

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



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

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SECTION 1: EXECUTIVE SUMMARY

A. Background

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

Through its monitoring of the State Vocational Rehabilitation Services program (VR program) and State Supported Employment Services program (Supported Employment program) administered by the Tennessee Division of Rehabilitation Services (TDRS), 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 State Vocational Rehabilitation Services and State Supported Employment Services 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 August 21 through 24, 2017, is described in detail in the Federal [FY 2017 Vocational Rehabilitation Program Monitoring and Technical Assistance Guide](#).

B. Summary of Observations and Findings

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

Observations:

- TDRS experienced a significant decline in the number of applications received over the three years reviewed, FFY 2014 to FFY 2016, with a total decline in applications of 1,950;
- From FFY 2014 through FFY 2016, over 40 percent of all individuals determined eligible for VR services exited the VR program without employment outcomes, before an individualized plan for employment (IPE) was signed or before receiving services;
- A number of key VR services are either not being provided or are not properly recorded in TRIMS, and therefore are not captured by required reporting on the RSA-911;
- TDRS' service records reviewed do not contain all proper documentation for purposes of maintaining appropriate internal controls;
- The percentage of youth under age 25 at exit who do not achieve employment is higher than the national performance for combined agencies, and of those youth under age 25 at exit who do find employment, their wages are relatively low; and
- Despite the higher percentage of employment outcomes in supported employment achieved by TDRS during the review period, the quality of employment outcomes in supported employment fell below the national performance for combined agencies in terms of wages earned and hours worked.

Findings:

- TDRS did not determine the eligibility for all individuals whose service records were closed in FFY 2014 through FFY 2016 within the required 60-day Federal time frame from the date of application, pursuant to 34 CFR §361.41(b)(1);
- TDRS did not develop IPEs within the 90-day time standard for nearly half of all individuals determined eligible for services in accordance with Section 101(a)(9)(A) of the Rehabilitation Act and 34 CFR §361.45(e); and
- TDRS is not adhering to prior approval requirements in accordance with 2 CFR §200.407.

C. Summary of Technical Assistance

During the review process, RSA:

- Provided technical assistance on RSA-911 reporting, particularly with respect to referral sources and the provision of VR services;
- Clarified the requirements regarding the continuation of Pre-Employment Transition Services Under an order of selection (OOS);

- Clarified the requirements for the State educational agency (SEA) agreement;
- Discussed the State VR agency's ability to charge travel costs to the funds reserved for the provision of pre-employment transition services;
- Clarified that authorized activities, as described in section 113(c) of the Rehabilitation Act, and 34 CFR §361.48(a)(3), must support the provision of or arrangement for the required activities under section 113(b) of the Rehabilitation Act;
- Clarified that pre-employment transition coordination activities listed in section 113(d) of the Rehabilitation Act and 34 CFR §361.48(a)(4) are necessary for the provision of required activities to students with disabilities;
- Reviewed requirements of the Supported Employment program under 34 CFR part 363 and revisions to TDRS policies and procedures, including the extension of the allowable timeframe for the provision of supported employment services, competitive integrated employment, customized employment, short-term basis, and extended services for youth with the most significant disabilities;
- Provided technical assistance on using new fiscal capacities as a tool to enhance fiscal and programmatic planning, third-party cooperative arrangement (TPCA) requirements, prior approval, and interagency agreements.

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

- How the VR agency will measure Effectiveness in Serving Employers, and the methods the core programs will use to measure Effectiveness in Serving Employers, one of the six primary performance accountability measures;
- How the agency will coordinate services and partner with other core programs to ensure effective service delivery and avoid duplication of workforce development services;
- How to establish a data sharing agreement across the six core partners;
- The completion of MOUs and infrastructure agreements within the local workforce development areas.

D. Review Team Participants

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

E. Acknowledgements

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

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

A. Nature and Scope

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

In addition to a review of the RSA-911 and RSA-113 data provided by the VR agency, RSA conducted a review of individual 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 TDRS and the method it uses to maintain records. RSA used the information obtained through the review of service records to assess TDRS' 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 TDRS' performance during FFYs 2014, 2015, and 2016, with particular attention given to the number and quality of outcomes achieved by individuals with disabilities in the State. Additionally, the review addressed the number of individuals who were determined eligible for VR services, who were placed on a waiting list due to implementation of an Order of Selection (OOS), and who received services through the VR program. The data used in this review were provided by TDRS to RSA on the Quarterly Cumulative Caseload Report (RSA-113) and the Case Service Report (RSA-911).

The VR Process

TDRS experienced a significant decline in the number of applications from FFY 2014 to FFY 2016, from 8,355 to 6,405, respectively. TDRS stated that this decline indicates the need to raise greater awareness of the VR program and to combat concerns about loss of benefits as a consequence of returning to work. TDRS also indicated that it needs to conduct a more thorough analysis of the problem.

Similarly, the number of individuals determined eligible dropped from 10,971 to 7,276 from FFY 2014 to FFY 2016. The number of individuals accepted for services who received no services remained constant at 42 percent, nearly double the national performance of 23 percent for combined agencies. Although fewer individuals entered the VR program as applicants, were determined eligible, or received services, the number of individuals in plan receiving services declined much less noticeably from 12,397 to 11,292 from FFY 2014 to FFY 2016.

An OOS was in place over the course of the three years under review, but the number of individuals on the waiting list remained static at precisely 234, as two of the three categories remained open. The agency did not indicate that the OOS had an impact on its service rate or the flow of individuals into the system.

Employment Outcomes

The number of individuals who exited the program with employment remained consistent over the three years reviewed, at 2,159 in FFY 2014, rising to 2,358 in FFY 2015, and dropping back to 2,130 in FFY 2016. Despite the slight decline in the total number of employment outcomes, the percentage who exited with employment of all those exiting the program increased from 23.5 percent to 29.3 percent, closer to the national performance of combined agencies of 34.6 percent in FFY 2016. At the same time, the number of individuals who exited without an employment outcome, after receiving services, was 1,555 in FFY 2014, 2,011 in FFY 2015, and 1,518 in FFY 2016. This resulted in the employment rate remaining relatively steady at 58 percent at the beginning and the end of the three-year period, with a decrease to 54 percent in FFY 2015.

The percentage of those achieving a competitive employment outcome increased from 91.4 percent to 94.7 percent over the three fiscal years reviewed, but remained just below the national performance for combined agencies of 95.2 percent. TDRS noted that it is continuing to focus greater attention on competitive integrated employment, and is working to place all individuals in competitive employment. TDRS indicated it is actively engaged in the process of determining the integrated nature of employment sites, using tools provided by the preamble to the VR program regulations.

Average hourly earnings rose only slightly from FFY 2014 to FFY 2016, from \$9.89 to \$10.27, \$1.57 less than the national performance of \$11.84 for combined agencies in FFY 2016. The state minimum wage for Tennessee is \$7.25, the same as the Federal minimum wage. The average hours worked per week for those with competitive employment rose just slightly from 28.4 to 29.2 over the three-year period reviewed, compared to the national performance for combined agencies of 30.3. The median hours worked was exactly 30 in each of the three years, which TDRS verified as accurate during the on-site visit. The median quarterly earnings for individuals served by TDRS were \$3,471 in FFY 2016, while median quarterly earnings for combined agencies in FFY 2016 were \$3,900, a \$429 difference.

VR Services Provided

TDRS' performance is consistent with the national performance for combined agencies with respect to the provision of college or university training - graduate school support - at 1.5 percent, or 57 individuals, in FFY 2014, decreasing to 1.1 percent, or 39 individuals, in FFY 2016. Four-year university training is more widely provided, with 299 individuals, or 8.1 percent, receiving this service in FFY 2014, 390 individuals, or 8.9 percent, in FFY 2015, and 370 individuals, or 10.1 percent, in FFY 2016. The national performance for combined agencies for this service was 8.8 percent in FFY 2016. TDRS' performance was also comparable to the national performance for combined agencies for its support of individuals attending junior or community colleges. In addition, academic and remedial training was provided to 170 individuals in FFY 2016, or 4.7 percent. While this is a relatively small number of individuals, it is well above the national performance for combined agencies of 1.6 percent of individuals served that year.

The provision of on-the-job training declined substantially from FFY 2014 to FFY 2016, from 898 individuals, or 24.2 percent, to 354 individuals, or 9.7 percent. This is still well above the national performance for combined agencies of 1.9 percent. Some VR counselors may report certain services only when provided as a purchased service and may not report them when provided in-house by VR counselors or other TDRS staff. This reporting issue was a common occurrence across a number of

services, such as counseling and guidance and information and referral. For example, TDRS reported that only 2.4 percent of individuals received VR counseling and guidance in FY 2016, while the national performance for this service was 64.4 percent. It is likely that far more individuals received counseling and guidance directly from TDRS staff, but this is not reflected in the RSA-911 report. Job search assistance rose from 33.1 percent in FFY 2014 to 46.5 percent in FFY 2016, compared to 33.2 percent nationally for combined agencies, and job placement assistance stayed consistent at 7 percent across the three years, compared to 29.8 percent nationally for combined agencies. It is likely that the relatively low percentages of individuals receiving job placement is due to reporting confusion as noted above. By contrast, TDRS provided on the job supports to nearly double the percentage of individuals, with 13 percent receiving this service in FFY 2016 compared to 7.8 percent for all combined agencies.

TDRS provided benefits counseling to only 11 individuals, or 0.3 percent, in FFY 2016, while the national performance for combined agencies was 5.9 percent.

Transportation and maintenance were two commonly provided services across the three years reviewed. Almost half of all individuals served by TDRS received transportation services – with 47.9, 49.4, and 45.7 percent in FFY 2014, FFY 2015, and FFY 2016, respectively – compared to 34.5 percent nationally; while 34.3, 38.5, and 32.2 percent, respectively, received maintenance, compared to 21.7 percent for all combined agencies.

TDRS provided rehabilitation technology, reader and interpreter services, personal attendant care, and technical assistance at consistent levels over the three years reviewed, and in line with national averages, evincing no clear trends or performance concerns.

Select Measures for All Individuals Served by Disability

TDRS is comparable to other combined agencies in terms of the percentages of individuals who achieve outcomes when disaggregated by impairment type. Sensory disabilities are relatively well represented, possibly reflecting TDRS' special services division for individuals with sensory disabilities.

The employment rate for individuals with visual disabilities fluctuated noticeably from 72.7 percent in FFY 2014, to 78.2 percent in FFY 2015, and back down to 63.8 percent in FFY 2016, close to the national performance of 64.7 percent. Individuals with auditory disabilities saw more consistently high rates of employment, with the rate rising from 68.8 percent in FFY 2014, to 80.9 percent in FFY 2016, just above the national performance in that year of 76.7 percent. Individuals with physical disabilities did not fare as well, with an employment rate ranging from 51.3 to 42.9, to 48.6 percent across the three years reviewed. The employment rate for individuals with intellectual disabilities dropped from 63 percent in FFY 2014, to 57 percent in FFY 2015, and back up to 65 percent in FFY 2016. The employment rate for individuals with psychosocial disabilities was fairly consistent at 54, 51, and 51 percent in FFYs 2014, 2015, and 2016. No clear trends emerge in these measures apart from the consistently higher performance for individuals with sensory disabilities.

Length of Time in Stages of the VR Process

TDRS improved its performance from FFY 2014 to FFY 2016 in the percentage of individuals who received an eligibility determination within the required 60 days from application. In FFY 2014, 76.3 percent, or 6,422 individuals, were determined eligible within 60 days; this increased to 84.8 percent in FFY 2015, or 6,561 individuals, and to 87.8 percent, or 5,909 individuals, in FFY 2016. This was appreciably above the 82.6 percent performance for this measure nationally. Improvement in this performance measure may be due in part to the drop in applications observed during the same period of time reviewed. TDRS also indicated that it was monitoring performance on this requirement much more closely through its internal quality assurance processes.

TDRS' performance in timeliness from eligibility to IPE development did not change over the three years from FFY 2014 to FFY 2016. In FFY 2014, 1,982 individuals, or 53.4 percent, had an IPE developed within the required 90 days following eligibility determination. In FFY 2015, the percentage dropped slightly to 52.7 percent, or 2,301 individuals, and rose again to 53.8 percent, or 1,962 individuals, in FFY 2016. This is substantially below the national performance of 75 percent for combined agencies in FFY 2016. The 90-day requirement was established with the passage of WIOA in July of 2014. TDRS changed its IPE development policy in FFY 2016 to meet the requirements of WIOA.

The time from IPE to closure has remained fairly constant over the three years from FFY 2014 to FFY 2016, with approximately one third of all individuals exiting within the first 12 months. The percentage of individuals who exited between 13 and 24 months rose from 20.6 percent in FFY 2014 to 26.9 percent in FFY 2016, compared to 25.6 percent nationally for that year. Over the same three years, however, the percentage of those who exited after five years dropped from 21 to 15 percent, or 791 to 556 individuals. TDRS noted it was working hard to identify reasons for individuals not making progress in their plans, with particular focus on those pursuing postsecondary education as part of their training.

Standard Occupational Codes for Individuals Who Achieved Employment Outcomes

SOC codes show that TDRS placed from 12 to 14 percent of individuals in building and grounds cleaning and maintenance occupations; 13 percent achieved employment in food and serving related occupations; 18 to 20 percent found work in office and administrative assistance positions, which was the largest category of outcomes; while transportation, sales, production, and personal care occupations made up most of the rest of the outcomes. There were no trends in any particular direction as outcomes were consistent across the three years reviewed in terms of the categories.

Internal Controls

During the on-site monitoring review with TDRS, RSA conducted a review of 30 service records comprised of service records for individuals who did and did not achieve employment by September 30, 2016 to verify and ensure that the documentation in the case service record was accurate, complete and supported the data entered into the RSA-911 with respect to the following: date of application, the date of eligibility determination, date of IPE, start date of employment in primary occupation, employment status at closure, weekly earnings at employment, type of closure, and date of closure.

Additionally, TDRS provided policies and procedures regarding the case service record (RSA-911) internal control process to ensure data accuracy, reliability, and timely submission. These policies and procedures included the following documents:

1. Disaster Recovery Plan for the Tennessee Rehabilitation Information Management System (TRIMS);
2. Help Desk Instructions for Correcting RSA Info;
3. Knowledge Retention Plan 911 Edit Checker; and
4. IPE instructions to VR counselors.

TDRS uses an electronic case management system to maintain a service record for each applicant and eligible individual, as required under 34 CFR §361.47, and no longer maintains paper documents. Some of the case records contained scanned documents, while two cases still had associated paper folders that contained older documents.

Of the 30 service records reviewed, 24 or 80% of records reviewed included the correct date of application, while 21 or 70% included the correct IPE date. Also, 27 or 90% of the service records reviewed included the correct start date of employment, as well as verification of the start date of employment in the primary occupation. Lastly, 26 or 86.6% of the service records reviewed included verification of weekly earnings at employment, and 24 or 80% of the service records correctly generated closure letters.

C. Analysis of Performance and Observations

RSA's review and analysis of the performance of TDRS in this focus area resulted in the following observations. See section B above for data referenced in the observations below. The recommendations to improve TDRS' performance related to the observations are in section D of this focus area.

2.1 Referrals and Applications

Observation: TDRS experienced a significant decline in the number of applications received over the three years reviewed, FFY 2014 to FFY 2016, with a total decline in applications of 1,950. TDRS attributed this to the need to raise greater awareness of the VR program, and to combat concerns about loss of benefits as a consequence of returning to work. TDRS also noted during the review that it needs to conduct a more thorough analysis of the problem, particularly with respect to referral sources.

At the time of this review, TDRS did not include referral sources as part of its internal quality assurance protocols, and has not analyzed its internal data at the state, local, or regional levels to determine the distribution of referral sources, or the quality of those referrals with respect to eligibility determinations, and to better identify those who are more likely to continue with the program.

This may in part explain the drop in the number of individuals determined eligible for VR services by 3,695 from FFY 2014 to FFY 2016, and the 42 percent of individuals who are accepted for services, but receive no services. The fact that the decline in the number of individuals who had an IPE and were receiving services declined by only 1,105 indicates that once in a plan, individuals are less likely to drop out of the VR program.

2.2 Attrition

Observation: From FFY 2014 through FFY 2016, over 40 percent of all individuals determined eligible for VR services exited the VR program without employment outcomes, before an IPE was signed or before receiving services. As a result, fewer individuals in need of, and eligible for, VR services received necessary services or achieved employment.

The decline in applications along with the decline in eligibility determinations and the numbers leaving the VR program before receiving services indicates that TDRS needs to increase both the scope and the quality of its outreach to the community to ensure it is receiving more applicants who are good candidates for VR services.

2.3 Reporting of services

Observation: A number of key VR services are either not being provided or are not properly recorded in TRIMS, and therefore are not captured by required reporting on the RSA-911. As noted above, TDRS reports providing little to no counseling and guidance, information and referral, benefits counseling, job readiness, or job placement services. Similarly, it reports a significant decline in the provision of on-the-job training and assessment services. It is likely that these key VR services are being provided in-house, but are not being captured either in the service records or case management system, and hence are not being reported on the RSA 911.

By contrast, services such as job search assistance rose from 33 to 47 percent over the three years reviewed. Other services such as transportation and maintenance remain widely provided as well. These services are more likely purchased services and therefore are included in the service records and reported on the RSA-911.

2.4 Internal Controls

Observation: TDRS' service records reviewed do not contain all proper documentation for purposes of maintaining appropriate internal controls. As noted above, some service records did not include the correct dates at application or IPE in that the signature dates of the applicant or eligible individual did not match what was recorded in the electronic system. In some instances, the signature dates of the VR counselor or the applicant or eligible individual listed on signed forms did not match the signature dates recorded in the electronic system because internal controls were not used (i.e., a supervisor was required to sign off on a new counselor's work before dates were entered in the electronic system). It is important to note that the TRIMS system should be able to backdate when this situation occurs in order to ensure data integrity; however, policies and procedures for this situation were not found when reviewing the applicable documents listed above.

Lastly, when asked about extensions to the 90-day requirement to develop the IPE after eligibility determination, TDRS reported that the TRIMS case management system provides alerts when IPE development takes longer than 90 days and produces a letter to be sent to individuals for notification and signature.

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 TDRS:

2.1 Referrals and Applications

- 2.1.1 Conduct an analysis as to potential causes for the decline in applications;
- 2.1.2 Develop and implement strategies and procedures, both internal and external, to improve the quality and quantity of referrals to the VR program; and
- 2.1.3 Establish goals and targets to measure progress and effectiveness of new strategies.

2.2 Attrition

- 2.2.1 Conduct surveys of individuals who exit the VR program after eligibility is determined but before IPEs are developed to determine the reasons why these individuals are withdrawing from the program;
- 2.2.2 Based on the information obtained through this survey, develop goals with measurable targets to decrease the number of individuals exiting the VR program at this stage of the process and strategies to achieve these goals; and
- 2.2.3 Assess barriers and challenges to timely IPE development and provide staff training to address barriers.

2.3 Reporting of Services

- 2.3.1 Expand written internal control policies and procedures for the accuracy and validity of data reported through the RSA-911, specifically for services provided;
- 2.3.2 Develop a quality assurance process for determining if services are being reported accurately and take appropriate measures to ensure proper reporting of services whether they are provided in-house, or purchased; and
- 2.3.3 Ensure that all individuals determined eligible receive the VR services needed to achieve their vocational goal.

2.4 Internal Controls

- 2.4.1 Evaluate whether the TRIMS case management system is able to backdate so that the signature dates of the applicant or eligible individual match what is recorded in the electronic system;
- 2.4.2 Evaluate and update policy and procedures related to internal controls to ensure data integrity and the proper recording of signature dates in the TRIMS electronic case management system; and
- 2.4.3 Ensure that future electronic case management systems utilize appropriate internal controls in order to maintain data integrity and the proper recording of signature dates.

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 Timely Eligibility Determination

Issue: Is TDRS determining the eligibility of applicants for VR services within the required 60-day Federal time frame from the date of application.

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: As part of the monitoring process, RSA analyzed the length of time it took for TDRS to make eligibility determinations for VR applicants.

Data reported by TDRS on the RSA-911 show that:

- 87.8 percent of all individuals served whose service records were closed in FFY 2016 had an eligibility determination made within the required 60-day period, compared to the national performance of 82.6 percent for combined agencies;
- Of the total number of youth under age 25 at exit served and whose service records were closed in FFY 2016, 85 percent of these individuals had an eligibility determination made within the required 60-day period, compared to the national performance of 81.70 percent for combined agencies;
- Of the total individuals served who achieved supported employment and whose service records were closed in FFY 2016, 92.4 percent had an eligibility determination made within the required 60-day period, compared to the national performance of 85.6 percent for combined agencies.

All of the above examples represent improvement from prior years' performance. For example:

- In FY 2014, 76.3 percent of all individuals served whose service records were closed had an eligibility determination made within the required 60-day period, and for FY 2015, performance was measured at 84.8 percent;
- Of the youth served who were under age 25 at exit, 71 percent of these individuals whose service records were closed in FFY 2014 had an eligibility determination made within the required 60-day period, and in FY 2015, the agency's performance increased to 82.2 percent; and

- Of the individuals served who achieved supported employment and whose service records were closed in FFY 2014, 81 percent had an eligibility determination made within the required 60-day period, and in FY 2015, 93.1 percent met this standard.

During the on-site monitoring visit, TDRS reported that it identified timely eligibility determinations as a performance priority and shared its procedures for reviewing VR counselor determinations to ensure the quality and accuracy of VR counselor determinations. The actions the agency took undoubtedly led to its improved compliance with the 60-day eligibility standard.

Conclusion: As demonstrated by performance data, TDRS did not make eligibility determinations within the required 60-day period for all individuals whose service records were closed in FFY 2016. As a result of the analysis, RSA determined that the agency did not satisfy the eligibility determination requirements in 34 CFR §361.41(b)(1).

Corrective Action Steps:

RSA requires that TDRS:

- 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 Timely Development of the IPE

Issue: Is TDRS developing IPEs within 90 days from the date of eligibility determination for each individual.

Requirement: In accordance with 34 CFR §361.45 (a), the VR services portion of the Unified or Combined State plan must assure that an IPE meeting the requirements of this section and 34 CFR §361.46 is developed and implemented in a timely manner for each individual determined to be eligible for VR services or, if the DSU is operating under an order of selection pursuant to 34 CFR §361.36, for each eligible individual to whom the State unit is able to provide services; and that services will be provided in accordance with the provisions of the IPE. In addition, under 34 CFR §361.45(e), the IPE must be developed as soon as possible, but not later than 90 days after the date of determination of eligibility, unless the State unit and the eligible individual agree to the extension of that deadline to a specific date by which the IPE must be completed.

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

- Only 53.8 percent of all individuals served whose service records were closed in FFY 2016 had an IPE developed within the required 90-day period, compared to the national performance of 75.1 percent for combined agencies;
- Only 55.9 percent of youth under age 25 at exit whose service records were closed in FFY 2016 had an IPE developed within the required 90-day period, compared to the national performance of 75.7 percent for combined agencies; and
- Of the total individuals served who achieved supported employment and whose service records were closed in FFY 2016, only 55.3 percent had an IPE developed within the required 90-day period, compared to the national performance of 79.1 percent for combined agencies.

TDRS' performance in developing IPEs within the 90-day time standard was similar for FFYs 2014 and 2015.

Conclusion: As TDRS' performance data demonstrate, TDRS 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, TDRS 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 TDRS:

- 2.2.1 Comply with 34 CFR §§361.45(a)(1) and (e) to ensure IPEs are developed within the 90-day Federal timeframe from date of eligibility determination;
- 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 TDRS as described below.

- The RSA review team discussed with TDRS the new RSA-911 reporting requirements, and how to incorporate these requirements into its TRIMS as well as quality assurance procedures.

TDRS has not requested additional technical assistance for this focus 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 post-secondary education, vocational training, competitive integrated employment, supported employment, continuing and adult education, adult services, independent living, or community participation.

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

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

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

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

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

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

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

B. Overview

Transition services, including pre-employment transition services, for students and youth with disabilities are coordinated by the Transition School to Work Unit within the VR program. TDRS has two dedicated full-time state positions that coordinate transition services statewide, with one position focused on the provision of the pre-employment transition services and the other serving as liaison with the Tennessee Department of Education (TN DOE), as well as other partners in the interagency agreement, to provide technical assistance and training related to VR services. Both positions reportedly work with VR counselors and supervisory staff to improve access and services for students with disabilities, and also identify, arrange for, or provide training to the VR counselors, educators, students with disabilities and families on a variety of topics related to transition services.

With regard to the provision of pre-employment transition services, TDRS uses the following five different modes of service provision:

1. The VR counselor;
2. The Transition from School to Work (TSW) program;
3. Contracts with community rehabilitation programs (CRPs);
4. Letters of agreement (LOAs) with private vendors; and
5. The Tennessee Rehabilitation Center located in Smyrna, along with 17 other community rehabilitation centers located throughout the State.

A VR counselor is assigned to work with each local educational agency (LEA) to manage referrals, provision of services to potentially eligible students, and eligibility determination and the provision of services to eligible students. VR counselors provide technical assistance to school personnel and LEAs to help them identify appropriate referrals for VR services. In 21 LEAs, the VR counselor is dedicated to the LEA under a Transition from School to Work third-party cooperative arrangement (TPCA). The VR counselor also provides information and referral to students not eligible for VR services.

VR counselors who provide pre-employment transition services keep track of provision of pre-employment transition services by recording time directly into Edison, which is the system of record for the State of Tennessee, on a weekly basis. Time is then certified by an assigned supervisor. Edison has specific codes for VR activities and pre-employment transition services, and has no option for administrative costs. Services are authorized and invoiced from the TRIMS case management system, which also keeps administrative costs separate from pre-employment transition services through safeguards to ensure that only pre-employment transition services are charged to the 15% reserve and to ensure that administrative costs are not charged to the 15% reserve. The TRIMS system reportedly posts nightly to the Edison system.

Continuation of Pre-Employment Transition Services Under an Order of Selection (OOS)

TDRS has been under an OOS since 2001. Currently, TDRS provides direct services to individuals in priority categories one and two. From January 2015 to March 2015, all priority categories were closed but were re-opened in March of 2015, which allowed for the provision of direct services to more students with disabilities. TDRS reported that information and referral services are provided to applicants who are placed on the OOS waiting list.

In regard to the continuation of pre-employment transition services under an OOS, it was noted that the TDRS revised pre-employment transition services policy states that “students who have not been provided pre-employment transition services, who later apply for VR services and are determined to be in a closed priority category, may not be provided pre-employment transition services individually but may be provided pre-employment transition services in a group setting.” It is important to note that students who have not received pre-employment transition services prior to applying for VR services and determined to be in a closed priority category may not receive pre-employment transition services even in a group setting. However, VR agencies may provide group transition services or other available VR services to groups of these students.

Transition from School to Work (TSW) Program

Transition services, including pre-employment transition services, for students and youth with disabilities, may be provided through the TSW program. TDRS has requested a waiver of statewideness in order to maintain thirty TPCAs with thirty-five (LEAs). These TPCAs are designed to provide new and enhanced services to students and youth who have disabilities. In discussions with VR counselors and a representative from TN DOE, it was noted that the TSW is popular within the State and seen as a needed and helpful program. However, some participants stated during these discussions that there are not enough TSW contracts throughout the State or enough VR counselors to effectively work with the TSW program in all schools in the State.

While TDRS provides transition services, to include pre-employment transition services, to all LEAs throughout the State, the TSW program enables the provision of expanded and more intense transition services to students and youth who have disabilities resulting from the inclusion of Transition Case Managers, job coaches, transition coaches, and work place readiness specialists that would not otherwise be available to work with students and youth who have disabilities.

The Federal regulations, which detail the TPCA requirements, in 34 CFR §361.28 were discussed with TDRS staff by using Appendix F, the State Vocational Rehabilitation Services Program Third-Party Cooperative Arrangement Review Instrument. Based on this discussion and a review of other pertinent documents (i.e., TSW contracts, the TDRS policy manual, and the interagency agreement with TN DOE), it appears that TDRS is in compliance with furnishing all or part of the non-Federal share (34 CFR §361.28(a)); providing new or modified services with a VR focus (34 CFR §361.28(a)(1)); providing services only to applicants for, or recipients of, VR services (34 CFR §361.28(a)(2)); applying all requirements of the VR services portion of the Unified or Combined State Plan, including a State's OOS (34 CFR §361.28(a)(4)); and the requirement for a waiver of statewideness (34 CFR §361.28(b)). However, there is no evidence from this discussion or in any of the documents that RSA reviewed that TDRS monitors the TSW programs to ensure compliance with Federal requirements to maintain administrative supervision (34 CFR §361.28(a)(3)). This issue is discussed in more detail in Section 5: Focus Area – Allocation and Expenditure of State Vocational Rehabilitation Services and State Supported Employment Services Program Funds of this monitoring report.

Partnership with TN DOE

A discussion with TDRS, as well as a separate phone call with a representative from the TN DOE, was conducted to discuss collaboration taking place to revise the interagency agreement between TDRS and TN DOE. As of the on-site visit, a draft of the interagency agreement was being finalized and was expected to be implemented in the near future. The draft interagency agreement appears to be in compliance with the requirements in 34 CFR §361.22(b) and reflects that coordination and facilitation is taking place between TDRS and TN DOE. However, even though collaboration is taking place, more work needs to be done to address an apparent gap in information and training among local school staff on pre-employment transition services. For instance, VR counselors during a phone discussion with the team noted that staff at some of the local schools were not informed about pre-employment transition services, which caused more work for the VR counselors who then had to provide education to the local school staff. The representative from the TN DOE noted that even though joint training had taken place around the State, it was only provided at the highest level and did not trickle down to local staff in some instances.

Further, there are no jointly developed policies and procedures specific to the TSW program. Although general guidance on transition services is found in the TDRS procedures manual, the TSW contracts and the revised pre-employment transition services policy, there was no evidence that the VR agency has developed or maintained written policies covering the nature and scope of the TSW program. The fact that there are no written policies for the TSW program or joint trainings taking place for local staff was presented as a possible cause of the information gap related to the provision of pre-employment transition services.

Provision of Required, Authorized, and Pre-Employment Transition Service Activities

When asked if all five of the required pre-employment transition services activities are provided to students with disabilities throughout the State, TDRS reported that the five required activities are provided throughout the State through the five different modes of service provision; however, authorized activities and pre-employment transition coordination are not being procured concurrently. TDRS reported that in an effort to procure these services, potentially eligible students are being identified through data pulled from the TN DOE child count. According to this child count, there are approximately 46,000 students who have disabilities within the State. Additionally, the TDRS revised pre-employment transition services policy covers required activities and pre-employment transition coordination as outlined in 34 CFR §361.48(a)(2) and (3); however, it does not cover authorized activities as outlined in 34 CFR §361.48(a)(4).

C. Analysis of Performance and Observations

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

3.1 Quality of employment outcomes for youth under age 25 at exit

Observation: The percentage of youth under age 25 at exit who do not achieve employment is higher than the national performance for combined agencies, and of those youth under age 25 at exit who do find employment, their wages are relatively low.

In FFY 2016, the employment rate for youth under age 25 at exit is 62.4 percent, which is higher than the national employment rate for youth reported by combined agencies (54.6 percent). Further, the percentages of these youth who achieved competitive employment outcomes consistently went up from FFY 2014 (93.2 percent) to FFY 2016 (96.4 percent), which is slightly lower than the FFY 2016 national performance of combined agencies of 97.6 percent.

On the other hand, data show the percentages for those youth who exited with employment of all youth who exited are: FFY 2014-20.8 percent; FFY 2015-25.8 percent; and FFY 2016-26.9 percent. Although the percentage of youth who exited with employment rose each year, the FFY 2016 percentage (26.9 percent) is still lower than the 2016 performance of 34.1 percent reported by combined agencies.

Data also show that there is a large percentage of youth exiting without employment after eligibility and before IPE development (41.5 percent in FFY 2016) as compared to the national performance of 4.5 percent for combined agencies, indicating that many youth drop out of the VR program before they become successfully employed.

Additionally, although a small percentage of youth under age 25 at exit participated in four-year or university training with the support of TDRS in FFY 2016 (11.7 percent), the percentage has consistently increased over the three-year period (FFY 2014-9.1 percent and FFY 2015-9.4 percent). When asked about the relatively small percentage of youth under age 25 at exit who participated in four-year or university training, TDRS reported that the agency expects the numbers to continue to

trend upward due to the provision of pre-employment transition services and the focus on job exploration counseling and counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education.

Over the three-year period reviewed, the following were the most common SOC codes reported for youth under age 25 at exit: Office and Administrative Support Occupations, Food Preparation and Serving Related Occupations, and Building and Grounds Cleaning and Maintenance. These occupations typically do not require four-year or university training. Finally, two of the SOC codes listed above resulted in the lowest median hourly wages reported for 2016: Food Preparation and Serving Related Occupations-\$7.57 and Building and Grounds Cleaning and Maintenance-\$8.00.

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 TDRS:

3.1 Quality of Employment Outcomes

- 3.1.1 Evaluate the reasons behind the relatively low number of youth under age 25 at exit participating in four-year or university training;
- 3.1.2 Develop and implement strategies to address the focus on pre-employment transition services in order to provide more meaningful opportunities for training and other services necessary for students and youth with disabilities to achieve employment outcomes in a competitive integrated setting; and
- 3.1.3 Evaluate policy and training to staff to ensure data integrity and the proper recording of the number of youth under age 25 at exit who are participating in four-year or university training.

E. Findings and Corrective Actions to Improve Performance

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

F. Technical Assistance

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

- **Continuation of Pre-Employment Transition Services Under an OOS**

The review team noted the need for technical assistance on the continuation of pre-employment transition services under an OOS after reviewing the TDRS revised pre-employment transition services policy concerning this issue; therefore, the following technical assistance is provided: For students who have not received pre-employment transition services and are determined

eligible for the VR program and placed into a closed order of selection priority category, VR agencies may provide general transition services that benefit a group of students with disabilities to ensure the continuation of beneficial services, but may not begin pre-employment transition services. Further, if a student with a disability were receiving pre-employment transition services prior to applying for VR services and being placed in a closed category, he or she may continue to receive pre-employment transition services.

- **Partnership with TN DOE**

RSA provided technical assistance on the partnership with TN DOE since it was noted during separate conversations with TDRS and TN DOE that the two departments are collaborating but more work needs to be done to address an apparent gap in information and training among school staff on pre-employment transition services. This may be due to the fact that there are no developed policies and procedures specific to the TSW program, which is one of the agency's modes of providing pre-employment transition services and is seen as a popular and helpful program by VR counselors and TN DOE staff. Although general guidance on transition services is found in the TDRS procedures manual, the TSW contracts and the revised pre-employment transition services policy, there was no evidence that the VR agency has developed or maintained written policies covering the nature and scope of the TSW program. Providing joint guidance on the TSW program, to include pre-employment transition services, and training to all staff involved in the program may build collaboration and fill the information gap for local staff.

Further, the review team explained that 34 CFR §361.50 states that VR agencies must develop written policies governing the nature and scope of each of the VR services, including pre-employment transition services, and the criteria under which each service is provided. VR agencies are responsible for developing policies, in consultation with the SRC, for determining the need for pre-employment transition services. These policies must include clear and consistent criteria based on the needs of students identified in the comprehensive statewide needs assessment. The policies guide the VR agency, in consultation with school personnel, family members, and students with a disability, in determining which pre-employment transition services each student needs, consistent with his or her interests and informed choice.

TDRS has requested additional technical assistance in the following area:

Provision of Required Activities Concurrently with Authorized and Pre-employment Transition Coordination Activities

TDRS provides the five required activities throughout the State; however, authorized activities and pre-employment transition coordination are not being procured concurrently. The review team encouraged TDRS to revise its policies and procedures to include each of the three types of pre-employment transition service activities.

The review team provided technical assistance on how to derive the estimate provided by the forecasting model to determine the number of potentially eligible students with disabilities throughout the State who might benefit from pre-employment transition services. RSA staff explained that the

analysis should include those authorized and coordination activities that TDRS may already be providing in relation to potentially eligible students that could count toward the 15 percent reserve.

The review team explained that, pursuant to section 113(b) and (d) of the Rehabilitation Act and 34 CFR §361.48(a)(2) and (4), the State must use funds reserved in accordance with section 110(d)(1) of the Rehabilitation Act and 34 CFR §361.65(a)(3) to provide “required” pre-employment transition services and coordination activities related to those pre-employment transition services. If funds remain after the provision of these services, the State may expend remaining reserved funds on those “authorized” pre-employment transition services described in section 113(c) of the Rehabilitation Act and 34 CFR §361.48(a)(3).

Further assistance may be obtained by sending specific questions to RSA or by reaching out to other resources, such as the Workforce Innovation Technical Assistance Center (WINTAC).

SECTION 4: FOCUS AREA – STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM

A. Nature and Scope

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

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

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

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

To facilitate the provision of monitoring and technical assistance activities, and in preparation for the on-site visit, RSA and TDRS 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;
- Cooperative agreements with employers, State agencies, private nonprofit organizations, and other groups that fund extended services;
- Cooperative agreements with supported employment vendors and associated community rehabilitation programs (CRPs);
- Supported employment assurances 5, 6, and 7 and descriptions e, j.1.A, k.2.B, 1.2, n, o, p, and q and any additional information from the VR services portion of the most recently approved Combined State Plan;
- Procedures to limit expenditures on administrative costs to 2.5 percent of the State's supported employment award; and
- Performance data related to the number and percentage of individuals with the most significant disabilities receiving supported employment services and achieving supported employment outcomes.

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

- The VR agency director and other senior managers;
- VR agency counselors;
- VR agency supported employment coordinators and staff; and
- Entities with which the VR agency has arrangements to fund extended services.

B. Overview

TDRS purchases supported employment services for individuals with the most significant disabilities with title I and VI funds. All administrative costs are charged to the VR program grant. Most TDRS VR counselors work with individuals with most significant disabilities, including youth, who require supports on the job to achieve a competitive integrated employment outcome. TDRS does not have specialized VR counselors working only with the Supported Employment program. Services are provided primarily through contracts with community rehabilitation programs (CRPs), some of which are statewide, but most of which are regional or local in scope.

Letters of agreement (LOAs) are standard statewide, and describe the specific supported employment services to be provided. Some vendors under LOAs provide a wide range of services, while others just one supported employment service, such as placement, or job coaching. Revised LOAs incorporate the new definition of competitive integrated employment, and TDRS conducts training and works to raise awareness about new opportunities for individuals with most significant disabilities to achieve competitive integrated employment.

TDRS has interagency agreements with the State mental health and developmental disability (DD) agencies, which also support the provision of supported employment services. TDRS does not have any third-party cooperative arrangements (TPCAs) established for the purpose of delivering supported employment services. The Tennessee rehabilitation centers, (TRCs), and the comprehensive rehabilitation center in Smyrna, both of which are agency funded and operated comprehensive rehabilitation centers, do not provide supported employment services to VR consumers.

TDRS confirmed with the RSA review team that supported employment services begin after job placement and do not include VR services such as job search, development, or placement services. Supported employment services are based on a determination of the needs of an eligible individual, as specified in an IPE. TDRS clarified that job search, development, and placement services are provided using funds from title I of the Rehabilitation Act prior to the provision of supported employment services.

TDRS has updated its supported employment policies to reflect changes in the law and regulations implementing WIOA, but these policies and procedures had not yet been fully implemented at the time of the on-site visit. At the time of the visit, TDRS expected to have the draft policies finalized and implemented in early fall 2017. New policies include extending the provision of supported employment services from 18 to 24 months, and the implementation of non-competitive integrated employment on a short-term basis as well as customized employment, both of which are new services for TDRS. Staff training for the implementation of these new policies was still under development at the time of the on-site visit. New memoranda of understanding (MOUs) will be developed with CRPs for the delivery of supported employment services under the new policies.

Medicaid waivers provide most of the funding for extended services. TDRS does not expect to see this change as a result of the extended services provision under WIOA, and anticipates its mental health and other community partners will continue to provide extended services as they have in the past. TDRS is prepared to provide extended services, however, for youth under 25 when appropriate. Training on the development of the IPE under the new policies for the identification of extended services will be provided to all VR counselors and staff.

In January of 2016, TDRS implemented the Individual Placement Services (IPS) model of supported employment service delivery, but it was not available statewide at the time of the review. TDRS was developing an MOU with the Tennessee mental health agency to expand this program to make IPS more widely available, as it has demonstrated positive results in terms of supported employment outcomes. VR counselors strongly support IPS, and encourage its broader use in the State and with a wider range of disabilities.

C. Analysis of Performance and Observations

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

4.1 Quality of Supported Employment Outcomes

Observation: Despite the higher percentage of employment outcomes in supported employment achieved by TDRS during the review period, the quality of employment outcomes in supported employment fell below the national performance for combined agencies in terms of wages earned and hours worked.

- The number and percentage of supported employment outcomes for TDRS remained relatively constant in FFYs 2014, 2015, and 2016, with 336 individuals (15.5 percent), 377 individuals

(15.9 percent), and 329 individuals (15.4 percent), respectively, exiting in employment with supports. This was just above the national performance of 11 percent for combined agencies in FY 2016;

- The average wage earned by individuals who achieved an employment outcome with supports was \$7.73, \$7.93, and \$8.35 for FFYs 2014, 2015, and 2016, compared to the national performance of \$9.07 for combined agencies in FFY 2016;
- The average number of hours worked per week in FFYs 2014, 2015, and 2016 (18.7, 18.3, and 20.6, respectively), was below the national performance in FFY 2016 of 22.4 average hours worked for combined agencies;
- The number and percentage of individuals achieving a supported employment outcome with earnings that met the Social Security Administration's definition of substantial gainful activity (SGA) improved over the three years, with 12, 13, and 17 percent of individuals meeting SGA in FFYs 2014, 2015, and 2016, respectively. TDRS' performance is below the national performance of 23.5 percent;
- Ten individuals who achieved a competitive supported employment outcome received employer provided medical insurance in FFY 2016, but in terms of the percentage it mirrored the national performance for combined agencies of just over three percent;
- TDRS provided virtually no college, four-year university, junior or community college, apprenticeship, or academic or remedial training to individuals who achieved a supported employment outcome. Occupational or vocational training, however, rose to 4.6 percent in FFY 2016, mirroring the national performance. On the job training dropped from 11 to 2 percent from FFY 2014 to FFY 2016, equivalent to the national performance. Job readiness training remained relatively steady across the three years FFY 2014 to FFY 2016 at 23, 18, and 22 percent, respectively, above the national performance of 19 percent for combined agencies;
- The number and percentage of youth under age 25 at exit who achieved a supported employment outcome declined each year from FFY 2014 to FFY 2016, dropping from 149 to 109 individuals, or 18 to 12.5 percent, bringing TDRS' performance closer to the national performance of just over 13 percent;
- Wages earned by youth under age 25 at exit who achieved a supported employment outcome were similar to TDRS' overall performance on this measure, with an average wage of \$7.72 in FFY 2014, rising to \$8.17 in FFY 2016, just under the national performance of \$8.77 for combined agencies in FFY 2016.
- Average hours worked by youth under age 25 at exit achieving a supported employment outcome rose from 18.2 to 20.7 hours per week, an increase in line with the overall performance on this measure; and
- The percentage of youth under age 25 at exit with a competitive supported employment outcome who achieved SGA rose to 14.7 percent in FFY 2016, although the number of individuals stayed nearly the same at 16 compared to 15 in FFY 2014, reflecting the overall drop in the total number of supported employment outcomes. TDRS' performance on this measure was below the national performance of 20 percent for combined agencies, and far below TDRS' performance of 49 percent for this measure for all outcomes.

D. Recommendations

RSA's review of the performance of TDRS 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 TDRS:

4.1 Quality of Supported Employment Outcomes

4.1.1 Develop measurable goals and strategies to improve the quality of the supported employment outcomes achieved by individuals with disabilities, including the performance as measured by hourly wages earned and hours worked per week.

E. Findings and Corrective Actions to Improve Performance

RSA's review of the performance of TDRS in this focus area did not result in the identification of findings and corrective actions to improve performance or to ensure compliance with statutory or regulatory requirements.

F. Technical Assistance

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

RSA provided technical assistance related to the revised definition of "supported employment services" consistent with section 7(39) of the Rehabilitation Act and 34 CFR §361.5(c) (54), including the extension of the allowable timeframe for the provision of these services from 18 months to 24 months. RSA clarified that this timeframe may be extended under special circumstances if the individual and VR counselor jointly agree to extend it in order to achieve the employment outcome identified in the IPE.

RSA provided clarification as to when the service record of an individual who has achieved a supported employment outcome may be closed in accordance with title VI of the Rehabilitation Act and 34 CFR §363.55, as well as the requirements under title I of the Rehabilitation Act and 34 CFR §361.56. Of particular interest to the VR agency was the question of when to close the service record of a youth who is receiving extended services, either from TDRS, or from another source. The review team discussed these different examples and the different options for closing a supported employment case.

RSA clarified extended services requirements in section 604(b)(2) of the Rehabilitation Act. RSA also clarified that once an individual reaches the age of 25, he or she no longer meets the definition of a "youth with a disability" pursuant to 34 CFR §361.5(c)(58) and is no longer eligible to receive extended services from the VR agency.

The RSA review team offered to continue to provide technical assistance on TDRS' supported employment policies, including those pertaining to extended services, as they are finalized and to review training modules upon request.

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; TDRS 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 TDRS's adherence to Federal fiscal accountability requirements, which include both general administrative and program-specific requirements.

General administrative requirements refer to:

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

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

In addition to the fiscal accountability requirements covered in this focus area, RSA reviewed fiscal requirements pertaining to the VR program funds reserved for the provision of pre-employment transition services (i.e., the prohibition against the use of these funds for administrative costs) and Supported Employment program funds (i.e., the limit on the use of these funds for administrative costs to 2.5 percent of the award to youth with the most significant disabilities). The nature and scope of this focus area did not include a review of the extent to which States have satisfied the requirements to reserve at least 15 percent of the Federal VR program award for expenditures on pre-employment transition services, to reserve 50 percent of Supported Employment program funds for services to youth with the most significant disabilities, and to provide a 10 percent match for this amount, or to track expenditures toward these reserves. Instead, in FFY 2017, RSA provided technical assistance to, and review the progress of, each State toward satisfying these requirements through other processes established by the State Monitoring and Program Improvement Division's 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 TDRS (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 TDRS 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;
- TDRS'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

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

On November 2, 2015, the TDRS FFY 2016 VR award was placed on high risk status for a number of issues related to assignment of obligations and expenditures to the appropriate FFY and the accurate reporting of fiscal data (e.g., SF-425's). Special conditions were associated with the FFY 2016 VR award which required an extensive corrective action plan to address systemic issues related to the assignment of State and Federal funds to the correct period of performance.

TDRS successfully completed all aspects of the corrective action plan, including the revision of policies and procedures related to the assignment of obligations, expenditures, liquidations and the reporting of VR funds. The internal policies and practices were reviewed by RSA and RSA conducted data sampling to ensure the accuracy of reassigned obligations and expenditures. On October 21, 2016, RSA concluded the special conditions had been met and did not attach special conditions to TDRS' FFY 2017 award.

As part of TDRS' corrective actions, the agency reviewed all expenditures during FFYs 2014, 2015 and 2016 to ensure the proper assignment of the expenditures to the correct FFY. Once completed, TDRS was required to resubmit SF-425s from any FFYs where changes were needed and correct draws in the Department's Grants Management System (G5) to reflect the appropriate FFY. As of the date of RSA's onsite review, TDRS had successfully completed all these steps, except finalization of SF-425 reports (drafts were successfully submitted and reviewed). Subsequent to the onsite review, TDRS submitted the required SF-425s and was found to be in compliance with the non-Federal share and Maintenance of Effort requirements.

RSA considers the issues that led to the high risk status to be corrected.

C. Analysis of Performance and Observations

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

5.1 Prior Approval Requirements Not Met

Issue: Did TDRS 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. TDRS informed RSA that although initial discussion had begun, no policies or procedures had been developed 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).

Corrective Action Steps 5.1.1: RSA requires that TDRS develop and implement a written internal control process, including a monitoring component, to ensure ongoing compliance with the prior approval requirements.

E. Technical Assistance

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

RSA staff provided technical assistance on using revised financial processes as a tool to enhance fiscal and programmatic planning. RSA also provided technical assistance on TPCA requirements, prior approval and inter-agency agreements.

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

This focus area consists of the following topical areas: Governance, Unified or Combined State Plans, One-Stop Operations, and Performance Accountability. To gather information pertinent to these topics, RSA reviewed the Program Year (PY) 2016 Combined State Plan, and sample Memoranda of Understanding and Infrastructure Funding Agreements related to the one-stop service delivery system, as available. Review team met with the VR agency director, management personnel, TDRS staff responsible for case management and data collection.

B. Overview

Among other functions, State Workforce Development Boards are responsible for the development, implementation, and modification of the Unified or Combined State Plan and for convening all relevant programs, partners, and stakeholders. As a core program in the workforce development system, TDRS is represented on the State Board by the Commissioner of Human Services. The Deputy Commissioner of Programs and Services within the Department of Human Services serves as the Commissioner's designee and the Director of TDRS also attends State Board meetings to work with other core partners in developing strategic goals and performance goals. The State Board meets monthly or as needed in reference to budgeting and resource sharing, working closely with the Local Workforce Development Boards (LWDBs). TDRS indicated that the VR program has a voice in the development of the State Plan and that the interests and needs of the program and individuals with disabilities are being adequately met.

Tennessee has established 13 LWDBs representing each local area within the State. Regional and district supervisors of TDRS represent the VR agency on the LWDBs. TDRS reported that it maintains a positive working relationship with all LWDBs assisting in the development of local plans and the certification of one-stop centers.

In an effort to continually develop strategies for effectively serving individuals with barriers to employment, including individuals with disabilities, TDRS collaborated with the Department of Labor and Workforce Development to host a WIOA Convening in October 2017. The convening consisted of workshops related to financial and grants management, business engagement, one-stop operations/integrated service delivery, and strategic governance.

Unified or Combined State Plans

TDRS was actively involved in the development of the State plan. TDRS was responsible for responding to comments related to VR made by the public during public hearings that were held across the State. Also, TDRS jointly developed with the SRC goals and objectives for inclusion in the VR services portion of the State Plan. TDRS informed RSA that the SRC has several vacancies and the agency is using a public information office to recruit qualified members.

Regular monthly meetings were held with all of the State's core partners to discuss strategies in the implementation of the State plan including MOUs and IFA costs with one-stop partners. At the time of the review, TDRS intended to begin working on its next comprehensive statewide needs assessment in September 2017, and will include the SRC and all core partners in this process.

Pathways Tennessee was developed by the State as a strategy to address the "skills gap" within the workforce development system affecting individuals with barriers to employment, including individuals with disabilities, within the workforce. The mission of Pathways Tennessee is to provide Tennessee students rigorous academic/career pathways, which are linked to economic and labor market needs and trends. Other programs developed to provide postsecondary education include Tennessee Drive to 55, a statewide initiative to equip 55% of Tennesseans with a postsecondary degree or certificate by the year 2025. Tennessee Reconnect offers adults the opportunity to attend and earn a

certificate at any of the 27 Tennessee Colleges of Applied Technology (TCATs), paying no tuition and fees. Additionally, Tennessee Promise offers high school students two years of tuition-free community or technical college education and offers a mentor to help them through the process. Tennessee is the only State to provide this opportunity.

One-Stop Delivery System

The purpose of the one-stop delivery system is to bring together workforce development, educational and other human resource services in a seamless customer-focused service delivery network that enhances access to services and improves long-term employment outcomes for individuals receiving assistance. In Tennessee, there are 16 comprehensive one-stop centers and 5 affiliate satellite centers throughout the State. There is at least 1 one-stop center in each of the 13 local workforce areas. A VR counselor is located in all of the comprehensive centers. In one-stop centers where a VR counselor is not co-located, a referral system is in place. Additionally, the Tennessee Department of Labor provides a virtual one stop platform, “Jobs for TN” in which individuals are able to access all services online that are available within the local one-stop center.

TDRS is directly involved in the certification process of one-stop centers across the State. The centers are responsible for the completion of accessibility surveys. TDRS is looking to see that all certified one-stop centers meet “reasonable accommodations.” If a center does not meet requirements for accommodations initially, the center is able to correct and complete the certification process again.

Memorandums of understanding (MOUs) are required between the local workforce development areas and the one-stop partner programs. At present, 11 of the 13 MOUs have been completed. The two incomplete MOUs are working to finalize budget and infrastructure costs. TDRS is continuing to meet monthly with State partners to finalize the MOUs. Reconciliations are also done quarterly on budgets to note increases or decreases as partners leave or enter the one-stop centers.

Performance Accountability

WIOA established performance accountability indicators and performance reporting requirements to assess the effectiveness of States and local areas in achieving positive outcomes for individuals served by the workforce development system’s six core programs. At the time of the onsite visit, TDRS had not established two core methods to measure Effectiveness in Serving Employers. TDRS requested additional technical assistance around performance accountability.

Additionally, TDRS is currently exploring the change in case management systems. At present, there is no way for the agency to determine if a VR program consumer is co-enrolled in multiple partner programs. Currently, TDRS staff are relying on consumer self-reporting to obtain this information. As mentioned, additional technical assistance was requested by the agency in this area.

C. Observations and Recommendations

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

D. Findings and Corrective Actions to Improve Performance

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

F. Technical Assistance

TDRS has requested additional technical assistance in the following areas:

- How it will measure Effectiveness in Serving Employers, and the methods the core programs will use to measure Effectiveness in Serving Employers – one of the six primary performance accountability measures;
- How the agency will coordinate services and partner with other core programs to ensure effective service delivery and avoid duplication of workforce development services;
- How to establish a data sharing agreement; and
- The completion of MOUs and infrastructure funding agreements within the local workforce development areas.

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 TN-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	8,355		7,489	100%	6,405	100%	511,205	100%
Total eligible individuals	10,971	n/a	8,590	n/a	7,276	n/a	255,928	n/a
Agency implementing order of selection	Yes	n/a	Yes	n/a	Yes	n/a	-	n/a
Individuals on order of selection waiting list at year-end	246	n/a	234	n/a	234	n/a	11,437	n/a
Individuals in plan receiving services	12,397	n/a	12,417	n/a	11,292	n/a	534,116	n/a
Percent accepted for services who received no services	n/a	42.9%	n/a	39.2%	n/a	42.4%	n/a	23.30%
Exited as applicants	698	7.6%	614	7.3%	511	7.0%	29,456	12.3%
Exited trial experience/extended evaluation	81	.9%	41	.5%	32	.4%	1,956	.8%
Exited with employment	2,159	23.5%	2,358	28.1%	2,130	29.3%	82,808	34.6%
Exited without employment	1,555	16.9%	2,011	24.0%	1,518	20.9%	65,276	27.3%
Exited from OOS waiting list	53	.6%	61	.7%	43	.6%	3,516	1.5%
Exited without employment outcomes, after eligibility, before an IPE was signed or before receiving services	4,655	50.6%	3,303	39.4%	3,042	41.8%	56,055	23.4%
Total received services	3,714	40.4%	4,369	52.1%	3,648	50.1%	148,084	61.9%
Employment rate	n/a	58.1%	n/a	54.0%	n/a	58.4%	n/a	55.9%
Competitive employment outcomes	1,974	91.4%	2,194	93.0%	2,017	94.7%	78,859	95.2%
Supported employment outcomes	336	15.6%	377	16.0%	329	15.4%	9,673	11.7%
Average hourly earnings for competitive employment outcomes	\$9.89	n/a	\$10.12	n/a	\$10.27	n/a	\$11.84	n/a
Average hours worked for competitive employment outcomes	28.43	n/a	28.89	n/a	29.24	n/a	30.3	n/a
Median hourly earnings for competitive	\$8.25	n/a	\$8.50	n/a	\$9.00	n/a	\$10.00	n/a

Performance category	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
employment outcomes								
Median hours worked for competitive employment outcomes	30.00	n/a	30.00	n/a	30.00	n/a	30.0	n/a
Quarterly median earnings	\$3,120.00	n/a	\$3,315.00	n/a	\$3,471.00	n/a	\$3,900.00	n/a

Data sources: RSA-911, RSA 113

Training Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of individuals served	3,714	100%	4,369	100%	3,648	100%	148,084	100%
College or university training	57	1.5%	59	1.4%	39	1.1%	1,951	1.3%
Four-year or university training	299	8.1%	390	8.9%	370	10.1%	13,025	8.8%
Junior or community college training	189	5.1%	247	5.7%	255	7.0%	9,790	6.6%
Occupational or vocational training	376	10.1%	406	9.3%	412	11.3%	14,961	10.1%
On-the-job training	898	24.2%	699	16.0%	354	9.7%	2,840	1.9%
Apprenticeship training	0	0.0%	0	0.0%	0	0.0%	83	0.1%
Basic academic remedial or literacy training	182	4.9%	202	4.6%	170	4.7%	2,357	1.6%
Job readiness training	1,757	47.3%	2,247	51.4%	1,852	50.8%	30,291	20.5%
Disability-related skills training	148	4.0%	241	5.5%	278	7.6%	4,642	3.1%
Miscellaneous training	398	10.7%	439	10.0%	435	11.9%	11,595	7.8%

Data source: RSA-911

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

Career Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of individuals served	3,714	100%	4,369	100%	3,648	100%	148,084	100%
Assessment	2,914	78.5%	3,060	70.0%	2,456	67.3%	84,756	57.2%
Diagnosis and treatment of impairment	665	17.9%	658	15.1%	603	16.5%	43,641	29.5%
Vocational rehab counseling and guidance	273	7.4%	116	2.7%	86	2.4%	95,439	64.4%
Job search assistance	1,231	33.1%	1,848	42.3%	1,697	46.5%	49,182	33.2%
Job placement assistance	280	7.5%	298	6.8%	249	6.8%	44,189	29.8%
On-the-job supports-short term	815	21.9%	1,385	31.7%	1,136	31.1%	20,412	13.8%
On-the-job supports-SE	446	12.0%	524	12.0%	473	13.0%	11,615	7.8%
Information and referral services	6	0.2%	3	0.1%	8	0.2%	33,306	22.5%
Benefits counseling	51	1.4%	25	0.6%	11	0.3%	8,715	5.9%
Customized employment services	3	0.1%	4	0.1%	2	0.1%	928	0.6%

Data source: RSA-911

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

Other Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of individuals served	3,714	100%	4,369	100%	3,648	100%	148,084	100%
Transportation	1,778	47.9%	2,159	49.4%	1,667	45.7%	51,017	34.5%
Maintenance	1,273	34.3%	1,682	38.5%	1,175	32.2%	32,145	21.7%
Rehabilitation technology	216	5.8%	317	7.3%	388	10.6%	24,372	16.5%
Reader services	7	0.2%	4	0.1%	3	0.1%	151	0.1%
Interpreter services	102	2.7%	96	2.2%	110	3.0%	2,590	1.7%
Personal attendant services	25	0.7%	10	0.2%	6	0.2%	247	0.2%
Technical assistance services	1	0.0%	0	0.0%	0	0.0%	1,437	1.0%
Other services	372	10.0%	479	11.0%	416	11.4%	32,136	21.7%

Data source: RSA-911

Table 3.3.a (TN-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	186	8.6%	158	6.7%	180	8.5%	5,241	6.3%
Visual - Without employment outcomes	70	4.5%	44	2.2%	102	6.7%	2,861	4.4%
Auditory and Communicative - Employment outcomes	130	6.0%	189	8.0%	220	10.3%	11,490	13.9%
Auditory and Communicative - Without employment outcomes	59	3.8%	55	2.7%	52	3.4%	3,490	5.4%
Physical - Employment outcomes	473	21.9%	446	18.9%	386	18.1%	14,906	18.0%
Physical - Without employment outcomes	449	28.9%	593	29.5%	408	26.9%	14,128	21.7%

Type of Impairment	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Intellectual and Learning disability - Employment outcomes	680	31.5%	830	35.2%	758	35.6%	28,084	34.0%
Intellectual and Learning disability - Without employment outcomes	392	25.2%	615	30.6%	402	26.5%	21,270	32.7%
Psychosocial and psychological - Employment outcomes	690	32.0%	735	31.2%	586	27.5%	22,897	27.7%
Psychosocial and psychological - Without employment outcomes	585	37.6%	704	35.0%	554	36.5%	23,281	35.8%
Total served - Employment outcomes	2,159	100.0%	2,358	100.0%	2,130	100.0%	82,618	100.0%
Total served - Without employment outcomes	1,555	100.0%	2,011	100.0%	1,518	100.0%	65,030	100.0%

Data source: RSA-911

Table 3.3.b (TN-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	256	6.9%	202	4.6%	282	7.7%	8,102	5.5%
Auditory and Communicative - Individuals served	189	5.1%	244	5.6%	272	7.5%	14,980	10.1%
Physical - Individuals served	922	24.8%	1,039	23.8%	794	21.8%	29,034	19.7%
Intellectual and Learning disability - Individuals served	1,072	28.9%	1,445	33.1%	1,160	31.8%	49,354	33.4%
Psychosocial and psychological	1,275	34.3%	1,439	32.9%	1,140	31.3%	46,178	31.3%
Total individuals served	3,714	100.0%	4,369	100.0%	3,648	100.0%	147,648	100.0

Data source: RSA-911

Table 3.3.c (TN-C) Employment Rate by Type of Impairment - FFYs 2014-2016

Type of Impairment	2014 Percent	2015 Percent	2016 Percent	2016 National Agency Type Percent
Visual - Employment rate	72.7%	78.2%	63.8%	64.7%
Auditory and Communicative - Employment rate	68.8%	77.5%	80.9%	76.7%
Physical - Employment rate	51.3%	42.9%	48.6%	51.3%
Intellectual and Learning disability - Employment rate	63.4%	57.4%	65.3%	56.9%
Psychosocial and psychological – Employment rate	54.1%	51.1%	51.4%	49.6%
Total served - Employment rate	58.1%	54.0%	58.4%	56.0%

Data source: RSA-911

**Table 3.4.a (TN-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	6,422	76.3%	6,561	84.8%	5,909	87.8%	171,607	82.6%
61 – 90 days	999	11.9%	620	8.0%	480	7.1%	17,315	8.3%
91 – 120 days	446	5.3%	277	3.6%	193	2.9%	8,398	4.0%
121 – 180 days	338	4.0%	182	2.4%	111	1.6%	6,202	3.0%
181 – 365 days	190	2.3%	75	1.0%	33	.5%	3,473	1.7%
More than 1 year	27	.3%	18	.2%	7	.1%	660	.3%
Total eligible	8,422	100.0%	7,733	100.0%	6,733	100.0%	207,655	100.0%

Data source: RSA-911

Table 3.4.b (TN-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	1,982	53.4%	2,301	52.7%	1,962	53.8%	111,220	75.1%
More than 90 days	1,732	46.6%	2,068	47.3%	1,686	46.2%	36,864	24.9%
Total served	3,714	100.0%	4,369	100.0%	3,648	100.0%	148,084	100.0%

Data source: RSA-911

Table 3.4.c (TN-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	72	1.9%	76	1.7%	64	1.8%	4,867	3.3%
4 – 6 months	440	11.8%	433	9.9%	399	10.9%	18,624	12.6%
7 – 9 months	327	8.8%	415	9.5%	315	8.6%	18,240	12.3%
10 – 12 months	287	7.7%	359	8.2%	310	8.5%	15,762	10.6%
13 - 24 months	765	20.6%	1,011	23.1%	980	26.9%	37,939	25.6%
25 – 36 months	372	10.0%	576	13.2%	557	15.3%	18,934	12.8%
37 – 60 months	660	17.8%	585	13.4%	467	12.8%	19,177	13.0%
More than 5 years	791	21.3%	914	20.9%	556	15.2%	14,541	9.8%
Total served	3,714	100.0%	4,369	100.0%	3,648	100.0%	148,084	100.0%

Data source: RSA-911

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

Standard Occupational Classification (SOC) Codes	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Architecture and Engineering Occupations (17-0000)	10	.5%	13	.6%	12	.6%	577	.7%
Arts, Design, Entertainment, Sports, and Media (27-0000)	22	1.0%	31	1.3%	22	1.0%	885	1.1%
Building and Grounds Cleaning and Maintenance (37-0000)	273	12.6%	301	12.8%	302	14.2%	6,923	8.4%
Business and Financial Operations Occupations (13-0000)	29	1.3%	20	.8%	21	1.0%	1,248	1.5%
Community and Social Services Occupations (21-0000)	56	2.6%	61	2.6%	42	2.0%	2,300	2.8%
Computer and Mathematical Occupations (15-0000)	19	.9%	24	1.0%	17	.8%	874	1.1%
Constructive and Extraction Occupations (47-0000)	29	1.3%	37	1.6%	35	1.6%	1,722	2.1%
Education, Training, and Library Occupations (25-0000)	70	3.2%	55	2.3%	51	2.4%	2,434	2.9%
Farming, Fishing, and Forestry Occupations (45-0000)	15	.7%	14	.6%	8	.4%	425	.5%
Food Preparation and Serving Related Occupations (35-0000)	289	13.4%	287	12.2%	279	13.1%	9,434	11.4%
Healthcare Practitioners and Technical Occupations (29-0000)	66	3.1%	68	2.9%	60	2.8%	2,238	2.7%
Healthcare Support Occupations (31-0000)	71	3.3%	79	3.4%	79	3.7%	2,722	3.3%
Homemaker*	83	3.8%	88	3.7%	49	2.3%	1,803	2.2%
Installation, Maintenance, and Repair Occupations (49-0000)	53	2.5%	56	2.4%	52	2.4%	4,981	6.0%
Legal Occupations (23-0000)	9	.4%	6	.3%	5	.2%	191	.2%
Life, Physical, and Social Science Occupations (19-0000)	11	.5%	8	.3%	7	.3%	374	.5%

Standard Occupational Classification (SOC) Codes	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Management Occupations (11-0000)	38	1.8%	46	2.0%	40	1.9%	2,050	2.5%
Military Specific Occupations (55-0000)	1	.0%	2	.1%	1	.0%	92	.1%
Office and Administrative Support Occupations (19-0000)	389	18.0%	500	21.2%	428	20.1%	15,218	18.4%
Personal Care and Service Occupations (39-0000)	139	6.4%	112	4.7%	120	5.6%	4,073	4.9%
Production Occupations (51-0000)	132	6.1%	173	7.3%	177	8.3%	6,888	8.3%
Protective Service Occupations (33-0000)	21	1.0%	28	1.2%	24	1.1%	1,376	1.7%
Randolph-Sheppard vending facility clerk*	0	.0%	0	.0%	0	.0%	8	.0%
Randolph-Sheppard vending facility operator*	2	.1%	1	.0%	3	.1%	76	.1%
Sales and Related Occupations (41-0000)	157	7.3%	158	6.7%	132	6.2%	6,552	7.9%
Transportation and Material Moving Occupations (53-0000)	166	7.7%	184	7.8%	161	7.6%	7,284	8.8%
Unpaid Family Worker*	6	.3%	6	.3%	2	.1%	18	.0%
Total employment outcomes	2,156	100.0%	2,358	100.0%	2,129	100.0%	82,766	100.0%

Data source: RSA-911

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

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

Standard Occupational Classification (SOC) Codes	2014 Number	2015 Number	2016 Number	2016 National Agency Type Number
Architecture and Engineering Occupations (17-0000)	\$13.13	\$13.90	\$16.50	\$19.00
Arts, Design, Entertainment, Sports, and Media (27-0000)	\$10.00	\$11.20	\$11.25	\$12.03
Building and Grounds Cleaning and Maintenance (37-0000)	\$7.50	\$7.53	\$8.00	\$9.00

Standard Occupational Classification (SOC) Codes	2014 Number	2015 Number	2016 Number	2016 National Agency Type Number
Business and Financial Operations Occupations (13-0000)	\$12.00	\$12.00	\$10.00	\$15.34
Community and Social Services Occupations (21-0000)	\$11.00	\$12.00	\$11.56	\$13.50
Computer and Mathematical Occupations (15-0000)	\$14.00	\$14.00	\$13.57	\$16.00
Constructive and Extraction Occupations (47-0000)	\$10.00	\$11.50	\$10.00	\$12.70
Education, Training, and Library Occupations (25-0000)	\$11.58	\$11.55	\$12.25	\$13.00
Farming, Fishing, and Forestry Occupations (45-0000)	\$7.81	\$8.67	\$10.00	\$10.00
Food Preparation and Serving Related Occupations (35-0000)	\$7.33	\$7.50	\$7.80	\$8.36
Healthcare Practitioners and Technical Occupations (29-0000)	\$15.00	\$15.00	\$16.75	\$16.12
Healthcare Support Occupations (31-0000)	\$9.25	\$10.00	\$9.60	\$10.43
Homemaker*				
Installation, Maintenance, and Repair Occupations (49-0000)	\$8.53	\$9.50	\$10.25	\$9.80
Legal Occupations (23-0000)	\$15.00	\$35.00	\$10.00	\$17.00
Life, Physical, and Social Science Occupations (19-0000)	\$12.65	\$12.00	\$14.00	\$15.00
Management Occupations (11-0000)	\$13.25	\$14.91	\$15.20	\$15.00
Military Specific Occupations (55-0000)	\$18.40	\$10.00	\$11.55	\$13.17
Office and Administrative Support Occupations (19-0000)	\$8.16	\$8.25	\$9.00	\$10.00
Personal Care and Service Occupations (39-0000)	\$8.00	\$7.94	\$8.00	\$9.00
Production Occupations (51-0000)	\$8.82	\$9.00	\$9.25	\$10.00
Protective Service Occupations (33-0000)	\$9.00	\$10.00	\$10.00	\$10.25
Randolph-Sheppard vending facility clerk*	n/a	n/a	n/a	\$10.91
Randolph-Sheppard vending facility operator*	\$7.50	\$22.08	\$12.03	\$12.68
Sales and Related Occupations (41-0000)	\$7.64	\$7.75	\$8.00	\$9.00
Transportation and Material Moving Occupations (53-0000)	\$8.10	\$8.50	\$9.00	\$10.00
Unpaid Family Worker*	n/a	n/a	n/a	n/a

Standard Occupational Classification (SOC) Codes	2014 Number	2015 Number	2016 Number	2016 National Agency Type Number
Total employment outcomes	\$8.00	\$8.31	\$8.75	\$10.00

Data source: RSA-911

**Table 4.1 (TN-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	3,994	100%	3,589	100%	3,258	100%	86,272	100%
Exited as an applicant	351	8.79%	332	9.25%	314	9.64%	10,776	12.49%
Exited during or after trial work experience/extended evaluation	31	0.78%	21	0.59%	12	0.37%	687	0.80%
Exited without employment after IPE, before services	164	4.11%	224	6.24%	155	4.76%	16,390	19.00%
Exited from order of selection waiting list	25	0.63%	17	0.47%	18	0.55%	972	1.13%
Exited without employment after eligibility, before IPE	2,147	53.76%	1,448	40.35%	1,353	41.53%	3,865	4.48%
Exited with employment	829	20.76%	927	25.83%	877	26.92%	29,391	34.07%
Exited without employment	447	11.19%	620	17.28%	529	16.24%	24,191	28.04%
Employment rate	n/a	64.97%	n/a	59.92%	n/a	62.38%	n/a	54.85%
Supported employment outcomes	149	17.97%	139	14.99%	109	12.43%	3,965	13.49%
Competitive employment outcomes	773	93.24%	879	94.82%	845	96.35%	28,670	97.55%
Average hourly earnings for competitive employment outcomes	\$ 8.87	n/a	\$9.07	n/a	\$ 9.49	n/a	\$10.12	n/a
Average hours worked per week for competitive employment outcomes	28.34	n/a	28.70	n/a	29.96	n/a	29.12	n/a
Competitive employment outcomes at 35 or more hours per week	273	32.93%	314	33.87%	342	39.00%	10,346	35.20%

Individuals with Disabilities under Age 25 at Exit	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Competitive employment outcomes meeting SGA	339	40.89%	422	45.52%	435	49.60%	14,616	49.73%
Competitive employment outcomes with employer- provided medical insurance	112	13.51%	128	13.81%	140	15.96%	3,866	13.15%

Data source: RSA-911

**Table 4.2.a (TN-C) VR Training Services Provided for Individuals Served under Age 25
at Exit- 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	1,276	100%	1,547	100%	1,406	100%	53,582	100%
College or university training	8	0.60%	11	0.70%	5	0.40%	852	1.60%
Four-year or university training	116	9.10%	146	9.40%	164	11.70%	5,289	9.90%
Junior or community college training	69	5.40%	109	7.00%	112	8.00%	4,482	8.40%
Occupational or vocational training	123	9.60%	168	10.90%	218	15.50%	5,067	9.50%
On-the-job training	334	26.20%	238	15.40%	114	8.10%	1,329	2.50%
Apprenticeship training	0	0.00%	0	0.00%	0	0.00%	42	0.10%
Basic academic remedial or literacy training	74	5.80%	88	5.70%	86	6.10%	1,198	2.20%
Job readiness training	644	50.50%	869	56.20%	763	54.30%	16,251	30.30%
Disability-related skills training	35	2.70%	78	5.00%	92	6.50%	1,272	2.40%
Miscellaneous training	155	12.10%	181	11.70%	208	14.80%	4,918	9.20%

Data source: RSA-911

Table 4.2.b (TN-C) VR Career Services Provided for Individuals Served under Age 25 at Exit - 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	1,276	100%	1,547	100%	1,406	100%	53,582	100%
Assessment	1,063	83.30%	1,202	77.70%	994	70.70%	29,430	54.90%
Diagnosis and treatment of impairment	157	12.30%	176	11.40%	150	10.70%	10,630	19.80%
Vocational rehab counseling and guidance	105	8.20%	43	2.80%	27	1.90%	36,168	67.50%
Job search assistance	434	34.00%	714	46.20%	691	49.10%	19,183	35.80%
Job placement assistance	91	7.10%	82	5.30%	73	5.20%	16,389	30.60%
On-the-job supports-short term	305	23.90%	517	33.40%	471	33.50%	7,651	14.30%
On-the-job supports-SE	185	14.50%	192	12.40%	156	11.10%	4,547	8.50%
Information and referral services	3	0.20%	2	0.10%	3	0.20%	14,113	26.30%
Benefits counseling	11	0.90%	5	0.30%	3	0.20%	1,974	3.70%
Customized employment services	1	0.10%	1	0.10%	0	0.00%	449	0.80%

Data source: RSA-911

Table 4.2.c (TN-C) VR Other Services Provided for Individuals- Served under Age 25 at Exit- 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	1,276	100%	1,547	100%	1,406	100%	53,582	100%
Transportation	512	40.10%	683	44.10%	549	39.00%	15,830	29.50%
Maintenance	392	30.70%	580	37.50%	427	30.40%	10,436	19.50%
Rehabilitation technology	22	1.70%	39	2.50%	56	4.00%	3,781	7.10%
Reader services	0	0.00%	1	0.10%	0	0.00%	30	0.10%
Interpreter services	22	1.70%	18	1.20%	24	1.70%	607	1.10%

Other Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Personal attendant services	8	0.60%	1	0.10%	3	0.20%	84	0.20%
Technical assistance services	0	0.00%	0	0.00%	0	0.00%	254	0.50%
Other services	82	6.40%	178	11.50%	168	11.90%	9,840	18.40%

Data source: RSA-911

Table 4.3.a (TN-C) Outcomes by Type of Impairment for Individuals with Disabilities under Age 25 at Exit- 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	18	2.20%	15	1.60%	16	1.80%	524	1.78%
Visual - Without employment outcomes	10	2.20%	7	1.10%	21	4.00%	535	2.21%
Auditory and Communicative - Employment outcomes	31	3.70%	38	4.10%	50	5.70%	1618	5.51%
Auditory and Communicative - Without employment outcomes	19	4.30%	21	3.40%	16	3.00%	1176	4.86%
Physical - Employment outcomes	107	12.90%	103	11.10%	104	11.90%	2339	7.96%
Physical - Without employment outcomes	60	13.40%	69	11.10%	73	13.80%	2054	8.49%
Intellectual and Learning disability - Employment outcomes	441	53.20%	527	56.90%	507	57.80%	18636	63.45%
Intellectual and Learning disability - Without employment outcomes	214	47.90%	356	57.40%	271	51.20%	14463	59.81%
Psychosocial and psychological - Employment outcomes	232	28.00%	244	26.30%	200	22.80%	6254	21.29%
Psychosocial and psychological - Without employment outcomes	144	32.20%	167	26.90%	148	28.00%	5954	24.62%
Total served - Employment outcomes	829	100.00%	927	100.00%	877	100.00%	29,371	100.00%
Total served - Without employment outcomes	447	100.00%	620	100.00%	529	100.00%	24,182	100.00%

Data source: RSA-911

**Table 4.3.b (TN-C) All Individuals Served by Type of Impairment for Individuals
With Disabilities under Age 25 at Exit- 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	28	2.20%	22	1.40%	37	2.40%	1059	1.98%
Auditory and Communicative - Individuals served	50	3.90%	59	3.80%	66	4.90%	2,794	5.22%
Physical - Individuals served	167	13.10%	172	11.10%	177	9.20%	4,393	8.20%
Intellectual and Learning disability - Individuals served	655	51.30%	883	57.10%	778	51.00%	33,099	61.81%
Psychosocial and psychological	376	29.50%	411	26.60%	348	32.50%	12,208	22.80%
Total individuals served	1,276	100.00%	1,547	100.00%	1,406	100.00%	53,553	100.00%

Data source: RSA-911

**Table 4.3.c (TN-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	64.30%	68.20%	43.20%	49.48%
Auditory and Communicative - Employment rate	62.00%	64.40%	75.80%	57.91%
Physical - Employment rate	64.10%	60%	58.80%	53.24%
Intellectual and Learning disability - Employment rate	67.30%	59.70%	65.20%	56.30%
Psychosocial and psychological – Employment rate	61.70%	59.40%	57.50%	51.23%
Total served - Employment rate	65.00%	59.90%	62.40%	54.84%

Data source: RSA-911

**Table 4.4.a (TN-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	2,563	70.96%	2,659	82.17%	2,493	85.03%	61,119	81.70%
61 – 90 days	535	14.81%	310	9.58%	263	8.97%	6,367	8.51%
91 – 120 days	239	6.62%	135	4.17%	95	3.24%	3,214	4.30%
121 – 180 days	171	4.73%	93	2.87%	62	2.11%	2,441	3.26%
181 – 365 days	92	2.55%	34	1.05%	15	0.51%	1,410	1.88%
More than 1 year	12	0.33%	5	0.15%	4	0.14%	258	0.34%
Total eligible	3,612	100%	3,236	100%	2,932	100%	74,809	100%

Data source: RSA-911

**Table 4.4.b (TN-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	682	53.45%	811	52.42%	787	55.97%	40,612	75.79%
4-6 months	274	21.47%	367	23.72%	339	24.11%	7,589	14.16%
7-9 months	128	10.03%	195	12.61%	154	10.95%	2,473	4.62%
10-12 months	70	5.49%	80	5.17%	62	4.41%	1,107	2.07%
More than 12 months	122	9.56%	94	6.08%	64	4.55%	1,801	3.36%
Total served	1,276	100%	1,547	100%	1,406	100%	53,582	100%

Data source: RSA-911

**Table 4.4.c (TN-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	19	1.49%	29	1.87%	24	1.71%	1,319	2.46%
4 – 6 months	150	11.76%	112	7.24%	116	8.25%	4,769	8.90%
7 – 9 months	106	8.31%	141	9.11%	111	7.89%	5,556	10.37%
10 – 12 months	100	7.84%	150	9.70%	113	8.04%	5,217	9.74%
13 - 24 months	320	25.08%	472	30.51%	468	33.29%	14,948	27.90%
25 – 36 months	152	11.91%	261	16.87%	265	18.85%	8,479	15.82%
37 – 60 months	275	21.55%	197	12.73%	183	13.02%	8,846	16.51%
More than 5 years	154	12.07%	185	11.96%	126	8.96%	4,448	8.30%
Total served	1,276	100%	1,547	100%	1,406	100%	53,582	100%

Data source: RSA-911

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

Standard Occupational Classification (SOC) Codes	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Architecture and Engineering Occupations (17-0000)	2	0.24%	4	0.43%	4	0.46%	172	0.59%
Arts, Design, Entertainment, Sports, and Media (27-0000)	4	0.48%	11	1.19%	9	1.03%	287	0.98%
Building and Grounds Cleaning and Maintenance (37-0000)	110	13.29%	93	10.03%	102	11.63%	2,125	7.23%
Business and Financial Operations Occupations (13-0000)	7	0.85%	4	0.43%	4	0.46%	275	0.94%
Community and Social Services Occupations (21-0000)	8	0.97%	11	1.19%	10	1.14%	293	1.00%
Computer and Mathematical Occupations (15-0000)	5	0.60%	7	0.76%	6	0.68%	235	0.80%
Constructive and Extraction Occupations (47-0000)	14	1.69%	12	1.29%	11	1.25%	518	1.76%
Education, Training, and Library Occupations (25-0000)	19	2.29%	16	1.73%	16	1.82%	562	1.91%
Farming, Fishing, and Forestry Occupations (45-0000)	7	0.85%	8	0.86%	5	0.57%	172	0.59%
Food Preparation and Serving Related Occupations (35-0000)	145	17.51%	155	16.72%	144	16.42%	4,862	16.55%
Healthcare Practitioners and Technical Occupations (29-0000)	18	2.17%	18	1.94%	21	2.39%	612	2.08%
Healthcare Support Occupations (31-0000)	25	3.02%	33	3.56%	36	4.10%	956	3.25%
Homemaker*	15	1.81%	13	1.40%	5	0.57%	50	0.17%
Installation, Maintenance, and Repair Occupations (49-0000)	32	3.86%	26	2.80%	28	3.19%	2,183	7.43%
Legal Occupations (23-0000)	4	0.48%		0.00%	1	0.11%	22	0.07%
Life, Physical, and Social Science	1	0.12%	4	0.43%	1	0.11%	115	0.39%

Standard Occupational Classification (SOC) Codes	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Occupations (19-0000)								
Management Occupations (11-0000)	7	0.85%	11	1.19%	13	1.48%	360	1.23%
Military Specific Occupations (55-0000)	0	0.00%	2	0.22%	1	0.11%	48	0.16%
Office and Administrative Support Occupations (43-0000)	143	17.27%	207	22.33%	188	21.44%	5,594	19.04%
Personal Care and Service Occupations (39-0000)	64	7.73%	45	4.85%	41	4.68%	1,665	5.67%
Production Occupations (51-0000)	55	6.64%	89	9.60%	80	9.12%	2,625	8.94%
Protective Service Occupations (33-0000)	5	0.60%	8	0.86%	6	0.68%	420	1.43%
Randolph-Sheppard Vending Facility Clerk*	0	0.00%	0	0.00%	0	0.00%	1	0.00%
Randolph-Sheppard Vending Facility Operator*	0	0.00%	0	0.00%	0	0.00%	1	0.00%
Sales and Related Occupations (41-0000)	66	7.97%	73	7.87%	67	7.64%	2,856	9.72%
Transportation and Material Moving Occupations (53-0000)	69	8.33%	76	8.20%	78	8.89%	2,367	8.06%
Unpaid Family Worker*	3	0.36%	1	0.11%	0	0.00%	2	0.01%
Total employment outcomes	828	100%	927	100%	877	100%	29,378	100%

Data source: RSA-911

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

Table 4.5.b (TN-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

Standard Occupational Classification (SOC) Codes	2014	2015	2016	2016 National Agency Type
Architecture and Engineering Occupations (17-0000)	\$10.13	\$14.65	\$14.30	\$16.08
Arts, Design, Entertainment, Sports, and Media (27-0000)	\$9.33	\$9.00	\$12.50	\$11.00
Building and Grounds Cleaning and Maintenance (37-0000)	\$7.50	\$7.50	\$8.00	\$8.60
Business and Financial Operations Occupations (13-0000)	\$20.83	\$12.96	\$10.00	\$12.00
Community and Social Services Occupations (21-0000)	\$9.61	\$10.53	\$11.64	\$12.25
Computer and Mathematical Occupations (15-0000)	\$10.00	\$15.38	\$13.75	\$13.00
Constructive and Extraction Occupations (47-0000)	\$10.00	\$9.50	\$10.00	\$11.00
Education, Training, and Library Occupations (25-0000)	\$10.50	\$11.48	\$8.96	\$11.26
Farming, Fishing, and Forestry Occupations (45-0000)	\$7.81	\$8.67	\$12.50	\$10.00
Food Preparation and Serving Related Occupations (35-0000)	\$7.30	\$7.45	\$7.57	\$8.27
Healthcare Practitioners and Technical Occupations (29-0000)	\$13.05	\$10.20	\$15.00	\$12.00
Healthcare Support Occupations (31-0000)	\$9.00	\$9.00	\$9.00	\$10.00
Homemaker*				
Installation, Maintenance, and Repair Occupations (49-0000)	\$8.50	\$9.00	\$9.00	\$9.00
Legal Occupations (23-0000)	\$13.75		\$10.00	\$13.04
Life, Physical, and Social Science Occupations (19-0000)	\$11.00	\$11.00	\$23.08	\$13.50
Management Occupations (11-0000)	\$12.50	\$12.00	\$10.50	\$13.00
Military Specific Occupations (55-0000)		\$10.00	\$11.55	\$12.00
Office and Administrative Support Occupations (43-0000)	\$8.00	\$7.94	\$8.59	\$9.00
Personal Care and Service Occupations (39-0000)	\$7.67	\$7.53	\$7.50	\$8.75

Standard Occupational Classification (SOC) Codes	2014	2015	2016	2016 National Agency Type
Production Occupations (51-0000)	\$9.00	\$9.35	\$9.50	\$9.76
Protective Service Occupations (33-0000)	\$10.00	\$12.00	\$12.76	\$10.00
Randolph-Sheppard Vending Facility Clerk*	n/a	n/a	n/a	8
Randolph-Sheppard Vending Facility Operator*	n/a	n/a	n/a	8.25
Sales and Related Occupations (41-0000)	\$7.60	\$7.66	\$8.00	\$9.00
Transportation and Material Moving Occupations (53-0000)	\$8.00	\$8.15	\$9.00	\$9.00
Unpaid Family Worker*	n/a	n/a	n/a	n/a
Total employment outcomes	\$7.90	\$8.00	\$8.50	\$9.00

Data source: RSA-911

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

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

Referral Sources	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	National Agency Type Number	National Agency Type Percent
American Indian VR Services Program	0	0.00%	0	0.00%	0	0.00%	41	0.05%
Centers for Independent Living	0	0.00%	2	0.06%	0	0.00%	71	0.08%
Child Protective Services	1	0.03%	1	0.03%	2	0.06%	106	0.12%
Community Rehabilitation Programs	83	2.08%	47	1.31%	27	0.83%	3,047	3.54%
Consumer Organizations or Advocacy Groups	0	0.00%	3	0.08%	3	0.09%	178	0.21%
Educational Institutions (elementary/secondary)	2,489	62.37%	2,159	60.17%	2,014	61.82%	45,619	52.96%
Educational Institutions (post-secondary)	85	2.13%	73	2.03%	78	2.39%	3,034	3.52%
Employers	1	0.03%	1	0.03%	1	0.03%	53	0.06%
Faith Based Organizations	2	0.05%	1	0.03%	2	0.06%	64	0.07%
Family/Friends	13	0.33%	11	0.31%	9	0.28%	4,041	4.69%
Intellectual and Developmental Disabilities Providers	5	0.13%	9	0.25%	6	0.18%	1,652	1.92%
Medical Health Provider (Public or Private)	92	2.31%	98	2.73%	73	2.24%	1,896	2.20%
Mental Health Provider (Public or Private)	32	0.80%	68	1.90%	75	2.30%	1,936	2.25%
One-stop Employment/Training Centers	54	1.35%	31	0.86%	30	0.92%	1,054	1.22%
Other Sources	335	8.39%	248	6.91%	191	5.86%	6,099	7.08%
Other State Agencies	3	0.08%	15	0.42%	13	0.40%	636	0.74%
Other VR State Agencies	11	0.28%	15	0.42%	14	0.43%	261	0.30%
Public Housing Authority		0.00%		0.00%		0.00%	15	0.02%
Self-referral	722	18.09%	726	20.23%	671	20.60%	14,829	17.21%

Referral Sources	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	National Agency Type Number	National Agency Type Percent
Social Security Administration (Disability Determination Service or District office)	12	0.30%	9	0.25%	6	0.18%	328	0.38%
State Department of Correction/Juvenile Justice	2	0.05%	5	0.14%	4	0.12%	522	0.61%
State Employment Service Agency	2	0.05%	2	0.06%	2	0.06%	67	0.08%
Veteran's Administration		0.00%	1	0.03%		0.00%	13	0.02%
Welfare Agency (State or local government)	47	1.18%	63	1.76%	37	1.14%	555	0.64%
Worker's Compensation	0	0.00%	0	0.00%	0	0.00%	28	0.03%

Data source: RSA-911

Table 4.7 (TN-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	National Agency Type Number	National Agency Type Percent
Achieved employment outcome	829	21.22%	927	26.68%	877	27.42%	29,393	35.55%
Unable to locate or contact	1,321	33.81%	892	25.68%	470	14.70%	18,723	22.65%
Transportation not feasible or available	12	0.31%	5	0.14%	11	0.34%	114	0.14%
Does not require VR services	3	0.08%	9	0.26%	2	0.06%	579	0.70%
Extended services not available	5	0.13%	3	0.09%	1	0.03%	87	0.11%
All other reasons	359	9.19%	350	10.07%	307	9.60%	6,857	8.29%
Extended employment	0	0.00%	0	0.00%	0	0.00%	62	0.07%
Individual in institution, other than a prison or jail	10	0.26%	9	0.26%	10	0.31%	179	0.22%
Individual is incarcerated in a prison or jail	30	0.77%	14	0.40%	11	0.34%	390	0.47%
Disability too significant to benefit from VR services	8	0.20%	4	0.12%	4	0.13%	501	0.61%
No longer interested in receiving services or further services	1,324	33.89%	1,252	36.04%	1,501	46.94%	25,623	30.99%
Death	6	0.15%	9	0.26%	4	0.13%	168	0.20%

Data source: RSA-911

All Individuals with Disabilities with Supported Employment Outcomes	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	National Agency Type Number	National Agency Type Percent
Supported employment outcomes	336	15.56%	377	15.99%	329	15.45%	9,673	11.67%
Average hourly wage for supported employment outcomes	\$7.73	n/a	\$7.93	n/a	\$8.35	n/a	\$9.07	n/a
Average hours worked per week for supported employment outcomes	18.7	n/a	18.35	n/a	20.36	n/a	22.48	n/a

Competitive supported employment outcomes	310	92.26%	354	93.90%	314	95.44%	9,099	94.07%
Average hourly earnings for competitive supported employment outcomes	\$7.84	n/a	\$7.97	n/a	\$8.42	n/a	\$9.30	n/a
Average hours worked per week for competitive supported employment outcomes	18.58	n/a	18.37	n/a	20.46	n/a	22.23	n/a
Competitive supported employment outcomes at 35 or more hours per week	22	6.55%	33	8.75%	38	11.55%	1,335	13.80%
Competitive supported employment outcomes meeting SGA	42	12.50%	49	13.00%	56	17.02%	2,276	23.53%
Competitive supported employment outcomes with employer-provided medical insurance	8	2.38%	8	2.12%	10	3.04%	338	3.49%

Data source: RSA-911

**Table 5.1.b (TN-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	149	17.97%	139	14.99%	109	12.43%	3,965	13.49%
Average hourly wage for supported employment outcomes	\$7.72	n/a	\$ 7.78	n/a	\$8.17	n/a	\$8.77	n/a
Average hours worked per week for supported employment outcomes	18.28	n/a	18.66	n/a	20.78	n/a	21.92	n/a
Competitive supported employment outcomes	141	94.63%	131	94.24%	103	94.50%	3,750	94.58%
Average hourly earnings for competitive supported employment outcomes	\$7.75	n/a	\$ 7.82	n/a	\$8.23	n/a	\$8.94	n/a
Average hours worked per week for competitive supported employment outcomes	18.41	n/a	18.48	n/a	20.69	n/a	21.75	n/a
Competitive supported employment outcomes at 35 or more hours per week	8	5.37%	8	5.76%	10	9.17%	489	12.33%
Competitive supported employment outcomes meeting SGA	15	10.07%	14	10.07%	16	14.68%	821	20.71%
Competitive supported employment outcomes with employer-provided medical insurance	4	2.68%	2	1.44%	4	3.67%	215	5.42%

Data source: RSA-911

**Table 5.2.a (TN-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	336	100%	377	100%	329	100%	9673	100%
College or university training	0	0.00%	0	0.00%	0	0.00%	32	0.30%
Four-year or university training	2	0.60%	2	0.50%	1	0.30%	116	1.20%
Junior or community college training	1	0.30%	2	0.50%	0	0.00%	124	1.30%
Occupational or vocational training	9	2.70%	6	1.60%	15	4.60%	423	4.40%
On-the-job training	38	11.30%	22	5.80%	9	2.70%	239	2.50%
Apprenticeship training	0	0.00%	0	0.00%	0	0.00%	7	0.10%
Basic academic remedial or literacy training	12	3.60%	6	1.60%	2	0.60%	78	0.80%
Job readiness training	79	23.50%	70	18.60%	74	22.50%	1,928	19.90%
Disability-related skills training	24	7.10%	23	6.10%	15	4.60%	153	1.60%
Miscellaneous training	13	3.90%	16	4.20%	19	5.80%	804	8.30%
Assessment	302	89.90%	298	79.00%	241	73.30%	5,992	61.90%
Diagnosis and treatment of impairment	45	13.40%	32	8.50%	36	10.90%	1,987	20.50%
Vocational rehab counseling and guidance	17	5.10%	5	1.30%	6	1.80%	6,718	69.50%
Job search assistance	17	5.10%	23	6.10%	23	7.00%	4,766	49.30%
Job placement assistance	8	2.40%	2	0.50%	8	2.40%	4,358	45.10%
On-the-job supports-short term	32	9.50%	37	9.80%	39	11.90%	2,911	30.10%
On-the-job supports-SE	323	96.10%	364	96.60%	315	95.70%	6,821	70.50%
Information and referral services	0	0.00%	0	0.00%	0	0.00%	2,005	20.70%
Benefits counseling	6	1.80%	1	0.30%	1	0.30%	1,233	12.70%
Customized employment services	0	0.00%	1	0.30%	0	0.00%	98	1.00%

Training Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Transportation	120	35.70%	138	36.60%	110	33.40%	2,769	28.60%
Maintenance	142	42.30%	164	43.50%	107	32.50%	2,324	24.00%
Rehabilitation technology	5	1.50%	6	1.60%	9	2.70%	568	5.90%
Reader services	0	0.00%	0	0.00%	0	0.00%	1	0.00%
Interpreter services	5	1.50%	0	0.00%	7	2.10%	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	24	7.10%	29	7.70%	18	5.50%	1,674	17.30%

Data source: RSA-911

**Table 5.2.b (TN-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	149		139		109		3,965	
College or university training	0	0.00%	0	0.00%	0	0.00%	15	0.40%
Four-year or university training	1	0.70%	1	0.70%	0	0.00%	51	1.30%
Junior or community college training	1	0.70%	2	1.40%	0	0.00%	69	1.70%
Occupational or vocational training	7	4.70%	5	3.60%	8	7.30%	183	4.60%
On-the-job training	21	14.10%	8	5.80%	1	0.90%	122	3.10%
Apprenticeship training	0	0.00%	0	0.00%	0	0.00%	4	0.10%
Basic academic remedial or literacy training	8	5.40%	3	2.20%	2	1.80%	55	1.40%
Job readiness training	46	30.90%	46	33.10%	36	33.00%	1,154	29.10%
Disability-related skills training	8	5.40%	14	10.10%	6	5.50%	80	2.00%
Miscellaneous training	7	4.70%	11	7.90%	12	11.00%	438	11.00%
Assessment	138	92.60%	128	92.10%	94	86.20%	2,653	66.90%
Diagnosis and treatment of impairment	22	14.80%	15	10.80%	15	13.80%	751	18.90%
Vocational rehab counseling and guidance	6	4.00%	3	2.20%	1	0.90%	2,785	70.20%
Job search assistance	8	5.40%	11	7.90%	9	8.30%	1,857	46.80%
Job placement assistance	3	2.00%	0	0.00%	0	0.00%	1,794	45.20%
On-the-job supports-short term	17	11.40%	16	11.50%	19	17.40%	1,310	33.00%
On-the-job supports-SE	143	96.00%	136	97.80%	105	96.30%	2,742	69.20%
Information and referral services	0	0.00%	0	0.00%	0	0.00%	883	22.30%

Training Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Customized employment services	0	0.00%	1	0.70%	0	0.00%	40	1.00%
Transportation	52	34.90%	59	42.40%	39	35.80%	1,120	28.20%
Maintenance	61	40.90%	72	51.80%	39	35.80%	834	21.00%
Rehabilitation technology	3	2.00%	1	0.70%	0	0.00%	208	5.20%
Reader services	0	0.00%	0	0.00%	0	0.00%	1	0.00%
Interpreter services	2	1.30%	0	0.00%	4	3.70%	37	0.90%
Personal attendant services	0	0.00%	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	8	5.40%	18	12.90%	9	8.30%	715	18.00%

Data source: RSA-911

Table 5.3.a (TN-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	National Agency Type Number	National Agency Type Percent
0 – 60 days	272	80.95%	351	93.10%	304	92.40%	8,277	85.57%
61 – 90 days	24	7.14%	10	2.65%	16	4.86%	633	6.54%
91 – 120 days	12	3.57%	9	2.39%	4	1.22%	291	3.01%
121 – 180 days	12	3.57%	4	1.06%	2	0.61%	250	2.58%
181 – 365 days	15	4.46%	3	0.80%	2	0.61%	169	1.75%
More than 1 year	1	0.30%		0.00%	1	0.30%	53	0.55%
Total SE	336	100%	377	100%	329	100%	9,673	100%

Data source: RSA-911

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

Elapsed Time Application to Eligibility	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	National Agency Type Number	National Agency Type Percent
0 – 60 days	109	73.15%	120	86.33%	99	90.83%	3,284	82.82%
61 – 90 days	14	9.40%	8	5.76%	4	3.67%	292	7.36%
91 – 120 days	7	4.70%	5	3.60%	2	1.83%	149	3.76%
121 – 180 days	9	6.04%	3	2.16%	1	0.92%	125	3.15%
181 – 365 days	9	6.04%	3	2.16%	2	1.83%	87	2.19%
More than 1 year	1	0.67%		0.00%	1	0.92%	28	0.71%
Total SE	149	100%	139	100%	109	100%	3,965	100%

Data source: RSA-911

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

Elapsed Time Eligibility to IPE	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	National Agency Type Number	National Agency Type Percent
0 – 3 months	183	54.46%	221	58.62%	182	55.32%	7,647	79.06%
4-6 months	64	19.05%	82	21.75%	73	22.19%	1,137	11.75%
7-9 months	36	10.71%	33	8.75%	46	13.98%	406	4.20%
10-12 months	16	4.76%	22	5.84%	13	3.95%	185	1.91%
More than 12 months	37	11.01%	19	5.04%	15	4.56%	298	3.08%
Total SE	336	100%	377	100%	329	100%	9,673	100%

Data source: RSA-911

Table 5.4.b (TN-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 Eligibility to IPE	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	National Agency Type Number	National Agency Type Percent
0 – 3 months	75	50.34%	70	50.36%	53	48.62%	3,004	75.76%
4-6 months	29	19.46%	28	20.14%	24	22.02%	556	14.02%
7-9 months	15	10.07%	20	14.39%	18	16.51%	190	4.79%
10-12 months	7	4.70%	13	9.35%	7	6.42%	85	2.14%
More than 12 months	23	15.44%	8	5.76%	7	6.42%	130	3.28%
Total SE	149	100%	139	100%	109	100%	3,965	100%

Data source: RSA-911

Table 5.5.a (TN-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	7	2.08%	2	0.53%	5	1.52%	246	2.54%
4 – 6 months	112	33.33%	115	30.50%	80	24.32%	1,555	16.08%
7 – 9 months	59	17.56%	81	21.49%	60	18.24%	1,713	17.71%
10 – 12 months	28	8.33%	49	13.00%	42	12.77%	1,251	12.93%
13 - 24 months	60	17.86%	76	20.16%	77	23.40%	2,558	26.44%
25 – 36 months	20	5.95%	25	6.63%	31	9.42%	1,024	10.59%
37 – 60 months	37	11.01%	19	5.04%	19	5.78%	911	9.42%
More than 5 years	13	3.87%	10	2.65%	15	4.56%	415	4.29%
Total SE	336	100%	377	100%	329	100%	9,673	100%

Data source: RSA-911

**Table 5.5.b (TN-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	Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months	5	3.36%	1	0.72%		0.00%	65	1.64%
4 – 6 months	36	24.16%	31	22.30%	20	18.35%	464	11.70%
7 – 9 months	21	14.09%	21	15.11%	17	15.60%	612	15.44%
10 – 12 months	15	10.07%	13	9.35%	12	11.01%	472	11.90%
13 - 24 months	34	22.82%	35	25.18%	37	33.94%	1,134	28.60%
25 – 36 months	11	7.38%	20	14.39%	14	12.84%	549	13.85%
37 – 60 months	21	14.09%	11	7.91%	7	6.42%	526	13.27%
More than 5 years	6	4.03%	7	5.04%	2	1.83%	143	3.61%
Total SE	149	100%	139	100%	109	100%	3,965	100%

Data source: RSA-911

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				
Date of Eligibility Determination				
Date of IPE				
Start Date of Employment in Primary Occupation at Exit or Closure				
Weekly Earnings at Exit or Closure				
Employment Status at Exit or Closure				
Type of Exit or Closure				
Date of Exit or Closure				

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

APPENDIX C: AGENCY RESPONSE

A. Overview

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

B. Agency Responses

Recommendations

2.1 Referrals and Applications

- 2.1.1 Conduct an analysis as to potential causes for the decline in applications;
- 2.1.2 Develop and implement strategies and procedures, both internal and external, to improve the quality and quantity of referrals to the VR program; and
- 2.1.3 Establish goals and targets to measure progress and effectiveness of new strategies.

Agency Response: TDRS appreciates the open discussions that took place during the monitoring visit, particularly those discussions that included best practices, strategies and methods that have yielded success in other agencies. As a result, TDRS leadership has begun preliminary internal discussions about ways that new and innovative approaches may be developed to address the quality and quantity of referrals and applications as better strategies to approach goal setting and progress measurements.

Technical Assistance: TDRS does not request technical assistance at this time.

2.2 Attrition

- 2.2.1 Conduct surveys of individuals who exit the VR program after eligibility is determined but before IPEs are developed to determine the reasons why these individuals are withdrawing from the program;
- 2.2.2 Based on the information obtained through this survey, develop goals with measurable targets to decrease the number of individuals exiting the VR program at this stage of the process and strategies to achieve these goals; and
- 2.2.3 Assess barriers and challenges to timely IPE development and provide staff training to address barriers.

Agency Response: While TDRS does conduct customer surveys, TDRS leadership has identified the need to revisit its current survey methodology and the intervals at which the surveys are conducted. By being more intentional in collecting and analyzing the survey results data, TDRS will be able to better identify trends in barriers to success for clients, thereby giving TDRS greater insight into attrition.

RSA Response: RSA stands ready to provide technical assistance to TDRS as it analyzes future survey results that shed light on factors that contribute to attrition.

Technical Assistance: TDRS requests technical assistance.

2.3 Reporting of Services

- 2.3.1 Expand written internal control policies and procedures for the accuracy and validity of data reported through the RSA-911, specifically for services provided;
- 2.3.2 Develop a quality assurance process for determining if services are being reported accurately and take appropriate measures to ensure proper reporting of services whether they are provided in-house, or purchased; and
- 2.3.3 Ensure that all individuals determined eligible receive the VR services needed to achieve their vocational goal.

Agency Response: Because of the limitations of its current case management system, TDRS is not in the optimal position to fully analyze data in an efficient manner. However, as a result of conversations with RSA and TDRS' own identification of its need to develop more effective methods to review both 911 and other program data that are meaningful in leadership decision making, TDRS has begun exploring resources within the Designated State Agency (DSA) to assist with data analytics to assist with better understanding and quality control.

RSA Response: RSA stands ready to provide technical assistance to TDRS as it engages in data analytics.

Technical Assistance: TDRS requests technical assistance.

2.4 Internal Controls

- 2.4.1 Evaluate whether the TRIMS case management system is able to backdate so that the signature dates of the applicant or eligible individual match what is recorded in the electronic system;
- 2.4.2 Evaluate and update policy and procedures related to internal controls to ensure data integrity and the proper recording of signature dates in the TRIMS electronic case management system; and
- 2.4.3 Ensure that future electronic case management systems utilize appropriate internal controls in order to maintain data integrity and the proper recording of signature dates.

Agency Response: TDRS will explore all options available in its current case management system and evaluate its internal procedures to allow for matching the signature and system dates. Additionally, TDRS will carefully evaluate the capabilities and controls of any future case management systems to ensure proper recording of signature dates along with the integrity of the data captured and reported.

Technical Assistance: TDRS does not request technical assistance at this time.

3.1 Quality of Employment Outcomes

- 3.1.1 Evaluate the reasons behind the relatively low number of youth under age 25 at exit participating in four-year or university training;
- 3.1.2 Develop and implement strategies to address the focus on pre-employment transition services in order to provide more meaningful opportunities for training and other services necessary for students and youth with disabilities to achieve employment outcomes in a competitive integrated setting; and
- 3.1.3 Evaluate policy and training to staff to ensure data integrity and the proper recording of the number of youth under age 25 at exit who are participating in four-year or university training.

Agency Response: TDRS has significantly increased its efforts to provide required and most recently authorized Pre-ETS services. However, as discussed during the onsite visit, more work can be done to determine potential reasons for, or barriers to, lower number of youth under age 25 at exit participating in four-year or university training and its associated data tracking related to those youth's participation in post-secondary programs and services. TDRS, as part of its data review improvements, will add youth participation in post-secondary programs as another element for more intentional review.

Technical Assistance: TDRS does not request technical assistance at this time.

4.1 Quality of Supported Employment Outcomes

- 4.1.1 Develop measurable goals and strategies to improve the quality of the supported employment outcomes achieved by individuals with disabilities, including the performance as measured by hourly wages earned and hours worked per week.

Agency Response: TDRS, as part of its overall and continuous quality improvement review process, will look more intentionally at the quality of the supported employment outcomes including the hourly wages earned and hours worked per week by individuals with disabilities participating in supported employment activities to identify any potential barriers and strategies for improving both the quality of those employment outcomes and associated wages of participants.

Technical Assistance: TDRS does not request technical assistance at this time.

Corrective Actions to Improve Performance

2.1 Timely Eligibility Determination

Corrective Action Steps:

- 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: As part of TDRS's continuing process and quality improvement efforts, TDRS has implemented several process improvements to ensure that all counselors determine eligibility for all applicants of the Vocational Rehabilitation (VR) program in a timely manner in accordance with 34 CFR §361.41(b)(1) by making eligibility determinations within the required 60-day period. Current and ongoing activities to enhance timeliness and compliance with 34 CFR §361.41(b)(1) include:

- **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:** In 2016, TDRS expanded the Policy Unit to include policy specialists located in each grand region of the state to provide specific policy guidance and technical assistance to field staff. In addition to their primary responsibilities related to performance trend analysis, policy guidance, and training reinforcement, the regional policy specialists are tasked with working with TDRS

leadership and field staff to identify, develop, and provide technical assistance to support counselors in complying with 34 CFR §361.41(b)(1). In addition to the support field staff receives through their field and regional supervisors, the policy specialists meet with counselors one on one, in unit and regional meetings, as well as develop and implement webinars for training and policy clarification purposes based on trends identified through timeliness tracking and best practices. TDRS leadership will continue to evaluate the effectiveness of this unit and approach and make adjustments as needed.

- **2.1.3 Develop procedures for VR counselors and supervisors to track and monitor timely and untimely eligibility determinations.** TDRS leadership, in collaboration with the Quality Improvement and Strategic Solutions (QISS) unit within the Department of Human Services, has developed review and monitoring strategies that specifically address timeliness of eligibility determinations by counselors. The monitoring process includes supervisors at all levels, including senior program management, to more intentionally monitor, discuss, and make course corrections to ensure that counselors are identifying potential delays in case progress and addressing them earlier. Supervisors discuss cases with their units and facilitate case conferences on more challenging cases as needed for a more collaborative approach to keep cases progressing timely. The process conducted by QISS includes reviewing client case files to determine if case work has been performed in accordance with 34 CFR §361.41(b)(1), standard business processes, VR Policy Manual, and best practices and reporting those findings to TDRS. Once these reports are provided to VR leadership, a monthly Quality Assurance (QA) results meeting is held with leadership, including the Assistant Commissioner, VR Director, VR Assistant Director, VR Policy Director, and Regional Supervisors to review the results. Following the QA results meeting with program leadership, VR QA conducts quarterly meetings with the regional staff to review results and the tools made available to counselors, supervisors and field management to ensure that staff is aware of and using the capabilities of the tools made available to them like the Action Alert List in the case management system.

Additional contributions to quality in VR case processes are made by Front Line and Regional Supervisors. Front Line Supervisor contributions in the QA process include regular and consistent case reviews of their unit member's caseloads to ensure timeliness of making eligibility determinations within the required 60-day period and that the appropriate procedural requirements are followed, evaluation of counselor performance, and assisting counselors with workload management. Regional Supervisor contributions in the QA process include periodic case reviews to ensure timeliness of cases and the appropriate procedural requirements are followed, and evaluation of counselor and front line supervisor performance.

Summary of Corrective Actions: As a result of TDRS's self-identification of areas requiring improvement prior to the monitoring visit, TDRS had already implemented the above process and quality improvement strategies. Below is a summary of the timetable of implementation of specific actions, those responsible for implementation and the method by which each was

evaluated for effectiveness.

- Technical Assistance to Field Staff: Beginning in Q3 of FFY 2016, the Policy Unit was expanded to ensure that each grand region of the state had access to a local policy specialist who provides technical assistance and guidance, as needed in the proper application of policy, including timely eligibility determination. The unit is supervised by a statewide Policy Manager and VR Policy Director who report to the Vocational Rehabilitation Services Director who has ultimate responsibility for ensuring that TDRS is compliant with 34 CFR §361.41(b)(1). TDRS evaluates and monitors its success through monthly performance reviews with staff, client case reviews conducted by field leadership and the policy unit team, as well as data and case discussions held during monthly regional unit meetings.
- Implementation of Quality Assurance Reviews: TDRS increased its intentional focus on quality reviews and timeliness of eligibility determination and compliance with 34 CFR §361.41(b)(1) in collaboration with the DSA's Quality Improvement and Strategic Solutions (QISS) Unit. TDRS evaluates and monitors its success through monthly QA Reports and conference calls where performance data specific to each region, and when needed counselor, is reviewed and discussed as well as during quarterly regional QA meetings.

TDRS takes timeliness seriously and will continue the improvement process to ensure that all VR cases are handled accurately, timely and making eligibility determinations within the required 60-day period in accordance with 34 CFR §361.41(b)(1). In the current Federal Fiscal Year to date, TDRS has experienced a continued and steady improvement making eligibility determinations within the required 60-day period. The average eligibility determination timeliness rate for Federal Fiscal year to date is 99.6%. Based on this performance improvement, TRDS believes that the corrective actions put into place are accurately and appropriately addressing the previous performance deficiencies. TDRS will continue to monitor the effectiveness of the quality assurance process monthly.

Technical Assistance: TDRS does not request technical assistance at this time.

2.2 Timely Development of the IPE

Corrective Action Steps:

- 2.2.1 Comply with 34 CFR §§361.45(a)(1) and (e) to ensure IPEs are developed within the 90-day Federal timeframe from date of eligibility determination;
- 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: As part of TDRS’s continuing process and quality improvement efforts, TDRS has implemented several process improvements to ensure that all counselors create and implement Individualized Plans for Employment (IPEs) for Vocational Rehabilitation (VR) clients in a timely manner in accordance with 34 CFR §§361.45(a)(1) and (e) to ensure IPEs are developed within the 90-day Federal timeframe from date of eligibility determination. Current and ongoing activities to enhance timeliness and compliance with 34 CFR §§361.45(a)(1) and (e) include:

- 2.2.1 Comply with 34 CFR §§361.45(a)(1) and (e) to ensure IPEs are developed within the 90-day Federal timeframe from date of eligibility determination.
- 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: In 2016, TDRS expanded the Policy Unit to include policy specialists located in each grand region of the state to provide specific policy guidance and technical assistance to field staff. In addition to their primary responsibilities related to performance trend analysis, policy guidance, and training reinforcement, the regional policy specialists are tasked with working with TDRS leadership and field staff to identify, develop, and provide technical assistance to support counselors in complying with 34 CFR §§361.45(a)(1) and (e). In addition to the support field staff receives through their field and regional supervisors, the policy specialists meet with counselors one on one, in unit and regional meetings, as well as develop and implement webinars for training and policy clarification purposes based on trends identified through timeliness tracking and best practices. TDRS leadership will continue to evaluate the effectiveness of this unit and approach and make adjustments as needed.
- **2.2.3 Develop goals and strategies to improve VR counselor performance specific to timely IPE development.** TDRS leadership, in collaboration with the Quality Improvement and Strategic Solutions (QISS) unit within the Department of Human Services, has developed review and monitoring strategies that specifically address timeliness of plan development by counselors. The monitoring process includes supervisors at all levels, including senior program management, to more intentionally monitor, discuss, and make course corrections to ensure that counselors are identifying potential delays in case progress and addressing them earlier. Supervisors discuss cases with their units and facilitate case conferences on more challenging cases as needed for a more collaborative approach to keep cases progressing timely. The process conducted by QISS includes reviewing client case files to determine if case work has been performed in accordance with 34 CFR §§361.45(a)(1) and (e), standard business processes, VR Policy Manual, and best practices and reporting those findings to TDRS. Once these reports are provided to VR leadership, a monthly Quality Assurance (QA) results meeting is held with leadership, including the Assistant Commissioner, VR Director, VR Assistant Director, VR Policy Director, and Regional Supervisors to review the results. Following the QA results meeting with program leadership, VR QA conducts

quarterly meetings with the regional staff to review results and the tools made available to counselors, supervisors and field management to ensure that staff is aware of and using the capabilities of the tools made available to them like the Action Alert List in the case management system.

Additional contributions to quality in VR case processes are made by Front Line and Regional Supervisors. Front Line Supervisor contributions in the QA process include regular and consistent case reviews of their unit member's caseloads to ensure timeliness of cases and that the appropriate procedural requirements are followed, evaluation of counselor performance, and assisting counselors with workload management. Regional Supervisor contributions in the QA process include periodic case reviews to ensure timeliness of cases and the appropriate procedural requirements are followed, and evaluation of counselor and front line supervisor performance.

Summary of Corrective Actions: As a result of TDRS's self-identification of areas requiring improvement prior to the monitoring visit, TDRS had already implemented the above process and quality improvement strategies. Below is a summary of the timetable of implementation of specific actions, those responsible for implementation and the method by which each was evaluated for effectiveness.

- **Technical Assistance to Field Staff:** Beginning in Q3 of FFY 2016, the Policy Unit was expanded to ensure that each grand region of the State had access to a local policy specialist who provides technical assistance and guidance as needed in the proper application of policy, including timely IPE development. The unit is supervised by a statewide Policy Manager and VR Policy Director who report to the Vocational Rehabilitation Services Director who has ultimate responsibility for ensuring that TDRS is compliant with 34 CFR §§361.45(a)(1) and (e). TDRS evaluates and monitors its success through monthly performance reviews with staff, client case reviews conducted by field leadership and the policy unit team, as well as data and case discussions held during monthly regional unit meetings.
- **Implementation of Quality Assurance Reviews:** TDRS increased its intentional focus on quality reviews and timeliness of IPE development and compliance with 34 CFR §§361.45(a)(1) and (e) in collaboration with the DSA's Quality Improvement and Strategic Solutions (QISS) Unit. TDRS evaluates and monitors its success through monthly QA Reports and conference calls where performance data specific to each region, and when needed counselor, is reviewed and discussed as well as during quarterly regional QA meetings.

TDRS takes timeliness seriously and will continue the improvement process to ensure that all VR cases are handled accurately, timely and in accordance with 34 CFR §§361.45(a)(1) and (e). In the current Federal Fiscal Year to date, TDRS has experienced significant improvement in plan development timeliness from eligibility determination. The average timeliness rate for Federal Fiscal year to date in Individualized Plan for Employment (IPE) development within 90 days is 93.54%. Based on this performance improvement, TRDS believes that the corrective actions put into place are accurately and appropriately addressing the previous performance

deficiencies. TDRS will continue to monitoring the effectiveness of the quality assurance process monthly.

Technical Assistance: TDRS does not request technical assistance at this time.

5.1 Prior Approval Requirements Not Met

Corrective Action Steps:

5.1.1 RSA requires that TDRS develop and implement a written internal control process, including a monitoring component, to ensure ongoing compliance with the prior approval requirements.

Agency Response: TDRS drafted preliminary policies to comply with the prior approval requirements in 2 CFR §200.407 prior to the monitoring visit and had brief discussions about the requirements during both the pre on-site conference calls and while RSA was on site. The draft policy was also provided to RSA following the visit. Subsequently, Technical Assistance Circular RSA-TAC-18-02 was issued on April 11, 2018 to provide further compliance guidance.

As a result TDRS will redraft, expand and clarify its draft policy to ensure compliance with the prior approval requirements in 2 CFR §200.407 and guidance provided in RSA-TAC-18-02 by October 2018. In addition, by December 2018, TDRS will develop accompanying procedural guidance for staff that will provide more detailed processes to ensure full compliance with 2 CFR §200.407 and guidance provided in RSA-TAC-18-02 that clearly defines the details of each requirement, the processes used to seek prior approval, the documentation necessary for prior approval, and the monitoring of those processes.

To ensure both technical and intentional compliance with 2 CFR §200.407 and guidance provided in RSA-TAC-18-02, TDRS will seek technical assistance from RSA throughout the redrafting and drafting process of each respective document.

RSA Response: RSA stands ready to provide TDRS with technical assistance as it develops its prior approval policy.

Technical Assistance: TDRS requests technical assistance.