	883	22.30%
Benefits counseling	20	11.60%	53	20.20%	76	19.00%	451	11.40%
Customized employment services	7	4.10%	3	1.10%	3	0.80%	40	1.00%
Transportation	68	39.50%	103	39.20%	124	31.00%	1,120	28.20%
Maintenance	15	8.70%	24	9.10%	58	14.50%	834	21.00%
Rehabilitation technology	1	0.60%	8	3.00%	12	3.00%	208	5.20%

Training Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Reader services	1	0.60%	0	0.00%	0	0.00%	1	0.00%
Interpreter services	0	0.00%	2	0.80%	5	1.30%	37	0.90%
Personal attendant services	1	0.60%	0	0.00%	0	0.00%	5	0.10%
Technical assistance services	0	0.00%	0	0.00%	0	0.00%	10	0.30%
Other services	15	8.70%	16	6.10%	12	3.00%	715	18.00%

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

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 60 days	218	72.67%	450	80.65%	689	85.17%	8,277	85.57%
61 – 90 days	32	10.67%	51	9.14%	61	7.54%	633	6.54%
91 – 120 days	17	5.67%	28	5.02%	30	3.71%	291	3.01%
121 – 180 days	18	6.00%	16	2.87%	23	2.84%	250	2.58%
181 – 365 days	15	5.00%	12	2.15%	6	0.74%	169	1.75%
More than 1 year		0.00%	1	0.18%		0.00%	53	0.55%
Total SE	300		558		809		9,673	

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

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 60 days	127	73.84%	195	74.14%	324	81.00%	3,284	82.82%
61 – 90 days	18	10.47%	31	11.79%	36	9.00%	292	7.36%
91 – 120 days	11	6.40%	19	7.22%	21	5.25%	149	3.76%
121 – 180 days	10	5.81%	10	3.80%	16	4.00%	125	3.15%
181 – 365 days	6	3.49%	7	2.66%	3	0.75%	87	2.19%
More than 1 year		0.00%	1	0.38%		0.00%	28	0.71%
Total SE	172		263		400		3,965	

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

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months	195	65.00%	390	69.89%	598	73.92%	7,647	79.06%
4-6 months	55	18.33%	125	22.40%	147	18.17%	1,137	11.75%
7-9 months	28	9.33%	22	3.94%	40	4.94%	406	4.20%
10-12 months	6	2.00%	13	2.33%	14	1.73%	185	1.91%
More than 12 months	16	5.33%	8	1.43%	10	1.24%	298	3.08%
Total SE	300		558		809		9,673	

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

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months	109	63.37%	173	65.78%	272	68.00%	3,004	75.76%
4-6 months	34	19.77%	63	23.95%	87	21.75%	556	14.02%
7-9 months	15	8.72%	10	3.80%	25	6.25%	190	4.79%
10-12 months	6	3.49%	10	3.80%	9	2.25%	85	2.14%
More than 12 months	8	4.65%	7	2.66%	7	1.75%	130	3.28%
Total SE	172		263		400		3,965	

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

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months	6	2.00%	11	1.97%	11	1.36%	246	2.54%
4 – 6 months	53	17.67%	94	16.85%	137	16.93%	1,555	16.08%
7 – 9 months	52	17.33%	129	23.12%	138	17.06%	1,713	17.71%
10 – 12 months	31	10.33%	80	14.34%	115	14.22%	1,251	12.93%
13 - 24 months	89	29.67%	141	25.27%	243	30.04%	2,558	26.44%
25 – 36 months	41	13.67%	49	8.78%	87	10.75%	1,024	10.59%
37 – 60 months	26	8.67%	47	8.42%	65	8.03%	911	9.42%
More than 5 years	2	0.67%	7	1.25%	13	1.61%	415	4.29%
Total SE	300		558		809		9,673	

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

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months	3	1.74%	4	1.52%	3	0.75%	65	1.64%
4 – 6 months	22	12.79%	29	11.03%	52	13.00%	464	11.70%
7 – 9 months	21	12.21%	43	16.35%	42	10.50%	612	15.44%
10 – 12 months	13	7.56%	33	12.55%	44	11.00%	472	11.90%
13 - 24 months	54	31.40%	73	27.76%	133	33.25%	1,134	28.60%
25 – 36 months	36	20.93%	34	12.93%	58	14.50%	549	13.85%
37 – 60 months	22	12.79%	43	16.35%	59	14.75%	526	13.27%
More than 5 years	1	0.58%	4	1.52%	9	2.25%	143	3.61%
Total SE	172		263		400		3,965	

Table 6.1 OH-C VR Resources and Expenditures—FFYs 2014–2016

VR Resources and Expenditures	2014	2015	2016*
Total program expenditures	139,135,959	133,106,615	129,035,360
Federal expenditures	109,500,000	104,754,906	99,293,902
State agency expenditures (4th quarter)	29,635,959	28,351,709	29,741,458
State agency expenditures (latest/final)	29,635,959	28,351,709	29,741,458
Federal formula award amount	127,715,538	128,337,515	129,344,935
MOE penalty from prior year	0	0	1,068,165
Federal award amount relinquished during reallocation	18,215,538	23,582,609	18,386,969
Federal award amount received during reallocation	0	0	0
Federal funds transferred from State VR agency	0	0	0
Federal funds transferred to State VR agency	0	0	0
Federal award amount (net)	109,500,000	104,754,906	109,889,801
Federal award funds deobligated	0	0	0
Federal award funds used	109,500,000	104,754,906	109,889,801
Percent of formula award amount used	85.74%	81.62%	84.96%
Federal award funds matched but not used	(1)	0	(1)

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

Table 6.2 OH-C Non-Federal Share and Maintenance of Effort - FFY 2014-2016

Non-Federal Share (Match) and Maintenance of Effort (MOE)	2014	2015	2016*
Match required per net award amount	29,635,959	28,351,709	29,741,458
Match provided (actual)	29,635,959	28,351,709	29,741,458
Match difference**	0	0	0
Federal funds matched (actual)	109,499,999	104,754,906	109,889,800
Percent Federal funds matched	100.00%	100.00%	100.00%
Match from State appropriation	15,485,574	15,875,695	15,825,539
Percent match from State appropriation	52.25%	56.00%	53.21%
Match from Third-Party Cooperative Arrangements (TPCA)	0	0	0
Percent match from TPCAs	0.00%	0.00%	0.00%
Match from Randolph-Sheppard program	654,255	772,880	937,729
Percent match from Randolph-Sheppard Program	2.21%	2.73%	3.15%
Match from interagency transfers	10,609,863	8,773,953	10,932,939
Percent match from interagency transfers	35.80%	30.95%	36.76%
Match from other sources	2,886,267	2,929,181	2,045,251
Percent match from other sources	9.74%	10.33%	6.88%
MOE required	25,753,378	29,419,874	29,635,959
MOE: Establishment/construction expenditures	0	0	0
MOE actual	29,635,959	28,351,709	29,741,458
MOE difference**	(3,882,581)	1,068,165	(105,499)

* 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 6.3 OH-C Program Income and Carryover - FFY 2014-2016

Program Income and Carryover	2014	2015	2016*
Program income received	7,507,986	10,167,034	8,568,597
Program income disbursed	7,507,986	10,167,034	8,568,597
Program income transferred	4,965,888	3,205,642	3,279,142
Program income used for VR program	2,542,098	6,961,392	5,289,455
Federal grant amount matched	109,499,999	104,754,906	109,889,800
Federal expenditures and unobligated funds 9/30	53,651,574	44,083,026	43,167,211
Carryover amount	37,646,483	44,114,935	52,114,612
Carryover as percent of award	34.38%	42.11%	47.42%

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

Table 6.4 OH-C RSA-2 Expenditures - FFY 2014-2016

RSA-2 Expenditures	2014	2015	2016*
Total expenditures	142,867,220	136,850,435	139,575,386
Administrative costs	33,410,077	28,121,699	29,437,001
Administration as Percent expenditures	23.39%	20.55%	21.09%
Purchased services expenditures	78,906,550	77,145,423	75,440,361
Purchased services as a Percent expenditure	55.23%	56.37%	54.05%
Services to groups	4,179,518	3,964,489	3,595,052
Services to groups percentage	2.93%	2.90%	2.58%

Table 6.5 OH-C SSA Clearance against Reported Program Income

RSA-2 Expenditures	2014	2015	2016*
Program Income Received - Q4	7,507,986	10,167,034	8,568,597
Program Income Received - Final	7,507,986	10,167,034	8,568,597
Change in Program Income after Q4	0	0	0
SSA Clearance Report Amount	Not Available	9,744,499	11,229,223
Difference between SSA and Q4	Not Available	(422,535)	2,660,626
Difference between SSA and Final	Not Available	(422,535)	2,660,626

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	29	1	97%	3%
Date of Eligibility Determination	28	2	93%	7%
Date of IPE	30	0	100%	0
Start Date of Employment in Primary Occupation at Exit or Closure	19	0	100%	0
Weekly Earnings at Exit or Closure	19	0	100%	0
Employment Status at Exit or Closure	19	0	100%	0
Type of Exit or Closure	30	0	100%	0
Date of Exit or Closure	29	1	97%	3%

Summary	Number (of 30)	Percent (of 30)
Files with all required documentation	26	87%
Files with documentation for four or more data elements examined	19	63%
Files with no required documentation	0	0
Files with all required documentation	26	87%
Files with documentation for four or more data elements examined	19	63%
Files with no required documentation	0	0

APPENDIX C: AGENCY RESPONSE

A. Overview

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

B. Agency Responses

RECOMMENDATIONS

2.1 Quality of Employment Outcomes

- 2.1.1 Develop strategies to identify barriers and opportunities to expand training and career services for adults and youth; and
- 2.1.2 Evaluate whether the training and career services provided adequately promote the maximization of employment outcomes.

Agency Response:

OOD believes that the number of individuals who have received training services, in particular post-secondary education, may have been under-reported in the RSA 911. Situations in which the individual receives training services through comparable benefits may not be accounted for as they are not being paid for by OOD, but rather by PELL Grants or other aid programs. With AWARE version 6.4, which is due to be installed in June of 2018, the case management system will have simplified screens that will allow staff to capture all services an individual is receiving, whether the agency is paying for them or they are being obtained by a comparable benefit. This will be in line with 911 expectations and will more accurately capture the scope of individuals taking part in training and post-secondary programs.

Technical Assistance: OOD does not request technical assistance.

3.1 Individuals Under the Age of 25 Exiting the VR System

- 3.1.1 Conduct surveys or cold-calls to identify the barriers or factors related to the exit of youth with disabilities without employment after eligibility and before an IPE;
- 3.1.2 Engage students and youth in the group transition process as described in section 103(b)(7) of the Rehabilitation Act and 34 CFR §361.49(a)(7); and
- 3.1.3 Continue to distribute case status reports to VR counselors and other CRPs to improve agency performance in the elapsed time from application to eligibility determination for individuals with disabilities under age 25 at exit (0-60 day standard) and the elapsed time from eligibility determination to IPE development for individuals with disabilities under age 25 at exit (90-day standard).

Agency Response:

OOD's goal is to maintain engagement with students (and adults) with disabilities throughout all aspects of the VR process. OOD will continue our partnership with the Ohio Department of Education and local school districts to support the engagement of students and families.

OOD would like to point out that while the percentage of individuals who exit the program after eligibility but before an IPE is higher than the national average, the number of individuals who exit the program after the IPE is signed but before services have begun is significantly lower than the national average (6.62% vs. 19%). OOD also has a significantly lower percentage of individuals leave the program as an applicant than the national average (6.66% vs. 12.49%). These numbers show that once an individual has signed their IPE and committed to their vocational goal, OOD is doing a good job of keeping these individuals engaged throughout the process.

Technical Assistance: OOD does not request technical assistance.

3.2 Employment Rate for Youth with Disabilities under Age 25

- 3.2.1 Identify and assess barriers to increase the employment rate for youth, particularly those with visual, auditory and communicative, physical, intellectual and learning, psychosocial and psychological disabilities, and develop strategies to improve performance in this area;
- 3.2.2 Develop and implement a plan to enhance VR counselor skills to assist youth with the aforementioned disabilities; and
- 3.2.3 Identify strategies to increase training and other services, including postsecondary education, to improve employment outcomes among underrepresented groups of youth with disabilities.

Agency Response:

OOD's goal is to maintain engagement with students (and adults) with disabilities throughout all aspects of the VR process. OOD will continue our partnership with the Ohio Department of Education and local school districts to support the engagement of students and families.

OOD has implemented several strategies to increase the overall employment rate for students with disabilities, including the employment rate for specific disability populations. OOD's transition services, including services provided under the Ohio Transition Support Partnership have successfully engaged an increasing number of students with disabilities beginning at age 14. This program model, along with the availability of Pre-Employment Transition Services, is designed to increase outcomes for students. As students served under this model exit from school, they will be able to take advantage of OOD's enhanced business relations strategies to ensure that they achieve their employment outcomes.

Technical Assistance: OOD does not request technical assistance.

CORRECTIVE ACTIONS TO IMPROVE PERFORMANCE

2.1 Eligibility Determination

Corrective Action Steps: RSA requires that OOD:

- 2.1.1 Comply with 34 CFR §361.41(b)(1) by making eligibility determinations within the required 60-day period;
- 2.1.2 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; and
- 2.1.3 Develop procedures for VR counselors and supervisors to track and monitor timely and untimely eligibility determinations.

Agency Response:

It is important to note, as RSA points out on page 12 of this report, that federal regulations allow for an agreed upon time extension to the 60-day requirement when "exceptional and unforeseen circumstances beyond the control of the designated State unit preclude making an eligibility determination within 60 days unless the designated State unit and the individual agree to a specific extension of time".

OOD has long recognized the importance of timely services to individuals with disabilities served by the Vocational Rehabilitation (VR) program. In December of 2011, OOD held a Lean 6 Sigma Kaizen event to specifically address the time to eligibility, significantly streamlining the process and dramatically reducing the time to eligibility. OOD established a goal at that time to average 30 days from application to eligibility, which was achieved in FFY 2016.

OOD has continued to increase the percentage of eligibility decisions made within 60 days in each of the last 3 years. In FFY 2015, 17,887 eligibility decisions were made with 86.4% of those completed in under 60 days. In FFY 2016, that number was 19,443 decisions with 94.1% completed in under 60 days. For FFY 2017, 18,543 eligibility decisions were made with 96.1% completed in under 60 days. It should be noted that these numbers are based on eligibility decisions made in that federal fiscal year, not on the cases closed in that federal fiscal year. In

situations where the eligibility is not completed within the 60- day time frame, time extensions are agreed upon with the individual and documented in the case record.

OOD has implemented several strategies in order to ensure that eligibility decisions for adults and youth are made timely. AWARE, OOD's case management system, creates an "Activity Due" as a reminder to the VRCs that an eligibility decision is needed. This "Activity Due" is created 30 days from the date of the application. Supervisors review a monthly staffing report that identifies the number of cases on individual VRCs caseloads that are greater than 30 days from the application date and are still in need of an eligibility decision. These cases are reviewed and discussed with the VRC at a monthly meeting to ensure timely actions are being taken and/or to discuss next steps.

Technical Assistance: OOD does not request technical assistance.

2.2 Development of IPEs Not Meeting the 90-Day Time Standard

Corrective Action Steps: RSA requires that OOD:

- 2.2.1 Comply with 34 CFR §361.45(a)(1) and (e) to ensure IPEs are developed within the 90-day Federal time frame from date of application;
- 2.2.2 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
- 2.2.3 Develop goals and strategies to improve VR counselor performance specific to timely IPE development.

Agency Response:

It is important to note, as RSA points out on page 13 of this report, that federal regulations allow for an agreed upon time extension to the 90-day requirement if "the State unit and the eligible individual agree to the extension of that deadline to a specific date by which the individualized plan for employment must be completed".

Similar to results achieved to reduce the time from application to eligibility, OOD has increased the percentage of IPEs completed within the 90 days in each of the last 3 years. In FFY 2015, 12,902 plans were signed with 63.3% of those completed within 90 days. In FFY 2016, 14,104 plans were signed with 73.9% completed within 90 days. For FFY 2017, 13,491 plans were signed with 76.0% of completed within 90 days. It should be noted that these numbers are based on plans completed within that federal fiscal year, not on the cases closed in that federal fiscal year. In situations where the IPE is not developed within the 90-day time frame, time extensions are agreed upon with the individual and documented in the case record.

OOD has implemented several strategies to ensure that IPEs for adults and youth are developed timely. AWARE, OOD's case management system, creates an "Activity Due" as a reminder to the VRCs that an IPE needs to be completed. This "Activity Due" is created 45 days from the eligibility date. Supervisors review a monthly staffing report that identifies the number of cases

on individual VRCs caseloads that are greater than 90 days from the eligibility date that do not have an agreed upon time extension and still need a plan completed. These cases are reviewed and discussed with the VRC at a monthly meeting to ensure timely actions are being taken and/or to discuss next steps.

Technical Assistance: OOD does not request technical assistance.

3.1 Availability of Pre-Employment Transition Services to Potentially Eligible Students with Disabilities

Corrective Action Steps: RSA requires that OOD:

- 3.1.1 Ensure that the agency will comply with 34 CFR §361.48(a)(1), which clarifies that all students with disabilities, regardless of whether or not they have applied or been determined eligible for the VR program, are potentially eligible to receive pre-employment transition services; and
- 3.1.2 Submit the actions that the agency will implement, including timelines, to ensure that its case management system has the ability to track those students who are potentially eligible, pursuant to section 113(a) of the Rehabilitation Act and 34 CFR §361.48(a)(1).

Agency Response:

As mentioned in Section 3 of this report, at the time of the monitoring visit, OOD was in the final stages of making Pre-Employment Transition Services available to potentially eligible students with disabilities. The following measures were put in place as of October 1, 2017:

- A potentially eligible case type was created in AWARE so pre-employment transition services can be authorized to potentially eligible students and data can be collected to comply with RSA 911 reporting requirements;
- A draft pre-employment transition services procedure was put in place to be piloted effective October 1, 2017. In March 2018, the draft procedure was updated and began the agency policy approval process;
- Contracts were put in place with various local partners for the provision of pre-employment transition services; and
- Information about available pre-employment transition services, including how to access them, was communicated to schools and the public and posted on OOD's website.

Technical Assistance: OOD does not request technical assistance.

5.1 Prior Approval Requirements Not Met

Corrective Action Step: RSA requires that OOD:

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

Agency Response:

OOD has developed, created and published a comprehensive Federal Prior Approval submission packet. This packet was vetted through our RSA contacts and was ostensibly approved for use.

OOD used this packet to complete a FFY 2018 submission containing five line items referencing various CFR sections. OOD received approval for 60% of the line items on January 16, 2018. The remaining requests are still under review by RSA as of March 29, 2018.

OOD's internal agency process requires these submissions and requests be funneled through the Division of Finance. Subsequently, the Division of Finance has adjusted its project checklist to include a "Request & Obtain Federal Prior Approval" task that is initiated upon completion of an internal cost projection.

OOD will continue to adjust internal processes as additional guidance is received from RSA. Upon receipt of final guidance, OOD will formalize an Agency Policy to ensure it aligns with RSA's requirements—this policy will include a monitoring component.

Technical Assistance: OOD does not request technical assistance.

5. Inaccurate Financial Reporting

Corrective Action Steps: RSA requires that OOD:

- 5.2.1 Revise the affected SF-425 financial reports (namely, H126A170052 – an interim report for reporting period ending 03/31/2017; H126A160052 – all interim reports; H126A150052 – final; and H126A140052 – final) to correct identified reporting errors; and
- 5.2.2 Implement internal controls to ensure that OOD accurately reports its approved indirect cost rate; and applicable credits are properly processed.

Agency Response:

Indirect Costs & Program Income – On 1/18/2018, OOD resubmitted and RSA has marked "Complete" the following SF-425 financial reports: H126A170052, H126A160052, H126A150052 and H126A140052, adjusting the amounts reported for program income and indirect costs. OOD will also change the methodology for reporting these items in the future based on RSA's direction.

Line 11 Indirect Costs – Policy Directive RSA-PD-15-05 states on page 12,

"11b. Rate:

Enter the approved indirect cost rate(s) in effect during the reporting period. For CAPs only, enter 100 percent of the costs attributable to this award."

OOD has a U.S. Department of Education approved indirect cost rate and not a CAP. Since the policy directive states that only CAPs are to report costs attributable to the award, OOD made the assumption that agencies with an indirect cost rate were to report the amount of labor along

with the corresponding approved indirect costs for the specific fiscal year of the grant. During RSA's recent visit, OOD learned that RSA's interpretation of the directive is to report the amount of labor and indirect costs incurred during the time period of expenditures of the grant funds, including the carry-over year while previous year grant funds are being drawn and expended.

Based on actual state accounting data already being used to complete our SF-425 reports, OOD will report indirect costs attributable to that award. So, if OOD begins drawing funds on the current year's grant in January, then OOD will report labor and indirect costs starting then rather than October 1st. Likewise, if OOD's last draw on the prior year grant occurred in December, then we will report on Line 11 the labor and indirect costs through that time period.

OOD asserts that there are excellent internal controls in place and reporting was based on actual state accounting data and our understanding of the Policy Directive. The issues raised by RSA are related to interpretation of RSA-PD-15-05 and timing. At no time did OOD fail to report any amount of indirect cost applied.

Technical Assistance: OOD does not request technical assistance.

RSA Response:

RSA appreciates the response provided by OOD regarding the reporting of indirect costs. As clarification, the indirect costs reported on the SF-425 include all indirect costs charged to the award during the period of performance. This includes the carryover year for the award, if applicable.

There are several references in RSA-PD-15-05 that support RSA's position that the SF-425 financial data to be reported is only for a single grant award and include the entire period of performance for the award. The instructions on page 7 state that "While the SF-425 report is designed for single grant and multiple grant award reporting, the U.S. Department of Education's (Department's) policy is that multiple grant award reporting is not permitted for Department grants." The SF-425 includes a single grant award number (Line 2) for which reporting is required, the award period beginning and end dates (Line 8), and the reporting period end date (Line 9).

RSA maintains this component of finding 5.2 without change.