

**FEDERAL FISCAL YEAR 2018
MONITORING REPORT
ON THE
KANSAS 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: THE FEDERAL MANDATE AND REVIEW SCOPE

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 of the Rehabilitation Act subject to the performance accountability provisions described in Section 116(b) of WIOA. In addition, the Commissioner must assess the degree to which VR agencies are complying with the assurances made in the State Plan Supplement for Supported Employment Services under Title VI of the Rehabilitation Act.

Through its monitoring of the State Vocational Rehabilitation Services program (VR program) and the State Supported Employment Services program (Supported Employment program) administered by Kansas Rehabilitation Services (KRS) in Federal fiscal year (FFY) 2018, 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, including those with significant and most significant disabilities;
- Identified strategies and corrective actions to improve program and fiscal performance related to the following focus areas:
 - Performance of the VR Program;
 - Transition Services, including Pre-Employment Transition Services, for Students and Youth with Disabilities;
 - Supported Employment program;
 - Allocation and Expenditure of VR and Supported Employment Program Funds; and
 - Joint WIOA Final Rule Implementation.

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

The nature and scope of this review and the process by which RSA carried out its monitoring activities, including the conduct of an on-site visit from September 18 through 20, 2018, is described in detail in the [FFY 2018 Vocational Rehabilitation Program Monitoring and Technical Assistance Guide](#).

B. Review Team Participants

Members of the RSA review team included Brian Miller, Shannon Moler, and David Wachter (VR Program Unit); Sean Barrett (Fiscal Unit); Caneshia McAllister (Technical Assistance Unit); and Yann-Yann Shieh (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.

C. Acknowledgements

The RSA review team wishes to thank the managers and staff of KRS, as well as the chair and other representatives of the Kansas state rehabilitation council (SRC), and the director and advocates from the Kansas Client Assistance Program, for their support of this monitoring effort.

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

A. Purpose

Through this focus area, RSA assessed the achievement of employment outcomes, including the quality of those 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 below, along with any accompanying observations, recommendations, or findings, is based on a review of the programmatic data contained in Tables 1 through 9 found in Appendix A of this report. The data used in the analysis are those collected and reported by VR agencies based on Policy Directive 14-01, which was implemented prior to changes in reporting requirements in Section 101(a)(10) of the Rehabilitation Act made by WIOA, as well as the establishment in Title I of WIOA of common reporting requirements and performance indicators for all core programs in the workforce development system, including the VR program.

B. Analysis of the Performance of the VR Program

RSA reviewed KRS' performance for FFYs 2015, 2016, and three quarters of FFY 2017, with particular attention given to the number and quality of outcomes achieved by individuals with disabilities in the State. Additionally, the review addressed the number of individuals who were determined eligible for VR services and who received services through the VR program. The data used in this review were provided by KRS to RSA on the Quarterly Cumulative Caseload Report (RSA-113) and the Case Service Report (RSA-911).

The VR Process

Resources: Program Performance Data Table 1 Summary Statistics from RSA 113—FFYs 2015-2017; Program Performance Data Tables 2a, 2b, and 2c Agency Case Status Information, Exit Status, and Employment Outcomes—FFYs 2015–2017; and Program Performance Data Tables 3a, 3b, and 3c Source of Referral—FFYs 2015–2017

The VR Process: All Individuals

In analyzing data from the RSA-113 for all individuals served, RSA noted that the total number of applicants dropped slightly each year from 4,883 in FFY 2015, to 4,720 in FFY 2017, a difference of 163 applicants. A total of 4,814 and 4,619 eligible individuals were reported in FFYs 2015 and 2017, respectively, representing a decrease of 195 eligible individuals. Even though the number of applicants only dropped by 163 and the number of eligible individuals only dropped by 195 from FFYs 2015 through 2017, the number of individuals in plan receiving services dropped each year from 7,297 in FFY 2015 to 5,988 in FFY 2017, a decrease of 1,309 individuals. The percentage of eligible individuals who had an IPE but received no services declined from 37.1 percent in FFY 2015, to 32.4 percent in FFY 2017. At the time of the review, KRS reported that it was implementing an order of selection, but that all categories were open. The agency reported that it had no plans to close categories in the future.

The VR Process: Youth under Age 25

Based on data from the RSA-911 related to the KRS VR Process for youth under age 25, the number of youth who exited as applicants decreased from 178, or 13.7 percent, in FFY 2015, to 105, or 14.6 percent, in the first three quarters of FFY 2017. Further, the number of youth under age 25 who exited without employment outcomes, after eligibility, before an IPE was signed or before receiving services decreased from 442, or 34.1 percent, in FFY 2015, to 255, or 35.6 percent, in the first three quarters of FFY 2017. Additionally, similar to the data for all individuals served, the number of youth under age 25 exiting the program prior to implementing an IPE trended downward over the three-year period under review.

Employment Outcomes

Resources: Program Performance Data Tables 2a, 2b, and 2c Case Status Information, Exit Status, and Employment Outcomes—FFYs 2015–2017

In analyzing data from the RSA-911 Case Service Report related to KRS employment outcomes, it was noted that the employment rate for all individuals served rose from 42.8 percent in FFY 2015, to 46.7 percent in FFY 2016, and then declined to 41.7 percent in the first three quarters of FFY 2017. This rise and fall in the employment rate was also evident in individuals below age 25, as well as those individuals age 25 and older.

Further, data showed that the number of competitive employment outcomes dropped from 1,236 (92 percent) in FFY 2015, to 1,065 (93.9 percent) in FFY 2016, and then to 687 (95.2 percent) in the first three quarters of FFY 2017. Similar to all individual served, competitive employment outcomes for youth under age 25 declined from 262, or 87.6 percent, in FFY 2015, to 152, or 95 percent, in the first three quarters of FFY 2017.

Additionally, in regard to measures pertaining to quality of competitive integrated employment outcomes for all individuals served, data showed that average hourly earnings for competitive employment outcomes remained steady for the three-year period, rising slightly from FFY 2015 to FFY 2017. The average hourly earnings for all individuals served rose from \$10.16 in FFY 2015, to \$10.27 in FFY 2016, and then to \$10.59 in the first three quarters of FFY 2017. On the other hand, the average hours worked for competitive employment outcomes went down each year from 29.7 hours in FFY 2015, to 28.7 hours in FFY 2016, and then to 28.2 hours in the first three quarters of FFY 2017. These data were consistent with case status information reported for individuals below age 25, as well as individuals age 25 and older at the time of case closure.

Lastly, similar to average hourly earnings, the median hourly earnings for competitive employment outcomes rose slightly from FFY 2015 to FFY 2017. The median hourly earnings rose from \$9.00 in FFY 2015, to \$9.08 in FFY 2016, and then to \$9.24 in the first three quarters of FFY 2017. The median hours worked for competitive employment outcomes decreased from 30 hours in FFYs 2015 and 2016, to 28 hours in the first three quarters of FFY 2017. Quarterly median earnings for competitive employment outcomes for all individuals served also declined over the three-year period, from \$3,542.50 in FFY 2015, to \$3,315.00 in the first three quarters of FFY 2017. Although the decline in median wages was consistent for all age groups, median wages were lower for individuals below age 25. Quarterly median earnings for competitive

employment outcomes for youth under age 25 dropped from \$2,996.50 in FFY 2015, to \$2,931.50 in the first three quarters of FFY 2017.

VR Services Provided

Resources: Program Performance Data Tables 7a, 7b, and 7c VR Services Provided—FFYs 2015–2017

Based on data from the RSA-911 reported by KRS during the review period, the three services most often provided to all individuals served were—

- Assessment at 75.7 percent (FFY 2015), 75.6 percent (FFY 2016), and 73.9 percent (the first three quarters of FFY 2017);
- Job placement assistance at 58.0 percent (FFY 2015), 59.1 percent (FFY 2016), and 58.6 percent (the first three quarters of FFY 2017); and
- Transportation at 46.6 percent (FFY 2015), 41.3 percent (FFY 2016), and 38.6 percent (the first three quarters of FFY 2017).

The percentages of all individuals served who KRS supported in bachelor degree training decreased over the review period from 11.0 percent in FFY 2015, to 8.4 percent in the first three quarters of FFY 2017. On the other hand, the percentages of all individuals served who KRS supported in community college training rose from 3.9 percent in FFY 2015, to 9.8 percent in the first three quarters of FFY 2017. Further, KRS reported that none of the individuals whose service records were closed in FFY 2015 through the first three quarters of FFY 2017 received VR counseling and guidance or benefits counseling. These services are comparable with those listed on Table 7c for individuals over age 25; however, data related to youth under age 25 show maintenance as the third service most often provided in the review period.

Outcomes by Disability Type

Resources: Program Performance Data Tables 4a, 4b, and 4c Agency Outcomes by Disability Type—FFYs 2015–2017.

Outcomes for All Individuals by Disability Type

In FFY 2016, the greatest percentages by types of disabilities of all individuals served who achieved employment outcomes were:

- Individuals with psychosocial/psychological disabilities at 38 percent;
- Individuals with intellectual/learning disabilities at 26.9 percent; and
- Individuals with physical disabilities at 26.2 percent.

Further, KRS reported the following employment rates for the above disability types in FFY 2016:

- Individuals with psychosocial/psychological disabilities at 41.3 percent;
- Individuals with intellectual/learning disabilities at 58.1 percent; and

- Individuals with physical disabilities at 37.9 percent.

In FFY 2016, KRS' highest employment rate for all individuals served was for those individuals with auditory/communicative impairments at 70.1 percent. However, this disability type represents a low percentage (5.9 percent) of all the individuals KRS served in FFY 2016. KRS also served very few individuals with visual impairments (3.0 percent) in FFY 2016, which was consistent with the number of individuals who have visual disabilities in the State as a whole.

Outcomes for Youth under Age 25 by Disability Type

In FFY 2016, the greatest percentages by types of disabilities of individuals under age 25 served who achieved employment outcomes were—

- Individuals with intellectual/learning disabilities at 56.6 percent;
- Individuals with psychosocial and psychological disabilities at 27.6 percent; and
- Individuals with physical disabilities at 10.0 percent.

In contrast, in FFY 2016, the greatest percentages by types of disabilities of individuals age 25 or older who achieved employment outcomes were—

- Individuals with psychosocial and psychological disabilities at 41.0 percent;
- Individuals with physical disabilities at 30.8 percent; and
- Individuals with intellectual and learning disabilities at 18.4 percent.

In FFY 2016, KRS' highest employment rate for youth under age 25 was for those individuals with intellectual/learning disabilities at 55.1 percent. Additionally, in FFY 2016 for individuals age 25 and older, the highest employment rate was for those individuals with auditory and communicative disabilities at 74.4 percent, which represented only 6.6 percent of individuals served during the review period.

Compliance with the Statutory Time Frame for Application to Eligibility Determination

Resources: Tables 5a, 5b, and 5c Number of Days from Application to Eligibility Determination—FFYs 2015–2017

From FFYs 2015 to 2016, the percentage of individuals served who were determined eligible within 60 days from the date of application remained steady at 92.0 percent and 92.4 percent, respectively, while the total number of these individuals decreased from 4,531 to 3,735 individuals. For the first three quarters of FFY 2017, KRS completed timely eligibility determinations for 93.1 percent of the individuals whose service records were closed in those quarters. These percentages are comparable with the percentages listed on Table 5c for individuals over age 25.

Similarly, from FFYs 2015 to 2016, the percentage of youth under age 25 who KRS determined eligible within 60 days from the date of application was approximately 91.0 percent, while the total number of these individuals decreased from 1,019 to 847. For the first three quarters of FFY

2017, KRS completed timely eligibility determinations for 92.3 percent of youth under age 25 whose service records were closed in those quarters.

Compliance with the Statutory Time Frame from Eligibility Determination to IPE Development

Resources: Tables 6a, 6b, and 6c Number of Days from Eligibility Determination to IPE—FFYs 2015–2017

From FFYs 2015 to 2016, the percentage of individuals served for whom KRS developed an IPE within 90 days from the date of application decreased from 86.9 percent to 84.5 percent. KRS developed timely IPEs for 86.6 percent of the individuals whose service records were closed in the first three quarters of FFY 2017. These percentages are comparable with the percentages listed on Table 6b and 6c for youth under age 25 and for individuals over age 25.

Types of Occupational Outcomes for Individuals Who Achieved Employment

Resources: Tables 8a, 8b, and 8c Standard Occupational Classification (SOC) Codes Percentages of Employment Outcomes and Median Hourly Earnings for Individuals Who Achieved Competitive Employment Outcomes at Closure—FFYs 2015–2017

In FFY 2016, the following three occupations were most often obtained by all individuals whose service records were closed and who achieved employment:

- Office and administrative support occupations at 20.2 percent (median hourly wage: \$9.25);
- Food preparation and serving-related occupations at 16.2 percent (median hourly wage: \$8.04); and
- Building and grounds cleaning and maintenance at 11.1 percent (median hourly wage: \$8.50).

These percentages were comparable with the percentages listed on Table 8c for individuals over age 25. In FFY 2016, for all individuals served, individuals who obtained legal occupations earned the highest median hourly wage at \$28.85; however, only 0.1 percent of these individuals achieved this type of employment. Individuals who obtained employment in food preparation and serving-related occupations earned the lowest median hourly wage at \$8.04.

In FFY 2016, the following three occupations were most often obtained by youth under age 25 whose service records were closed and who achieved employment:

- Food preparation and serving-related occupations at 21.8 percent (median hourly wage: \$8.00);
- Office and administrative support occupations at 21.0 percent (median hourly wage: \$9.00); and
- Building and grounds cleaning and maintenance at 9.5 percent (median hourly wage: \$8.00).

In FFY 2016, youth under age 25 who achieved employment in computer and mathematical occupations earned the highest median hourly wage at \$27.40; however, only 0.4 percent of these individuals achieved this type of employment. Youth under age 25 who achieved employment in Food preparation and serving-related occupations and building and grounds cleaning and maintenance earned the lowest median hourly wages at \$8.00.

Reasons for Exit for Individuals Who Did Not Achieve an Employment Outcome

Resources: Tables 9a, 9b, and 9c Reason for Exit for All Individuals Who Did Not Achieve an Employment Outcome at Closure—FFYs 2015–2017

For FFY 2016, KRS reported that individuals served who did not achieve an employment outcome and whose service record was closed most often exited the VR program for the following reasons:

- No longer interested in receiving services or further services: 47.7 percent of all individuals;
- Unable to locate or contact: 31.4 percent of all individuals; and
- All other reasons: 12.5 percent of all individuals.

These percentages were comparable with the percentages listed on Table 9c for individuals over age 25.

Similarly, youth under age 25 who did not achieve an employment outcome and whose service record was closed that year most often exited the VR program for the following reasons:

- No longer interested in receiving services or further services: 49.0 percent of youth under age 25;
- Unable to locate or contact: 33.5 percent of youth under age 25; and
- All other reasons: 11.8 percent of youth under age 25.

C. Internal Controls

The RSA review team assessed performance accountability in relation to the internal control requirements in 2 C.F.R. § 200.303. Internal controls mean a process, implemented by a non-Federal entity, designed to provide reasonable assurances regarding the achievement of objectives in the effectiveness and efficiency of operations, reliability of reporting for internal and external use, and compliance with applicable laws and regulations. Internal controls are established and implemented as a measure of checks and balances to ensure proper expenditure of funds. Internal controls serve to safeguard assets and prevent fraud, waste, abuse, and mismanagement. They include methods and procedures the grantee uses to manage the day-to-day operations of grant-supported activities to assure compliance with applicable Federal requirements and that performance goals are being achieved.

Policies and Procedures

During the on-site monitoring review with KRS, RSA conducted a review of 30 case files comprised of service records for individuals who did and did not achieve employment by

September 30, 2017, to verify and ensure that the documentation in the case service record was accurate, complete and supported the data entered in 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.

KRS uses a legacy in-house case management system to maintain a service record for each applicant and eligible individual, as required under 34 C.F.R. § 361.47, and also maintains paper documents for each individual receiving services. The case management system, which was developed and implemented in the 1980s, reportedly uses obsolete programming language, which makes it difficult for KRS to meet the data requirements outlined in WIOA. KRS had requested approximately three million dollars from the FY 2019 State general fund to replace the case management system, which required legislation that was not passed.

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

1. Record of Service, section 1, part 11 of the KRS policy manual; and
2. Documentation Guide, section 1, part 12 of the KRS policy manual.

Data Verification Review

The RSA review team reviewed 30 service records to verify that the records contained documentation supporting data reported by the VR agency on the RSA-911 report. Of the 30 cases reviewed, nine were closed as individuals having achieved competitive employment, and 21 were closed with individuals achieving no employment outcome. Of the nine cases closed as individuals having achieved competitive employment, two were supported employment cases.

Of the 30 service records reviewed, 17 or 56.7 percent included the correct date of application, and 24 or 80.0 percent included the correct date of eligibility determination. The date of the most recent or amended IPE reported in the RSA-911 matched the date on the source documentation in 17 of the 30 cases reviewed, resulting in an accuracy rate of 56.7 percent for that element. Also, six or 66.7 percent of the nine service records closed as individuals having achieved competitive employment included the correct start date of employment, verification of the employment outcome at exit, and verification of the hourly wage at exit. Lastly, 24 or 80.0 percent of all 30 cases reviewed for type of exit, and 23 or 76.7 percent of the cases reviewed for date of exit, matched the source documentation.

The on-site case review yielded the following information.

- The date of application reported in the RSA-911 matched the date on the source documentation in 17 of the 30 cases reviewed, resulting in an accuracy rate of 56.7 percent for that element. In some instances, the date entered into the case management system did not match the signature dates on the hard copy application in the case file. Reportedly, the case management system has the ability to back date if an application is

taken one day and entered into system on a different date, but the practice is not encouraged since it must be performed by the system administrator.

- The date of eligibility determination reported in the RSA-911 matched the date on the source documentation in 24 of the 30 cases reviewed, resulting in an accuracy rate of 80.0 percent for that element. In some cases, the signature dates on the paper copy of the eligibility determination did not match the date entered into the case management system. In the other cases, the VR counselor did not sign the paper copy of the eligibility determination in the case file.
- The date of the most recent or amended IPE reported in the RSA-911 matched the date on the source documentation in 17 of the 30 cases reviewed, resulting in an accuracy rate of 56.7 percent for that element. In most cases, the date entered into the case management system did not match the signature dates on the paper copy of the IPE in the case file. In other cases, the paper copy of the IPE was missing signatures either of the individual or the counselor. It was noted that no amendments are required if the individual accepts a job during the placement phase that is different than the job listed on the IPE. KRS reported that such a change should be documented specifically in the closure letter and that the letter must be labeled IPE Amendment.
- The start date of employment in the primary occupation reported in the RSA-911 matched the date on the source documentation in six or 66.7 percent of the nine service records reviewed that were closed as having achieved a competitive employment outcome. In two cases, there was no supporting documentation or case note to support the start date reported. In the other case, the date entered into the case management system did not match what was reported in the supporting documentation.
- Verification of employment outcome at exit reported in the RSA-911 was verified by supporting documentation in six of the nine service records reviewed that were closed as having achieved a competitive employment outcome, resulting in an accuracy rate of 66.7 percent for that element. In all cases noted as inaccurate, the employment outcome at exit was not supported by documentation from an employer or other source.
- The hourly wage at exit reported in the RSA-911 also matched the date on the source documentation in six of the nine cases reviewed that were closed as having achieved a competitive employment outcome, resulting in an accuracy rate of 66.7 percent for that element. In three instances where it did not match, the hourly wage at exit was not verified with supporting documentation.
- The type of exit reported in the RSA-911 matched the source documentation in 24 of the 30 cases reviewed, resulting in an accuracy rate of 80.0 percent for that element. In some instances, no supporting documentation was in the file. In other instances, the system information did not match the file copy, or a letter was not required since the individual either moved out of State or was unable to be located.
- The date of exit reported in the RSA-911 matched the source documentation in 23 of the 30 cases reviewed, resulting in an accuracy rate of 76.7 percent for that element. In some instances, the system information did not match the file copy. In other instances, a letter was not required since the individual either moved out of State or was unable to be located.

D. Observations and Recommendations

RSA's review of the performance of KRS in this focus area resulted in the identification of the following observations and recommendations to improve performance.

Observation 2.1 Attrition

Individuals with disabilities, including those under age 25, in need of and eligible for VR services exited the VR system without receiving the necessary services to achieve an employment outcome during the period of review. In terms of individuals determined eligible for VR services who exited the VR program without employment outcomes, before an IPE was signed or before receiving services—

- From October 1, 2014 to June 30, 2017, 4,529 individuals exited the program before an IPE was signed or before receiving services. 24.0 percent or 1,088 of these individuals, were individuals under the age of 25 over this time period;
- In FFY 2015, 31.8 percent of all individuals served, or 1,784 individuals, exited before an IPE was signed or before receiving services. In FFY 2016, 34.6 percent of all individuals served, or 1,614 individuals, exited before the IPE was signed or before receiving services. In the first three quarters of FFY 2017, 34.5 percent of all individuals served, or 1,131 individuals, exited before IPE was signed or before receiving services; and
- In FFY 2015, 34.1 percent of youth under age 25, or 442 individuals, exited prior to signing an IPE or receiving services. In FFY 2016, 36.1 percent of youth under age 25, or 391, exited prior to signing an IPE or receiving services. In the first three quarters of FFY 2017, 35.6 percent of youth under age 25, or 255 individuals, exited prior to signing and IPE or receiving services.

In terms of the reason for exit for all individuals who did not achieve an employment outcome at closure—

- From October 1, 2014 to June 30, 2017, 4,837 individuals exited the program because they were no longer interested in receiving services. 23.4 percent or 1,133 of these individuals, were individuals under the age of 25 over this time period;
- In FFY 2015, 45.7 percent of all individuals served, or 1,951 individuals, exited the program because they were no longer interested in receiving services. In FFY 2016, 47.7 percent of all individuals served, or 1,687 individuals, exited the program because they were no longer interested in receiving services. In the first three quarters of FFY 2017, 46.9 percent of all individuals served, or 1,199 individuals, exited because they were no longer interested in receiving services; and
- In FFY 2015, 46.8 percent of youth under age 25, or 467 individuals, exited the program because they were no longer interested in receiving services. In FFY 2016, 49.0 percent of youth under age 25, or 396, exited the program because they were no longer interested in receiving services. In the first three quarters of FFY 2017, 48.5 percent of youth under age 25, or 270 individuals, exited the program because they were no longer interested in receiving services.

While on-site, RSA and KRS discussed the trend in the number of eligible individuals, including youth under the age of 25, who exited the VR program prior to signing an IPE or receiving services, and the fact that many of these individuals leave the program because they are no longer interested in receiving services. KRS recognized these issues and reported that staff turnover may have contributed to the trend. In an effort to address the issue, KRS developed a new staffing plan that includes higher pay rates with step increases for good performance to enhance longevity and to promote consistency for the individuals being served, but it cannot be implemented without legislative approval. This new staffing plan had not been implemented at the time of the on-site review.

Additionally, the agency reported that the trend may be related to a push at the State level to complete IPEs within 45 days from application, which is a component of each VR counselor's performance appraisal and could contribute to individuals prematurely withdrawing from the program. It was also noted during the review process that the number of individuals exiting the program prior to implementing an IPE or receiving services because they are no longer interested is trending downward, which may be due to the agency actively reviewing and managing caseloads at the beginning of the three-year period in preparation for serving more potentially eligible students in need of pre-employment transition services, and in preparation for new reporting requirements under WIOA.

Lastly, it was noted during the review process that KRS has implemented a residency requirement in its policy located in section 1, part 13 (Miscellaneous Administrative Issues) and in section 14, part 1 (Pre-Employment Transition Services) of its policy manual. The policies state that clients and students must maintain Kansas residency in order to continue receiving services and clients who receive services in another State must complete a residency verification form annually to certify continued Kansas residency, which could contribute to eligible individuals leaving the VR program prior to receiving services because they are no longer interested in receiving services.

Recommendations 2.1 Attrition

RSA recommends that KRS—

- 2.1.1 Conduct surveys of individuals, particularly for youth under age 25, who exit prior to IPE development, to determine the reasons why these individuals are withdrawing from the VR program; and
- 2.1.2 Based on the information obtained through these surveys, develop goals with measurable targets to decrease the number of individuals exiting the VR program at these stages of the process, and strategies to achieve these goals.

Agency Response:

General comment pertaining to all aspects of the review: As of January 2020, KRS is in a leadership transition period. The current VR Director was selected to lead a broad scope of employment priorities for people with disabilities, including an emphasis on work for people receiving Home and Community-Based Waiver Services through Medicaid. Recruitment for a new VR Director is underway, and it is assumed that the new Director will want to comment on

any responses and plans pertaining to this review. This issue was discussed with RSA, and RSA emphasized that, in spite of this transition, they must complete the report before the end of January 2020.

Recommendations: These will be taken into consideration in future planning once the new State Director of VR is appointed.

KRS also offers the following comments on specific points of the review:

- **Impact of counselor turnover and staffing levels on case management and attrition:** The VR Counselor plays a pivotal role in every aspect of program implementation, including engagement with consumers, attrition and outcomes. In State Fiscal Year (SFY) 2016, the average monthly number of filled counselor positions was 66, and the agency experienced a 33% turnover rate. In SFY 2017, these issues were even more critical, with an average of 63 filled counselor positions monthly, and a turnover rate of 43%. The agency is continuously recruiting to fill about 12 vacant VR counselor positions, which represent nearly 19% of the VR counselor workforce. In addition, the number of FTE allocated for VR counselor positions has decreased from 117 in 2007 to 78 currently. KRS has proposed a modified salary and hiring plan to address these issues, and it has been approved by RSA through the State Plan process. KRS continues to advocate for its retention and recruitment plan for VR counselor positions which is evident by its inclusion in the 2017-2020 State Plan and the soon to be submitted PY 2020-2024 State Plan.
- **Correct reporting of the date of application:** Often consumers fill out the application, sign and date it at their convenience but do not turn the application into the agency until a later date. Therefore, the agency practice is to date-stamp the application upon receipt and this becomes the date of application. The case management system allows the counselor to enter the date of application (date-stamped upon receipt) and the system auto-generates the date the application is entered. The date of entry can be a few days after receipt. For purposes of timeliness standards, we consider the date of application (date stamped, not the date entered). It is unclear whether RSA considered these distinctions when reviewing case files. The RSA-911 reporting is based on the date the application was received, not the date it is entered on the system. With this methodology to ensure we are tracking from the consumer's actual submission of the application, and not from an administrative function to enter the information on the case management system, there is no back-dating.
- **Timely access to services goal:** KRS has established a goal that at least 60% of our consumers will have access to services within 45 days from the date of application. The sooner an individual can access services, the more likely he/she will achieve a successful employment outcome. The longer a person waits for engagement in services and employment, the more likely it is that they will remain unemployed. This approach emphasizes getting to the "customer value added" (services leading to employment) more quickly while still maintaining the "business value added" steps of case processing. We do not agree with the characterization that the trend in attrition may be related to this goal. The goal still allows for a significant percentage (40%) of cases to take longer than

the 45 days identified. If exceptional and unforeseen circumstances warrant, time extensions may be implemented with the consumer's agreement. As part of the regular performance review process, KRS identified that roughly 40% of all VR applicants are individuals who have SSI, SSDI or both. As of December 31, 2019, the eligibility determination timeframe for SSI participants is nine days, for SSDI participants eight days and for those who have both SSI and SSDI eight days. The current average days to agree to and implement the IPE for all VR consumers is 63 days from the date of eligibility. Combined the current average days from application received to completion of the IPE is 92 days. With that in mind, the goal of having IPE completion within 45 days for 60% of applicants is well within the reach of VR counselors' current practices. Finally, this goal was not formalized into the counselor performance evaluation system until November 1, 2019. Demonstrating additional leeway in this matter, the counselor can be considered to meet expectations if 40% of his/her consumers have access to services within 45 days.

RSA Response: RSA appreciates KRS's information and efforts expressed in the above response and is prepared to work closely with the new director of KRS once that individual is hired.

Request for Technical Assistance: KRS requests detailed technical assistance on data reporting requirements and definitions.

Observation 2.2 Employment Outcomes

The employment rate rose from 42.8 percent in FFY 2015, to 46.7 percent in FFY 2016; however, it decreased to 41.7 percent in the first three quarters of FFY 2017. A similar trend was noted for youth under age 25 in that the employment rate rose from 44.3 percent in FFY 2015, to 51 percent in FFY 2016, and then decreased to 44.8 percent in the first three quarters of FFY 2017.

In terms of individuals who achieved employment outcomes—

- Median hourly earnings rose from \$9.00 in FFY 2015, to \$9.08 in FFY 2016, to \$9.24 in the first three quarters of FFY 2017;
- Median hours worked dropped from 30 hours in FFYs 2015 and 2016 to 28 hours in the first three quarters of FFY 2017; and
- Quarterly median earnings dropped from \$3,542.50 in FFY 2015, to \$3,380.00 in FFY 2016, to \$3,315.00 in the first three quarters of FFY 2017.

In terms of specific occupations individuals with disabilities achieved—

- In FFY 2016, KRS reported its highest percentage of individuals who achieved employment outcomes to be employed in office and administrative support occupations (20.2 percent), followed by food preparation and serving-related occupations (16.2 percent) and building and grounds cleaning and maintenance (11.1 percent); and
- The median hourly earnings reported for food preparation and serving-related occupations (\$8.04) and building and grounds cleaning and maintenance (\$8.50) were

less than the median hourly earnings reported overall for FFY 2016 (\$9.08). The median hourly earnings reported for office and administrative support occupations was \$9.25 in FFY 2016.

In terms of services these individuals received—

- The provision of bachelor degree training for all individuals served at closure declined from 11.0 percent in FFY 2015, to 8.4 percent in the first three quarters of FFY 2017;
- The provision of job placement assistance for all individuals served at closure was relatively steady at 58.0 percent in FFY 2015, and 58.6 percent in the first three quarters of FFY 2017; and
- The provision of junior or community college training for all individuals served rose from 3.9 percent in FFY 2015, to 9.8 percent in the first three quarters of FFY 2017.

While on-site, RSA and KRS discussed the upward trend in individuals receiving junior or community college training. KRS reported that this trend was consistent with the State’s push toward certificate training and career pathways. The agency was encouraged to continue to collaborate with Federal partners to implement the approaches called for in WIOA.

Recommendations 2.2 Employment Outcomes

RSA recommends that KRS—

- 2.2.1 Develop measurable goals and strategies to improve the agency’s performance in terms of maximizing and improving the quality of employment outcomes;
- 2.2.2 Assess the effect of postsecondary education (e.g., junior or community college training) on the quality of employment outcomes achieved by individuals who attended various levels of postsecondary education; and
- 2.2.3 Assess the effect of various job-related services (e.g., job placement assistance) on the quality of an individual’s employment outcome.

Agency Response: For many years, the Counselor’s performance evaluation has included an informational section pertaining to average hourly wages. It was listed so that counselors would be aware of the wages achieved on their caseloads and so that counselors and managers could discuss performance pertaining to wages with job placement providers. Effective November 1, 2020 this has become a measurable outcome indicator for all counselors and their regional managers and administrations. This step was taken to emphasize the importance of maximizing employment. Case reviews also rate counseling and guidance pertaining to maximizing employment. Recommendations will be taken into consideration in future planning once the new State Director of VR is appointed.

Request for Technical Assistance: KRS did not request technical assistance at this time.

Observation 2.3 Data Integrity

Less than 100 percent of the reported employment outcomes for the three-year review period, including those reported for individuals with disabilities, those for youth under age 25, and those

for individuals who received supported employment services, were reported as being competitive employment outcomes.

In terms of competitive employment outcomes reported from October 1, 2014 to June 30, 2017—

- In FFY 2015, for all individuals served, 92.0 percent of employment outcomes (1,236 outcomes) were reported as competitive employment outcomes; in FFY 2016, 93.9 percent of employment outcomes (1,065 outcomes) were reported as being competitive employment outcomes; and in the first three quarters of FFY 2017, 95.2 percent of employment outcomes (687 outcomes) were reported as being competitive employment outcomes;
- In FFY 2015, for youth under age 25, 87.6 percent of employment outcomes (262 outcomes) were reported as being competitive employment outcomes; in FFY 2016, 91.6 percent of employment outcomes (252 outcomes) were reported as being competitive employment outcomes; and in the first three quarters of FFY 2017, 95.0 percent of employment outcomes (152 outcomes) were reported as being competitive employment outcomes; and
- In FFY 2015, for individuals who received supported employment services, 81.8 percent of employment outcomes (121 outcomes) were reported as being competitive employment outcomes; in FFY 2016, 84.5 percent of employment outcomes (120 outcomes) were reported as being competitive employment outcomes; and in the first three quarters of FFY 2017, 88.6 percent of employment outcomes (70 outcomes) were reported as being competitive employment outcomes.

While on-site, RSA and KRS discussed this trend in the number of competitive employment outcomes for all individuals served, including youth under age 25 and those who received supported employment services. Since KRS reported that it does not provide services to uncompensated workers such as homemakers or unpaid family workers, the agency reported that these numbers may be attributed to reporting errors in the case management system. Reportedly, the system's section on competitive employment outcomes can be confusing to staff, particularly in relation to self-employment outcomes and those outcomes that require extended services.

Recommendations 2.3 Data Integrity

RSA recommends that KRS—

- 2.3.1 Analyze the data to determine why some employment outcomes are not being reported as being competitive employment outcomes;
- 2.3.2 Develop internal controls to ensure that VR counselors are reporting employment outcomes correctly; and
- 2.3.2 Conduct training to ensure that VR counselors and supervisors understand that a self-employed individual with a disability in the start-up phase of a business venture who is making less than the applicable minimum wage can meet the definition of competitive integrated employment, and that extended services does not preclude an outcome from being counted as a competitive employment outcome.

Agency Response: KRS data show that 99.5% of outcomes in FFY 2015 were competitive integrated employment. In FFY 2016 the percentage was 99.7%. In FFY 2016 through 2019, 100% of employment outcomes were in competitive integrated employment. Recommendations will be taken into consideration in future planning once the new State Director of VR is appointed.

RSA Response: RSA appreciates KRS' analysis of its data and will work with the agency to identify the cause of the discrepancy with the data drawn from the RSA-911 when providing the technical assistance requested below so that RSA and/or KRS can take appropriate steps to resolve these differences.

Request for Technical Assistance: KRS requests technical assistance for determining competitive integrated employment outcomes for individuals operating small businesses, and correctly reporting data related to these outcomes. The agency also requests assistance to determine why RSA and KRS data analysis for competitive integrated employment results in different reported metrics.

E. Findings and Corrective Actions

RSA's review of the performance of KRS in this focus area resulted in the identification of the following findings and the corresponding corrective actions to improve performance.

Finding 2.1 Residency Requirement

Issue: Did KRS include a residency requirement in Section 1, part 13 (Miscellaneous Administrative Issues) and in Section 14, part 1 (Pre-Employment Transition Services) of its policy manual that was not consistent with Federal requirements.

Requirement: Section 101(a)(12) of the Rehabilitation Act prohibits a state agency from imposing a "residence requirement that excludes from services provided under the [state plan] any individual who is present in the State." Further, 34 C.F.R. § 361.42(c)(1) states: "The State plan must assure that the State unit will not impose, as part of determining eligibility under this section, a duration of residence requirement that excludes from services any applicant who is present in the State. The designated State unit may not require the applicant to demonstrate a presence in the State through the production of any documentation that under State or local law, or practical circumstances, results in a de facto duration of residence requirement." Lastly, 34 C.F.R. § 361.50(b)(2) states: "The State unit may not establish policies that effectively prohibit the provision of out-of-State services."

Analysis: KRS is not in compliance with 34 C.F.R. § 361.42(c)(1) because Section 1, part 13 and Section 14, part 1 of the KRS policy manual, as written, require the individual who has applied for VR services to demonstrate a presence in the State through the production of documentation that under State or local law, or practical circumstances, results in a de facto duration of residence requirement. Further, KRS is not in compliance with 34 C.F.R. § 361.50(b)(2) because the previously mentioned policies could prohibit the provision of out-of-State services.

Section 1, part 13 states: “Clients must maintain Kansas residency in order to continue receiving services from RS. Clients whose services are being provided out-of-state must complete a residency verification form annually.” The Kansas residency verification form states that it may require further verification to include—

- A copy of the client’s driver’s license;
- A copy of the client’s state/federal income tax forms;
- A copy of the client’s vehicle registration; and
- Other documentation to be identified by the client’s VR counselor.

Section 14, part 1 states: “Students must maintain Kansas residency in order to continue receiving services from RS.”

Conclusion: These policies, as written, imply that individuals receiving services out-of-State, to include students with disabilities, may be asked to provide the above-listed documents to verify residency. Therefore, the policies, as written, could impose a duration of residency requirement, which is prohibited by 34 C.F.R. § 361.42(c)(1), and effectively prohibit the provision of out-of-State services to individuals who have not met the residency requirement, which is prohibited by 34 C.F.R. § 361.50(b)(2) .

Corrective Actions 2.1

RSA requires that KRS—

- 2.1.1 Revise Section 1, part 13 (Miscellaneous Administrative Issues) and Section 14, part 1 (Pre-Employment Transition Services) of the KRS policy manual to make clear that individuals receiving services out-of-State, including students with disabilities, are not required to provide documentation to verify residency. This policy change is necessary to ensure that VR applicants are not subject to a duration of residency requirement, as prohibited by Section 101(a)(12) of the Rehabilitation Act and 34 C.F.R. § 361.42(c)(1), and to ensure that policies do not effectively prohibit the provision of out-of-State services, which is prohibited by 34 C.F.R. § 361.50(b)(2); and
- 2.1.2 Provide training and guidance to VR counselors and supervisors to ensure that a duration of residency requirement is not imposed on applicants of VR services, and to ensure that out-of-State services are not effectively prohibited.

Agency Response: It was noted during the review process that RSA believes KRS has implemented a residency requirement. KRS does not impose a duration of residency requirement at application or order of selection, as long as the individual is present in the state. KRS has flexible and open policies pertaining to supporting out-of-state services. Otherwise when individuals receiving services from KRS have moved out of state and informed their VR counselor they do not intend to return to Kansas, KRS asks for various forms of residence verification, which are not tied to a duration of residency but simply represent documentation of “present in the state.” To maintain services funded by Kansas taxpayers, the individual must maintain some connection to the state. If an individual is no longer present in the state, their Kansas case may be closed, they may seek to have a VR case opened in their current state of residence, or the two VR agencies can see if it is feasible for both to have an open case at the

same time. KRS has many case examples of supporting Kansas consumers to participate in out-of-state services for extended periods of time, e.g., post-secondary education, comprehensive blindness training, without service interruption. We do not understand the connection made by RSA to this provision contributing to persons exiting the program because they are no longer interested in services.

RSA Response: RSA affirms its original finding based on its understanding of KRS policies during the time of the review.

Request for Technical Assistance: KRS did not request technical assistance at this time.

2.2 Untimely Development of the IPE

Issue: Did KRS develop IPEs within 90 days from the date of eligibility determination for each individual.

Requirement: In accordance with 34 C.F.R. § 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 C.F.R. § 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 C.F.R. § 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 C.F.R. § 361.45(e), the IPE must be developed as soon as possible, but not later than 90 days after the date of eligibility determination, 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 KRS to develop IPEs for individuals determined eligible for VR services. In particular, data reported by KRS on the RSA-911 show that, in FFYs 2015 and 2016, 86.9 percent and 84.5 percent, respectively, of all individuals served whose service records were closed had an IPE developed within the Federally required 90-day period. In the first three quarters of FFY 2017, 86.6 percent had an IPE developed within the required 90-day period.

RSA discussed untimely development of IPEs as a performance issue with KRS during the review process. As previously mentioned, KRS reported there is a push at the State level to complete IPEs within 45 days from application, which is a component of each VR counselor's performance appraisal. As a result, ongoing training is being provided to VR counselors and supervisors to help them start thinking about IPE development from the moment the individual walks in the door. When asked about the IPE extension process, KRS reported that IPE extensions do not commonly occur. Further, a time remaining report is generated by KRS, which is reviewed weekly by program administrators (PAs), who monitor those cases nearing the 90-day deadline.

Conclusion: KRS 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,

KRS did not develop IPEs in a timely manner pursuant to 34 C.F.R. § 361.45(a)(1) and within the Federally required 90-day period pursuant to 34 C.F.R. § 361.45(e).

Corrective Action Steps:

RSA requires that KRS—

- 2.2.1 Comply with 34 C.F.R. §§ 361.45(a)(1) and (e) to ensure IPEs are developed within the 90-day Federal time frame from the date of eligibility determination;
- 2.2.2 Assess and evaluate current procedures for tracking and monitoring VR 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 extensions; and
- 2.2.3 Develop goals and strategies to improve VR counselor performance specific to timely IPE development.

Agency Response: RSA and KRS data do not match in reporting the percentage of IPEs developed within 90 days of the date of application. KRS data show this percent as 93% in FFY 2016 compared to 84.5% as reported by RSA, for example. The reasons for the different reported results are unknown and KRS requests technical assistance on this subject. Further, KRS does not agree with the statement that extensions do not commonly occur and have not been a requirement among counselors and supervisors. Time extensions are referenced in the IPE section of the policy manual. Correct implementation of time extensions has been part of the case review process for at least seven years. Data from our case management system shows that 208 IPE timeframe extensions were implemented in FFY 2015; 192 in FFY 2016; and 159 in FFY 2017.

RSA response: RSA affirms this finding based on the data reported to RSA on the RSA-911 by

KRS for the period covered under the review. However, RSA acknowledges the discrepancy in the data RSA and KRS have used to analyze the timely development of IPEs. RSA will work with the agency to identify the cause of the discrepancy with the data drawn from the RSA-911 when providing the technical assistance requested below so that RSA and/or KRS can take appropriate steps to resolve these differences. In addition, RSA recognizes the efforts KRS is currently making to improve the timeliness of IPE development. Finally, RSA has removed the language “and have not historically been a requirement among VR counselors and supervisors” related to the discussion of extensions in the finding based upon KRS’ response.

Request for technical assistance: KRS requests technical assistance on this subject.

2.3 Internal Controls

Issue: Do KRS’s internal controls ensure that case files adhere to the record of service requirements at 34 C.F.R. § 361.47. Specifically, in fulfilling these requirements, do the internal controls ensure that KRS adheres to the requirements for closing the record of services of an individual who has achieved an employment outcome pursuant to 34 C.F.R. § 361.56.

Requirement: Pursuant to 34 C.F.R. § 361.47(a), VR agencies must maintain for each applicant and eligible individual a record of services that includes, to the extent pertinent, documentation including, but not limited to, information related to closing the service record of an individual who achieves an employment outcome. Further, VR agencies, in consultation with the State Rehabilitation Council, if the State has such a Council, must determine the type of documentation that the VR agency must maintain for each applicant and eligible individual to meet these requirements in accordance with 34 C.F.R. § 361.47(b).

Pursuant to 34 C.F.R. § 361.56, the service records for individuals who have achieved an employment outcome may only be closed if: an employment outcome described in the individual's IPE in accordance with 34 C.F.R. § 361.46(a)(1) has been achieved and is consistent with an individual's unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice; the employment outcome is maintained for an appropriate period of time, but not less than 90 days to ensure stability of the employment outcome and the individual no longer needs VR services; the outcome is considered to be satisfactory and agreed to by the qualified rehabilitation counselor employed by the VR agency and the individual who must agree that the individual is performing well in the employment; and the individual has been informed of post-employment services through appropriate modes of communication.

Under 34 C.F.R. § 361.47(a)(15), prior to closing a service record, VR agencies must maintain documentation verifying that the provisions of 34 C.F.R. § 361.56 have been satisfied. More specifically, under 34 C.F.R. § 361.47(a)(9), VR agencies must maintain documentation verifying that an individual who obtains employment is compensated at or above minimum wage and that the individual's wage and level of benefits are not less than that customarily paid by the employer for the same or similar work performed by individuals without disabilities.

Analysis: While on-site, RSA reviewed 30 service records of individuals with disabilities, nine of which achieved a competitive integrated employment outcome. KRS reported that the agency has issues with data integrity due to reporting errors related to the age of the case management system. The agency reported that the section on competitive employment outcomes can be confusing to staff, particularly in relation to self-employment outcomes and those outcomes that require extended services.

During the service record review, RSA observed 13 service records, or 43.3 percent of all service records reviewed, in which the dates that the VR counselor and the eligible individual signed the IPE did not match the date in KRS's case management system and the date reported on the RSA-911 report, or in which the IPE was missing signatures. RSA also observed in regard to the start date of employment in the primary occupation reported in the RSA-911, that three records, or 33.3 percent of the nine service records that achieved a competitive employment outcome, did not include sufficient documentation. There was either no supporting documentation to support the start date or the date entered into the case management system did not match what was reported in the supporting documentation.

Further, RSA observed that documentation in the service records verifying the hourly wage at exit was insufficient. Of the nine service records reviewed for individuals who achieved competitive employment, again three records, or 33.3 percent, did not include documentation that verified the hourly wage of the individual at the time of exit. Similarly, three service records,

or 33.3 percent of the nine service records reviewed of individuals who achieved competitive employment, did not include sufficient documentation to substantiate the individual's employment status at the time of exit. In all cases noted as inaccurate, the employment outcome at exit was not supported by documentation from an employer or other source.

Additionally, six records, or 20 percent of all service records reviewed, did not include sufficient documentation to substantiate the individual's date of exit. In some instances, the service record closure letters in the case management system did not match the dates that were reported on the RSA-911. In other instances, a letter was not required since the individual either moved out of State or was unable to be located. Due to the lack of supporting documentation, RSA was not able to verify whether KRS informed the individual of the availability of post-employment services as required by 34 C.F.R. § 361.56(d).

KRS must maintain documentation to verify the accuracy of reporting of Federal requirements. For some of the service records reviewed, KRS did not maintain case files that substantiated these reporting requirements indicating that its internal controls in this area need improvement. Therefore, without documentation supporting that the data elements were valid, RSA was unable to verify whether the date VR services began under the IPE, start date of employment, weekly earnings, and the employment outcomes that KRS reported on the RSA-911 were completely accurate.

Conclusion: As a result of the analysis, RSA determined that KRS's internal controls did not ensure the service record requirements at 34 C.F.R. § 361.47 were met. Specifically, KRS's internal controls did not ensure the requirements were met for closing the record of services of an individual who has achieved an employment outcome pursuant to 34 C.F.R. § 361.56.

Corrective Action Steps:

RSA requires that KRS—

- 2.3.1 Develop internal control policies and procedures to ensure that the provisions of 34 C.F.R. § 361.47 have been met and through service record documentation, the requirements at 34 C.F.R. § 361.56 are met;
- 2.3.2 Review current internal control mechanisms for effectiveness and adjust the internal controls as necessary; and
- 2.3.3 Review current mechanisms used to collect and aggregate the results of these reviews and use the results to inform the training and evaluation of staff.

Agency Response: KRS did not respond to this finding.

Request for technical assistance: No technical assistance was requested.

F. Technical Assistance

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

- RSA discussed and provided information to reiterate the following practices to ensure the reliability of data reported on the RSA-911:
 - Develop written procedures for data validation, including a description of the process for identifying and correcting errors or missing data, which may include, among other things, electronic data checks;
 - Conduct data validation training for appropriate program staff regularly (e.g., at least annually);
 - Conduct monitoring, consistent with 2 C.F.R. § 200.328, to ensure that program staff are following the written data validation procedures and take appropriate corrective action if those procedures are not being followed;
 - Review program data regularly (e.g., quarterly) for errors, missing data, out-of-range values, and anomalies;
 - Document that the missing and erroneous data identified during the review process have been corrected; and
 - Assess the effectiveness of its data validation process regularly (e.g., at least annually) and revise the process as needed.
- RSA pointed out that it is not sufficient to rely on the RSA-911 edit checks that are performed when the file is uploaded to the RSA management information system. These edits look at the structure of the file and the basic relationships in the data, such as whether the eligibility date occurs after the application date, and do not indicate that the data are correct or of high quality.
- RSA discussed during the case review process the policy changes and training to staff needed to ensure data integrity in the areas of date of application, date of the most recent or amended IPE, and date of exit reported. KRS was encouraged to work with technical assistance centers, such as the Workforce Innovation Technical Assistance Center (WINTAC), on data quality, performance and internal controls.
- RSA provided guidance on the quarterly dashboard data used to describe characteristics of VR participants for Program Year (PY) 2017. The purpose of the data dashboard is to provide the agency with the information that will be reported on the WIOA annual report, so that if there are noticeable errors in the data, they could be corrected prior to the development of the WIOA annual report. Once agency quarterly data is received, RSA will produce the data dashboards and inform each agency when it is available for review. KRS is encouraged to use the data dashboards as a tool on an ongoing basis to determine errors or anomalies in its reporting.

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

A. Purpose

The Rehabilitation Act, as amended by Title IV of WIOA, places heightened emphasis on the provision of services, including pre-employment transition services under Section 113, to students and youth with disabilities to ensure they have meaningful opportunities to receive training and other VR services necessary to achieve employment outcomes in competitive integrated employment. Pre-employment transition services are designed to help students with disabilities to begin to identify career interests that will be explored further through additional VR services, such as transition services. Through this focus area RSA assessed the VR agency's performance and technical assistance needs related to the provision of VR services, including transition services to students and youth with disabilities and pre-employment transition services to students with disabilities; and the employment outcomes achieved by these individuals.

B. Service Delivery Overview

The VR agency must consider various requirements under the Rehabilitation Act and its implementing regulations in designing the delivery of VR services, including pre-employment transition services and transition services. For example, pre-employment transition services provided under Section 113 of the Rehabilitation Act, and 34 C.F.R. § 361.48(a) are available only to students with disabilities. However, transition services provided for the benefit of a group of individuals under Section 103(b)(7) of the Rehabilitation Act and 34 C.F.R. § 361.49(a)(7) may be provided to both students and youth with disabilities. Youth with disabilities who are not students may receive transition-related services identified in an individualized plan for employment (IPE) under Section 103(a) of the Rehabilitation Act but may not receive pre-employment transition services because these services are limited to students with disabilities. On the other hand, students with disabilities may receive pre-employment transition services with or without an IPE under Section 113 of the Rehabilitation Act or may receive pre-employment transition services and/or transition services under an IPE in accordance with Section 103(a)(15) of the Rehabilitation Act. A discussion of KRS' service delivery system and implementation of VR services, including pre-employment transition services and transition services follows.

Structure of Service Delivery

At the time of the on-site review, the agency reported that it was providing transition services to youth and students with disabilities. KRS was providing pre-employment transition services using the 15 percent reserve through two different service models, including (1) 1.3 million dollars per year for the 20 transition specialist positions when fully staffed and (2) provider agreements, which are based on milestone payments. KRS hired a pre-employment transition services statewide manager, whose salary does not come from the 15 percent reserve, but the agency reported that it has been making progress toward spending the required 15 percent reserve on pre-employment transition services provided under 34 C.F.R. § 361.48(a). KRS

reported 309 different school districts in the State in 105 counties, with five school districts choosing not to participate in the provision of pre-employment transition services to potentially eligible students.

KRS has divided the State into four regions: (1) the West region, (2) the Wichita region, (3) the East region, and (4) the Kansas City region. When fully staffed, the 20 transition specialists reportedly provide all five of the required pre-employment transition services activities in each of the four regions of the State, and each school district within a region is assigned to one of the five transition specialists within a region. Travel expenses for transition specialists to meet with potentially eligible students throughout the State are paid out of the 15 percent reserve and administrative costs are separately paid from a local budget. At the time of the on-site review, the agency reported that the 20 transition specialist positions were not fully staffed, and that staff turnover is a barrier to providing pre-employment transition services on a statewide basis. KRS estimated that each transition specialist serves 30 to 40 potentially eligible students with a goal of serving 80 to 100 students.

KRS reported that work-based learning experiences are provided through provider agreements with Kansas centers for independent living (CILs) and local workforce development centers in four of the five local workforce areas. According to the agreements, students are to be paid for a minimum of 120 hours of work and a maximum of 240 hours within a year. KRS provides payment to service providers based on successful completion of the requirements defined for each component including job preparation, self-advocacy, registration and job development, placement, benchmark tiers, monitoring and support, and successful completion. KRS reported that the ability to provide these work-based learning experiences was increasing.

KRS VR counselors provide transition services under 34 C.F.R. § 361.48(b) but are not authorized to provide any pre-employment transition services due to difficulties with data reporting and tracking. Transition services are paid through service authorizations and invoices through the agency's management information system. It is possible for a student to have a pre-employment transition services case with a general VR case served under an IPE concurrently. In this case, the VR counselor and the transition counselor work closely together to provide services as seamlessly as possible.

KRS does not use third-party cooperative arrangements to provide transition services and pre-employment transition services. Also, when asked about the availability of apprenticeships in the State, the agency reported that it is not sure that the term "apprenticeship" is being used in the State, but that the Wichita region is promoting programs that are similar to apprenticeships.

Outreach and Identification of Students and Youth

KRS provides pre-employment transition services to students with disabilities ages 16 to 21 and transition services to students and youth with disabilities beginning two years, or four semesters, prior to exiting the school setting. KRS' transition policy states that although local educational agencies (LEAs) must ensure transition services are in place for students with disabilities when they reach age 14, KRS has no responsibility to serve students at this age. The policy further states that KRS will accept applications for VR services from transition students approximately 24 months or four semesters prior to exiting school, and that exceptions may be granted under

extenuating circumstances.

KRS reported that the most recent Comprehensive Statewide Needs Assessment (CSNA) was completed in 2016 and focus groups were offered to youth with disabilities and special education professionals around the State. KRS works with the Kansas State Department of Education (KSDE) to determine the number of potentially eligible students with disabilities in the State and estimates the number being close to 20,000, which the agency reported was beyond its capacity to serve.

KRS reported that staff, including VR counselors and transition specialists, visit local schools and other agencies and attend conferences, resource fairs, etc. to conduct outreach. The focus is on students who have individualized education programs (IEPs) since students eligible under Section 504 of the Rehabilitation Act are more difficult to locate because there is no central tracking process in place.

Provision of Pre-Employment Transition Services

KRS provides pre-employment transition services to students with disabilities aged 16 to 21. For pre-employment transition services, anyone can make a referral, but local schools are the main referral source. Referrals are made on the request for services form, which is similar to the referral form for VR services. The student and parent or guardian, if applicable, must sign the request for services form. The local schools also provide the documentation to verify that the student has a disability.

According to KRS, to be eligible for pre-employment transition services, the student must be 16 to 21 years, enrolled in a secondary, post-secondary or other recognized education program, a Kansas resident, and receiving services under an IEP or be an individual with a disability as defined under Section 504 of the Rehabilitation Act. If a student meets the criteria to participate, an appointment is scheduled with the student and his or her parent or guardian, if applicable, to jointly develop a pre-employment transition services plan. This plan must be completed and signed within 30 days of the eligibility for pre-employment transition services determination. KRS reported that requiring this plan in addition to the referral form may be delaying the provision of services in some cases since parent/guardian signatures can be difficult to obtain.

KRS reported that all five required activities are provided statewide between staff and providers; however, KRS stated that there is a struggle to provide these services statewide since five school districts refuse to allow the provision of pre-employment transition services in the local schools. Another barrier relates to the degree of turnover among newly hired transition specialists. Reportedly, there has been a 60 percent turnover rate among transition specialists since the inception of these positions in 2016. KRS hopes to implement a new staffing plan to attract and retain more qualified applicants, such as transition specialists who are vital to providing WIOA mandated pre-employment transition services to local schools within the school districts of the State.

Pre-employment transition services are also provided through Empower Me workshops through provider agreements with the Kansas Youth Empowerment Academy. Empower Me workshops cover four of the five required activities, including job exploration, self-advocacy, work

readiness skills, and counseling on post-secondary training. The workshops are available in all four regions of the State, and each may serve up to 25 potentially eligible students during one of the 10 one-day workshops offered per year. Local school personnel have expressed excitement about the workshops, which empower students with disabilities to pursue meaningful opportunities for training and other services necessary to achieve employment outcomes in a competitive integrated setting, including VR services.

Regarding pre-employment transition coordination activities, the KRS pre-employment transition services policy states that coordination activities may include: attending IEP meetings; working with the local workforce development boards, one-stop centers and employers to develop work opportunities for students with disabilities, including internships, summer employment and other employment opportunities available throughout the school year, and apprenticeships; and attending person-centered planning meetings. KRS reported that coordination activities are included in the duties of the transition specialist; however, pre-employment transition services are not tracked using timesheets since transition specialists' salaries are assigned to the 15 percent reserve. Reportedly a supervisor confirms that a transition specialist has spent 100 percent of his or her time providing only activities related to pre-employment transition services, to include the provision of coordination activities. Only direct client services are entered into the case management system.

At the time of the on-site visit, KRS reported that it did not provide or track authorized activities since the initial focus has been on providing required activities to potentially eligible students with disabilities on a statewide basis. When asked about the process for determining if the agency can move from providing required activities to authorized activities, the agency reported that it has not developed this process but is interested in determining if it can assign authorized pre-employment transition services to the 15 percent reserve.

Although KRS has implemented a comprehensive policy on pre-employment transition services, RSA noted that the policy does not include continuation of pre-employment transition services under an order of selection for students with disabilities who began these services prior to application and eligibility determination or the provision of services to groups as outlined in 34 C.F.R. § 361.49(a)(7). These additions to the policy may be beneficial since the agency has an order of selection policy although all categories are open, and the agency does not project closing categories in the next few years.

As mentioned previously, KRS' policy contains a residency requirement, which states that students must maintain Kansas residency in order to continue receiving services from KRS and cites 34 C.F.R. § 361.42. This topic is covered thoroughly in the finding in the performance focus area of this monitoring report.

Although at the time of the review KRS did not have an intensive technical assistance agreement with WINTAC, RSA suggested that the agency might benefit from assistance from the WINTAC in identifying and implementing the skills and processes needed to successfully meet the 15 percent reserve requirement mandated under Section 110(d)(1) of the Rehabilitation Act, including moving to authorized activities.

Provision of Transition Services

KRS begins to provide transition services to students and youth with disabilities beginning two years, or four semesters, prior to students' exit from the school setting. As previously mentioned in this focus area, KRS policy states that although the agency has no responsibility to serve students prior to two years, or four semesters, before exiting the school setting, exceptions may be granted under extenuating circumstances since services are individualized. Exceptions must be approved by a program administrator using a required exceptions request form. The policy also states that KRS may provide technical assistance, such as participation in IEP meetings or referral to community resources, for students prior to the two year limit only if a program administrator determines that existing staff resources are available to provide the services.

Additionally, related to the provision of transition services, the stated purpose of KRS is to ensure that all students who require VR services receive these services in a timely manner, and the stated role of the VR counselor is to facilitate the provision of transition services and work with students to ensure that the IPE and IEP are in sync. VR counselors and transition specialists work together, so that two cases may be going on simultaneously for a single student with a disability (i.e., a concurrent VR case and a pre-employment transition services case).

KRS reported that barriers also exist in the provision of transition services to students with disabilities, which are similar to the barriers to the provision of pre-employment transition services. These barriers reportedly are related to staff turnover at the local schools, as well as KRS staff, and the fact that some districts are resistant to partnering with KRS to provide transition services. KRS indicated that there is a constant need to ensure that education and training are provided to the local schools, as well as KRS staff, so that transition services are offered to students with disabilities, as required by the Rehabilitation Act and the Individuals with Disabilities Education Act (IDEA), which both make clear that transition services require a coordinated set of activities for students with disabilities within an outcome-oriented process. KRS also reported that some school districts will not allow KRS staff to disseminate any promotional materials to youth or their families since it was not produced by the school district.

State Educational Agency (SEA) Agreement

At the time of the on-site visit, KRS reported that it was working with the KSDE on finalizing an updated agreement and the draft agreement reportedly was ready for agency attorneys to review and approve, as appropriate. RSA reviewed the draft agreement and noted that it is in line with the requirements of 34 C.F.R. § 361.22(b), which includes coordination of documentation requirements and contracting limitations for educational agencies imposed by Section 511 of the Rehabilitation Act. However, in regard to the requirements related to the coordination and provision of pre-employment transition services in 34 C.F.R. § 361.48(a), it appears that KRS provides pre-employment transition services to students with disabilities ages 16 to 21, which is inconsistent with the State's identified ages of 14 to 21 for the provision of transition services under IDEA.

During the on-site review, two representatives from KSDE attended the scheduled session to discuss the SEA agreement and the collaboration taking place among both KRS and KSDE to provide transition services to students with disabilities, including the provision of pre-employment transition services. Reportedly, KRS and KSDE hope to work more closely after the SEA agreement is approved and implemented since there is an individual plan of study model in

effect in the State that should drive the provision of pre-employment transition services in the local schools. Once the connection is made, it is believed that pre-employment transition services will be more in-demand since the individual plans of study for every student will include services needed to help them transition to life after secondary school.

IPE Development for Students and Youth with Disabilities

KRS' policy indicates that in an IPE for students with disabilities, the vocational goal must be as specific as possible but, if the student is uncertain of the vocational goal, a more general goal may be indicated. The policy further indicates that in these instances, assessment services should be considered to help identify a more specific vocational goal, and the IPE should be amended once a more specific goal is identified.

In addition, KRS policy states that other services that cannot be funded from the 15 percent reserve may be determined necessary for a student to effectively participate in pre-employment transition services. In these cases, if the student is determined eligible for VR services, then an IPE should be developed to include the additional services.

KRS' policy states that each IPE should be developed as soon as possible, but no later than 90 days from the date of eligibility, and if the IPE was not signed within 90 days, there must be documentation of the reason for the delay to include evidence of an extension.

C. Observations and Recommendations

RSA's review of KRS' performance in this focus area resulted in the identification of the following observation and recommendations to improve performance.

Observation 3.1 Providing Pre-Employment Transition Services Statewide

Pre-employment transition services must be made available statewide to all students with disabilities, regardless of whether the student has applied or been determined eligible for VR services (34 C.F.R. § 361.48(a)(1)). Since VR counselors reportedly do not provide pre-employment transition services due to data reporting issues, and KRS has only 20 transition specialists available to provide pre-employment transition services to the entire State, it appears that pre-employment transition services may be available statewide on a limited basis. Further, only four of the five local workforce areas provide work-based learning experiences, and five of the 309 school districts choose not to work with KRS to provide pre-employment transition services to potentially eligible students. Although Empower Me workshops are available in all four regions of the State, each only may serve up to 25 potentially eligible students during one of the 10 one-day workshops offered per year.

Recommendations 3.1 Providing Pre-Employment Transition Services Statewide

RSA recommends that KRS—

- 3.1.1 Develop and implement strategies that would allow VR counselors to provide pre-employment transition services, such as coordination activities needed to build on

- existing relationships and to provide outreach to the local workforce areas and local school districts;
- 3.1.2 Explore and develop policy and training on data reporting in the current management information system to allow for tracking of pre-employment transition services provided by VR counselors; and
 - 3.1.3 Explore and develop business requirements for a case management system to allow for more efficient data entry and tracking of pre-employment transition services.

Agency Response: Recommendations will be taken into consideration in future planning once the new State Director of VR is appointed.

Request for Technical Assistance: no technical assistance requested.

D. Findings and Corrective Actions

RSA’s review of KRS’ performance in this focus area resulted in the identification of the following findings and the corresponding corrective actions to improve performance.

Finding 3.1 Arbitrary Age Requirements and Time Frames for the VR Agency’s Provision of Transition Services and Pre-Employment Transition Services

Issue: Did KRS enforce an arbitrary age requirement and time frame for the provision of transition services and pre-employment transition services.

Requirement: In accordance with 34 C.F.R. § 361.50(a), the State unit must develop and maintain written policies covering the nature and scope of each of the VR services specified in 34 C.F.R. § 361.48 and the criteria under which each service is provided. The policies must ensure that the provision of services is based on the rehabilitation needs of each individual as identified in that individual's IPE and is consistent with the individual's informed choice (34 C.F.R. § 361.52). Further, these written policies may not establish any arbitrary limits on the nature and scope of VR services to be provided to eligible individuals to achieve an employment outcome. This includes policies related to processing referrals and applications under 34 C.F.R. § 361.41(b), which states that “(1) Once an individual has submitted an application for vocational rehabilitation services,...an eligibility determination must be made within 60 days, unless—(i) Exceptional and unforeseen circumstances beyond the control of the designated State unit preclude making an eligibility determination within 60 days and the designated State unit and the individual agree to a specific extension of time; or (ii) An exploration of the individual's abilities, capabilities, and capacity to perform in work situations is carried out in accordance with § 361.42(e).”

Additionally, in regard to the provision of pre-employment transition services, to meet the definition of a “student with a disability” under Section 7(37) of the Rehabilitation Act, and 34 C.F.R. § 361.5(c)(51), the individual must be in an educational program; and—

- Not younger than the earliest age for the provision of transition services under the IDEA or if the State involved elects to use a lower minimum age for the receipt of pre-employment transition services; and
- Not older than 21 years old or the oldest age established by the State for the receipt of services under IDEA; and
- Eligible for and receiving special education or related services under IDEA or is an individual with a disability for purposes of Section 504 of the Rehabilitation Act.

Analysis: KRS reported that it can provide transition services to eligible students and youth with disabilities beginning two years, or four semesters, prior to exiting the school setting. The KRS transition policy located in Section 3, part 12 of the KRS policy manual, states that although local schools must ensure transition services are in place for students with disabilities when they reach age 14, KRS has no responsibility to serve students at this age. The policy also states that KRS will accept applications for VR services from transition students approximately 24 months or four semesters prior to exiting school, but exceptions may be granted under extenuating circumstances. According to Section 3, part 12 of the KRS policy, these exceptions must be approved by a program administrator using a required exceptions request form, and KRS may provide technical assistance, such as participation in IEP meetings or referral to community resources, for students prior to the two year limit only if a program administrator determines that existing staff resources are available to provide the services.

Furthermore, regarding placing arbitrary age limits on application or time frames on the provision of transition services, RSA has clarified that a State agency cannot implement limits, such as a minimum or maximum age requirement, for the submission of an application to the VR program for VR services. 34 C.F.R. § 361.41(b) requires that once an individual has submitted an application for VR services, including applications made through common intake procedures in one-stop centers, an eligibility determination must be made within 60 days. A VR agency cannot deny the submission of an application for VR services. Age requirements are only relevant when determining whether an individual with a disability meets the definition of a “student with a disability” in 34 C.F.R. § 361.5(c)(51) for the provision of pre-employment transition services. As clarified in the preamble to the final VR regulations (81 FR 55629, 55697 (August 19, 2016)), students and youth with disabilities should receive adequate information and applications for vocational rehabilitation services at the beginning of the transition from secondary programs. A DSU may provide the information and application in 34 C.F.R. §§ 361.41 and 361.52, which require the DSU to establish and implement standards for promptly processing referrals, informing individuals of application requirements, and facilitating individuals’ informed choice as they transition.

The KRS pre-employment transition policy located in Section 14, part 2 of the KRS policy manual, and the draft SEA agreement, state that KRS provides pre-employment transition services to students with disabilities ages 16 to 21, which is inconsistent with the State’s identified ages of 14 to 21 for the provision of transition services under IDEA. It is important to note that Chapter 4 of the Kansas Special Education Process Handbook, dated October 19, 2018, indicates that although transition planning begins at age 14 and the transition plan is due at age 16, the transition plan and interagency linkages may be completed as early as age 14, if needed by the student. Chapter 4 of the Kansas Special Education Process Handbook also indicates that

a free appropriate public education (FAPE) must be made available to eligible children until graduation or the end of the school year in which the child reaches age 21. Therefore, it appears that pre-employment transition services may begin at age 16 when the transition plan is due, or as early as age 14, if needed by the student, and continue until graduation or the end of the school year in which the student reaches age 21, whichever comes first.

Conclusion: In accordance with 34 C.F.R. §§ 361.50(a) and 361.41(b), a State agency may not place an arbitrary age or time frame on when a student or youth with a disability can submit an application for transition services, or receive pre-employment transition services, under 34 C.F.R. § 361.48. Additionally, pre-employment transition services must be provided to students with disabilities as defined in Section 7(37) of the Rehabilitation Act and 34 C.F.R. § 361.5(c)(51) of its implementing regulations. As a result of this analysis, RSA determined that KRS has placed arbitrary age requirements and time frames on the VR agency's provision of transition services and pre-employment transition services under 34 C.F.R. § 361.48.

Corrective Action 3.1

RSA requires that KRS—

- 3.1.1 Revise the transition policy located in Section 3, part 12 of the KRS policy manual to remove the arbitrary age or time frame related to when students or youth with disabilities may apply for VR services, including transition services under 34 C.F.R. § 361.48(b);
- 3.1.2 Revise the pre-employment transition services policy located in Section 14, part 2 of the KRS policy manual to remove the arbitrary age or time frame related to when a student with disabilities may receive pre-employment transition services under 34 C.F.R. § 361.48(a);
- 3.1.3 Revise the SEA agreement with KSDE to include the appropriate ages for when a student with a disability may receive pre-employment transition services;
- 3.1.4 Establish and implement standards for promptly processing referrals, informing individuals of application requirements, and facilitating individuals' informed choice as they transition from the secondary school setting; and
- 3.1.5 Evaluate the availability of staff and resources and provide training as needed to ensure that transition services, including pre-employment transition services, are made available on an individual basis to students and youth with disabilities who are in need of such services.

Agency Response: KRS provides the following highlights in relation to Pre-ETS and Transition services:

- The Pre-ETS state manager and regional managers have provided training to staff on outreach to schools to ensure that students have access to services. Outreach functions and activities are reported to the central administration office and collected on an Excel spreadsheet. In the future it is planned that this reporting will become part of the case management system.
- RSA reports that VR counselors provide transition services under 34 C.F.R. § 361.48(b) but are not authorized to provide any pre-employment transition services *due to difficulties with data reporting and tracking*. KRS would like to clarify that this is not an issue of tracking

and reporting services. There are numerous reasons VR counselors are not currently providing Pre-ETS services. The cost allocation plan would require a random moment time study to be implemented to correctly assign work completed to the proper funding source. The current data management system is not able to track this information. Counselors are already busy with high caseloads and experiencing high caseloads, so the agency does not want to add to those concerns by adding new or additional service expectations.

- Through the WIOA partnerships, apprenticeships are available to VR consumers if that is their informed choice to pursue those opportunities.
- Kansas law specifies when transition planning and transition services are to begin and makes a distinction between planning and provision of services.
 - Each IEP must include, beginning at age 14, appropriate measurable postsecondary goals and a statement of the transition services needed to assist the student in reaching the postsecondary goals. K.S.A. 72-3429(c)(8).
 - Beginning at age 14, and updated annually, the IEP must contain (1) appropriate measurable postsecondary goals based upon age-appropriate transition assessments related to training/education, employment and where appropriate, independent living skills; and (2) the transition services, including appropriate courses of study, needed to assist the child in reaching the stated postsecondary goals; and (3) beginning at age 16, or younger, if determined appropriate by the IEP team, a statement of needed transition services for the child, including, when appropriate, a statement of the interagency responsibilities or any needed linkages (K.S.A. 72-3429(c)(8)).

Therefore, KRS is in compliance with state law in using age 16 for the beginning of Pre-ETS Services. This is not arbitrary in that exceptions can be granted to provide services at a younger age on a case by case basis including for exceptional circumstances.

- The KRS transition policy does not set an age for referral for VR services. Rather it identifies as best practice that the optimal time for referral is two years or four semesters prior to the projected exit from secondary school. This is an optimal timeframe for planning transition and VR services, and also a timeframe when students are more easily available to participate in VR services. Again, this is not arbitrary in that exceptions can be made based on individual circumstances.

RSA Response: RSA appreciates the agency's efforts to provide highlights on its provision of transition services, including pre-employment transition services, as it moves toward addressing the corrective action items. As the agency highlights in its response, transition services, including pre-employment transition services, may begin at age 16 when the transition plan is due; or as early as age 14, if needed by the student. Therefore, the finding and the required corrective action items remain unchanged. Once the corrective action plan is developed, RSA will work with the agency to determine if updated processes consistently result in meeting Federal requirements and ongoing compliance.

Request for Technical Assistance: no technical assistance is requested.

E. Technical Assistance

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

Provision of Pre-Employment Transition Services

- Technical assistance was provided to KRS related to the total number of individuals who received pre-employment transition services since July 22, 2014. According to quarterly data reported by the agency on the RSA-911 Case Service Report, the total number of individuals, including those eligible and potentially eligible, was 498 at the time of the on-site review. These data could be helpful for KRS to determine if the initiatives the agency has implemented are being reported and executed correctly to serve students with disabilities in need of pre-employment transition services and to meet the 15 percent reserve. KRS was encouraged to engage with WINTAC on intensive technical assistance in the area of pre-employment transition services to help the agency meet the WIOA mandated requirements on pre-employment transition services for students with disabilities.
- Technical assistance was provided to KRS on the documentation requirements for the provision of pre-employment transition services. KRS reportedly uses a pre-employment transition services plan, which is similar to the IPE, and requires the signature of both the student, and parent or guardian, if the student is under the age of majority. Since KRS also requires a referral form that contains both the signature of the student and the parent/guardian, if the student is under the age of majority, it was recommended that KRS investigate changing its process so that only one signed form is needed. Consolidation of forms requiring parental consent could make the process more efficient and reach more students. It should be noted that basic documentation is necessary to ensure that students indeed have a disability and, thus, are “potentially eligible” for VR services; and the agency has sufficient information necessary to complete the RSA-911 Case Service Report and satisfy performance accountability requirements under Section 116 of WIOA. To that end, supporting documentation, relevant to the required documentation for the provision of pre-employment transition services, may include the following:
 - A case note documenting counselor observation, review of school records, statements of education staff; or
 - A referral form for pre-employment transition services with the identification of a student’s disability, signed by school staff and parent/guardian if the student is under the age of majority in a State (parental consent to participate in pre-employment transition services is governed by State law, as well as policies of the educational programs and the DSU); or
 - A copy of an individualized education program (IEP) document, SSA beneficiary award letter, school psychological assessment, documentation of a diagnosis or disability determination or documentation relating to 504 accommodation(s).
- Technical assistance was provided to KRS on continuation of pre-employment transition services after an order of selection is in place. This topic was not in the agency’s policy at the time of the on-site review. Even though KRS currently has all categories open, the agency should include language on continuation of services after an order of selection in

its existing pre-employment transition services policy in the event the agency closes categories in the future. It should be noted that 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 under 34 C.F.R. § 361.49(a)(7), 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.

- Technical assistance was provided to KRS on providing transition services to students and youth under the services to groups authority (34 C.F.R. § 361.49(a)(7)). This topic was not in the agency's policy at the time of the onsite review. It should be noted that although these group services are not individualized, they can still be beneficial for job exploration, including presentations from employers in the community and group mentoring activities. A student or youth with a disability is not required to have applied or been determined eligible for vocational rehabilitation services to receive general transition services provided to groups under 34 C.F.R. § 361.49(a)(7). This could benefit those students and youth assigned to a waiting list should the agency close categories in the future. It should also be noted that pre-employment transition services cannot be provided to students with disabilities as a service to groups under 34 C.F.R. § 361.49(a)(7) and that pre-employment transition services must only be provided under 34 C.F.R. § 361.48(a).

Planning for the Provision of Pre-Employment Transition Services

Technical assistance was provided to KRS on pre-employment transition services coordination and authorized activities. The RSA review team went over the provisions of 34 C.F.R. § 361.48(a)(3) and (4) and highlighted what services may be considered to be a coordination or an authorized activity that may be charged to the 15 percent reserve. KRS was encouraged to work with WINTAC on the process for determining if the agency can move from required pre-employment transition services to authorized activities since documentation should be maintained in order to demonstrate the agency has met the requirement for the provision of required and coordination activities before assigning authorized pre-employment transition services to the 15 percent reserve.

Assigning Personnel to Provide Pre-Employment Transition Services

Technical assistance was provided to KRS on allocating 100 percent of an employee's salary and fringe benefits to the funds reserved for the provision of pre-employment transition services. The agency should note that when considering whether staff is only providing pre-employment transition services to students with disabilities, it is important to consider that a student receiving pre-employment transition services may also be receiving other VR services (other than pre-employment transition services) and, therefore, would be under a different cost objective. Such costs would not be permissible with the funds reserved for the provision of pre-employment transition services. The agency may refer to the Frequently-Asked Questions on Pre-Employment Transition Services located on RSA's website.

SECTION 4: FOCUS AREA – STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM

A. Purpose

WIOA made several significant changes to Title VI of the Rehabilitation Act that governs the Supported Employment program. The amendments to Title VI are consistent with those made throughout the Rehabilitation Act to maximize the potential of individuals with disabilities, especially those individuals with the most significant disabilities, to achieve competitive integrated employment and to expand services for youth with the most significant disabilities. Through this focus area RSA assessed the VR agency's performance and technical assistance needs related to the provision of supported employment services to individuals with the most significant disabilities and extended services for youth with the most significant disabilities, and the employment outcomes achieved by these individuals.

B. Overview of Service Delivery and Performance of the Supported Employment Program

Delivery of Supported Employment Services

KRS provides supported employment services exclusively through providers across the State through contracts, most of which are milestone-based. Not all CRPs provide on-the-job supports. Some provide job placement and vocational evaluation, while others provide the full spectrum of services. KRS has no statewide coordinator for the Supported Employment program, relying upon program administrators such as regional managers to meet with local providers and address any issues regarding service delivery. At the time of the on-site visit, KRS reported that it had not provided extended services to youth. However, its policies were up to date and included discussion of the short-term basis, customized employment, and extended services to youth.

Although not provided statewide, a few pilot locations are implementing the rapid employment or Individual Placement and Support (IPS) model, which KRS expects to expand to eligible individuals with mental health disabilities in the near future. In addition, End-Dependence Kansas, a pilot program which provides supported employment services in two of its three components, served 81 individuals in 2018. KRS reported challenges around individuals with disabilities who are reluctant to seek employment for fear of losing benefits. The waiting list for waivers services is seven years, and KRS noted that despite the ability for an individual with a most significant disability to advance to the top of the list when employment is achieved, few individuals have taken advantage of this opportunity.

KRS did not expend any of its Title VI grant in FY 2015, 2016, or 2017. As such, no administrative costs were charged to this grant, and no non-Federal match was provided for the 50 percent reserve for services, including extended services, to youth with the most significant disabilities.

Performance of the Supported Employment Program

A summary analysis of the performance of the Supported Employment program (see Appendix

C) revealed the following information:

- Individuals achieving supported employment outcomes declined from 148 individuals in FFY 2015, to 79 individuals during the first three quarters of FFY 2017. KRS attributed this to under-reporting and speculated that individuals participating in the End-Dependence Kansas programs are not being counted when they should be;
- Fewer than 90 percent (81.8 percent in FFY 2015, 84.5 percent in FFY 2016, and 88.6 percent in the first three quarters of FFY 2017) of supported employment outcomes were competitive, which KRS attributed to reporting errors by counselors who are unsure about when to consider an outcome in supported employment as competitive, particularly if the individual required extended services;
- The average number of hours worked per week varied from 20.3 in FFY 2015, to 22.2 in FFY 2016, to 18.7 in the first three quarters of FFY 2017. KRS attributed this performance to the limited hours available to consumers for on-the-job supports due to providers' insufficient funding for those providers relying on Medicaid waiver funds, and providers encouraging consumers to stay below the level of substantial gainful activity so as not to jeopardize benefits, and for those individuals with mental health disabilities, to maintain eligibility for the IPS program;
- The median hourly wage remained stable at \$8.00 over the review period;
- The five services most often provided to individuals pursuing supported employment during the first three quarters of FFY 2017 were: job placement (87.1 percent), on-the-job supports SE (71.4 percent), assessment (64.3 percent), transportation (38.6 percent), and maintenance (30.0 percent); and
- In the first three quarters of FFY 2017, the five occupations most often obtained by individuals who achieved supported employment were: office and administrative support (24.3 percent), building and grounds cleaning and maintenance (22.9 percent), food preparation and serving-related occupations (22.9 percent), production occupations (8.6 percent), and sales and related occupations (5.7 percent).

C. Observations and Recommendations

RSA's review of KRS' performance in this focus area resulted in the identification of the following observation and recommendations to improve performance.

Observation 4.1 Reporting of Supported Employment Outcomes

As noted in the analysis of KRS supported employment performance above, individuals achieving supported employment outcomes dropped from 148 individuals in FFY 2015 to 79 individuals in the first three quarters of FFY 2017. Additionally, under 90 percent of employment outcomes were reported to be competitive employment outcomes in supported employment. KRS hypothesized that the low number of reported supported employment outcomes may be due in part to lack of understanding on the part of some VR counselors that the case for an individual who requires extended supports to achieve the vocational goal may be closed and the individual reported as having achieved a successful supported employment outcome. Additionally, KRS suggested that some supported employment outcomes may go unreported as a result of the way the case management system is structured.

Recommendations 4.1 Reporting of Supported Employment Outcomes

RSA recommends that KRS—

- 4.1.1 Conduct training of its VR counselor staff to ensure their understanding of supported employment outcomes and that receiving extended services and supports does not preclude successfully closing an individual in supported employment; and
- 4.1.2 Review the case management infrastructure to facilitate the reporting of supported employment outcomes.

Agency Response: Recommendations will be taken into consideration in future planning once the new State Director of VR is appointed.

Request for Technical Assistance: No technical assistance is requested.

D. Findings and Corrective Actions

RSA's review of KRS' performance in this focus area did not result in the identification of any compliance findings.

E. Technical Assistance

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

- The review team discussed with KRS the benefits to the VR program of re-allotting the Title VI grant when it does not plan to spend it, rather than allowing the grant to revert to the federal treasury.
- The review team strongly encouraged KRS to seek more intensive technical assistance from the WINTAC for this focus area, particularly with respect to managing the delivery of extended services to youth.

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

A. Purpose

Through this focus area RSA assessed the fiscal accountability of the VR and Supported Employment programs to ensure that: funds are being used only for intended purposes; programs have sound internal controls and reliable reporting systems; available resources are maximized 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.

B. Overview and Analysis

RSA reviewed KRS' internal control policies and procedures for the allocation and expenditure of VR and Supported Employment program funds, fiscal internal control process, manuals and several contracts, leases and agreements spanning a variety of agency functions. Additionally, KRS staff demonstrated case management systems and how costs are tracked, monitored for fraud and aggregated for Federal reports.

KRS did not have policies or procedures for submitting requests for prior approval to RSA. KRS had not submitted any prior approval requests during the period of time between implementation of Uniform Guidance and the on-site monitoring visit.

KRS was not aware of requirements related to period of performance and assignment of expenses to any particular award did not reflect requirements set forth in 34 C.F.R. § 76.707.

Match, Maintenance of Effort, and Federal Funds

KRS meets 99 percent of its match through State appropriation. In FFYs 2015 and 2016 KRS matched exactly the amount necessary to expend the funds drawn.

KRS had MOE penalties in FFY 2015 (\$2,417,096) and FFY 2016 (\$5,037,528) and relinquished \$15,000,000 in FFY 2015. KRS reported these actions were due to lack of State funds. Relinquishments did not occur in FFYs 2016 or 2017.

KRS spent none of its Supported Employment program allotment in FFY 2016 and in subsequent years. KRS reported this was due to the small amount of the award and the costs to administer these funds statewide. KRS provides supported employment services, but these costs are covered by VR funds.

C. Observations and Recommendations

The review of KRS's performance in this focus area yielded no observations or recommendations.

D. Findings and Corrective Actions

5.1 Prior Approval Not Obtained

Issue: Does KRS obtain prior written approval from RSA before purchasing items requiring prior approval in accordance with 2 C.F.R. §§ 200.407 and 200.439.

Requirement: The Uniform Guidance at 2 C.F.R. § 200.407 includes a list of specific circumstances for which prior approval from the Federal awarding agency in advance of the occurrence is either required for allowability or recommended in order to avoid subsequent disallowance or dispute based on the unreasonableness or nonallocability. The Uniform Guidance provisions at 2 C.F.R. §§ 200.62(a) and 200.303(a) also require that the agency have a process, and establish and maintain effective internal control over the Federal award, which provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award.

On November 2, 2015, the Department of Education adopted the final regulations found in 2 C.F.R. part 200 ([Federal Register notice 80 FR 67261](#)). The Department issued notifications to grantees regarding the new requirements and made training and technical assistance documents available to grantees to assist in implementation of the new requirements. To ensure that RSA grantees were aware of the applicability of the prior approval requirements, RSA included a special clause on grant award notifications for FFY 2015 awards necessitating implementation of these requirements in FFY 2016. The special clause stated, in pertinent part, “that the prior approval requirements listed in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) (2 C.F.R. 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 C.F.R. part 200 subpart E).” In addition, information regarding the requirements in 2 C.F.R. part 200 was communicated to grantees via RSA’s listserv on September 23, 2015.

Analysis: At the time of the on-site visit, KRS had not submitted any prior approval requests. RSA requested the agency’s written policies, procedures, or processes that ensure the agency was meeting the prior approval requirements. KRS informed RSA that it had not developed or implemented policies, procedures or processes as required to meet the Uniform Guidance requirements at 2 C.F.R. § 200.407. RSA provided extensive technical assistance regarding prior approval during the on-site visit.

Conclusion: KRS did not meet the prior approval requirements pursuant to the Uniform Guidance (2 C.F.R. § 200.407) or the requirement to have written procedures for determining the allowability of costs in accordance with Subpart E – Cost Principles within Uniform Guidance (2 C.F.R. § 200.302(b)(7)).

Corrective Action Steps:

RSA requires that KRS—

- 5.1.1 Within three months from the issuance of the final monitoring report, RSA requires that KRS develop and implement policies and procedures, as well as written internal control processes, including a monitoring component, to ensure ongoing compliance with the prior approval requirements and the Frequently Asked Questions (FAQs) Prior Approval – OSEP and RSA Formula Grants, issued by OSERS on October 29, 2019.

Agency Response: The agency has extensive policies on counselor spending authorities, which are intended to route purchases requiring prior federal and state approval to KRS Administration for next steps. However, the agency acknowledges that its policies pertaining to prior approvals and internal controls can be strengthened. KRS received numerous prior approvals for vehicle modifications in FFY 2019. There were no other equipment purchases during that FFY that required prior approval from RSA. RSA TAC-18-02 was not issued until April 11, 2018. Since that time, the October 29, 2019 bulletin from OSERS provides a blanket approval for IPE services.

Request for Technical Assistance: No technical assistance is requested.

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

Issue: Does KRS meet obligation and expenditure requirements in 2 C.F.R. § 200.71 and 34 C.F.R. § 76.707. Does KRS assign obligations and expenditures to the correct Federal award in accordance with 34 C.F.R. § 361.12; 2 C.F.R. §§ 200.77, 200.302, 200.303(a), and 200.309; and 34 C.F.R. § 76.702.

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

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

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

Analysis: RSA requested supporting documentation for KRS’ procedures and internal controls to ensure compliance with the period of performance requirements. After numerous requests for documentation related to period of performance and Federal requirements described in 34 C.F.R. § 76.707, it was determined that KRS was not determining the date of obligations per Federal requirements. Although KRS was able to document compliance with State rules regarding the obligation and liquidation of funds, where the State and Federal requirements differed, KRS was not ensuring that Federal reports were completed in accordance with the Federal requirements.

Conclusion: KRS’ financial management system does not meet Federal requirements because the agency is not able to ensure obligations and expenditures are assigned and liquidated within the period of performance of the Federal award in accordance with the award’s terms and conditions, as required by 34 C.F.R. § 76.707 and 2 C.F.R. § 200.302.

Corrective Action Steps:

RSA requires that KRS—

- 5.2.1 Review Federal requirements related to period of performance and determine any inconsistencies with State policies governing similar activities and consult with RSA to resolve these inconsistencies;

- 5.2.2 Make requisite changes to its financial data collection and analysis process to bring it into compliance so that KRS can—
 - Account for and accurately liquidate all expenditures from the correct FFY award, commensurate with the period of performance for the corresponding obligations based on when they were assigned; and
 - Accurately report obligations and liquidations on the SF-425 report for the corresponding period of performance for Federal awards;
- 5.2.3 Within six months following the issuance of the final monitoring report, develop and implement policies and procedures to accurately account for and report all obligations and expenditures to the correct period of performance. Supporting documentation will be submitted to RSA for review to ensure compliance with requirements. policies/ procedures must address—
 - The assignment of obligations to the appropriate FFY award and the liquidation of such funds based upon the assignment of the obligation; and
 - The obligation of contract services in the financial management system to ensure liquidations are based upon the FFY in which the contracts were obligated; and
- 5.2.4 Develop and implement a written internal control process, including a monitoring component, to ensure ongoing compliance with Federal requirements for the areas mentioned in corrective actions 5.2.1 and 5.2.2; and
- 5.2.5 Once new systems are implemented, review obligations for FFYs 2017-2019 to determine if changes are necessary for data submitted on related SF-425s.

Agency Response: At the time of the review, KRS was not fully compliant with the Period of Performance regulations. With direction from Sean Barrett during the September 2018 review, KRS transitioned to full compliance with the FFY 2018 award (currently being closed out). The KRS fourth quarter report for the FFY 2019 award – the first completely operated under Period of Performance – was filed in October 2019.

In addressing the steps outlined:

- 5.2.1 – As mentioned, this was completed with Sean Barrett’s assistance during the review.
- 5.2.2
 - The state’s accounting system doesn’t directly provide information necessary to comply. It does provide a unique budget date for each transaction which reflects the initiation date for each expenditure. An Access query was developed to analyze all payments at the detail level. Based on the budget date, a FFY is assigned. All draws are made post-expenditure based on this analysis.
 - Obligations are also reported based on the budget date as shown in the accounting system. Since the date doesn’t change, any payment made on the obligation will carry the originally assigned FFY.
- 5.2.3 – Adopted in Fall 2018. Details addressed in second point for 5.2.2
- 5.2.4 – The query has been documented and can be reviewed against the documentation at any time to verify compliance with Period of Performance.

- 5.2.5 – Due to transitioning since the review, final reports submitted for FFY 2017 and FFY 2018 and the first annual report for FFY 2019 reflect needed Period of Performance adjustments.

Request for Technical Assistance: No technical assistance is requested.

E. Technical Assistance

During monitoring activities, RSA provided technical assistance to KRS as described below.

Prior Approval

RSA provided technical assistance on prior approval, including the most common categories that VR agencies have submitted to RSA, in accordance with Uniform Guidance at 2 C.F.R. § 200.407.

Period of Performance

RSA clarified the VR and Supported Employment formula awards are 12-month awards that are eligible for a carryover period if certain requirements are met, including non-Federal share and an unobligated Federal fund balance. RSA explained the need to track non-Federal and Federal obligations and unobligated balances to ensure the carryover requirements were met. To track these accurately, KRS must ensure they are following the Federal period of performance requirements. RSA recommended that KRS review 34 C.F.R. § 76.707, which identifies when an obligation is made for cost categories, including payroll costs, contracts, and purchased services. RSA emphasized the requirement to report unliquidated obligations on the SF-425 report exactly as the obligations are accounted for at the end of the reporting period (e.g., September 30).

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

A. Purpose

The Departments of Education and Labor issued the Workforce Innovation and Opportunity Act (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 Title I of WIOA. These joint regulations apply to all core programs of the workforce development system established by Title I of WIOA and the joint regulations are incorporated into the VR program regulations through subparts D, E, and F of 34 C.F.R. part 361.

WIOA strengthens the alignment of the public workforce development system's six core programs through unified strategic planning requirements, common performance accountability measures, and requirements governing the one-stop delivery system. 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.

In FFY 2018, the Employment and Training Administration in the U.S. Department of Labor, the Office of Career, Technical, and Adult Education, and RSA developed the WIOA Shared Monitoring Guide. RSA incorporated its content into the FFY 2018 monitoring of the VR program in this focus area. RSA assessed the VR agency's progress and compliance in the implementation of the Joint WIOA Final Rule through this focus area.

B. Implementation of WIOA Joint Final Rule

This focus area consists of the following topical areas: WIOA Partnership; Governance; One-Stop Operations; and Performance Accountability. To gather information pertinent to these topics, RSA staff reviewed a variety of documents including the Program Year (PY) 2016 Unified or Combined State Plan; Memoranda of Understanding (MOUs) including the One-Stop Center Operating Budget and Infrastructure Funding Agreement (IFA) related to the one-stop service delivery system; and other supporting documentation related to the four topical areas.

WIOA Partnership

WIOA requires States and local areas to enhance coordination and partnerships with local entities and supportive service agencies for strengthened service delivery, including through Unified/Combined State Plans. Beyond the partnerships reflected in the Governance and One-Stop Operations sections of this focus area, Federal partners thought it was important for Federal agencies to inquire about the broader partnership activities occurring to implement many of the approaches called for within WIOA, such as career pathways and sector strategies. These require robust relationships across programs and with businesses, economic development, education, and training institutions, including community colleges and career and technical education local entities and supportive service agencies. Exploring how these activities are led and sustained may be useful in assessing how these initiatives are progressing within a State.

KRS management works closely together with other core partners in various areas, including State plan development, cross training across partner programs, career development, and apprenticeships. However, KRS stated that the collaboration process has been challenging with workforce partners. According to KRS, partners need to change the way they view individuals with disabilities and their ability to work. Despite the challenges, KRS continues to advocate on behalf of individuals with disabilities and their abilities. In order to maintain and support these partnerships, agency representatives actively participate in monthly and quarterly calls, share data across programs, and at the time of the on-site visit, were working to finalize the Memoranda of Understanding (MOU) across the local workforce areas.

Governance

State workforce development boards (SWDBs) and local workforce development boards (LWDBs), which should include representation from all six core programs, including the VR program, set strategy and policies for an aligned workforce development system and partner with the education continuum, economic development, human services, and other businesses. The VR representative on the SWDB must be an individual who has optimum policy making authority for the VR program, and each LWDB is required to have at least one representative from programs carried out under Title I of the Rehabilitation Act of 1973 (other than Section 112 or part C of that Title).

At the time of the on-site monitoring visit, the director of KRS represented the VR agency on the SWDB. The workforce development system in Kansas is known as KANSASWORKS. There are five local workforce areas. Staff members are represented on each board within the local area. Administrators also attend board meetings when possible. The KANSASWORKS State board charge is to connect all services into a comprehensive workforce system and to serve as the organizer of those connections with the ultimate-goal of positioning KANSASWORKS as the premier workforce system in the nation.

One-Stop Operations

The one-stop delivery system brings 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. One-stop partners administer separately funded programs as a set of integrated streamlined services to customers.

There is a total of 26 one stop centers across the State, seven of which are affiliate sites. At the time of the on-site monitoring, there were no VR counselors co-located within the comprehensive centers, but there is a referral process in place to coordinate receipt of VR services. KRS does not have a role in the certification process of one stop centers within the State. At the time of the on-site visit, MOUs were being reviewed by attorneys and there were no MOUs in place, and infrastructure costs were being renegotiated in local areas. The agency reported that it was considering assigning costs based on the numbers of individuals with disabilities being served. KRS reported that it has agreed to assist with accessibility costs within the one stop centers.

Performance Accountability

Section 116 of WIOA establishes performance accountability indicators and performance reporting requirements to assess the effectiveness of States and local areas in achieving positive outcomes for individuals served in the workforce development system. WIOA requires that these requirements apply across all six core programs, with a few exceptions. RSA reviewed the VR agency's progress and implementation of performance accountability measures and data sharing and matching requirements.

The Department of Commerce is responsible for the coordination and submission of the WIOA Statewide Annual Performance Report Template in accordance with 34 C.F.R. § 361.160. Due to a data breach, the agency advised that it was unable to check co-enrollment data and was waiting on clearance before it can begin exchanging data with core partners. KRS reported that, there was no way to detect duplication of services other than local staff planning. KRS was working on developing data sharing agreements with core partners. The agency was using retention and repeat business customers as the two measures for effectively serving employers. KRS' case management system is more than 30 years old, and although, the agency recognized the need for a new system to assist with case management and data collection, the State legislature will not address the request again until 2020.

C. Observations and Recommendations

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

D. Findings and Corrective Actions

RSA's review of the performance of KRS in this focus area resulted in the identification of the following finding and the corresponding corrective actions to improve performance.

Finding 6.1 One-Stop Service Delivery System Memoranda of Understanding and Infrastructure Funding Agreements

Issue: Has KRS executed MOUs, including IFAs, with each LWDB and other one-stop partners satisfying 34 C.F.R. § 361.420 and 34 C.F.R. § 361.500, as well as policy guidance issued jointly by the U.S. Departments of Education and Labor.

Requirement: The DSU has sole responsibility for the VR program's participation as a partner in the one-stop service delivery system (34 C.F.R. § 361.13(c)(1)(v) and (2)). As a required one-stop partner pursuant to 34 C.F.R. § 361.420, the DSU must—

- Provide access to the VR program through the one-stop delivery system, in addition to any other appropriate locations;
- Use a portion of its funds, consistent with the Rehabilitation Act, as amended by WIOA, and with Federal cost principles in 2 C.F.R. parts 200 and 3474 (requiring, among other things, that costs are allowable, reasonable, necessary, and allocable), to—
 - Provide applicable career services; and

- Work collaboratively with the State Board and LWDBs to establish and maintain the one-stop delivery system. This includes jointly funding the one-stop infrastructure through partner contributions that are based upon—
 - A reasonable cost allocation methodology by which infrastructure costs are charged to each partner based on proportionate use and relative benefit received;
 - Federal cost principles; and
 - Any local administrative cost requirements in the Federal law authorizing the partner's program. (This is further described in 34 C.F.R. § 361.700.);
- Enter into an MOU with the LWDBs relating to the operation of the one-stop delivery system that meets the requirements of 34 C.F.R. § 361.500(b);
- Participate in the operation of the one-stop delivery system consistent with the terms of the MOU, requirements of authorizing laws, the Federal cost principles, and all other applicable legal requirements; and
- Provide representation on the State Board and LWDBs as required and participate in Board committees as needed.

Pursuant to 34 C.F.R. § 361.500(a), the MOU is the product of local discussion and negotiation. It is an agreement developed and executed between the LWDB and the one-stop partners, with the agreement of the chief elected official and the one-stop partners, relating to the operation of the one-stop delivery system in the local area. In accordance with 34 C.F.R. § 361.500(b), each MOU must contain—

- A description of services to be provided through the one-stop delivery system, including the manner in which the services will be coordinated and delivered through the system;
- Agreement on funding the costs of the services and the operating costs of the system, including—
 - Funding of infrastructure costs of one-stop centers in accordance with 34 C.F.R. §§ 361.700 through 361.755; and
 - Funding of the shared services and operating costs of the one-stop delivery system described in 34 C.F.R. § 361.760;
- Methods for referring individuals between the one-stop operators and partners for appropriate services and activities;
- Methods to ensure that the needs of workers, youth, and individuals with barriers to employment, including individuals with disabilities, are addressed in providing access to services, including access to technology and materials that are available through the one-stop delivery system;
- The duration of the MOU and procedures for amending it; and
- Assurances that each MOU will be reviewed, and if substantial changes have occurred, renewed, not less than once every 3-year period to ensure appropriate funding and delivery of services.

The MOU may contain any other provisions agreed to by the parties that are consistent with Title I of WIOA, the authorizing statutes and regulations of one-stop partner programs, and the implementing regulations of WIOA (34 C.F.R. § 361.500(c)). When fully executed, the MOU must contain the signatures of the LWDB, one-stop partners, the chief elected official(s), and the

time period in which the agreement is effective. The MOU must be updated not less than every three years to reflect any changes in the signatory official of the Board, one-stop partners, and chief elected officials, or one-stop infrastructure funding (34 C.F.R. § 361.500(d)). If a one-stop partner appeals to the State regarding infrastructure costs, using the process described in 34 C.F.R. § 361.750, results in a change to the one-stop partner's infrastructure cost contributions, the MOU must be updated to reflect the final one-stop partner infrastructure cost contributions (34 C.F.R. § 361.500(e)).

The U.S. Departments of Education and Labor (the Departments) provided extensive guidance regarding the operation of the one-stop service delivery system and the funding of its infrastructure costs in the joint regulations ([Federal Register notice 81 FR 55791](#)), published August 19, 2016. On December 27, 2016, the Departments published a set of frequently asked questions related to the one-stop service delivery system. In this guidance, the Departments indicated that in order to have MOUs in place for PY 2017, which began on July 1, 2017, LWDBs and one-stop partners must enter into MOUs that align with the requirements of WIOA, except for the final IFA, by June 30, 2017. The Departments also indicated that the U.S. Department of Labor (DOL) used its transition authority in section 503(b) of WIOA to extend the implementation date of the final IFAs for PY 2017. With this extension, final IFAs were to be in place no later than January 1, 2018. However, the Departments explained that Governors had the discretion to require local areas to enter into final IFAs at any time between July 1, 2017, and January 1, 2018. During the extension period, local areas were allowed to use existing funding agreements in place for PY 2016, with any such modifications as the partners may have agreed to, to fund infrastructure costs in the local area. On January 18, 2017, the Departments issued formal policy guidance, which RSA published as technical assistance circulars: RSA-TAC-17-02 and RSA-TAC-17-03. In RSA-TAC-17-02, the Departments reiterated the extended IFA deadline of January 1, 2018.

Analysis: Kansas has five local workforce areas across the State. During the monitoring review, RSA requested sample MOUs from local workforce areas to assess KRS' progress in implementing the joint one-stop requirements for purposes of the VR program, including those regarding funding the one-stop system's infrastructure costs. Prior to the on-site monitoring review, KRS provided RSA with no MOUs (draft or otherwise). On October 4, 2018, RSA received five MOUs for each local workforce area. However, none of the draft MOUs contained signatures from all core program partners. Additionally, none contained infrastructure funding agreements. The agency reported that discussions are still ongoing relative to infrastructure funding costs assigned to partners within each local workforce area. None of the local workforce area MOUs was fully implemented, and an expected executed date was not provided by the agency at the time of the on-site visit.

Conclusion: As explained in this analysis, at the time of the on-site monitoring review KRS did not meet the joint one-stop requirements regarding the development and implementation of MOUs and final IFAs with each local workforce area in the State, as required by 34 C.F.R. §§ 361.420 and 361.500. At the time of the on-site visit, the State had not fully executed any of the required MOUs within the five local workforce areas and also had not developed and implemented final IFAs in all five local areas.

Corrective Actions:

RSA requires that KRS—

- 6.1.1** Finalize MOUs with those local workforce areas that do not have fully executed MOUs in accordance with 34 C.F.R. § 361.500; and
- 6.1.2** Finalize IFAs for each of the State’s local workforce areas in accordance with 34 C.F.R. §§ 361.700 through 361.755.

Agency response: The KRS Director is continuing to work with local areas to clarify IFAs, assuring that requirements are met for the proportional use by VR participants and relative benefit received.

Request for technical assistance: No technical assistance requested.

E. Technical Assistance

During the course of monitoring activities, RSA provided technical assistance to KRS regarding infrastructure funding agreements, particularly when the VR program is not co-located in a one-stop center.

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 (Quarterly Cumulative Caseload Report), the RSA-911 (Case Service Report), and SF-425 (Federal Financial Report). 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 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.

PROGRAM DATA TABLES

Table 1. Kansas Combined Agency Summary Statistics from RSA 113: FFYs 2015-2017

Row	Performance category	2015	2016	2017
1	Number of total applicants	4,883	4,771	4,720
2	Number of total eligible individuals	4,814	4,666	4,619
3	Agency implementing order of selection (Y/N)	Yes	Yes	Yes
4	Number of individuals on order of selection waiting list at year-end	0	0	0
5	Percent eligible of individuals had IPE who received no services	37.1%	34.6%	32.4%
6	Number of individuals in plan receiving services	7,297	6,306	5,988

Data source: RSA-113

Table 2a. Kansas Combined Agency Case Status Information, Exit Status, and Employment Outcomes for All Individuals at Closure-FFYs 2015-2017

Row	Performance category	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
1	Exited as applicants	684	12.2	627	13.4	420	12.8
2	Exited from trial work experience	3	0.1	1	0.0	0	0
3	Exited with employment	1,343	23.9	1,134	24.3	722	22.0
4	Exited without employment	1,797	32.0	1,294	27.7	1,008	30.7
5	Exited from OOS waiting list	0	0	0	0	0	0
6	Exited without employment outcomes, after eligibility, before an IPE was signed or before receiving services	1,784	31.8	1,614	34.6	1,131	34.5
7	Employment rate*		42.8		46.7		41.7
8	Competitive employment outcomes	1,236	92.0	1,065	93.9	687	95.2
9	Average hourly earnings for competitive employment outcomes**	\$10.16		\$10.27		\$10.59	
10	Average hours worked for competitive employment outcomes	29.7		28.7		28.2	
11	Median hourly earnings for competitive employment outcomes	\$9.00		\$9.08		\$9.24	
12	Median hours worked for competitive employment outcomes	30.0		30.0		28.0	
13	Quarterly median earnings for competitive employment outcomes***	\$3,542.50		\$3,380.00		\$3,315.00	
14	Competitive employment outcomes meeting SGA	656	53.1	518	48.6	318	46.3
15	Competitive employment outcomes with employer-provided medical insurance	215	17.4	213	20.0	143	20.8

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*Using RSA-911: Total number of individuals who exited with employment divided by total number of individuals who received services multiplied by 100.

**Using RSA-911: Sum of the Weekly Wage at Closure / sum of the Hours Worked in a Week at Closure for individuals achieving a competitive employment outcome.

***Using RSA-911: Weekly earnings at closure (Data Element 197) multiplied by hours worked in a week at closure (Data Element 198) for individuals who achieved a competitive employment outcome multiplied by 13. Then the values are listed in order, from the lowest to the highest value. The value in the middle of this list is the median quarterly earnings, so there is the same quantity of numbers above the median number as there is below the median number.

Table 2b. Kansas Combined Agency Case Status Information, Exit Status, and Employment Outcomes for Individuals below Age 25 at Closure -FFYs 2015-2017

Row	Performance category	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
1	Exited as applicants	178	13.7	152	14.0	105	14.6
2	Exited from trial work experience	2	0.2	1	0.1	0	0
3	Exited with employment	299	23.1	275	25.4	160	22.3
4	Exited without employment	376	29.0	264	24.4	197	27.5
5	Exited from OOS waiting list	0	0	0	0	0	0
6	Exited without employment outcomes, after eligibility, before an IPE was signed or before receiving services	442	34.1	391	36.1	255	35.6
7	Employment rate*		44.3		51.0		44.8
8	Competitive employment outcomes	262	87.6	252	91.6	152	95.0
9	Average hourly earnings for competitive employment outcomes**	\$8.89		\$9.23		\$9.68	
10	Average hours worked for competitive employment outcomes	27.9		27.2		26.6	
11	Median hourly earnings for competitive employment outcomes	\$8.24		\$8.50		\$9.00	
12	Median hours worked for competitive employment outcomes	25.0		25.0		25.0	
13	Quarterly median earnings for competitive employment outcomes***	\$2,996.50		\$2,912.00		\$2,931.50	
14	Competitive employment outcomes meeting SGA	111	42.4	100	39.7	59	38.8
15	Competitive employment outcomes with employer-provided medical insurance	33	12.6	42	16.7	29	19.1

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*Using RSA-911: Total number of individuals who exited with employment divided by total number of individuals who received services multiplied by 100.

**Using RSA-911: Sum of the Weekly Wage at Closure / sum of the Hours Worked in a Week at Closure for individuals achieving a competitive employment outcome.

***Using RSA-911: Weekly earnings at closure (Data Element 197) multiplied by hours worked in a week at closure (Data Element 198) for individuals who achieved a competitive employment outcome multiplied by 13. Then the values are listed in order, from the lowest to the highest value. The value in the middle of this list is the median quarterly earnings, so there is the same quantity of numbers above the median number as there is below the median number.

Table 2c. Kansas Combined Agency Case Status Information, Exit Status, and Employment Outcomes for Individuals Age 25 and Older at Closure -FFYs 2015-2017

Row	Performance category	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
1	Exited as applicants	506	11.7	475	13.2	315	12.3
2	Exited from trial work experience	1	0.0	0	0	0	0
3	Exited with employment	1,044	24.2	859	23.9	562	21.9
4	Exited without employment	1,421	32.9	1,030	28.7	811	31.6
5	Exited from OOS waiting list	0	0	0	0	0	0
6	Exited without employment outcomes, after eligibility, before an IPE was signed or before receiving services	1,342	31.1	1,223	34.1	876	34.2
7	Employment rate*		42.4		45.5		40.9
8	Competitive employment outcomes	974	93.3	813	94.6	535	95.2
9	Average hourly earnings for competitive employment outcomes**	\$10.51		\$10.59		\$10.85	
10	Average hours worked for competitive employment outcomes	30.2		29.2		28.7	
11	Median hourly earnings for competitive employment outcomes	\$9.00		\$9.48		\$9.50	
12	Median hours worked for competitive employment outcomes	30.0		30.0		30.0	
13	Quarterly median earnings for competitive employment outcomes***	\$3,744.00		\$3,510.00		\$3,510.00	
14	Competitive employment outcomes meeting SGA	545	56.0	418	51.4	259	48.4
15	Competitive employment outcomes with employer-provided medical insurance	182	18.7	171	21.0	114	21.3

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*Using RSA-911: Total number of individuals who exited with employment divided by total number of individuals who received services multiplied by 100.

**Using RSA-911: Sum of the Weekly Wage at Closure / sum of the Hours Worked in a Week at Closure for individuals achieving a competitive employment outcome.

***Using RSA-911: Weekly earnings at closure (Data Element 197) multiplied by hours worked in a week at closure (Data Element 198) for individuals who achieved a competitive employment outcome multiplied by 13. Then the values are listed in order, from the lowest to the highest value. The value in the middle of this list is the median quarterly earnings, so there is the same quantity of numbers above the median number as there is below the median number.

**Table 3a. Kansas Combined Agency Source of Referral for All Individuals at Closure-
FFYs 2015-2017**

Row	Source of Referral	2015 Percent	2016 Percent	2017* Percent
1	Educational Institutions (elementary/secondary)	9.6	10.0	9.6
2	Educational Institutions (post-secondary)	0.7	0.9	1.0
3	Medical Health Provider (Public or Private)	8.2	6.6	6.1
4	Welfare Agency (State or local government)	2.3	2.8	3.2
5	Community Rehabilitation Programs	5.4	4.9	5.1
6	Social Security Administration (Disability Determination Service or District office)	3.3	3.5	4.2
7	One-stop Employment/Training Centers	2.2	2.1	2.5
8	Self-referral	28.3	26.4	24.4
9	Other Sources	19.9	15.8	15.5
10	American Indian VR Services Program	0.0	0.0	0.1
11	Centers for Independent Living	0.6	0.7	0.7
12	Child Protective Services	0.5	0.7	0.6
13	Consumer Organizations or Advocacy Groups	0.6	1.0	0.5
14	Employers	0.1	0.1	0.2
15	Faith Based Organizations	0.3	0.6	0.6
16	Family/Friends	4.6	6.1	6.3
17	Intellectual and Developmental Disabilities Providers	1.9	3.6	4.2
18	Mental Health Provider (Public or Private)	6.7	7.8	8.1
19	Public Housing Authority	0.2	0.3	0.3
20	State Department of Correction/Juvenile Justice	1.8	2.4	2.4
21	State Employment Service Agency	0.4	0.5	0.9
22	Veteran's Administration	0.4	0.4	0.2
23	Worker's Compensation	0.1	0.1	0.1
24	Other State Agencies	1.7	2.1	2.6
25	Other VR State Agencies	0.3	0.4	0.4
26	Total Identified Referral Sources	100.0	100.0	100.0
27	Other Referral Sources (unknown)	0.0	0.0	0.0

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 3b. Kansas Combined Agency Source of Referral for Individuals below Age 25 at Closure -FFYs 2015-2017

Row	Source of Referral	2015 Percent	2016 Percent	2017 Percent
1	Educational Institutions (elementary/secondary)	39.4	41.7	40.7
2	Educational Institutions (post-secondary)	0.8	1.3	1.5
3	Medical Health Provider (Public or Private)	4.5	3.2	3.9
4	Welfare Agency (State or local government)	2.0	1.7	3.3
5	Community Rehabilitation Programs	3.6	2.4	3.3
6	Social Security Administration (Disability Determination Service or District office)	1.2	1.6	2.1
7	One-stop Employment/Training Centers	1.5	0.9	1.0
8	Self-referral	13.6	9.3	8.9
9	Other Sources	14.3	11.9	11.4
10	American Indian VR Services Program	0	0	0
11	Centers for Independent Living	0.7	0.6	1.0
12	Child Protective Services	0.3	0.8	1.4
13	Consumer Organizations or Advocacy Groups	0.5	0.8	0.3
14	Employers	0.2	0.3	0.1
15	Faith Based Organizations	0.3	0.4	0.3
16	Family/Friends	6.4	8.0	7.0
17	Intellectual and Developmental Disabilities Providers	2.7	5.9	5.7
18	Mental Health Provider (Public or Private)	5.1	4.5	4.9
19	Public Housing Authority	0.1	0.3	0.1
20	State Department of Correction/Juvenile Justice	1.1	2.1	0.8
21	State Employment Service Agency	0.1	0.2	0.3
22	Veteran's Administration	0	0	0
23	Worker's Compensation	0.1	0	0
24	Other State Agencies	1.2	1.6	1.5
25	Other VR State Agencies	0.3	0.4	0.3
26	Total Identified Referral Sources	100.0	100.0	100.0
27	Other Referral Sources	0	0	0

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 3c. Kansas Combined Agency Source of Referral for Individuals Age 25 and Older at Closure -FFYs 2015-2017

Row	Source of Referral	2015 Percent	2016 Percent	2017 Percent
1	Educational Institutions (elementary/secondary)	0.6	0.4	0.9
2	Educational Institutions (post-secondary)	0.7	0.8	0.9
3	Medical Health Provider (Public or Private)	9.3	7.6	6.7
4	Welfare Agency (State or local government)	2.4	3.2	3.2
5	Community Rehabilitation Programs	5.9	5.7	5.6
6	Social Security Administration (Disability Determination Service or District office)	3.9	4.0	4.8
7	One-stop Employment/Training Centers	2.4	2.5	2.9
8	Self-referral	32.7	31.6	28.7
9	Other Sources	21.5	17.0	16.7
10	American Indian VR Services Program	0.0	0	0.1
11	Centers for Independent Living	0.5	0.7	0.6
12	Child Protective Services	0.5	0.6	0.4
13	Consumer Organizations or Advocacy Groups	0.6	1.1	0.6
14	Employers	0.1	0.1	0.2
15	Faith Based Organizations	0.3	0.7	0.7
16	Family/Friends	4.1	5.6	6.2
17	Intellectual and Developmental Disabilities Providers	1.7	3.0	3.8
18	Mental Health Provider (Public or Private)	7.2	8.8	9.0
19	Public Housing Authority	0.3	0.3	0.4
20	State Department of Correction/Juvenile Justice	2.0	2.5	2.8
21	State Employment Service Agency	0.5	0.6	1.1
22	Veteran's Administration	0.5	0.5	0.3
23	Worker's Compensation	0.0	0.1	0.2
24	Other State Agencies	1.9	2.3	2.9
25	Other VR State Agencies	0.3	0.4	0.5
26	Total Identified Referral Sources	100.0	100.0	100.0
27	Other Referral Sources	0	0	0

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 4a. Kansas Combined Agency Outcomes by Disability Type for All Individuals at Closure - FFYs 2015-2017

Row	Disability Type	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
1	Visual - Individuals served	100	3.2	73	3.0	63	3.6
2	Visual - Employment rate		42.0		43.8		31.7
3	Auditory and Communicative - Individuals served	165	5.3	144	5.9	130	7.5
4	Auditory and Communicative - Employment rate		57.0		70.1		50.8
5	Physical - Individuals served	783	24.9	636	26.2	434	25.1
6	Physical - Employment rate		37.5		37.9		38.5
7	Intellectual and Learning disability - Individuals served	845	26.9	652	26.9	476	27.5
8	Intellectual and Learning disability - Employment rate		51.6		58.1		50.6
9	Psychosocial and psychological- Individuals served	1,247	39.7	923	38.0	627	36.2
10	Psychosocial and psychological- Employment rate		38.3		41.3		36.4

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 4b. Kansas Combined Agency Outcomes by Disability Type for Individuals below Age 25 at Closure - FFYs 2015-2017

Row	Disability Type	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
1	Visual - Individuals served	20	3.0	12	2.2	8	2.2
2	Visual - Employment rate		20.0		33.3		62.5
3	Auditory and Communicative - Individuals served	23	3.4	19	3.5	24	6.7
4	Auditory and Communicative - Employment rate		26.1		42.1		33.3
5	Physical - Individuals served	55	8.1	54	10.0	40	11.2
6	Physical - Employment rate		38.2		42.6		45.0
7	Intellectual and Learning disability - Individuals served	373	55.3	305	56.6	196	54.9
8	Intellectual and Learning disability - Employment rate		50.4		55.1		47.4
9	Psychosocial and psychological- Individuals served	204	30.2	149	27.6	89	24.9
10	Psychosocial and psychological- Employment rate		39.2		48.3		40.4

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 4c. Kansas Combined Agency Outcomes by Disability Type for Individuals Age 25 and Older at Closure - FFYs 2015-2017

Row	Disability Type	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
1	Visual - Individuals served	80	3.2	61	3.2	55	4.0
2	Visual - Employment rate		47.5		45.9		27.3
3	Auditory and Communicative - Individuals served	142	5.8	125	6.6	106	7.7
4	Auditory and Communicative - Employment rate		62.0		74.4		54.7
5	Physical - Individuals served	728	29.5	582	30.8	394	28.7
6	Physical - Employment rate		37.5		37.5		37.8
7	Intellectual and Learning disability - Individuals served	472	19.1	347	18.4	280	20.4
8	Intellectual and Learning disability - Employment rate		52.5		60.8		52.9
9	Psychosocial and psychological- Individuals served	1,043	42.3	774	41.0	538	39.2
10	Psychosocial and psychological- Employment rate		38.1		39.9		35.7

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 5a. Kansas Combined Agency Number of Days from Application to Eligibility Determination for All Individuals at Closure - FFYs 2015-2017

Number of Days	2015 Number	2015 Percent	2016 Number	2016 Percent	2017* Number	2017* Percent
0 – 60 days	4,531	92.0	3,735	92.4	2,664	93.1
More than 60 days	393	8.0	307	7.6	197	6.9
Total eligible	4,924	100.0	4,042	100.0	2,861	100.0

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 5b. Kansas Combined Agency Number of Days from Application to Eligibility Determination for Individuals below Age 25 at Closure - FFYs 2015-2017

Number of Days	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
0 – 60 days	1,019	91.2	847	91.1	565	92.3
More than 60 days	98	8.8	83	8.9	47	7.7
Total eligible	1,117	100.0	930	100.0	612	100.0

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 5c. Kansas Combined Agency Number of Days from Application to Eligibility Determination for Individuals Age 25 and Older at Closure - FFYs 2015-2017

Number of Days	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
0 – 60 days	3,512	92.3	2,888	92.8	2,099	93.3
More than 60 days	295	7.7	224	7.2	150	6.7
Total eligible	3,807	100.0	3,112	100.0	2,249	100.0

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 6a. Kansas Combined Agency Number of Days from Eligibility* Determination to IPE for All Individuals Served at Closure- FFYs 2015-2017

Number of Days	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
0 – 90 days	371	86.9	1,088	84.5	1,047	86.6
More than 90 days	56	13.1	199	15.5	162	13.4
Total served	427	100.0	1,287	100.0	1,209	100.0

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*Eligibility occurred on or after July 22, 2014

Table 6b. Kansas Combined Agency Number of Days from Eligibility* Determination to IPE for Individuals Served below Age 25 at Closure- FFYs 2015-2017

Number of Days	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
0 – 90 days	74	86.0	253	82.4	219	87.6
More than 90 days	12	14.0	54	17.6	31	12.4
Total served	86	100.0	307	100.0	250	100.0

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*Eligibility occurred on or after July 22, 2014

Table 6c. Kansas Combined Agency Number of Days from Eligibility* Determination to IPE for Individuals Served Age 25 and Older at Closure- FFYs 2015-2017

Number of Days	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
0 – 90 days	297	87.1	835	85.2	828	86.3
More than 90 days	44	12.9	145	14.8	131	13.7
Total served	341	100.0	980	100.0	959	100.0

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*Eligibility occurred on or after July 22, 2014

Table 7a. Kansas Combined Agency VR Services Provided for All Individuals Served* at Closure – FFYs 2015-2017

Row	Services Provided**	2015 Percent	2016 Percent	2017 Percent
1	Training- Graduate degree training	0.2	0.3	0.5
2	Training- Bachelor degree training	11.0	10.0	8.4
3	Training- Junior or community college training	3.9	7.1	9.8
4	Training- Occupational or vocational training	11.1	9.0	6.6
5	Training- On-the-job training	0.1	0.2	0.6
6	Training- Apprenticeship training	0.0	0.0	0.1
7	Training- Basic academic remedial or literacy training	1.0	1.2	0.8
8	Training- Job readiness training	7.4	7.5	6.6
9	Training- Disability-related skills training	0.8	0.6	1.1
10	Training- Miscellaneous training	4.9	4.2	3.9
11	Career- Assessment	75.7	75.6	73.9
12	Career- Diagnosis and treatment of impairment	34.6	34.9	36.1
13	Career- Vocational rehab counseling and guidance	0.0	0.0	0.0
14	Career- Job search assistance	1.0	0.9	0.6
15	Career- Job placement assistance	58.0	59.1	58.6
16	Career- On-the-job supports-short term	10.8	10.3	10.5
17	Career- On-the-job supports-SE	3.1	3.4	4.7
18	Career- Information and referral services	0.8	0.7	1.2
19	Career- Benefits counseling	0.0	0.0	0.0
20	Career- Customized employment services	1.2	0.7	1.0
21	Other services- Transportation	46.6	41.3	38.6
22	Other services- Maintenance	31.5	29.0	27.7
23	Other services- Rehabilitation technology	20.0	18.0	17.3
24	Other services- Reader services	0.1	0.1	0.0
25	Other services- Interpreter services	1.3	2.0	2.7
26	Other services- Personal attendant services	0.5	0.9	1.3
27	Other services- Technical assistance services	0.1	0.2	0.1
28	Other services- Other services	24.2	23.1	20.4

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*For individuals who were determined eligible, placed on an IPE, and received a service under the IPE.

**VR Services include both those provided and purchased by the VR agency as well as those provided by comparable service providers

Table 7b. Kansas Combined Agency VR Services Provided for Individuals Served* below Age 25 at Closure- FFYs 2015-2017

Row	Services Provided**	2015 Percent	2016 Percent	2017 Percent
1	Training- Graduate degree training	0.0	0.0	0.3
2	Training- Bachelor degree training	10.1	7.8	8.1
3	Training- Junior or community college training	2.4	6.7	10.6
4	Training- Occupational or vocational training	7.6	4.6	5.6
5	Training- On-the-job training	0.1	0.6	1.7
6	Training- Apprenticeship training	0.0	0.0	0.3
7	Training- Basic academic remedial or literacy training	1.2	2.2	2.0
8	Training- Job readiness training	9.6	10.2	9.5
9	Training- Disability-related skills training	0.3	0.6	0.6
10	Training- Miscellaneous training	7.0	6.5	6.2
11	Career- Assessment	67.3	69.4	68.1
12	Career- Diagnosis and treatment of impairment	15.0	16.5	19.3
13	Career- Vocational rehab counseling and guidance	0.0	0.2	0.0
14	Career- Job search assistance	0.3	0.0	0.0
15	Career- Job placement assistance	58.5	57.9	55.7
16	Career- On-the-job supports-short term	18.7	16.9	18.2
17	Career- On-the-job supports-SE	5.5	6.1	6.7
18	Career- Information and referral services	0.3	0.7	1.7
19	Career- Benefits counseling	0.0	0.0	0.0
20	Career- Customized employment services	1.8	1.1	2.0
21	Other services- Transportation	28.0	25.0	19.6
22	Other services- Maintenance	19.6	20.6	21.3
23	Other services- Rehabilitation technology	9.2	7.8	10.1
24	Other services- Reader services	0.1	0.0	0.0
25	Other services- Interpreter services	1.5	1.9	1.7
26	Other services- Personal attendant services	0.9	1.3	1.7
27	Other services- Technical assistance services	0.0	0.0	0.0
28	Other services- Other services	19.6	19.1	19.9

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*For individuals who were determined eligible, placed on an IPE, and received a service under the IPE.

** VR Services include those provided and purchased by the VR agency.

Table 7c. Kansas Combined Agency VR Services Provided for Individuals Served* Age 25 and Older at Closure - FFYs 2015-2017

Row	Services Provided**	2015 Percent	2016 Percent	2017 Percent
1	Training- Graduate degree training	0.2	0.4	0.6
2	Training- Bachelor degree training	11.2	10.7	8.4
3	Training- Junior or community college training	4.3	7.2	9.5
4	Training- Occupational or vocational training	12.1	10.2	6.9
5	Training- On-the-job training	0.1	0.2	0.3
6	Training- Apprenticeship training	0.0	0.1	0.0
7	Training- Basic academic remedial or literacy training	1.0	1.0	0.5
8	Training- Job readiness training	6.7	6.7	5.8
9	Training- Disability-related skills training	0.9	0.6	1.2
10	Training- Miscellaneous training	4.3	3.6	3.3
11	Career- Assessment	78.0	77.4	75.5
12	Career- Diagnosis and treatment of impairment	40.0	40.2	40.5
13	Career- Vocational rehab counseling and guidance	0.0	0.0	0.0
14	Career- Job search assistance	1.2	1.1	0.8
15	Career- Job placement assistance	57.9	59.4	59.3
16	Career- On-the-job supports-short term	8.6	8.5	8.4
17	Career- On-the-job supports-SE	2.4	2.6	4.2
18	Career- Information and referral services	0.9	0.7	1.1
19	Career- Benefits counseling	0.0	0.0	0.0
20	Career- Customized employment services	1.0	0.6	0.8
21	Other services- Transportation	51.7	45.9	43.6
22	Other services- Maintenance	34.7	31.3	29.4
23	Other services- Rehabilitation technology	23.0	20.9	19.2
24	Other services- Reader services	0.0	0.1	0.0
25	Other services- Interpreter services	1.2	2.1	3.0
26	Other services- Personal attendant services	0.4	0.7	1.2
27	Other services- Technical assistance services	0.1	0.3	0.1
28	Other services- Other services	25.5	24.3	20.5

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*For individuals who were determined eligible, placed on an IPE, and received a service under the IPE.

**VR Services include those provided and purchased by the VR agency.

Table 8a. Kansas Combined Agency Standard Occupational Classification (SOC) Codes Percentages of Employment Outcomes and Median Hourly Earnings for All Individuals Who Achieved Competitive Employment Outcomes at Closure - FFYs 2015-2017

Row	SOC for Competitive Integrated Employment Outcomes	2015 Percent	2015 Median Hourly Wage	2016 Percent	2016 Median Hourly Wage	2017 Percent	2017 Median Hourly Wage
1	Architecture and Engineering Occupations	0.3	\$19.00	0.6	\$13.75	0.4	\$22.83
2	Arts, Design, Entertainment, Sports, and Media	1.3	\$12.25	0.6	\$9.91	1.0	\$9.75
3	Building and Grounds Cleaning and Maintenance	10.5	\$8.50	11.1	\$8.50	11.2	\$8.50
4	Business and Financial Operations Occupations	0.9	\$16.30	0.6	\$11.25	1.2	\$13.83
5	Community and Social Services Occupations	2.1	\$12.18	2.3	\$13.58	2.8	\$12.00
6	Computer and Mathematical Occupations	0.9	\$15.00	0.9	\$14.50	0.6	\$21.28
7	Constructive and Extraction Occupations	2.3	\$13.00	1.6	\$14.50	1.5	\$12.00
8	Education, Training, and Library Occupations	2.5	\$10.50	3.1	\$10.75	2.9	\$12.25
9	Farming, Fishing, and Forestry Occupations	0.2	\$9.00	0.5	\$9.00	0.6	\$9.55
10	Food Preparation and Serving Related Occupations	14.9	\$8.00	16.2	\$8.04	13.2	\$8.50
11	Healthcare Practitioners and Technical Occupations	2.5	\$18.58	1.7	\$15.75	2.5	\$16.00
12	Healthcare Support Occupations	6.4	\$10.00	6.4	\$10.00	7.1	\$10.90
13	Installation, Maintenance, and Repair Occupations	4.0	\$9.00	2.4	\$10.42	3.2	\$9.37
14	Legal Occupations	0.1	\$12.00	0.1	\$28.85	NA	NA
15	Life, Physical, and Social Science Occupations	0.1	\$21.90	0.2	\$15.06	0.6	\$15.31
16	Management Occupations	1.7	\$10.48	1.4	\$10.00	1.5	\$13.75
17	Military Specific Occupations	NA	NA	NA	NA	NA	NA
18	Office and Administrative Support Occupations	17.9	\$9.00	20.2	\$9.25	21.5	\$9.31
19	Personal Care and Service Occupations	5.3	\$9.00	5.7	\$9.00	3.9	\$9.00
20	Production Occupations	8.0	\$9.00	8.1	\$9.40	7.6	\$9.13
21	Protective Service Occupations	1.2	\$9.47	0.9	\$10.25	0.9	\$12.33
22	Randolph-Sheppard vending facility clerk*	NA	NA	NA	NA	NA	NA
23	Randolph-Sheppard vending facility operator*	NA	NA	NA	NA	NA	NA
24	Sales and Related Occupations	8.3	\$8.00	7.5	\$9.00	8.2	\$8.88
25	Transportation and Material Moving Occupations	8.5	\$9.73	8.1	\$9.63	7.7	\$10.00
26	Total competitive employment outcomes		\$9.00		\$9.08		\$9.24

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*RSA specific occupational classifications

Table 8b. Kansas Combined Agency Standard Occupational Classification (SOC) Codes Percentages of Employment Outcomes and Median Hourly Earnings for Individuals below Age 25 Who Achieved Competitive Employment Outcomes at Closure - FFYs 2015-2017

Row	SOC for Competitive Integrated Employment Outcomes	2015 Percent	2015 Median Hourly Wage	2016 Percent	2016 Median Hourly Wage	2017 Percent	2017 Median Hourly Wage
1	Architecture and Engineering Occupations	NA	NA	0.8	\$17.83	NA	NA
2	Arts, Design, Entertainment, Sports, and Media	0.8	\$12.00	0.8	\$10.12	1.3	\$14.28
3	Building and Grounds Cleaning and Maintenance	8.4	\$8.00	9.5	\$8.00	15.8	\$8.50
4	Business and Financial Operations Occupations	0.4	\$16.30	0.4	\$23.55	1.3	\$20.56
5	Community and Social Services Occupations	0.4	\$8.25	0.4	\$15.00	1.3	\$13.61
6	Computer and Mathematical Occupations	NA	NA	0.4	\$27.40	NA	NA
7	Constructive and Extraction Occupations	3.4	\$12.65	1.2	\$10.00	1.3	\$11.75
8	Education, Training, and Library Occupations	1.5	\$9.00	3.2	\$9.94	3.3	\$11.23
9	Farming, Fishing, and Forestry Occupations	0.4	\$8.00	1.2	\$10.50	2.0	\$10.10
10	Food Preparation and Serving Related Occupations	18.7	\$8.00	21.8	\$8.00	14.5	\$8.63
11	Healthcare Practitioners and Technical Occupations	2.3	\$8.33	0.4	\$15.00	2.6	\$9.60
12	Healthcare Support Occupations	4.6	\$9.23	4.8	\$10.25	1.3	\$8.00
13	Installation, Maintenance, and Repair Occupations	5.0	\$11.00	2.8	\$9.40	4.6	\$9.00
14	Legal Occupations	NA	NA	NA	NA	NA	NA
15	Life, Physical, and Social Science Occupations	NA	NA	NA	NA	NA	NA
16	Management Occupations	0.8	\$8.95	0.4	\$9.25	0.7	\$12.00
17	Military Specific Occupations	NA	NA	NA	NA	NA	NA
18	Office and Administrative Support Occupations	21.8	\$8.00	21.0	\$9.00	21.7	\$9.00
19	Personal Care and Service Occupations	5.7	\$8.00	6.0	\$8.00	5.9	\$9.00
20	Production Occupations	8.8	\$9.00	7.5	\$9.21	10.5	\$8.88
21	Protective Service Occupations	0.4	\$9.50	0.8	\$10.00	NA	NA
22	Randolph-Sheppard vending facility clerk*	NA	NA	NA	NA	NA	NA
23	Randolph-Sheppard vending facility operator*	NA	NA	NA	NA	NA	NA
24	Sales and Related Occupations	10.7	\$7.88	8.7	\$9.00	5.9	\$8.00
25	Transportation and Material Moving Occupations	6.1	\$8.33	7.9	\$8.53	5.9	\$9.00
26	Total competitive employment outcomes		\$8.25		\$8.50		\$9.00

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*RSA specific occupational classifications

Table 8c. Kansas Combined Agency Standard Occupational Classification (SOC) Codes Percentages of Employment Outcomes and Median Hourly Earnings for Individuals Age 25 and Older Who Achieved Competitive Employment Outcomes at Closure- FFYs 2015-2017

Row	SOC for Competitive Integrated Employment Outcomes	2015 Percent	2015 Median Hourly Wage	2016 Percent	2016 Median Hourly Wage	2017 Percent	2017 Median Hourly Wage
1	Architecture and Engineering Occupations	0.4	\$19.00	0.5	\$13.75	0.6	\$22.83
2	Arts, Design, Entertainment, Sports, and Media	1.4	\$12.25	0.5	\$9.91	0.9	\$9.50
3	Building and Grounds Cleaning and Maintenance	11.1	\$8.72	11.6	\$8.50	9.9	\$8.72
4	Business and Financial Operations Occupations	1.0	\$17.50	0.6	\$10.00	1.1	\$12.38
5	Community and Social Services Occupations	2.6	\$12.25	2.8	\$13.45	3.2	\$11.50
6	Computer and Mathematical Occupations	1.1	\$15.00	1.1	\$14.50	0.7	\$21.28
7	Constructive and Extraction Occupations	2.1	\$13.47	1.7	\$15.00	1.5	\$12.00
8	Education, Training, and Library Occupations	2.8	\$11.10	3.1	\$11.33	2.8	\$12.97
9	Farming, Fishing, and Forestry Occupations	0.2	\$9.77	0.2	\$8.38	0.2	\$8.00
10	Food Preparation and Serving Related Occupations	13.9	\$8.00	14.4	\$8.46	12.9	\$8.50
11	Healthcare Practitioners and Technical Occupations	2.6	\$19.50	2.1	\$16.50	2.4	\$17.15
12	Healthcare Support Occupations	6.9	\$10.00	6.9	\$10.00	8.8	\$10.90
13	Installation, Maintenance, and Repair Occupations	3.8	\$9.00	2.3	\$10.50	2.8	\$9.50
14	Legal Occupations	0.1	\$12.00	0.1	\$28.85	NA	NA
15	Life, Physical, and Social Science Occupations	0.1	\$21.90	0.2	\$15.06	0.7	\$15.31
16	Management Occupations	2.0	\$11.68	1.7	\$10.47	1.7	\$15.50
17	Military Specific Occupations	NA	NA	NA	NA	NA	NA
18	Office and Administrative Support Occupations	16.8	\$9.00	19.9	\$9.55	21.5	\$9.72
19	Personal Care and Service Occupations	5.1	\$9.24	5.7	\$9.13	3.4	\$8.54
20	Production Occupations	7.8	\$9.23	8.2	\$9.49	6.7	\$9.25
21	Protective Service Occupations	1.4	\$9.35	1.0	\$10.25	1.1	\$12.33
22	Randolph-Sheppard vending facility clerk*	NA	NA	NA	NA	NA	NA
23	Randolph-Sheppard vending facility operator*	NA	NA	NA	NA	NA	NA
24	Sales and Related Occupations	7.7	\$8.23	7.1	\$9.00	8.8	\$9.00
25	Transportation and Material Moving Occupations	9.1	\$10.00	8.1	\$10.00	8.2	\$10.10
26	Total competitive employment outcomes		\$9.00		\$9.48		\$9.50

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data. *RSA specific occupational classifications

Table 9a. Kansas Combined Agency Reason for Exit for All Individuals Who Did Not Achieve an Employment Outcome at Closure- FFYs 2015-2017

Row	Reason for Closure	2015 number	2015 Percent	2016 number	2016 Percent	2017* number	2017* Percent
1	Unable to locate or contact	1,273	29.8	1,112	31.4	819	32.0
2	Disability too significant to benefit from VR services - ineligible	96	2.2	62	1.8	36	1.4
3	No longer interested in receiving services or further services	1,951	45.7	1,687	47.7	1,199	46.9
4	Death	32	0.7	29	0.8	23	0.9
5	Transferred to another agency	27	0.6	18	0.5	16	0.6
6	No disabling condition – ineligible	35	0.8	34	1.0	29	1.1
7	No impediment to employment - ineligible	61	1.4	31	0.9	25	1.0
8	Transportation not feasible or available	8	0.2	2	0.1	3	0.1
9	Does not require VR services - ineligible	29	0.7	34	1.0	12	0.5
10	All other reasons	651	15.3	441	12.5	336	13.1
11	Extended employment	3	0.1	2	0.1	2	0.1
12	Individual in institution other than a prison or jail	15	0.4	22	0.6	8	0.3
13	Individual is incarcerated in a prison or jail	87	2.0	61	1.7	51	2.0

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 9b. Kansas Combined Agency Reason for Exit for Individuals below Age 25 Who Did Not Achieve an Employment Outcome at Closure - FFYs 2015-2017

Row	Reason for Closure	2015 number	2015 Percent	2016 number	2016 Percent	2017 number	2017 Percent
1	Unable to locate or contact	323	32.4	271	33.5	167	30.0
2	Disability too significant to benefit from VR services - ineligible	14	1.4	6	0.7	9	1.6
3	No longer interested in receiving services or further services	467	46.8	396	49.0	270	48.5
4	Death	5	0.5	4	0.5	2	0.4
5	Transferred to another agency	7	0.7	5	0.6	2	0.4
6	No disabling condition - ineligible	5	0.5	7	0.9	11	2.0
7	No impediment to employment - ineligible	11	1.1	4	0.5	4	0.7
8	Transportation not feasible or available	2	0.2	1	0.1	1	0.2
9	Does not require VR services - ineligible	7	0.7	11	1.4	3	0.5
10	All other reasons	143	14.3	95	11.8	76	13.6
11	Extended employment	0	0	1	0.1	0	0
12	Individual in institution other than a prison or jail	1	0.1	2	0.2	3	0.5
13	Individual is incarcerated in a prison or jail	13	1.3	4	0.5	9	1.6

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 9c. Kansas Combined Agency Reason for Exit for Individuals Age 25 and Older Who Did Not Achieve an Employment Outcome at Closure - FFYs 2015-2017

Row	Reason for Closure	2015 number	2015 Percent	2016 number	2016 Percent	2017 number	2017 Percent
1	Unable to locate or contact	950	29.1	841	30.8	652	32.6
2	Disability too significant to benefit from VR services - ineligible	82	2.5	56	2.1	27	1.3
3	No longer interested in receiving services or further services	1,484	45.4	1,291	47.3	929	46.4
4	Death	27	0.8	25	0.9	21	1.0
5	Transferred to another agency	20	0.6	13	0.5	14	0.7
6	No disabling condition - ineligible	30	0.9	27	1.0	18	0.9
7	No impediment to employment - ineligible	50	1.5	27	1.0	21	1.0
8	Transportation not feasible or available	6	0.2	1	0.0	2	0.1
9	Does not require VR services - ineligible	22	0.7	23	0.8	9	0.4
10	All other reasons	508	15.5	346	12.7	260	13.0
11	Extended employment	3	0.1	1	0.0	2	0.1
12	Individual in institution other than a prison or jail	14	0.4	20	0.7	5	0.2
13	Individual is incarcerated in a prison or jail	74	2.3	57	2.1	42	2.1

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

FISCAL DATA TABLES

Table 6.1 Kansas-Combined (KS-C) VR Resources and Expenditures—FFYs 2015–2017*

VR Resources and Expenditures	2015	2016	2017*
Total program expenditures	\$11,330,497	\$26,297,791	\$20,783,671
Federal expenditures	\$8,917,101	\$20,090,736	\$15,294,386
State agency expenditures (4 th quarter)	\$2,839,289	\$6,186,093	\$5,489,285
State agency expenditures (latest/final)	\$2,413,396	\$6,207,055	\$5,489,285
Federal formula award amount	\$27,907,803	\$28,747,534	\$27,814,886
MOE penalty from prior year	\$2,417,096	\$5,463,421	-
Federal award amount relinquished during reallocation	\$15,000,000	-	-
Federal award amount received during reallocation	-	-	-
Federal funds transferred from State VR agency	-	-	-
Federal funds transferred to State VR agency	-	-	-
Federal award amount (net)	\$10,490,707	\$23,284,113	\$27,814,886
Federal award funds deobligated	\$1,573,606	\$853,410	-
Federal award funds used	\$8,917,101	\$22,430,703	\$27,814,886
Percent of formula award amount used	31.95%	78.03%	100.00%
Federal award funds matched but not used	\$1	\$425,894	-\$7,532,880

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

Table 6.1 Kansas-Combined - VR Resources and Expenditures—Descriptions, Sources and Formulas

VR Resources and Expenditures	Source/Formula
Total program expenditures	The sum of the Federal and non-Federal expenditures. Source/Formula: Table 6.1: Federal expenditures plus State expenditures (latest/final)
Federal expenditures	The cumulative amount of disbursements from Federal funds. Source/Formula: SF-425 line 10e from latest/final report
State expenditures (4 th quarter)	The cumulative amount of disbursements and unliquidated obligations from State funds through September 30 th of the award period. Source/Formula: SF-425 line 10j from 4 th quarter report
State expenditures (latest/final)	The cumulative amount of disbursements and unliquidated obligations from State funds as reported on the agency’s latest or final SF-425 report. Final reports do not include unliquidated obligations. Source/Formula: SF-425 line 10j from latest/final report
Federal formula award amount	The amount of the Federal funds available to the agency based on the formula mandated in the Rehabilitation Act. Formula/Source: Federal formula award calculation
MOE penalty from prior year	The amount of the Maintenance of Effort (MOE) deficit from the previous FFY which resulted in a MOE penalty against the current FFY. Source/Formula: Table 6.2: MOE difference from prior year
Federal award amount relinquished during reallotment	Amount of Federal award voluntarily relinquished through the reallotment process. Formula/Source: RSA-692
Federal award received during reallotment	Amount of funds received through the reallotment process. Source/Formula: RSA-692
Federal funds transferred from State VR agency	Amount of award funds transferred from State VR agencies (Blind to General or General to Blind). Formula/Source: Agency transfer request documentation
Federal funds transferred to State VR agency	Amount of award funds transferred to State VR agencies (Blind to General or General to Blind). Formula/Source: Agency transfer request documentation
Federal award amount (net)	Federal award amount available after accounting for adjustments to award (e.g., MOE penalties, relinquishment, reallotment and transfers). Formula/Source: Federal formula award calculation, RSA-692, agency documentation, SF-425 : Federal formula calculation minus MOE penalty minus funds relinquished in reallotment plus funds received in reallotment plus funds transferred from agency minus funds transferred to agency
Federal award funds deobligated	Federal award funds deobligated at the request of the agency or as part of the award closeout process. These funds may include matched or unmatched Federal funds. Source/Formula: Agency deobligation request documentation, G5 closeout reports

VR Resources and Expenditures	Source/Formula
Federal award funds used	Amount of Federal award funds expended. Source/Formula: Federal formula calculation, RSA-692, agency documentation, SF-425 lesser of the 4 th quarter or latest/final: Federal award amount (net) (calculation above) minus Federal award funds deobligated
Percent Federal formula award used	Percent of Federal formula award funds used. Source/Formula: Federal award funds used (calculation above) divided by Federal formula award amount
Federal award funds matched but not used	This represents unused Federal award funds for which the agency provided match. I. Source/Formula: Table 6.2 Federal award funds matched (actual) minus Table 6.1 Federal award funds used

Table 6.2 Kansas-Combined (KS-C) Non-Federal Share and Maintenance of Effort—FFYs 2015–2017*

Non-Federal Share (Match) and Maintenance of Effort (MOE)	2015	2016	2017*
Match required per net award amount	\$2,839,289	\$6,186,093	\$7,528,044
Match provided (actual)	\$2,413,396	\$6,186,093	\$5,489,285
Match difference**	\$425,893	-	\$2,038,759
Federal funds matched (actual)	\$8,917,102	\$22,856,597	\$20,282,006
Percent Federal funds matched	85.00%	98.16%	72.92%
Match from State appropriation			
Percent match from State appropriation	0.00%	0.00%	0.00%
Match from Third-Party Cooperative Arrangements (TPCA)			
Percent match from TPCAs	0.00%	0.00%	0.00%
Match from Randolph-Sheppard program			
Percent match from Randolph-Sheppard Program	0.00%	0.00%	0.00%
Match from interagency transfers			
Percent match from interagency transfers	0.00%	0.00%	0.00%
Match from other sources			
Percent match from other sources	-	-	-
MOE required	\$7,876,817	\$5,482,647	\$2,413,396
MOE: Establishment/construction expenditures	-	-	-
MOE actual	\$2,413,396	\$6,186,093	\$5,489,285
MOE difference**	\$5,463,421	-\$703,446	-\$3,075,889

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

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

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

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

Non-Federal Share (Match) and Maintenance of Effort (MOE)	Source/Formula
Match from interagency transfers	Match amount from interagency transfers. Source/Formula: Data provided by State
Percent match from interagency transfers	Match amount from interagency transfers expressed as a percentage of total match provided. Source/Formula: Match from interagency transfers divided by SF-425 line 10j
Match from other sources	Match amount from all sources of match not previously listed. Source/Formula: Data provided by State
Percent match from other sources	Match amount from all other sources expressed as a percentage of total match provided. Source/Formula: Match from other sources divided by SF-425 line 10j
Maintenance of Effort (MOE) required	Maintenance of effort (MOE) is the level of non-Federal expenditures, minus establishment/construction expenditures for CRPs, established by the State's non-Federal expenditures two years prior, i.e. Recipient Share of Expenditures. Source/Formula: (For FFY two year prior) SF-425 4 th quarter or latest/final report: line 10j minus line 12a. If non-Federal share is added in the prior carryover year, the additional amount is added to the MOE required. If an agency increases their Establishment/Construction expenditures in the prior carryover year, the increase is deducted from the FFY's total non-Federal share for MOE purposes.
MOE: Establishment / construction expenditures	Non-Federal share of expenditures for construction of facilities for community rehabilitation program (CRP) purposes and the establishment of facilities for community rehabilitation purposes. Source/Formula: SF-425 latest/final report: line 12a
MOE actual	Non-Federal share provided by agency minus establishment/construction expenditures for CRPs. Source/Formula: SF-425: Match provided actual minus establishment/construction expenditures. NOTE: If non-Federal share is added in the prior carryover year, the additional amount is added to the MOE actual. If an agency increases their Establishment/Construction expenditures in the prior carryover year, the increase is deducted from the FFY's total non-Federal share for MOE purposes.
MOE difference**	The difference between MOE required and the actual MOE provided. Source/Formula: MOE required minus MOE actual

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

Table 6.3 Kansas-Combined (KS-C) Program Income and Carryover—FFYs 2015–2017*

Program Income and Carryover	2015	2016	2017*
Program income received	\$1,123,976	\$904,610	\$410,234
Program income disbursed	\$1,123,976	\$904,610	\$410,234
Program income transferred	\$1,123,976	\$904,610	\$410,234
Program income used for VR program	-	-	-
Federal grant amount matched	\$8,917,102	\$22,856,597	\$20,282,006
Federal expenditures 9/30	\$-24,710	\$4,593,256	\$4,690,829
Federal unliquidated obligations 9/30	-	-	-
Carryover amount	\$10,515,417	\$18,263,340	\$23,124,057
Carryover as percent of award	100.24%	78.44%	83.14%

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

Table 6.3 Kansas-Combined - Program Income and Carryover—Descriptions, Sources and Formulas

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

Table 6.4 Kansas-Combined (KS-C) RSA-2 Expenditures—FFYs 2015–2017*

RSA-2 Expenditures	2015	2016	2017
Total expenditures	\$20,295,640	\$21,364,497	\$25,169,314
Administrative costs	\$761,592	\$816,979	\$1,888,406
Administration as Percent expenditures	3.75%	3.82%	7.50%
Purchased services expenditures	\$9,569,672	\$9,729,163	\$12,394,810
Purchased services as a Percent expenditures	47.15%	45.54%	49.25%
Services to groups	\$461,477	\$1,214,018	-
Services to groups percentage	2.27%	5.68%	0.00%

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

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

RSA-2 Expenditures	Sources/Formula
Total expenditures	All expenditures from Federal, State and other rehabilitation funds (including VR, supported employment, program income, and carryover from previous FFY). This includes unliquidated obligations. Source: RSA-2: Schedule 1.4
Administrative costs	Total amount expended on administrative costs under the VR program. Source/Formula: RSA-2: Schedule 1.1
Administration as percent of expenditures	Administrative costs expressed as a percentage of all expenditures. Source/Formula: Administrative costs divided by total expenditures
Purchased services expenditures	Expenditures made for services purchased by the agency. Source/Formula: RSA-2: Schedule 1.2.B
Purchased services as a percent of expenditures	Purchased services expressed as a percentage of total expenditures. Source/Formula: Purchased services expenditures divided by total expenditures
Services to groups	Expenditures made by the agency for the provision of VR services for the benefit of groups of individuals with disabilities. Source/Formula: RSA-2: Schedule 1.3
Services to groups percentage	Services to groups expressed as a percentage of total expenditures. Source/Formula: Services to groups divided by total expenditures

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

APPENDIX B: DATA VERIFICATION RESULTS

Data Element	Number with required documentation	Number of service records reviewed	Percent with required documentation	Percent without required documentation
Date of Application	17	30	56.7%	43.3%
Date of Eligibility Determination	24	30	80%	20%
Date of IPE	17	30	56.7%	43.3%
Start Date of Employment in Primary Occupation at Exit or Closure	6	9	66.7%	33.3%
Weekly Earnings at Exit or Closure	6	9	66.7%	33.3%
Employment Status at Exit or Closure	6	9	66.7%	33.3%
Type of Exit or Closure	24	30	80%	20%
Date of Exit or Closure	23	30	76.7%	23.3%

Summary	Number (of 30)	Percent (of 30)
Files with all required documentation	8	26.6%
Files with documentation for four or data elements examined	30	100%
Files with no required documentation	0	--

APPENDIX C: SUPPORTED EMPLOYMENT PROGRAM PROFILE

2017 Kansas Combined Supported Employment Program Profile

Summary Statistics – Supported Employment Outcomes						
Performance category	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
Supported employment (SE) outcomes	148		142		79	
Competitive employment outcomes	121	81.8%	120	84.5%	70	88.6%
Median hourly earnings for competitive employment outcomes	\$8.00		\$8.00		\$8.00	
Average hours worked for competitive employment outcomes	20.3		22.2		18.7	

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

***Using RSA-911: Total number of individuals who exited with competitive supported employment divided by total number of individuals who exited with supported employment outcomes multiplied by 100.*

Top Five Services Provided to Individuals in Competitive Supported Employment

Services Provided	2017 Percent
Job placement assistance	87.1%
On-the-job supports-SE	71.4%
Assessment	64.3%
Transportation	38.6%
Maintenance	30.0%

Data source: RSA-911

Note: FFY 17 contains closed case data from October 1, 2016 to June 30, 2017.

Top Five Occupations by Percentages of Employment Outcomes with Median Hourly Earnings for All Individuals Who Achieved Competitive Supported Employment Outcomes at Closure for FFY17

SOC Code	2017 Percent	2017 Median Hourly Wage
Office and Administrative Support Occupations	24.3	\$8.00
Building and Grounds Cleaning and Maintenance	22.9	\$8.00
Food Preparation and Serving Related Occupations	22.9	\$8.50
Production Occupations	8.6	\$7.41
Sales and Related Occupations	5.7	\$8.63

Data source: RSA-911

Note: FFY 17 contains closed case data from October 1, 2016 to June 30, 2017.