

**FEDERAL FISCAL YEAR 2018
MONITORING REPORT
ON THE
NEW JERSEY COMMISSION
FOR THE
BLIND AND VISUALLY IMPAIRED
VOCATIONAL REHABILITATION
AND
SUPPORTED EMPLOYMENT PROGRAMS**



**U.S. Department of Education
Office of Special Education and
Rehabilitative Services
Rehabilitation Services Administration
November 18, 2019**

TABLE OF CONTENTS

	Page
Section 1: The Federal Mandate and Scope of the Review	1
Section 2: Focus Area – Performance of the State Vocational Rehabilitation Services Program..	3
Section 3: Focus Area – Transition Services, Including Pre-Employment Transition Services, for Students and Youth with Disabilities.....	13
Section 4: Focus Area – State Supported Employment Services Program.....	24
Section 5: Focus Area – Allocation and Expenditure of State Vocational Rehabilitation Services and State Supported Employment Services Program Funds.....	29
Section 6: Focus Area – Joint Workforce Innovation and Opportunity Act Final Rule Implementation	37
Appendix A: Program and Fiscal Performance Data Tables	45
Appendix B: Data Verification Results	76
Appendix C: Supported Employment Program Profile	77

SECTION 1: THE FEDERAL MANDATE AND SCOPE OF THE REVIEW

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 the New Jersey Commission for the Blind and Visually Impaired (CBVI) 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 for Students and Youth with Disabilities, including Pre-Employment Transition Services for Students 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 Case Service Report (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 11 through 14, 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 Suzanne Mitchell (Vocational Rehabilitation Program Unit Chief); Jessica Davis and Tonya Stellar (Vocational Rehabilitation Program Unit); Terry Martin (Technical Assistance Unit); David Miller (Fiscal Unit); Andy Kerns and Vernita Washington (Data Analysis Unit); and Christopher Pope (Office of the Director of the State Monitoring and Program Improvement Division). 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

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

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 through 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 (PD) 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 CBVI's performance during FFYs 2015, 2016, and the first 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 CBVI to RSA on the Quarterly Cumulative Caseload Report (RSA-113) and the 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 201 – 2017.

The VR Process: All Individuals

The total number of applicants for VR services decreased from 817 individuals in FFY 2015, to 709 individuals in FFY 2017. During the same period, the number of individuals determined eligible for VR services decreased from 883 individuals to 700 individuals. Conversely, the total number of individuals with an individualized plan for employment (IPE) who received services increased from 1,482 individuals in FFY 2015, to 1,608 individuals in FFY 2017. The percentage of individuals determined eligible for services who received no services, however, increased from 11.9 percent in FFY 2015, to 16.3 percent in the first three quarters of FFY 2017.

The total number of individuals who exited from the VR system as applicants decreased from 103 individuals (15.4 percent) in FFY 2015, to 71 individuals (13.6 percent) in FFY 2016, to 44 individuals (11.5 percent) in the first three quarters of FFY 2017. Over the review period, of the

218 individuals who exited as applicants, 75 individuals (34 percent) were under age 25 at the time of exit from the VR program. Approximately one-third of all individuals exiting as applicants were under age 25.

During the period under review, the percentage of individuals who exited the VR program without employment outcomes, after eligibility determination, but before an IPE was signed and VR services provided, increased from 15.7 percent in FFY 2015, to 20.5 percent, in the first three quarters of FFY 2017. Over the review period, of the 290 individuals who exited at this stage of the VR process, 16.2 percent were under age 25.

The percentage of individuals under age 25 at exit whose service records were closed after eligibility, prior to a signed IPE or the receipt of services, increased from 22.7 percent in FFY 2015, to 35.9 percent in the first three quarters of FFY 2017. Approximately one-third of individuals under age 25 exited before an IPE was developed and services provided.

Based upon the large percentage of applicants and individuals determined eligible under age 25 who exited the VR program prior to receiving services, the rate of attrition for this group needs further exploration by CBVI.

At the time of the review, CBVI had not implemented an order of selection (OOS); nor did it indicate any consideration of implementing an OOS in the near future.

Employment Outcomes

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

Employment Outcomes for All Individuals

The number of individuals served whose service records were closed after achieving an employment outcome decreased from 296 individuals in FFY 2015, to 118 individuals during the first three quarters of FFY 2017. The percentage of these individuals that achieved competitive employment decreased from 93.6 percent in FFY 2015, to 89.8 percent during the first three quarters of FFY 2017.

During the period reviewed, the percentage of individuals served who did not achieve employment and whose service records were closed, increased from 23.1 percent in FFY 2015, to 36.5 percent during the first three quarters of FFY 2017. The employment rate for all individuals served, whose service records were closed, decreased from 65.8 percent in FFY 2015, to 61.7 percent in FFY 2016, to 45.9 percent during the first three quarters of FFY 2017. The VR agency reported that it anticipated achieving or exceeding the previous employment rates after the fourth quarter of FFY 2017.

From FFY 2015 through the first three quarters of FFY 2017, the median hourly earnings for all individuals who achieved competitive employment outcomes remained relatively stable, from \$12.00 in FFY 2015, to \$12.05 in the first three quarters of FFY 2017. The median hours worked for individuals who achieved these outcomes increased from 31 hours per week in FFY 2015, to

34 hours per week in the first three quarters of FFY 2017. The percentage of individuals achieving competitive employment outcomes with employer-provided medical insurance varied from 15.5 percent in FFY 2015, to 24.9 percent in FFY 2016, to 16.0 percent in the first three quarters of FFY 2017.

For all individuals under age 25 who achieved employment outcomes, 100 percent achieved competitive employment. The median hourly earnings for individuals under age 25 who achieved competitive employment outcomes decreased from \$10.50 per hour in FFY 2015, to \$10.25 per hour during the first three quarters of FFY 2017. The median hours worked for individuals who achieved these outcomes increased from 32.5 hours per week in FFY 2015, to 35 hours per week in the first three quarters of FFY 2017. CBVI's employment rate decreased from 50 percent in FFY 2015, to 48.3 percent in FFY 2016, to 28.6 percent during the first three quarters of FFY 2017 for individuals under age 25. The VR agency anticipated an increase in the employment rate for FFY 2017 at the completion of the fourth quarter.

VR Services Provided

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

VR Services: All Eligible Individuals Served

Over the review period, training services most frequently provided to all individuals served whose cases were closed in FFY 2016 included: disability-related skills training (15.8 percent), Miscellaneous training (13.5 percent), bachelor's degree training (9.1 percent), job readiness training (4.1 percent), and occupational/vocational training (3.5 percent). The career services most frequently provided to all individuals served whose cases were closed in FFY 2016 included: diagnosis and treatment of impairment (65.8 percent), vocational rehabilitation counseling and guidance (62 percent), career assessment (47.4 percent), job placement assistance (15.5 percent), short term on-the-job supports (8.2 percent), and supported employment on-the-job supports (2.9 percent).

No individuals served whose service records were closed in FFY 2016 were reported to have participated in apprenticeship training; less than one percent (0.6 percent) participated in junior or community college training; and less than one percent (0.9 percent) received on-the-job training.

VR Services: Youth under Age 25 Served

Training services most frequently provided to individuals below age 25 whose cases were closed in FFY 2016 included miscellaneous training (58.6 percent), bachelor degree training (44.8 percent), junior or community college training (3.4 percent), and disability-related skills training (3.4 percent). The VR agency did not provide an explanation for the large percentage of miscellaneous training. The percentage of individuals receiving junior or community college training or bachelor degree training was significantly greater than for most VR agencies nationally and reflects the VR agency's investment in postsecondary education leading to quality employment outcomes.

Career services most frequently provided to individuals below age 25 whose cases were closed in FFY 2016 included career assessment (75.9 percent), vocational rehabilitation counseling and guidance (58.6 percent), diagnosis and treatment of impairment (51.7 percent), and short term on-the-job-supports (13.8 percent).

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.

Eligibility Time Frames for All Individuals

The percentage of all individuals served at service record closure and determined eligible for VR services within 60 days from the date of application decreased from 85.6 percent in FFY 2015, to 82.6 percent in FFY 2016. For the first three quarters of FFY 2017, CBVI completed timely eligibility determinations for 81.5 percent of all individuals whose service records were closed.

Eligibility Time Frames for Youth Under Age 25

From FFY 2015 to FFY 2016, the percentage of individuals below age 25 at service record closure who were determined eligible for VR services within 60 days from the date of application decreased from 79.6 percent to 77.5 percent. For the first three quarters of FFY 2017, CBVI reported that 77.1 percent of individuals below age 25 at service record closure were determined eligible for VR services within 60 days from the date of eligibility determination.

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.

IPE Development Time Frame for All Individuals

The percentage of all individuals served whose IPEs were developed within 90 days from the date of eligibility determination decreased from 95.2 percent in FFY 2015, to 90.0 percent in the first three quarters of FFY 2017. Therefore, CBVI substantially met the required 90-day time frame from eligibility to IPE development.

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.

Occupational Outcomes for All Individuals

A review of the employment outcomes achieved by all individuals served whose service records were closed during the period of review identified the most common standard occupational classification (SOC) codes as office and administrative support occupations, followed by sales and related occupations. Similarly, a greater percentage of individuals under age 25 at service record closure also achieved employment within office and administrative support occupations. The median hourly earnings for those who achieved employment in this occupational field were \$11.88 for all individuals served and \$10.00 for individuals under age 25 during the first three quarters of FFY 2017.

For all individuals served, management occupations comprised 5.1 percent of employment outcomes in FFY 2015, and grew to 7.5 percent in FFY 2017, with an increase in the median hourly wage from \$14.51 in FFY 2015, to \$20.43 in the first three quarters of FFY 2017. Of the individuals served under age 25 at exit, 16.7 percent achieved employment in the field of management occupations and earned a median hourly wage of \$10.00 during the first three quarters of FFY 2017.

During the period of review, CBVI reported a significant increase in the percentage of individuals below age 25 who achieved an employment outcome in the fields of computer and mathematical occupations, as well as office and administrative support occupations. For this population, employment in computer and mathematical occupations increased from 0 percent in FFY 2016, to 16.7 percent during the first three quarters of FFY 2017. Office and administrative support occupations increased from 18.8 percent in FFY 2015, to 50.0 percent in the first three quarters of FFY 2017.

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.

Reasons for Exit for All Individuals

From FFY 2015 through the first three quarters of FFY 2017, 945 individuals exited from the VR program without achieving an employment outcome. Approximately one-third of those who exited during the period under review were reported by CBVI as not being able to locate or contact, and another third were reported as no longer interested in receiving services. A similar trend was noted for individuals under age 25, except that the percentage nearly doubled for no longer interested in receiving services from FFY 2015 to the first three quarters of FFY 2017 (16.0 percent to 30.3 percent). CBVI has noted these trends and is exploring reasons for these exits and strategies to address the attrition.

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

CBVI generates the RSA-911 report through its case management system. While on-site, RSA confirmed that its system has been updated to reflect the data elements and data collection requirements in accordance with RSA-PD-16-04. Edit checks and application settings within the system provide internal controls for data accuracy. As a result, CBVI submitted error free RSA-911 reports for all four quarters of program year (PY) 2017. The data edit checks do not allow case progression if certain data elements have not been entered. For example, the IPE cannot be signed by the participant, if the data required to be entered at the time of IPE development has not been entered into the appropriate form.

VR counselors complete and certify that the required quarterly data has been entered and updated on a WIOA Quarterly Documentation Form. Once the counselor updates data and certifies the form, the data cannot be edited by VR staff other than a system administrator after the last date within that quarter. This allows CBVI to verify that data submitted in a report is not updated after the report is submitted to RSA.

CBVI purchased an edit-checker system, a report verification tool that reviews reports and identifies potential errors in the report based on the RSA-911 edit specification document. Each RSA-911 report generated is run through this software prior to submittal to RSA and ensures an additional level of data validation.

Data Verification Review

RSA conducted a review of 30 service records comprised of individuals who did and did not achieve employment, and whose service records were closed. The purpose of this review was to verify and ensure that the documentation in the case service record was accurate, complete, and supported the data entered into the RSA-911 with respect to the date of application, the date of eligibility determination, date of IPE, start date of employment in primary occupation at exit, hourly wage at exit, employment status at exit, type of exit, and date of exit. The results of that review are summarized in Appendix B: Data Verification Results.

Of the service records reviewed for individuals who achieved employment, 53 percent did not include verification of the start date for employment, while 33 percent did not include verification of the individual's employment status at closure. Additionally, 33 percent of the service records reviewed did not include documentation of the hourly wage at closure. Overall, eighteen of the service records RSA reviewed were free from any errors.

D. Observations and Recommendations

RSA's review of the performance of CBVI in this focus area did not result in any observations to improve performance.

E. Findings and Corrective Actions

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

2.1 Untimely Eligibility Determination

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

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

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

Data reported by CBVI on the RSA-911 show—

- Of all individuals served whose service records were closed in FFY 2015, 85.6 percent had an eligibility determination made within the required 60-day period;
- Of all individuals served whose service records were closed in FFY 2016, 82.6 percent had an eligibility determination made within the required 60-day period; and
- Of all individuals served whose service records were closed for the first three quarters of FFY 2017, 81.5 percent had an eligibility determination made within the required 60-day period.

Conclusion: As a result of the analysis of performance data, RSA concluded that CBVI did not satisfy the eligibility determination requirements in 34 C.F.R. § 361.41(b)(1).

Corrective Action Steps: RSA requires that CBVI—

- 2.1.1 Comply with 34 C.F.R. § 361.41(b)(1) by making eligibility determinations within the required 60-day period;
- 2.1.2 Fully assess and identify the factors leading to eligibility determinations exceeding 60 days and develop and implement a plan to address and correct the identified factors;
- 2.1.3 Develop and implement internal controls, including a monitoring component, to ensure eligibility determination requirements are met; and

2.1.4 Ensure eligibility determination extensions, when appropriate, are accurately and properly documented.

Agency Response: The CBVI upper management has been working with supervisors and managers to increase quality assurance activities through an updated case review procedure with all counselors that was implemented in the Spring 2019, and is currently being evaluated. We have also been invested in program evaluation and quality assurance initiatives through partnerships with the Program Evaluation and Quality Assurance Technical Assistance Center to identify and create activities to improve program compliance and performance.

Request for Technical Assistance: None at this time.

2.2 Lack of Supporting Documentation for Service Record Closure

Issue: Does CBVI close the service records of individuals who achieved an employment outcome without documenting that the employment outcome was maintained for at least 90 days, that the employment outcome was stable, and that the individual no longer needed VR services in accordance with 34 C.F.R. § 361.56(b). In addition, do CBVI service records include supporting documentation that the employment outcome was considered to be satisfactory by the individual employed and the VR counselor, that the individual was performing well in his or her employment, and that the individual was informed of the availability of post-employment services pursuant to 34 C.F.R. § 361.56(c) and (d).

Requirement: 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 DSU and the individual who must agree that they are 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), CBVI must maintain documentation verifying that an individual who obtains competitive 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 closed service records, which included service records of individuals who did, and did not, achieve employment. Of the 15 service records reviewed for those individuals who achieved employment, seven records or 47 percent included the required documentation to substantiate an accurate start date of employment, 10 records or 67 percent included the required documentation to support the employment status at

closure, and 10 service records or 67 percent included documentation of the weekly earnings at employment.

Conclusion: As a result of the analysis, RSA determined that CBVI did not satisfy the supporting documentation and service record closure requirements in 34 C.F.R. § 361.56.

Corrective Action Step:

RSA requires that CBVI—

- 2.2.1 Develop internal control procedures to ensure and document that the provisions of 34 C.F.R. § 361.56 have been met and verified through service record documentation in accordance with 34 C.F.R. § 361.47(a), including verified documentation that individuals have sustained satisfactory competitive integrated employment earning at least the minimum wage, prior to determining that they have achieved and maintained stable competitive employment for at least 90 days.

Agency Response: CBVI has implemented and provided training over the last year to increase documentation compliance at placement and closure, including guidance to staff and the creation of a new form that allows consumers and their employers to easily document the required employment and wage verification information when UI wage data and other documentation is not available. Additional training and detailed procedures are forthcoming, as well as the identification of additional staff supports to increase compliance.

Request for Technical Assistance: None at this time.

F. Technical Assistance

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

- RSA discussed how enhanced internal controls would help CBVI to ensure the accuracy and validity of the data being collected and reported to RSA. RSA explained that data from the RSA-911 are used to provide a profile of VR program performance and are reported to Governors, Congress, and the public. RSA reiterated that it is imperative that a system of internal controls be implemented as a measure of checks and balances to ensure proper expenditure of funds. Internal controls serve as a mechanism to prevent waste, fraud, abuse, and mismanagement of funds and other resources.
- RSA provided technical assistance and provided sub-regulatory guidance on the requirements set forth in WIOA, related to the implementation and operation of the performance accountability system under Section 116 of WIOA, as well as technical assistance specific to implementing joint regulations in accordance with 20 C.F.R. Part 677 and 34 C.F.R. Parts 361 and 463

- RSA provided technical assistance on the use of supplemental wage information, when appropriate, to assist in carrying out the performance accountability requirements under Section 116 of WIOA.
- RSA clarified the types of supporting documentation that should be included in service records related to employment.

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 WIOA, places heightened emphasis on the provision of services to students and youth with disabilities, including pre-employment transition services under Section 113 to students 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 vocational rehabilitation 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 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 CBVI's service delivery system and implementation of VR services, including pre-employment transition services and transition services follows.

Structure of Service Delivery

CBVI provides a continuum of VR services to students and youth with disabilities through approximately seven dedicated transition VR counselors assigned to two regional offices covering 21 counties. To facilitate the provision of transition services and pre-employment transition services, transition VR counselors have been assigned as liaisons to each of the high schools in each school district. These VR counselors are responsible for providing and coordinating both transition and pre-employment transition services. VR counselors work closely with the student, parents, school personnel, teachers of blind and visually impaired (TBVIs), and other relevant entities, to provide consultation, information, coordination, and services to enable

a student's successful transition from school to post-high school employment, education, specialized training and independence.

Transition services are available statewide to students and youth with disabilities between the ages of 14 and 24, who have applied, been determined eligible for vocational rehabilitation services, and have an approved IPE. Transition services are provided statewide through community rehabilitation providers (CRPs), local education agencies (LEAs), and CBVI's VR counselors.

CBVI also provides transition and pre-employment transition services through several programs designed to enable the student to successfully make the transition from the school environment to postsecondary education, vocational training, or employment in the workforce. These programs include the Student Hands-on Alternative Reinforcement Project (SHARP); Life 101; Employment, Development, Guidance, and Engagement (EDGE); Work Skills Preparation; College Prep Experience; and Youth Employment Solutions (YES).

Pre-employment transition services are available to students with disabilities between the ages of 14 and 21, who are enrolled in an approved educational program. The VR agency developed an intake process for pre-employment transition services and updated the referral and application processes for VR services to include potentially eligible students since pre-employment transition services are available to students with disabilities who are potentially eligible or who have been determined eligible for VR services. All five required activities under pre-employment transition services are provided statewide through fee-for-service contracts with providers and directly by CBVI's VR counselors.

CBVI has conducted fiscal forecasting to identify the amount of funds reserved for pre-employment transition services necessary to provide the required pre-employment transition services to students with disabilities, and to reasonably identify the funds available and remaining to engage in authorized activities (34 C.F.R. § 361.48(a)(3)). At the time of the on-site monitoring review, CBVI had not engaged in authorized activities and was focused on the provision of required activities to all students with disabilities in need of such services.

In conjunction with the New Jersey Department of Vocational Rehabilitation Services (DVRS), CBVI maintains an Interagency Agreement for Transition from School to Adult Life with the New Jersey Office of Special Education Programs (OSEP). This formal interagency agreement complies with the provisions of 34 C.F.R. § 361.22(b). Under the agreement, the agency provides technical consultations to students and/or parents/guardians, and other members of the IEP team in the form of telephone consultations, face-to-face meetings, and/or attendance at IEP meetings. The IEP designates the individuals and agencies responsible for the provision of transition services implemented while the student is in school.

In its delivery of transition and pre-employment transition services, CBVI is engaged in collaborative partnerships with local, regional, and statewide teams to support and improve systems to better serve children and youth. CBVI recently signed a new Memorandum of Understanding (MOU) with DVRS, and the Department of Developmental Disabilities (DDD), a sister agency within the New Jersey Department of Human Services, and an eligibility-based agency that provides a full array of services for youth exiting secondary education including

employment supports for individuals with developmental disabilities. Individuals with developmental disabilities may apply for DDD services at age 18, but are not eligible for services until the age of 21, when they exit secondary education.

During the monitoring process, CBVI communicated it is in the process of developing targeted strategies for engagement with employers on behalf of individuals receiving pre-employment transition services. CBVI's business relations unit evaluates business partners' interest in participation in career exploration activities, such as informational interviews, job shadowing, work-based learning opportunities, and networking events. The business relations unit staff work collaboratively with CBVI staff serving students and youth with disabilities, as well as CBVI partner programs that serve students and youth with disabilities, to identify and develop opportunities for employment engagement, and competitive, integrated employment outcomes for students and youth with disabilities following the completion of their educational programs.

CBVI also has a MOU with The College of New Jersey and the Division of Disabilities Services to provide support service providers (SSPs) to individuals who are deaf-blind, are at least 18 years old, and have exited secondary education. SSPs provide specialized support to facilitate greater community integration through the facilitation of communication access with the public in the preferred method of communication (e.g., American Sign Language) of the individual who is deaf-blind.

At the time of the monitoring visit, CBVI shared its plan to develop a collaborative relationship with the Department of Children and Families (DCF) and DVRS to develop a MOU to jointly serve students with disabilities served under these systems of care. This includes students with intellectual and developmental disabilities under age 21, as well as students with disabilities with significant and pervasive psychiatric and behavioral health needs served by DCF.

Outreach and Identification of Students and Youth

While an individual may be referred for vocational rehabilitation services by a variety of sources, referrals result mostly from CBVI's education services program (ESP) staff and TBVIs as a result of providing consultation, technical assistance, and training for families, early intervention staff, and public school staff who teach blind infants and children who are blind or visually impaired.

CBVI's ESP staff are responsible for collaborating and coordinating with the local school systems to assist students who are blind, visually impaired or deaf-blind. CBVI is also responsible for working with assigned school systems to identify students with disabilities who are potentially eligible for the VR program, as well as students with disabilities who have applied or are eligible for VR services for whom pre-employment transition services may be appropriate. As such, CBVI's ESP staff and TBVIs are typically involved with the vast majority of students and youth who may be referred to and are able to benefit from the VR program.

Once a student turns age 14, CBVI's ESP staff refer these students to one of the eight transition counselors assigned to the VR unit (i.e., six transition VR counselors assigned to the agency's service centers and two Deaf-Blind Specialists). A TBVI will complete and send a referral for transition services through ESP supervisory staff, to the VR supervisor responsible for the

service area. Simultaneously, the TBVIs also complete and mail a transition letter to the family notifying the student's parents or representatives that the referral has occurred. The transition letter also describes the purpose of the VR program, eligibility requirements, application procedures, and the scope of services that may be provided to eligible individuals. The VR supervisor, based on location of the student's school attendance, completes an assignment to the appropriate transition counselor. If a student does not have a TBVI, a referral can also be made directly to the VR unit by the school district or by self-referral requesting the case be opened with a transition counselor through a regional service center.

In coordination with the TBVI, school personnel and the transition counselor will schedule a meeting with the student and other relevant parties at least once in the first few months following the referral to further discuss the availability of pre-employment transition services and transition services, and to begin to assess whether the student may be appropriate for CBVI sponsored pre-employment transition programs and services.

CBVI provides consultation and technical assistance that assists LEAs to plan for the transition of students with disabilities. CBVI counselors provide information about VR services in a variety of ways, including distribution of brochures about VR services, classroom visits to discuss services, and sessions with families. VR counselors participate in county-wide transition fairs developed by LEAs, as well as "Planning for Adult Life" seminars hosted by the DDD as an outreach effort to families that may not be aware of CBVI services.

The VR agency's policies and procedures have been updated to include information related to referrals for pre-employment transition services; application for VR services; collaborative service provision; service agreements; and documenting, tracking, and reporting such services.

Provision of Pre-Employment Transition Services

CBVI provides pre-employment transition services to students with disabilities between the ages of 14 and 21 who are blind, deaf-blind, or visually impaired who need these services regardless of whether the student has applied for or been determined eligible for VR services (i.e., students who are potentially eligible or eligible for VR services). In collaboration with its CRPs and LEAs, CBVI provides all five required activities described in Section 113(b) of the Rehabilitation Act and 34 C.F.R. § 361.48(a)(2). VR counselors work collaboratively with school personnel to identify pre-employment transition needs and coordinate and complement transition services being provided under the student's individualized education program (IEP). The VR counselors can directly provide or arrange for the provision of the full range of pre-employment transition services for students potentially eligible or eligible for VR services. CBVI transition counselors provide pre-employment transition services, including job exploration counseling, work-based learning experiences, counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education, workplace readiness training, and instruction in self-advocacy.

During July 2018, CBVI revised its transition policies to include the nature and scope of pre-employment transition services as required in 34 C.F.R. § 361.50(a) and to reflect the transition-related revisions to the statutory requirements in the Rehabilitation Act, as amended by WIOA, and the regulatory requirements in 34 C.F.R. Part 361. The VR agencies policies and procedures

also reflect guidance specific to students in need of individualized VR services. As such, if a student needs a service that goes beyond the scope of pre-employment transition services, and the additional service is listed on the student's approved IPE, the VR agency will pay for those costs with non-reserved VR funds. CBVI reported that while developing policy, it provided transition-related guidance and training on the implementation of new policies to VR staff.

For students with disabilities who have received pre-employment transition services, the VR agency tracks and reports each service received by each individual in receipt of such services. CBVI also tracks those potentially eligible students who received pre-employment transition services and then apply for VR services.

Provision of Transition Services

Transition services are provided to both youth and students with disabilities between the ages of 14 and 24, who have applied, been determined eligible for VR services and have an approved IPE. Transition services are provided statewide through CRPs, LEAs, and CBVI transition counselors.

Although CBVI had not implemented an order of selection at the time of the on-site monitoring review, RSA recommended revising its transition and pre-employment transition policy to include the requirement that students with disabilities in receipt of pre-employment transition services, prior to eligibility determination and placement in a closed order of selection priority category, may continue to receive any of the five required activities under pre-employment transition services (34 C.F.R. § 361.36(e)). RSA also clarified that students and youth with disabilities may continue to receive group transition services (34 C.F.R. § 361.49(a)(7)), while assigned to a closed order of selection priority category.

State Educational Agency (SEA) Agreement

The most recent formal interagency agreement between CBVI, DVRS, and the New Jersey OSEP (effective November 2002), includes consultation and technical assistance to students and the IEP team; inclusion of transition planning in each student's IEP; and that the VR agencies will open a case for a student two years prior to exiting school, if requested by the student. The existing agreement does not include all of the minimum requirements for a formal interagency agreement with the SEA at 34 C.F.R. § 361.22(b) of the VR regulations.

At the time of the on-site review, CBVI, DVRS, and the OSEP were updating the current SEA agreement. CBVI provided RSA with a draft SEA agreement that was reviewed and discussed during the on-site monitoring review. The draft SEA agreement is consistent with requirements in Section 101(a)(11)(D) of the Rehabilitation Act, as amended by WIOA, and 34 C.F.R. § 361.22(b), including the requirements related to Section 511 of the Rehabilitation Act.

The draft agreement identifies the specific level of services that CBVI will provide for each child in the school district. These services are tiered according to individual student needs and are provided by CBVI staff within the education service unit.

The draft agreement clarifies roles and responsibilities of the LEAs and VR agency. Specifically, the agreement clarifies that school districts have the primary planning and programmatic

responsibilities for the provision of transition services for students enrolled in school. School districts are financially responsible for the provision of transition services mandated by applicable Federal and State statutory and regulatory requirements. CBVI personnel currently consult with schools to ensure that adult services are part of the planning and decision-making process for students with disabilities in transition.

IPE Development for Students and Youth with Disabilities

Individualized VR services, including transition services, are provided to students and youth with disabilities who have applied and been determined eligible for the VR program, under an approved IPE. When a student is determined to be eligible for VR services, the transition counselor will begin a process of comprehensive assessment to determine service needs that will inform the development of the IPE around the specific needs of the student, as well as specialized techniques and training in career awareness, college admission procedures, job seeking activities, etc.

While on-site, RSA provided technical assistance to CBVI, recommending that the agency's transition policy reflect the requirement that IPEs for students be developed within 90 days of eligibility determination. In addition, for those students with disabilities who receive special education and related services under IDEA, the IPE must be developed and approved no later than the time each VR eligible student leaves the school setting.

The IPE is jointly developed by the counselor and the student and formalizes the planning process through which the vocational goal, service delivery, and time frames for service delivery are determined. Information in the IPE is written to be consistent with the content of the IEP, including vocational goals, educational and rehabilitation objectives, projected dates, and responsibilities for participation in the transition process. The IPE identifies the individual's unique strengths, resources, priorities, concerns, abilities, capabilities, career interests, and informed choice consistent with the general goal of competitive integrated employment.

CBVI has included in its policies the use of a projected post-school employment outcome in an IPE for a student or youth with a disability in accordance with 34 C.F.R. § 361.46(a)(1) .

C. Observations and Recommendations

RSA's review of the performance of CBVI in this focus area did not result in any observations to improve performance.

D. Findings and Corrective Actions

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

3.1 SEA with the New Jersey Department of Education, OSEP

Issue: Does CBVI have an executed SEA agreement that is in compliance with the statutory requirements in the Rehabilitation Act, as amended by Title IV of WIOA.

Requirement: In accordance with Section 101(a)(11)(D) of the Rehabilitation Act, and 34 C.F.R. § 361.22(b), VR agencies are required to enter into formal interagency agreements with SEAs in order to facilitate the seamless transition of students with disabilities from the receipt of educational services, including pre-employment transition services, in school to the receipt of vocational rehabilitation services.

Pursuant to Section 101(a)(11)(D) of the Rehabilitation Act, the formal interagency agreements must describe, at a minimum, consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services and other VR services; transition planning by State VR agency and school personnel that facilitates the development and implementation of their IEPs under Section 614(d) of IDEA; the roles and responsibilities, including financial responsibilities of each agency; and procedures for outreach to and identification of students with disabilities who need transition services. In addition 34 C.F.R. § 361.22(b) requires the formal interagency agreement to include coordination necessary to satisfy documentation requirements set forth in Section 511 of the Rehabilitation Act, and 34 C.F.R. part 397 regarding students and youth with disabilities who are seeking subminimum wage employment and an assurance that neither the SEA nor the LEA will enter into an agreement with an employer holding a Section 14(c) certificate under the Fair Labor Standards Act for the purpose of operating a program in which students or youth with disabilities are paid subminimum wage.

Analysis: CBVI entered into an agreement with OSEP in FFY 2002 that is not in compliance with the minimum requirements of a formal interagency agreement with a SEA pursuant to Section 101(a)(11)(D) of the Rehabilitation Act and 34 C.F.R. § 361.22(b). CBVI executed the current SEA agreement with OSEP and DVRS on November 27, 2002, and this remained in effect until September 30, 2005, “or until the parties determine a need for modification or renewal.” As such, the existing SEA agreement has not been updated since 2002, and does not delineate the responsibilities of CBVI staff to provide consultation and technical assistance to assist educational agencies in planning for the transition of students and youth from school to post-school activities, including pre-employment transition services and other VR services, as required by Section 101(a)(11)(D)(i) of the Rehabilitation Act and 34 C.F.R. § 361.22(b)(1).

In addition, the agreement does not provide for the responsibilities of each party or entity with respect to providing transition planning to facilitate the development of the individualized education program (IEP) per Section 101(a)(11)(D)(ii) of the Rehabilitation Act and 34 C.F.R. § 361.22(b)(2).

Furthermore, the SEA agreement does not include the financial responsibilities of each agency or provisions for determining the State lead agencies and qualified personnel responsible for transition services and pre-employment transition services, as required by Section 101(a)(11)(D)(iii) of the Rehabilitation Act and 34 C.F.R. § 361.22(b)(3).

The SEA agreement does not include procedures for outreach to and identification of students with disabilities in need of transition services and pre-employment transition services pursuant to Section 101(a)(11)(D)(iv) of the Rehabilitation Act and 34 C.F.R. 361.22(b)(4). It also does not

include a description of the purpose of the VR program, eligibility requirements, application procedures, or the scope of services that can be provided to eligible individuals.

Finally, the agreement does not address the coordination and documentation requirements with regard to students and youth with disabilities who are seeking subminimum wage employment (34 C.F.R. § 361.22(b)(5)), including the assurance that neither the SEA nor LEA will enter into a contract or other arrangement with entities for the purpose of operating a program under which a youth with a disability is engaged in work compensated at a subminimum wage (34 C.F.R. § 361.22(b)(6)).

Conclusion: Pursuant to Section 101(a)(11)(D) of the Rehabilitation Act and 34 C.F.R. § 361.22(b), CBVI must enter into a formal interagency agreement with OSEP that is in compliance with the statutory and regulatory requirements. As a result of the analysis, RSA determined that the current SEA agreement does not address the statutory requirements (effective July 22, 2014), nor the regulatory requirements (effective September 19, 2016). As such, CBVI is not in compliance with Section 101(a)(11)(D) of the Rehabilitation Act or 34 C.F.R. § 361.22(b)).

Corrective Action Steps:

RSA requires that CBVI—

- 3.1.1 Revise the current SEA agreement with DVRS and OSEP to comply with the requirements at Section 101(a)(11)(D) of the Rehabilitation Act and 34 C.F.R. § 361.22 (b); and
- 3.1.2 Submit the revised formal interagency agreement between CBVI, OSEP and DVRS for RSA’s review as part of CBVI’s corrective actions associated with the FY 2018 Section 107 Monitoring Review.

Agency Response: CBVI will revise the current SEA agreement with DVRS and OSEP to meet regulatory requirements. The interagency agreement between CBVI, OSEP and DVRS has been revised and is in process for final review and signatures. Please note that CBVI previously shared a plan to develop a collaborative relationship with the Department of Children and Families (DCF) and DVRS in order to create a MOU to jointly serve students with disabilities; currently this initiative has been placed on hold due to other priority initiatives, however, we will continue to identify ways to collaborate across agencies.

Request for Technical Assistance: None at this time.

E. Technical Assistance

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

Planning for the Provision of Pre-Employment Transition Services

RSA provided technical assistance to CBVI on the development of its fiscal forecasting model and inclusion of the number of potentially eligible and eligible students with disabilities

(currently served and projected to be served) in need of the required activities under pre-employment transition services, as well as the current and projected costs for required and pre-employment transition coordination activities, in order for CBVI to reasonably identify the funds available and remaining to engage in authorized activities (34 C.F.R. § 361.48(a)(3)). At the time of the on-site monitoring review, CBVI had not engaged in authorized activities and was focused on the provision of required activities to all students with disabilities in need of such services.

Potentially Eligible for Pre-Employment Transition Services

At the time of the on-site review, CBVI management staff and VR counselors communicated that a number of students referred by LEAs and identified as potentially eligible for the VR program were students who did not intend to pursue an employment outcome due to the severity of their disability. Specifically, many of these students are individuals with chronic physical and/or intellectual disabilities that substantially limit the individual in self-care, learning, mobility, communication, self-direction, and the ability to live independently who are seeking day habilitation services after exiting secondary education. VR counselors reported that, although these students were classified as potentially eligible for the VR program, none requested or were in receipt of any of the five required pre-employment transition services. However, these students remain on the VR counselor's caseload until their case is transferred to DDD when the individual turns 21 years of age and exits secondary education for day habilitation services. In PY 2017, CBVI reported 596 individuals as potentially eligible for the VR program and, of those, 196 individuals received pre-employment transition services. CBVI reported that many students referred by LEAs and TBVIs are either DDD-eligible or out-of-district placements and decline pre-employment transition services or application for other VR services. Once CBVI confirms that a referred student has declined VR services, it "tracks" the student assigned to a VR caseload, the status of the DDD referral, and no pre-employment transition services are provided. CBVI uses this methodology as TBVIs are not able to adequately assess a student's eligibility for the VR program.

While on-site, RSA clarified that CBVI is permitted to provide pre-employment transition services to eligible and potentially eligible students; however, CBVI is only permitted to fund the cost of pre-employment transition services for students with disabilities who are potentially eligible or eligible for VR services. A student should not be considered to be potentially eligible for VR services if the individual does not intend to achieve an employment outcome or has been determined ineligible due to the severity of the disability upon application to the VR program.

RSA further clarified that potentially eligible students who have applied and meet the eligibility requirements for the VR program may be presumed to benefit from VR services; however, they are not presumed to be eligible for VR services, as are beneficiaries of Social Security Administration benefits under Titles II or XVI of the Social Security Act. Any eligible individual, including an individual whose eligibility for VR services is based on the individual being eligible for Social Security benefits under Title II or Title XVI of the Social Security Act, must intend to achieve an employment outcome that is consistent with the applicant's unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice (34 C.F.R. § 361.42).

RSA recommended that CBVI evaluate and assess referrals received from LEAs and TBVIs to determine if appropriate referrals are being made for VR services, including pre-employment transition services, and provide training to referral sources to assist them in identifying those students who are potentially eligible or can benefit from VR services to achieve an employment outcome. Furthermore, RSA recommended that CBVI evaluate the number of potentially eligible students who have been referred to the VR program, but declined an application for VR services, or the pursuit of employment and have VR counselors remove students from their caseloads who have declined to apply for VR services or do not intend to pursue employment.

Formal Interagency Agreement between the State Educational Agency (SEA), CBVI and DVRS

While on-site, RSA and CBVI discussed the regulatory requirements (effective September 19, 2016), specific to the formal interagency agreement as described in 34 C.F.R. § 361.22(b) and the need for CBVI to incorporate the following requirements into the next formal interagency agreement, including—

- The definitions of “student with a disability” (34 C.F.R. § 361.5(c)(51)), “youth with a disability (34 C.F.R. § 361.5(c)(58)), and “pre-employment transition services” (34 C.F.R. § 361.5(c)(42));
- Consultation and technical assistance services provided to the educational agencies (not families and students) by CBVI staff to assist in transition planning, including the provision of pre-employment transition services and other VR services (e.g., transition services) (34 C.F.R. § 361.22(b)(1));
- Transition planning to develop the IPE in coordination with the IEP (34 C.F.R. § 361.22(b)(2));
- Procedures for outreach to and identification of students not only in need of transition services but also pre-employment transition services, who are between the ages of 14 and 21, and a process for referring potentially eligible students starting at the age of 14, rather than two years prior to exit, since New Jersey has elected to make pre-employment transition services available to students with disabilities at age 14 (34 C.F.R. § 361.22(b)(4)); and
- Description of the process and timelines that will be used to ensure that the LEAs will provide Section 511 documentation of completion of the required actions to CBVI (34 C.F.R. § 361.22(b)(5)).

Policies and Procedures

RSA also reviewed CBVI’s PD-18-03 specific to the provision of pre-employment and transition services. RSA provided technical assistance regarding the following:

- Clarification of the provision of auxiliary aides and services using funds reserved for the provision of pre-employment transition services;
- Clarification that nothing in statute or regulations permits VR agencies to deny a VR application based upon a minimum age. The minimum and maximum age ranges are only applicable to the definitions of a “youth with a disability” and “student with a disability”

in the provision of pre-employment transition services, not for an application to the VR program (34 C.F.R. § 361.42(2)(A));

- Recommendation that CBVI-PD-18-03 include the requirements that an IPE be developed within 90 days from the date of eligibility determination, and as early as possible during the transition planning process, and not later than the time a student with a disability determined to be eligible for VR services leaves the school setting (34 C.F.R. §§ 361.22(a)(2) and 361.45);
- Recommendation that CBVI include in its policy the four pre-employment transition coordination activities in 34 C.F.R. § 361.48(a)(4); and
- Recommendation that CBVI include in its policies and procedures information regarding an OOS and the continuation of pre-employment transition services if they were initiated prior to an individual being assigned to a closed order of selection priority category (34 C.F.R. § 361.36(e)(3)(i) and (ii)).

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 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

CBVI's VR counselors work with eligible individuals seeking employment who are blind or visually impaired, including those with the most significant disabilities. While on-site, RSA met with three of these VR counselors to discuss the delivery of supported employment services and the outcomes achieved by individuals with the most significant disabilities. Based upon a comprehensive assessment, VR counselors determine those individuals who could benefit from supported employment services beyond time-limited job coaching and develop the individual's IPE as a "Supported Employment" plan, giving them access to supported employment services and funding. VR counselors use Title I VR funds to provide appropriate individualized training and pre-placement services, including customized employment/discovery, job development and placement, job site analysis, and situational assessment provided by CRPs.

Once the individual obtains supported employment, the VR counselor may authorize intensive supported employment services funded through Title VI to enable the consumer to obtain the intensive on-the-job skills training to achieve and maintain job stability. All Title VI funds are used to provide direct services and no administrative costs are charged to the supported employment funds. CBVI has a Memorandum of Agreement (MOA) in effect until 2020, and uses supported employment vendors approved by the DDD and DVRS on a fee-for-service basis. The VR counselor maintains contact with the employed individual and/or his or her representative, the CRP working with the consumer, and the employer, as appropriate, to ensure adequate supports and to troubleshoot any issues that may arise.

At the time of the on-site visit, CBVI had not funded extended services for youth with the most significant disabilities. The DDD is the primary source of funding for extended services in New Jersey through Medicaid Community Care Waivers. Additionally, during the period of the monitoring visit, CBVI reported that it had not encountered the need to implement a short-term basis period for any of the individuals placed in supported employment, noting that the agency

has set a clear expectation that all supported employment services result in competitive integrated employment.

Policies and Procedures

CBVI submitted a draft Policy Directive (CBVI-PD-17-02) on supported employment services dated July 10, 2017, for RSA's review prior to the on-site monitoring visit. The comprehensive draft policy included most of the new provisions resulting from the amendments to Title VI of the Rehabilitation Act made with the passage of WIOA, such as the extended time frame for the provision of supported employment services. Additionally, it focused on competitive integrated employment as the goal of supported employment; however, CBVI did not include the provision for the short-term basis in which an individual may be working toward competitive wages for a six-month period, or up to 12 months, if determined necessary. The policy also did not include the requirements for closure of the service record for a youth with most significant disabilities, when the youth is receiving extended services funded by CBVI or receiving VR services during the short-term basis period. RSA provided technical assistance on-site to address these omissions.

Performance of the Supported Employment Program

A summary analysis of the performance of the Supported Employment program (see Appendix C) revealed the following information.

Historically, CBVI has not provided supported employment services to a substantial number of individuals with the most significant disabilities, reporting that supported employment closures have made up approximately two to five percent of all closures in the past five years. In FFY 2015, seven individuals achieved a supported employment outcome with median hourly earnings of \$10.00 for the six individuals who achieved competitive supported employment. In FFY 2016, 11 individuals achieved supported employment outcomes with 100 percent achieving competitive employment with median hourly earnings of \$9.00. During the first three quarters of FFY 2017, five individuals achieved supported employment outcomes, all of which were in competitive employment with median hourly earnings of \$9.50. The average number of hours worked for competitive employment outcomes in supported employment has remained relatively stable with 22.3 hours in FFY 2015, 25.1 hours in FFY 2016, and 21.4 hours in the first three quarters of FFY 2017.

In the first three quarters of FFY 2017, as reported in the Supported Employment Program Profile in Appendix C, the top five VR services provided to individuals seeking supported employment outcomes were: diagnosis and treatment of impairment, vocational rehabilitation counseling and guidance, disability-related skills training, job placement assistance, and on-the-job supports – supported employment.

CBVI acknowledged that improving supported employment outcomes has been a challenge for a number of reasons; however, the agency has attempted to address some of these challenges in recent years. Some initiatives undertaken by CBVI over the last three to four years have included: customized employment training for all VR counselors; the Youth Employment Solutions pilot (in collaboration with The College of New Jersey's Center for Complex and

Sensory Disabilities, to implement customized employment and provide better wrap-around and collaborative services for a select group of supported employment eligible post-school youth); VR counselor training on accurate documentation and classification of supported employment services; and most recently a blindness learning community to provide targeted training and technical assistance to a group of five supported employment CRP providers and CBVI staff who sometimes lack the experienced, nuanced knowledge, and skills to best serve this small subset of an already small demographic. The agency reported additional initiatives under consideration or already in place including—

- Creating specialized caseloads that will allow one or two counselors in each office to gain expertise in the various needs, services, and vendors for individuals that can benefit from supported employment services and receive specialized training to enhance current skills and knowledge on best practices;
- Conducting an RFI/RFP to more closely partner with CRPs that provide supported employment services and are dedicated to providing quality services for blind, deaf-blind, and vision-impaired consumers;
- Facilitating a formal technical assistance plan and learning community to enhance the ability and capacity of CRPs to work with individuals with vision impairments;
- Providing a greater degree of job exploration counseling and other pre-employment transition services and programs to facilitate interest and the pursuit of competitive integrated employment by students and youth with the most significant disabilities, including the Youth Employment Services program, which uses the customized employment/discovery model for pre-placement and placement activities; and
- Engaging consumers, through the agency’s extended employment specialist responsible for statewide outreach to individuals with disabilities working at subminimum wage, to encourage them to return to the VR system and to explore and seek competitive integrated employment.

C. Observations and Recommendations

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

D. Findings and Corrective Actions

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

E. Technical Assistance

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

Short-Term Basis

Although CBVI indicated during the monitoring process that it had not, and did not anticipate, using the short-term basis period, the RSA team discussed making needed revisions to the

supported employment policies to include the short-term basis provisions in the definition of “supported employment” in Section 7(38) of the Rehabilitation Act. RSA clarified that for purposes of supported employment, an individual with a most significant disability, whose supported employment in an integrated setting does not satisfy the criteria of competitive integrated employment, as defined in 34 C.F.R. § 361.5(c)(9), is considered to be working on a short-term basis toward competitive integrated employment so long as the individual can reasonably anticipate achieving competitive integrated employment within six months of achieving a supported employment outcome. In limited circumstances, the short-term basis period may be extended up to an additional six months (not to exceed 12 months from the achievement of the supported employment outcome), if a longer period is necessary based on the needs of the individual, and the individual has demonstrated progress toward competitive earnings based on information contained in the service record (Section 7(38) of the Rehabilitation Act and 34 C.F.R. § 363.1(c)). The six-month short-term basis period, and the additional six months that may be available in limited circumstances, begins after an individual has completed up to 24 months of supported employment services (unless a longer period of time is necessary based upon the individual’s needs) and the individual has achieved a supported employment outcome, meaning that the individual is stable in the supported employment placement for a minimum period of 90 days and has transitioned to extended services. At this point, the individual has achieved a supported employment outcome in accordance with the criteria set forth in 34 C.F.R. § 363.54.

Closure of the Service Record

CBVI addressed closure of the service record in draft CBVI Policy Directive (PD)17-02) on supported employment services; however, the RSA team clarified that the closure of the service record (exit) of individuals with the most significant disabilities may not occur if the individual is receiving VR services during the short-term basis period or a youth with a most significant disability is receiving extended services provided by CBVI. The service record may only be closed once all VR and extended services provided by CBVI have been completed.

“Extended services,” as defined in 34 C.F.R. § 361.5(c)(19), means ongoing support services and other appropriate services that are needed to support and maintain an individual with a most significant disability, including a youth with a most significant disability, in supported employment. Extended services must be organized and made available, singly or in combination, in such a way as to assist an individual in maintaining supported employment; based on needs specified in the IPE; provided by a State agency, a private nonprofit organization, employer, or any other appropriate resource after an individual has made the transition from support from the VR agency; and, in the case of a youth with a most significant disability, provided by the VR agency in accordance with requirements in Section 604(b)(2) of the Rehabilitation Act and 34 C.F.R. § 363.4(a)(2), and as described in 34 C.F.R. § 361.5(c)(19)(v). The transition to extended services begins after all supported employment services are complete.

VR agencies must make extended services available to youth with the most significant disabilities with funds available under the Supported Employment program based upon the individual needs of the youth. Sections 603(d) and 604(b)(2) of the Rehabilitation Act mandate that the VR agency make available extended services for youth with the most significant disabilities for a period not to exceed four years. Furthermore, Section 604(b)(2) of the

Rehabilitation Act permits VR agencies to use Title I VR funds to pay for extended services to youth with the most significant disabilities. The regulations in 34 C.F.R. §§ 361.5(c)(19)(v) and 363.4(a)(2) clarify that extended services may be provided for a period of up to four years or until such time that a youth reaches the age of 25, and, thus, no longer meets the definition of a “youth with a disability” under 34 C.F.R. § 361.5(c)(58), whichever occurs first. Therefore, a youth may no longer be eligible to receive extended services provided by the VR agency with funds allotted under the Supported Employment program or the VR program if the individual—

- No longer meets age requirements established in the definition of a “youth with a disability” in 34 C.F.R. § 361.5(c)(58); or
- Has received extended services for a period of four years; or
- Has transitioned to extended services provided with funds other than those allotted under the VR program or Supported Employment program prior to meeting the age or time restrictions.

Once a youth reaches age 25 or his or her four year limit of extended services provided by the Supported Employment or VR program, under 34 C.F.R. § 363.53(b)(2)(ii), the VR agency must identify another source of extended services to ensure that there will be no interruption of services. The VR agency may not provide extended services to youth with the most significant disabilities who have not received services from the VR agency through an IPE simply because they meet the definition of a “youth with a disability” and need extended services. To be eligible for supported employment services, including extended services, a youth must meet the requirements of Section 605 of the Rehabilitation Act and 34 C.F.R. § 363.3 of the regulations, which include being determined eligible for VR services.

VR services provided during the short-term basis may include any services available in 34 C.F.R. § 361.48(b), as appropriate.

Capacity and Performance Improvement

The RSA team explored possible methods to address the development of expertise of CRPs in working with individuals with the most significant disabilities who are blind or visually impaired. The agency currently uses approved vendors and fee schedules used by DVRS to provide services; however, management staff indicated that the cost for serving individuals who are blind or visually impaired may need to be adjusted based upon the additional expertise needed to serve these individuals. To date, CBVI has provided some training to a few CRPs and is contemplating methods to identify CRPs that are willing to develop the expertise. The RSA team discussed the benefits and drawbacks associated with conducting an RFI/RFP to more closely partner with CRPs providing supported employment services dedicated to ensuring quality services for blind, deaf-blind, and vision-impaired consumers. CBVI was encouraged to review its fee schedule to determine if adjustments should be made rather than relying solely on the fee schedule established by DVRS.

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

During the onsite visit, CBVI demonstrated the ability of its financial management system to record obligation and payment dates of VR and Supported Employment program expenditures and to track those expenditures to specific periods of funding availability by award to ensure assignment of expenditures to the correct Federal fiscal year (FFY) for costs other than those reported as pre-employment transition services. Allocation categories for the provision of pre-employment transition services by agency staff were being updated at the time of the review but were not currently active.

CBVI provided memoranda covering processes for account selection, dating authorizations, authorization of planned services, and completion of Federal financial reports (SF-425). These documents provided steps to support agency staff in assigning obligations to the correct FFY award, and to correctly enter data into SF-425 reports with the available information. However, there was little documented information available to support the key grant management processes for meeting maintenance of effort (MOE) or non-Federal share (match) requirements, even though management appears to have met these requirements for the periods under review based on reviewed expenditures.

The current cost allocation processes result in delays in reporting of actual costs and have not been updated in many years. Staff assign client services to vendors based on short codes that are not well defined.

C. Findings and Corrective Actions

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

5.1 Internal Control Deficiencies

Issue: Does CBVI maintain effective internal control over the Federal award to provide reasonable assurance that it is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the award.

Requirement: A State VR agency must assure, in the VR services portion of the Unified or Combined State Plan, that it will employ methods of administration that ensure the proper and efficient administration of the VR program. These methods of administration (i.e., the agency’s internal controls) must include procedures to ensure accurate data collection and financial accountability (34 C.F.R. § 361.12).

“Internal controls” means a process, implemented by a non-Federal entity, designed to provide reasonable assurance regarding the achievement of objectives in the following categories:

- Effectiveness and efficiency of operations;
- Reliability of reporting for internal and external use; and
- Compliance with applicable laws and regulations (2 C.F.R. § 200.61).

Additionally, 2 C.F.R. § 200.303, among other things, requires a non-Federal entity to—

- Establish and maintain effective internal control over the Federal award that 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. These internal controls should be in compliance with guidance in Standards for Internal Control in the Federal Government issued by the Comptroller General of the United States and the Internal Control Integrated Framework issued by the Committee of Sponsoring Organizations of the Treadway Commission;
- Comply with Federal statutes, regulations, and the terms and conditions of the Federal awards;
- Evaluate and monitor the non-Federal entity’s compliance with statute, regulations and the terms and conditions of Federal awards; and
- Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings.

In accordance with the Uniform Guidance (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
- Tracing of funds to a level of expenditures adequate to establish that such funds have been used according to the Federal statutes, regulations, and the terms and conditions of the Federal award.

In its guidance titled *The Role of Internal Control, Documenting Internal Control, and Determining Allowability & Use of Funds*, the Department states that internal controls represent those processes by which an organization assures operational objectives are achieved efficiently, effectively, and with reliable, compliant reporting.

Therefore, an internal control deficiency would exist when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or correct processes that might lead to non-compliance with Federal and State requirements.

Analysis: RSA found several areas of concern that fall within the internal control focus area. These areas are identified below.

A. Inaccurate and Unreconciled Federal Financial Reports

- i. **Federal Financial Reports Populated with Estimates.** CBVI uses a “Step-Down Cost Reporting” process to determine final allocations for a given reporting period under its awards. The process begins with the DSA submitting an initial allocation proposal to CBVI. Then, CBVI submits its salary analysis with reclassifications and adjustments back to the DSA for final approval. According to program staff, this process previously would be completed within a few weeks, but more recently the process has taken up to nine months. To meet the Uniform Guidance reporting requirements at 2 C.F.R. § 200.328(b)(1), agencies must be able to report accurate financial data within 30 days from the end of the reporting period for semiannual reports, and within 90 days from the end of the period of performance of the award for final reports.

Program staff reported that the delay occurs at the step in which the DSA approves CBVI’s reclassifications and adjustments. According to staff, these delays likely result from leadership changes at the DSA, which began around September 2017. As a result of these delays, CBVI staff populate SF-425 reports with estimates in order to meet reporting deadlines. CBVI staff reported using final expenditures, once approved by the DSA, to increase the accuracy of estimates CBVI includes in subsequent reports. However, CBVI has not requested that RSA reopen previously submitted SF-425 reports for the agency to make corrections based on final data once approved by the DSA. CBVI is not submitting accurate and timely Federal financial reports per the terms and conditions of the Federal grant award.

- ii. **Incorrect Information Reported as Indirect Costs.** During the period under review, CBVI regularly reported an indirect cost rate of 20 percent to the VR award, however in a follow-up discussion with the agency, staff stated that no indirect costs are charged to the VR award. Staff indicated that populating the SF-425 with indirect cost rate information is a practice current management “inherited” from previous staff, but that CBVI “does not charge the VR award those costs.” Because the agency reported incorrectly that it paid indirect costs in its Federal financial reports, CBVI is not in compliance with 2 C.F.R. § 200.302(b)(2).

B. Missing and Inadequate Cost Allocation Processes

- i. **Cost Allocation Based on Outdated Function Report.** CBVI uses a function report, last revised in 2004, to allocate administrative costs to its VR award. The function report lists various categories of work activities (functions) alongside percentages of costs for each category of activity to assign to VR, such as Rehabilitation Teaching at 13 percent, Mobility at 14 percent, and Eye Health Services at 5 percent. CBVI assigns administrative costs to its VR award based on these predetermined levels and does so without first reconciling the percentages against reports of the actual work

performed. In addition, CBVI assigns costs in this manner without having a cognizant agency-approved Cost Allocation Plan in place (see finding 5.1.B.ii below).

For example, the function report assigns VR three cost center codes an unchanging 14 percent allocation of District Office Mobility Unit costs, irrespective of the actual effort contributed by staff towards VR during the reporting period. While 14 percent may be an accurate representation of the final 2004 allocation of costs, the use of these percentages for assigning VR costs to subsequent year VR awards without adjusting them to reflect actual effort contributed by the staff for the specific reporting period in question is inadequate because such an allocation is based on estimates rather than actual after-the-fact reporting of effort, as required by 2 C.F.R. § 200.430. According to these regulations, budget estimates may be used for interim accounting purposes, provided the non-Federal entity's system of internal controls includes processes to review after-the-fact interim charges made to a Federal award based on budget estimates, and all necessary adjustments are made such that the final amount charged to the Federal award is accurate, allowable, and properly allocated. Personnel costs finally assigned to an award may not be based on estimates but must instead be based on amounts derived from the actual effort personnel contributed, per cost objective, during the reporting period.

In addition, if a function report table is to be used for assigning interim budget estimates later to be reconciled with actuals, such estimates should be based on the most current data available. As noted in 2 C.F.R. § 200.430(i)(viii), the estimates must provide reasonable approximations of the activity performed, with significant changes in the corresponding work activity identified and entered into the records in a timely manner. The percentage data CBVI used to assign personnel costs to its awards, not only as an interim placeholder but as the final basis for its allocation of costs, was 15 years old at the time of this review.

- ii. **Outdated Cost Allocation Plan.** The New Jersey Department of Human Services Commission for the Blind and Visually Impaired Cost Allocation Plan includes a cover letter, from the CBVI director of the office of finance to the director of the U.S. Department of Education Indirect Cost Group, dated June 27, 2016. The letter states that CBVI's revised Cost Allocation Plan is included for the U.S. Department of Education's review and approval. CBVI staff report that they did not receive a response to this letter from the U.S. Department of Education Indirect Cost Group. It is likely CBVI did not receive a response to the letter because the letter was addressed to the wrong Federal agency. The cognizant agency, which is the Federal agency responsible for reviewing, negotiating, and approving Cost Allocation Plans or indirect cost proposals on behalf of all Federal agencies for the New Jersey Department of Human Services (the DSA for CBVI) is the U.S. Department of Health and Human Services (Appendix V to Part 200, paragraph F.1.). CBVI would have needed to coordinate with the New Jersey Department of Human Services and the U.S. Department of Health and Human Services to obtain approval of CBVI's revised Cost Allocation Plan.

Based on a review of CBVI's revised Cost Allocation Plan proposal, it appears that some areas of the plan were updated while other areas, especially those pertaining to new WIOA requirements, were not. Items that need to be revised include: the incorrect identification of certain awards as being funded by RSA; missing Supported Employment-B award information including the matching requirement; pre-employment transition services reservation and expenditure of funds allocation, including for required, authorized, and coordination activities costs; and outdated OMB circular citations.

C. Undocumented, Incomplete or Inaccurate Internal Controls.

- i. **Undocumented Match and Maintenance of Effort Policies.** CBVI did not provide clearly documented policies to support compliance with Federal requirements concerning MOE for VR or match (non-Federal share) for the VR and Supported Employment programs. While the agency has managed to meet program requirements in these areas during the period under review, the agency's documented policies only restate the requirements and do not provide information concerning the processes the agency uses to capture, report, or monitor financial information relevant to meeting either MOE or match requirements.
- ii. **No Rate-Setting Policy.** 34 C.F.R. § 361.50(c)(1) requires the designated state unit to establish and maintain written policies to govern the rates of payment for all purchased vocational rehabilitation services. When asked what policies the agency follows when a vendor requests an increase in rates of payment for services, CBVI staff explained that they do not follow any set policy and, at times, are uncertain as to what to do. As such, CBVI did not identify a rate-setting methodology for the agency to use when rate changes are needed. Because CBVI has not established and maintained written policies to govern the rates of payment for all purchased vocational rehabilitation services, CBVI is not in compliance with 34 C.F.R. §§ 361.50(c) and 361.12.
- iii. **Undefined Vendor Service Codes.** Descriptions of client services are limited to several word descriptions in CBVI's case management system dropdown menus. Agency staff reported that they have 500 plus codes available for various services and are unclear about the purpose of some codes or when to use one code versus another. While CBVI does have contracts with its vendors, the services are not clearly identified through the system CBVI uses to process authorizations. Therefore, services described in a contract can be misaligned with expectations of the individual authorizing the service since the services are not clearly defined by the agency. The identification of what is to be provided by a vendor when a code is used to authorize a service will help ensure Federal and non-Federal funds are being used only for allowable VR purposes.
- iv. **Outdated Contract Boilerplate Language.** The DSU uses DSA boilerplate language that in many cases conflicts with Uniform Guidance requirements for contracts. CBVI

contracts obligated since 2014 include references to OMB Circulars, which were replaced with the Uniform Guidance on December 26, 2014.

Conclusion: CBVI does not maintain effective internal controls over the Federal award that provide reasonable assurances that the non-Federal entity is managing its award in compliance with Federal statutes, regulations, and the terms and conditions of the award, as required by 34 C.F.R. § 361.12 and 2 C.F.R. § 200.303. Specific internal control areas of deficiency include documentation of control activities to ensure management oversight of MOE, match, rates of payment for purchased services, and cost allocation.

While these control deficiencies suggest elevated risk to CBVI's effectiveness and efficiency of operations, reliability of reporting, and compliance with applicable laws and regulations, the risk will be greatly reduced through management's development of internal controls at a level of detail necessary to address the complexity of its systems. The corrective action steps listed below will support CBVI in developing its ability to correct processes that have led to the internal controls non-compliance finding.

Corrective Action Steps:

RSA requires that CBVI—

- 5.1.A.i Within 60 days after the date of the final monitoring report, develop, and submit to RSA for review, internal controls that ensure the accurate and timely submission of Federal financial reports based upon actual expenditures, not estimates. Include processes to ensure accurate reporting of Cost Allocation Plan and, if appropriate, indirect costs. Internal controls must be implemented within 60 days after RSA review.
- 5.1.A.ii Within 90 days of the date of the final monitoring report: 1) submit documentation to RSA that verifies whether any of the costs reported to RSA as indirect costs, in any of the SF-425 reports submitted to RSA during the period under review, were charged to the VR or Supported Employment awards, and 2) correct each report that includes incorrect indirect cost information.
- 5.1.B.i Within 60 days after the date of the final monitoring report, develop, and submit to RSA for review, internal controls for the tracking and reconciliation of personnel costs charged in accordance with the Uniform Guidance requirements. The approved internal controls must be implemented within 60 days after RSA review. CBVI must reconcile the FFY 2018 grant award personnel costs and provide RSA with an analysis of the actual personnel costs charged to the award compared to the actual time worked.
- 5.1.B.ii CBVI must immediately coordinate with the New Jersey Department of Human Services and the U.S. Department of Health and Human Services to identify and carryout steps necessary to obtain approval of CBVI's revised Cost Allocation Plan.
- 5.1.C.i Within 120 days after the date of the final monitoring report, develop, and submit to RSA for review, internal controls that address the missing processes identified in the finding. Internal controls will be implemented within 60 days after review.
- 5.1.C.ii Within 120 days after the date of the final monitoring report, establish, and submit to RSA for review written policies that govern the rate-setting methodology for all

purchased VR services, as required by 34 C.F.R. 361.50(c)(1), in order to ensure uniformity in the process for updating schedules of fees for payments for such services. Policies will be implemented within 60 days after review.

- 5.1.C.iii Within 180 days after the date of the final monitoring report, identify a complete set of needed VR case services and develop specific clear descriptions of each, including minimum requirements for vendors. Analyze all existing client service codes to determine which need to be rewritten or eliminated. Update the case management system based on the analysis, and communicate the changes to vendors and staff, including issuance of a case services code catalog with complete descriptions and vendor requirements for each service.
- 5.1.B.iv Within 60 days after the date of the final monitoring report, develop or revise, as necessary, contract boilerplate language, to ensure compliance with WIOA and 2 C.F.R. part 200 requirements. Additionally, CBVI must develop and implement internal controls necessary to ensure contract language complies with periodic changes to Federal law, regulations, and RSA policy guidance.

RSA Response: RSA revised portions of this finding based on post on-site conversations with CBVI staff. Revisions are based on CBVI's affirmation that it assigned no indirect costs through an indirect cost rate, despite having consistently reported doing so in its Federal financial reports. RSA has noted CBVI's request for technical assistance in the areas of cost allocation, rate setting and contract language.

Request for Technical Assistance: CBVI would request technical assistance specifically in the areas of Cost Allocation, Rate setting and Contract language.

D. Technical Assistance

RSA provided CBVI an overview of fiscal resources available at www.rsa.ed.gov and through the WINTAC. To assist CBVI in developing internal controls, RSA recommended that management review the document *The Role of Internal Control, Documenting Internal Control, and Determining Allowability & Use of Funds*, which is available at ed.gov at <https://www2.ed.gov/policy/fund/guid/uniform-guidance/fundsguidance.pdf>.

At the time of review, CBVI had instituted a process for requesting prior written approval, regularly submitting prior approval requests to RSA's Fiscal Unit. While the agency submitted requests regularly and had policies to support adherence to prior approval requirements, it will be important for CBVI to fine-tune its policies as RSA updates its guidance. For example, on October 29, 2019, RSA issued interim prior approval guidance titled: *Frequently Asked Questions (FAQs) Prior Approval — OSEP and RSA Formula Grants*. This replaces RSA-TAC-18-02. Two key features of the new guidance are, as of October 29, 2019, VR grantees no longer must submit prior approval requests for:

- equipment for delivery of services to eligible individuals with disabilities provided under individualized plans for employment (e.g., rehabilitation technology, or home or vehicle modifications); and,
- participant support costs that do not exceed a total cost of \$5,000 per individual participant or trainee per conference training or event.

The full interim guidance is available at the link below.

<https://www2.ed.gov/policy/speced/guid/faq-prior-approval-10-29-2019.pdf>

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 Office of Career, Technical and Adult Education and RSA in the U.S. Department of Education; and the Employment and Training Administration in the U.S. Department of Labor developed the WIOA Shared Monitoring Guide. RSA incorporated the guide's 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 PY 2016 Unified 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; 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.

Sector Strategies

With the State Employment and Training Commission (SETC) serving as the policy-making entity and through its direction, the core and required partner programs, which now fall under WIOA, developed a set of Talent Networks in 2011. The SETC website explains that Talent Networks are “the architects that meet with businesses and organizations to gather firsthand intelligence on the industry and assess their needs.” These networks (e.g., financial services and technology) share that information with what the SETC have termed Talent Development Centers housed with community colleges and universities. These seven centers are “the builders who develop curricula and instruction programs based on information from businesses.” Together, the Talent Networks and Talent Development Centers “align training and education with in-demand skills” to fulfill some of the needs of both one-stop customers and employers in the State.

Governance

State Workforce Development Boards (SWDBs) and Local Workforce Development Boards (LWDBs), which must include representation from the VR program, set State strategy and policies for aligning the workforce development system with partners from the education continuum, economic development, human services, and businesses. The VR representative on the SWDB must be an individual who has optimum policy making authority for the VR program. Further, 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), as amended by WIOA.

The SETC, New Jersey’s SWDB, plays a key role in leading the State’s implementation of WIOA. According to its website, the SETC “partners with business, employers and job seekers, organized labor, and State and county agencies to set policy, develop plans and evaluate system performance to enhance the workforce for the economic viability of New Jersey.” The SETC identifies and analyzes critical issues relating to workforce readiness and provides policy guidance to the Governor and to State professionals in the fields of employment, training and education; supports innovative programs that advance collaboration among governmental agencies; and, reports to the Governor on the progress that has been made and the issues that must be addressed in the area of employment, training and education.” The SETC’s quarterly meetings are open to the public and generally held in locations in central New Jersey. On January 19, 2016, the SETC issued a policy resolution (SETC #2016-08) that recognized both of New Jersey’s SRCs, established under Section 105 of the Rehabilitation Act “as the entities which will provide disability expertise, policy recommendations and information to the SETC in order to improve New Jersey’s public workforce system and its services to individuals with disabilities.” As a result, rather than establish a separate disability subcommittee, the SRCs for CBVI and DVRS serve as the de facto disability experts for the SETC.

The Governor appointed the Commissioner of New Jersey’s Department of Human Services to the SWDB. The Human Services Commissioner represents the CBVI, along with other WIOA

required partner programs (e.g., Temporary Assistance for Needy Families). The Governor appointed the Commissioner of the New Jersey LWD to represent each of the core programs, under WIOA, on the SWDB. As a result, the LWD Commissioner represents DVRS, the other Title IV program in New Jersey, on the SETC.

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.

VR Service Delivery

During the period of monitoring, CBVI reported that it did not have a presence in any of the 30 New Jersey one-stop career centers.

One-Stop Center Accessibility

CBVI, through its SRC representation on the disability subcommittee of the SETC, has worked to ensure the accessibility of the one-stop career centers. During the on-site monitoring review, CBVI did not report any significant concerns related to the physical and programmatic accessibility of the one-stop centers.

Memoranda of Understanding and Infrastructure Funding Agreements

During the monitoring period, CBVI reported that it did not have any participation in the development or finalization of the MOUs or IFAs for the 17 local workforce areas.

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.

Effectiveness in Serving Employers

CBVI reported during monitoring that the State partners selected the Repeat Business and Business Penetration approaches in collecting data on the "Effectiveness in Serving Employers" measure and noted that the partners have not added a State-specific approach.

Data Matching and Sharing

CBVI and LWD's Division of Employer Accounts entered into an agreement to share unemployment insurance (UI) wage record data so that CBVI may use it to obtain information for the primary indicators of performance. Using Social Security numbers for matching purposes, the Division of Employer Accounts will extract a quarterly wage database, and share it with CBVI quarterly at the request of the CBVI case management system administrator.

Unique Identifier, Co-Enrollment, and Additional Measures

The State partners are not using a unique identification number to be retained by the same individual across multiple programs; rather, workforce development programs within LWD and CBVI may identify individuals co-enrolled in one or more programs using Social Security numbers. PY 2017 quarterly RSA-911 reports, which CBVI had submitted to RSA at the time of the monitoring review, indicate that very few individuals are co-enrolled. In its four-year Combined State Plan, submitted in PY 2016, New Jersey indicated its "intent that, effective July 1, 2016, all WIOA Title I and WIOA Title III (Wagner-Peyser) participants will be co-enrolled in both programs; this is reflective of the new one-stop service integration and will be reflected in the performance outcomes of both programs." As such, other core programs within LWD have begun to gradually co-enroll individuals across programs. For example, beginning on July 1, 2017, individuals receiving UI benefits were to be automatically co-enrolled in the Dislocated Worker program, authorized under WIOA Title I, as well as the Wagner-Peyser Employment Service program, authorized under WIOA Title III.

While CBVI has not established any additional performance measures for the VR program, State partners have done so for programs authorized under Titles I and II of WIOA (e.g., the number of program participants served by the program and the number of program participants exited from the program), as well as some measures specific to only Title I programs (e.g., number of high quality partnerships established), as described in SETC Policy Resolution #2016-10.

C. Observations and Recommendations

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

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

Issue: Has CBVI 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 361.13(c)(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 (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 three-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 appeal to the State regarding infrastructure costs, using the process described in § 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: New Jersey has established 17 local workforce areas across the State. During the monitoring review, CBVI reported no participation in the development of the MOUs or IFAs for these areas.

Conclusion: As explained in this analysis, at the time of the on-site monitoring review CBVI 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.

Corrective Action Steps:

RSA requires that CBVI—

- 6.1.1 Finalize MOUs with each of the local workforce areas in accordance with 34 C.F.R. § 361.500; and
- 6.1.2 Finalize IFAs with each of the State’s local workforce areas in accordance with 34 C.F.R. §§ 361.700 through 361.755.

Agency Response: CBVI will develop and implement a cross-department collaboration so that joint MOUs and final IFAs are established.

Request for Technical Assistance: None at this time.

E. Technical Assistance

Governance

CBVI and DVRS, the core workforce development programs authorized under the Rehabilitation Act, as amended by Title IV of WIOA, are housed in New Jersey DHS and LWD, respectively. DHS and LWD are overseen by Commissioners.

During RSA’s on-site monitoring, RSA learned that CBVI and other WIOA required partner programs (e.g., Temporary Assistance for Needy Families (TANF)) are represented on the State Board by the DHS Commissioner; and DVRS is represented by the LWD Commissioner, who also represents each of the five other core programs that are housed within LWD: the Adult, Dislocated Worker, and Youth programs authorized under Title I of WIOA; the Adult Education and Family Literacy Act (AEFLA) program authorized under Title II of WIOA; and the Employment Service program authorized under the Wagner-Peyser Act, as amended by Title III of WIOA.

Section 101(b)(1)(C)(iii)(I)(aa) of WIOA requires that the State Board be comprised of, among others, representatives from “the lead State officials with primary responsibility for the core programs” (see also 20 C.F.R. § 679.110(b)(3)(iii)(A)(1)). The preamble to the final regulations explains further that 20 C.F.R. § 679.110(b)(3)(iii)(A)(1)(i) through (iii) were modified for purposes of the final regulations to make clear that the Title II AEFLA and the Title IV VR programs must each be represented by a single, unique representative (see 81 FR 56072, 56074 (Aug. 19, 2016)). In other words, one representative cannot represent both the AEFLA and VR programs, as is done in New Jersey.

This policy position by the U.S. DOL is consistent with 20 C.F.R. § 679.110(e), which requires that State Board members representing core programs, such as the VR program, be individuals who have optimum policy-making authority for the core program that they represent. Pursuant to 20 C.F.R. § 679.120(a)—

(a) A representative with “optimum policy-making authority” is an individual who can reasonably be expected to speak affirmatively on behalf of the entity he or she represents and to commit that entity to a chosen course of action.

Finally, the VR regulations at 34 C.F.R. § 361.13(c)(1) specify certain functions that are the sole responsibility of the VR agency, including participation as a partner in the workforce development system. This would include the VR program’s participation on the State Board pursuant to 20 C.F.R. § 679.110(b)(3)(iii)(A)(1)(iii) and 20 C.F.R. § 679.120(a). The VR program director does not have the authority to delegate this authority to another entity or individual (34 C.F.R. §361.13(c)(2)). In other words, the directors of CBVI and DVRS do not have the authority to delegate to the Commissioners of DHS and LWD, respectively, the authority to represent the VR program on the State Board.

Therefore, the State Board has not complied with Section 101(b) of WIOA and 20 C.F.R. § 679.110(b)(3)(iii)(A)(1)(iii) of its implementing regulations by having the Commissioner of LWD represent all of the core programs, including DVRS, and the Commissioner of DHS representing CBVI and TANF, on the State Board. After consultation with the U.S. DOL and the U.S. Department of Education’s Office of Career, Technical, and Adult Education on this matter, RSA recommends that New Jersey revise its State Board composition by appointing either the director of DVRS or CBVI to the State Board to represent the VR program. Enforcement of this matter falls under the jurisdiction of the U.S. DOL.

One-Stop Operations

RSA provided technical assistance regarding CBVI’s presence in the 30 one-stop career centers. During on-site monitoring, RSA discussed with CBVI the option of developing relationships with DVRS, which is co-located in each of the one-stop centers, to establish a mechanism to inform individuals who are blind or visually impaired of the services available through CBVI. CBVI informed RSA that its VR counselors meet in the community with individuals to discuss services and accept applications to eliminate the need for individuals to travel to CBVI offices. RSA suggested that CBVI work collaboratively with DVRS staff to establish procedures to facilitate the understanding of CBVI services for individuals who are blind or visually impaired, along with the coordination of meeting with CBVI counselors and the processing of applications.

WIOA Reporting

RSA explained the ETA-9169 reporting requirements for States and discussed how CBVI can work with DVRS to calculate the required data. RSA provided CBVI with a breakdown of the annual report data for the agency, explained how the report data can be used to validate CBVI’s calculations, and, combined with data from DVRS, to validate the State calculations on the annual report. Additionally, RSA explained that CBVI should use the RSA quarterly feedback reports to look at data reasonableness and verify the data reported on the RSA-911.

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.

Table1. New Jersey Blind Agency Summary Statistics from RSA 113: FFYs 2015-2017

Row	Performance category	2015	2016	2017
1	Number of total applicants	817	762	709
2	Number of total eligible individuals	883	792	700
3	Agency implementing order of selection (Y/N)	No	No	No
4	Number of individuals on order of selection waiting list at year-end	NA	NA	NA
5	Percent eligible of individuals had IPE who received no services	11.9	13.6	16.3
6	Number of individuals in plan receiving services	1,482	1,510	1,608

Data source: RSA-113

Table 2a. New Jersey Blind 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	103	15.4	71	13.6	44	11.5
2	Exited from trial work experience	9	1.3	2	0.4	2	0.5
3	Exited with employment	296	44.4	211	40.4	118	31.0
4	Exited without employment	154	23.1	131	25.1	139	36.5
5	Exited from OOS waiting list	NA	NA	NA	NA	NA	NA
6	Exited without employment outcomes, after eligibility, before an IPE was signed or before receiving services	105	15.7	107	20.5	78	20.5
7	Employment rate*		65.8		61.7		45.9
8	Competitive employment outcomes	277	93.6	193	91.5	106	89.8
9	Average hourly earnings for competitive employment outcomes**	\$16.38		\$17.91		\$16.45	
10	Average hours worked for competitive employment outcomes	30.1		31.2		31.1	
11	Median hourly earnings for competitive employment outcomes	\$12.00		\$13.00		\$12.05	
12	Median hours worked for competitive employment outcomes	31.0		35.0		34.0	
13	Quarterly median earnings for competitive employment outcomes***	\$4,875.00		\$5,200.00		\$5,200.00	
14	Competitive employment outcomes meeting SGA	110	39.7	89	46.1	45	42.5
15	Competitive employment outcomes with employer-provided medical insurance	43	15.5	48	24.9	17	16.0

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.

*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. New Jersey Blind 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	36	37.1	35	46.7	4	10.3
2	Exited from trial work experience	7	7.2	0	0	0	0
3	Exited with employment	16	16.5	14	18.7	6	15.4
4	Exited without employment	16	16.5	15	20.0	15	38.5
5	Exited from OOS waiting list	NA	NA	NA	NA	NA	NA
6	Exited without employment outcomes, after eligibility, before an IPE was signed or before receiving services	22	22.7	11	14.7	14	35.9
7	Employment rate*		50.0		48.3		28.6
8	Competitive employment outcomes	16	100.0	14	100.0	6	100.0
9	Average hourly earnings for competitive employment outcomes**	\$12.13		\$17.49		\$14.75	
10	Average hours worked for competitive employment outcomes	34.6		34.6		34.2	
11	Median hourly earnings for competitive employment outcomes	\$10.50		\$15.17		\$10.25	
12	Median hours worked for competitive employment outcomes	32.5		40.0		35.0	
13	Quarterly median earnings for competitive employment outcomes***	\$5,018.00		\$6,500.00		\$5,122.00	
14	Competitive employment outcomes meeting SGA	7	43.8	9	64.3	1	16.7
15	Competitive employment outcomes with employer-provided medical insurance	3	18.8	8	57.1	2	33.3

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 2c. New Jersey Blind 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	67	11.8	36	8.1	40	11.7
2	Exited from trial work experience	2	0.4	2	0.4	2	0.6
3	Exited with employment	280	49.1	197	44.1	112	32.7
4	Exited without employment	138	24.2	116	26.0	124	36.3
5	Exited from OOS waiting list	NA	NA	NA	NA	NA	NA
6	Exited without employment outcomes, after eligibility, before an IPE was signed or before receiving services	83	14.6	96	21.5	64	18.7
7	Employment rate*		67.0		62.9		47.5
8	Competitive employment outcomes	261	93.2	179	90.9	100	89.3
9	Average hourly earnings for competitive employment outcomes**	\$16.64		\$17.95		\$16.55	
10	Average hours worked for competitive employment outcomes	29.9		30.9		30.9	
11	Median hourly earnings for competitive employment outcomes	\$12.00		\$13.00		\$12.14	
12	Median hours worked for competitive employment outcomes	31.0		35.0		34.0	
13	Quarterly median earnings for competitive employment outcomes***	\$4,784.00		\$5,200.00		\$5,200.00	
14	Competitive employment outcomes meeting SGA	103	39.5	80	44.7	44	44.0
15	Competitive employment outcomes with employer-provided medical insurance	40	15.3	40	22.3	15	15.0

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.

*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. New Jersey Blind 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)	1.9	2.5	1.8
2	Educational Institutions (post-secondary)	0.0	0.0	0.3
3	Medical Health Provider (Public or Private)	13.9	12.5	10.0
4	Welfare Agency (State or local government)	0.7	1.7	1.6
5	Community Rehabilitation Programs	0.4	0.4	0.0
6	Social Security Administration (Disability Determination Service or District office)	0.0	0.0	0.0
7	One-stop Employment/Training Centers	0.0	0.0	0.0
8	Self-referral	64.3	65.9	73.0
9	Other Sources	12.6	12.1	8.7
10	American Indian VR Services Program	1.5	1.1	0.8
11	Centers for Independent Living	0.0	0.0	0.0
12	Child Protective Services	0.0	0.0	0.3
13	Consumer Organizations or Advocacy Groups	0.0	0.0	0.3
14	Employers	0.0	0.0	0.0
15	Faith Based Organizations	0.0	0.0	0.0
16	Family/Friends	3.0	1.5	2.4
17	Intellectual and Developmental Disabilities Providers	0.0	0.0	0.3
18	Mental Health Provider (Public or Private)	0.0	0.0	0.0
19	Public Housing Authority	0.0	0.0	0.0
20	State Department of Correction/Juvenile Justice	0.0	0.0	0.0
21	State Employment Service Agency	0.0	0.0	0.0
22	Veteran's Administration	0.0	0.0	0.0
23	Worker's Compensation	0.0	0.0	0.0
24	Other State Agencies	0.7	0.8	0.5
25	Other VR State Agencies	0.0	0.2	0.0
26	Total Identified Referral Sources	99.3	98.7	99.7
27	Other Referral Sources (unknown)	0.7	1.3	0.3

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.

Table 3b. New Jersey Blind 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)	12.4	16.0	17.9
2	Educational Institutions (post-secondary)	0.0	0.0	0.0
3	Medical Health Provider (Public or Private)	13.4	14.7	10.3
4	Welfare Agency (State or local government)	1.0	0.0	5.1
5	Community Rehabilitation Programs	0.0	0.0	0.0
6	Social Security Administration (Disability Determination Service or District office)	0.0	0.0	0.0
7	One-stop Employment/Training Centers	0.0	0.0	0.0
8	Self-referral	23.7	16.0	25.6
9	Other Sources	43.3	45.3	28.2
10	American Indian VR Services Program	1.0	1.3	0.0
11	Centers for Independent Living	0.0	0.0	0.0
12	Child Protective Services	0.0	0.0	2.6
13	Consumer Organizations or Advocacy Groups	0.0	0.0	0.0
14	Employers	0.0	0.0	0.0
15	Faith Based Organizations	0.0	0.0	0.0
16	Family/Friends	1.0	1.3	5.1
17	Intellectual and Developmental Disabilities Providers	0.0	0.0	0.0
18	Mental Health Provider (Public or Private)	0.0	0.0	0.0
19	Public Housing Authority	0.0	0.0	0.0
20	State Department of Correction/Juvenile Justice	0.0	0.0	0.0
21	State Employment Service Agency	0.0	0.0	0.0
22	Veteran's Administration	0.0	0.0	0.0
23	Worker's Compensation	0.0	0.0	0.0
24	Other State Agencies	4.1	2.7	5.1
25	Other VR State Agencies	0.0	0.0	0.0
26	Total Identified Referral Sources	100.0	97.3	100.0
27	Other Referral Sources	0.0	2.7	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. New Jersey Blind 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)	0.2	0.2	0.0
2	Educational Institutions (post-secondary)	0.0	0.0	0.3
3	Medical Health Provider (Public or Private)	14.0	12.1	9.9
4	Welfare Agency (State or local government)	0.7	2.0	1.2
5	Community Rehabilitation Programs	0.5	0.4	0.0
6	Social Security Administration (Disability Determination Service or District office)	0.0	0.0	0.0
7	One-stop Employment/Training Centers	0.0	0.0	0.0
8	Self-referral	71.2	74.3	78.4
9	Other Sources	7.4	6.5	6.4
10	American Indian VR Services Program	1.6	1.1	0.9
11	Centers for Independent Living	0.0	0.0	0.0
12	Child Protective Services	0.0	0.0	0.0
13	Consumer Organizations or Advocacy Groups	0.0	0.0	0.3
14	Employers	0.0	0.0	0.0
15	Faith Based Organizations	0.0	0.0	0.0
16	Family/Friends	3.3	1.6	2.0
17	Intellectual and Developmental Disabilities Providers	0.0	0.0	0.3
18	Mental Health Provider (Public or Private)	0.0	0.0	0.0
19	Public Housing Authority	0.0	0.0	0.0
20	State Department of Correction/Juvenile Justice	0.0	0.0	0.0
21	State Employment Service Agency	0.0	0.0	0.0
22	Veteran's Administration	0.0	0.0	0.0
23	Worker's Compensation	0.0	0.0	0.0
24	Other State Agencies	0.2	0.4	0.0
25	Other VR State Agencies	0.0	0.2	0.0
26	Total Identified Referral Sources	99.1	98.9	99.7
27	Other Referral Sources	0.9	1.1	0.3

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.

Table 4a. New Jersey Blind 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	450	100.0	341	99.7	255	99.2
2	Visual - Employment rate		65.8		61.6		46.3
3	Auditory and Communicative - Individuals served			1	0.3	2	0.8
4	Auditory and Communicative - Employment rate				100.0		0.0
5	Physical - Individuals served						
6	Physical - Employment rate						
7	Intellectual and Learning disability - Individuals served						
8	Intellectual and Learning disability - Employment rate						
9	Psychosocial and psychological- Individuals served						
10	Psychosocial and psychological- Employment rate						

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. New Jersey Blind 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	32	100.0	29	100.0	21	100.0
2	Visual - Employment rate		50.0		48.3		28.6
3	Auditory and Communicative - Individuals served						
4	Auditory and Communicative - Employment rate						
5	Physical - Individuals served						
6	Physical - Employment rate						
7	Intellectual and Learning disability - Individuals served						
8	Intellectual and Learning disability - Employment rate						
9	Psychosocial and psychological- Individuals served						
10	Psychosocial and psychological- Employment rate						

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. New Jersey Blind 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	418	100.0	312	99.7	234	99.2
2	Visual - Employment rate		67.0		62.8		47.9
3	Auditory and Communicative - Individuals served			1	0.3	2	0.8
4	Auditory and Communicative - Employment rate				100.0		0.0
5	Physical - Individuals served						
6	Physical - Employment rate						
7	Intellectual and Learning disability - Individuals served						
8	Intellectual and Learning disability - Employment rate						
9	Psychosocial and psychological- Individuals served						
10	Psychosocial and psychological- Employment rate						

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. New Jersey Blind 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	475	85.6	371	82.6	273	81.5
More than 60 days	80	14.4	78	17.4	62	18.5
Total eligible	555	100.0	449	100.0	335	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. New Jersey Blind 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	43	79.6	31	77.5	27	77.1
More than 60 days	11	20.4	9	22.5	8	22.9
Total eligible	54	100.0	40	100.0	35	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. New Jersey Blind 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	432	86.2	340	83.1	246	82.0
More than 60 days	69	13.8	69	16.9	54	18.0
Total eligible	501	100.0	409	100.0	300	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. New Jersey Blind 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	119	95.2	159	88.3	135	90.0
More than 90 days	6	4.8	21	11.7	15	10.0
Total served	125	100.0	180	100.0	150	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. New Jersey Blind 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	4	100.0	8	100.0	6	85.7
More than 90 days	0	0	0	0	1	14.3
Total served	4	100.0	8	100.0	7	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. New Jersey Blind 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	115	95.0	151	87.8	129	90.2
More than 90 days	6	5.0	21	12.2	14	9.8
Total served	121	100.0	172	100.0	143	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. New Jersey Blind 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	0.4	0.9	0.8
2	Training- Bachelor degree training	5.3	9.1	9.7
3	Training- Junior or community college training	0.4	0.6	2.7
4	Training- Occupational or vocational training	4.2	3.5	1.6
5	Training- On-the-job training	0.7	0.9	1.6
6	Training- Apprenticeship training	0.0	0.0	0.0
7	Training- Basic academic remedial or literacy training	0.0	0.3	0.0
8	Training- Job readiness training	2.0	4.1	2.3
9	Training- Disability-related skills training	8.0	15.8	26.5
10	Training- Miscellaneous training	12.0	13.5	13.6
11	Career- Assessment	55.1	47.4	54.5
12	Career- Diagnosis and treatment of impairment	73.3	65.8	68.5
13	Career- Vocational rehab counseling and guidance	57.6	62.0	66.9
14	Career- Job search assistance	0.0	0.0	0.0
15	Career- Job placement assistance	11.8	15.5	14.8
16	Career- On-the-job supports-short term	2.0	8.2	7.0
17	Career- On-the-job supports-SE	1.8	2.9	4.3
18	Career- Information and referral services	0.0	0.0	0.0
19	Career- Benefits counseling	0.0	0.0	0.0
20	Career- Customized employment services	0.0	0.0	0.4
21	Other services- Transportation	29.3	32.7	38.1
22	Other services- Maintenance	8.0	12.9	13.2
23	Other services- Rehabilitation technology	26.4	36.0	39.3
24	Other services- Reader services	4.9	6.1	6.6
25	Other services- Interpreter services	1.3	1.2	0.4
26	Other services- Personal attendant services	0.2	1.5	0.4
27	Other services- Technical assistance services	8.4	12.0	15.6
28	Other services- Other services	21.1	27.8	32.3

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.

*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. New Jersey Blind 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	0.0
2	Training- Bachelor degree training	28.1	44.8	33.3
3	Training- Junior or community college training	3.1	3.4	19.0
4	Training- Occupational or vocational training	0.0	0.0	4.8
5	Training- On-the-job training	3.1	0.0	0.0
6	Training- Apprenticeship training	0.0	0.0	0.0
7	Training- Basic academic remedial or literacy training	0.0	0.0	0.0
8	Training- Job readiness training	0.0	0.0	0.0
9	Training- Disability-related skills training	6.3	3.4	23.8
10	Training- Miscellaneous training	34.4	58.6	42.9
11	Career- Assessment	65.6	75.9	71.4
12	Career- Diagnosis and treatment of impairment	37.5	51.7	42.9
13	Career- Vocational rehab counseling and guidance	46.9	58.6	61.9
14	Career- Job search assistance	0.0	0.0	0.0
15	Career- Job placement assistance	9.4	3.4	0.0
16	Career- On-the-job supports-short term	3.1	13.8	23.8
17	Career- On-the-job supports-SE	0.0	3.4	4.8
18	Career- Information and referral services	0.0	0.0	0.0
19	Career- Benefits counseling	0.0	0.0	0.0
20	Career- Customized employment services	0.0	0.0	0.0
21	Other services- Transportation	40.6	48.3	61.9
22	Other services- Maintenance	28.1	41.4	42.9
23	Other services- Rehabilitation technology	28.1	31.0	61.9
24	Other services- Reader services	3.1	10.3	9.5
25	Other services- Interpreter services	6.3	0.0	0.0
26	Other services- Personal attendant services	0.0	0.0	0.0
27	Other services- Technical assistance services	9.4	0.0	14.3
28	Other services- Other services	40.6	51.7	66.7

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.

*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. New Jersey Blind 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	0.5	1.0	0.8
2	Training- Bachelor degree training	3.6	5.8	7.6
3	Training- Junior or community college training	0.2	0.3	1.3
4	Training- Occupational or vocational training	4.5	3.8	1.3
5	Training- On-the-job training	0.5	1.0	1.7
6	Training- Apprenticeship training	0.0	0.0	0.0
7	Training- Basic academic remedial or literacy training	0.0	0.3	0.0
8	Training- Job readiness training	2.2	4.5	2.5
9	Training- Disability-related skills training	8.1	16.9	26.7
10	Training- Miscellaneous training	10.3	9.3	11.0
11	Career- Assessment	54.3	44.7	53.0
12	Career- Diagnosis and treatment of impairment	76.1	67.1	70.8
13	Career- Vocational rehab counseling and guidance	58.4	62.3	67.4
14	Career- Job search assistance	0.0	0.0	0.0
15	Career- Job placement assistance	12.0	16.6	16.1
16	Career- On-the-job supports-short term	1.9	7.7	5.5
17	Career- On-the-job supports-SE	1.9	2.9	4.2
18	Career- Information and referral services	0.0	0.0	0.0
19	Career- Benefits counseling	0.0	0.0	0.0
20	Career- Customized employment services	0.0	0.0	0.4
21	Other services- Transportation	28.5	31.3	36.0
22	Other services- Maintenance	6.5	10.2	10.6
23	Other services- Rehabilitation technology	26.3	36.4	37.3
24	Other services- Reader services	5.0	5.8	6.4
25	Other services- Interpreter services	1.0	1.3	0.4
26	Other services- Personal attendant services	0.2	1.6	0.4
27	Other services- Technical assistance services	8.4	13.1	15.7
28	Other services- Other services	19.6	25.6	29.2

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. New Jersey Blind 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	1.1	\$16.00	1.0	\$23.75	0.9	\$10.00
2	Arts, Design, Entertainment, Sports, and Media	1.4	\$23.25	3.6	\$11.55	0.9	\$46.20
3	Building and Grounds Cleaning and Maintenance	6.5	\$10.00	6.7	\$10.00	6.6	\$10.00
4	Business and Financial Operations Occupations	4.3	\$18.12	2.6	\$23.08	7.5	\$17.04
5	Community and Social Services Occupations	4.0	\$20.00	4.7	\$21.43	2.8	\$20.83
6	Computer and Mathematical Occupations	2.9	\$25.93	4.1	\$20.81	1.9	\$25.59
7	Constructive and Extraction Occupations	3.6	\$15.93	4.7	\$18.50	3.8	\$17.52
8	Education, Training, and Library Occupations	6.5	\$19.61	8.8	\$19.23	3.8	\$15.22
9	Farming, Fishing, and Forestry Occupations	0	NA	0.5	\$13.50	0	NA
10	Food Preparation and Serving Related Occupations	10.1	\$10.00	6.2	\$10.00	1.9	\$24.15
11	Healthcare Practitioners and Technical Occupations	2.5	\$14.40	3.6	\$20.20	3.8	\$22.49
12	Healthcare Support Occupations	7.6	\$11.50	4.1	\$10.79	5.7	\$12.30
13	Installation, Maintenance, and Repair Occupations	2.9	\$10.13	3.1	\$11.50	3.8	\$9.38
14	Legal Occupations	0.7	\$19.71	0.5	\$43.94	0	NA
15	Life, Physical, and Social Science Occupations	0.4	\$14.33	1.0	\$30.93	1.9	\$17.26
16	Management Occupations	5.1	\$14.51	8.3	\$22.17	7.5	\$20.43
17	Military Specific Occupations	0	NA	0	NA	0	NA
18	Office and Administrative Support Occupations	13.4	\$13.33	13.0	\$13.00	17.0	\$11.88
19	Personal Care and Service Occupations	2.5	\$11.75	3.1	\$11.04	4.7	\$11.54
20	Production Occupations	4.3	\$9.00	5.7	\$10.00	8.5	\$8.52
21	Protective Service Occupations	0.4	\$15.00	0.5	\$11.00	0.9	\$9.50
22	Randolph-Sheppard vending facility clerk*	0	NA	0	NA	0	NA
23	Randolph-Sheppard vending facility operator*	1.8	\$15.00	2.6	\$26.63	1.9	\$22.53
24	Sales and Related Occupations	10.5	\$10.50	5.7	\$9.67	6.6	\$10.00
25	Transportation and Material Moving Occupations	7.6	\$12.00	5.7	\$12.50	7.5	\$10.53
26	Total competitive employment outcomes		\$12.00		\$13.00		\$12.05

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. New Jersey Blind 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	0	NA	0	NA	0	NA
2	Arts, Design, Entertainment, Sports, and Media	0	NA	0	NA	0	NA
3	Building and Grounds Cleaning and Maintenance	6.3	\$19.00	0	NA	0	NA
4	Business and Financial Operations Occupations	6.3	\$11.00	7.1	\$17.00	0	NA
5	Community and Social Services Occupations	0	NA	0	NA	0	NA
6	Computer and Mathematical Occupations	0	NA	14.3	\$28.13	16.7	\$33.18
7	Constructive and Extraction Occupations	0	NA	0	NA	0	NA
8	Education, Training, and Library Occupations	12.5	\$19.28	21.4	\$10.45	0	NA
9	Farming, Fishing, and Forestry Occupations	0	NA	0	NA	0	NA
10	Food Preparation and Serving Related Occupations	25.0	\$8.72	0	NA	0	NA
11	Healthcare Practitioners and Technical Occupations	0	NA	14.3	\$15.66	0	NA
12	Healthcare Support Occupations	6.3	\$10.00	0	NA	16.7	\$15.52
13	Installation, Maintenance, and Repair Occupations	0	NA	0	NA	0	NA
14	Legal Occupations	0	NA	0	NA	0	NA
15	Life, Physical, and Social Science Occupations	0	NA	0	NA	0	NA
16	Management Occupations	0	NA	14.3	\$30.63	16.7	\$10.00
17	Military Specific Occupations	0	NA	0	NA	0	NA
18	Office and Administrative Support Occupations	18.8	\$10.00	7.1	\$11.00	50.0	\$10.00
19	Personal Care and Service Occupations	0	NA	0	NA	0	NA
20	Production Occupations	12.5	\$9.83	0	NA	0	NA
21	Protective Service Occupations	6.3	\$15.00	0	NA	0	NA
22	Randolph-Sheppard vending facility clerk*	0	NA	0	NA	0	NA
23	Randolph-Sheppard vending facility operator*	0	NA	0	NA	0	NA
24	Sales and Related Occupations	6.3	\$9.00	21.4	\$8.40	0	NA
25	Transportation and Material Moving Occupations	0	NA	0	NA	0	NA
26	Total competitive employment outcomes		\$10.50		\$15.17		\$10.25

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. New Jersey Blind 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	1.1	\$16.00	1.1	\$23.75	1.0	\$10.00
2	Arts, Design, Entertainment, Sports, and Media	1.5	\$23.25	3.9	\$11.55	1.0	\$46.20
3	Building and Grounds Cleaning and Maintenance	6.5	\$10.00	7.3	\$10.00	7.0	\$10.00
4	Business and Financial Operations Occupations	4.2	\$19.17	2.2	\$24.04	8.0	\$17.04
5	Community and Social Services Occupations	4.2	\$20.00	5.0	\$21.43	3.0	\$20.83
6	Computer and Mathematical Occupations	3.1	\$25.93	3.4	\$17.00	1.0	\$18.00
7	Constructive and Extraction Occupations	3.8	\$15.93	5.0	\$18.50	4.0	\$17.52
8	Education, Training, and Library Occupations	6.1	\$19.61	7.8	\$21.00	4.0	\$15.22
9	Farming, Fishing, and Forestry Occupations	0	NA	0.6	\$13.50	0	NA
10	Food Preparation and Serving Related Occupations	9.2	\$10.13	6.7	\$10.00	2.0	\$24.15
11	Healthcare Practitioners and Technical Occupations	2.7	\$14.40	2.8	\$23.00	4.0	\$22.49
12	Healthcare Support Occupations	7.7	\$11.61	4.5	\$10.79	5.0	\$12.10
13	Installation, Maintenance, and Repair Occupations	3.1	\$10.13	3.4	\$11.50	4.0	\$9.38
14	Legal Occupations	0.8	\$19.71	0.6	\$43.94	0	NA
15	Life, Physical, and Social Science Occupations	0.4	\$14.33	1.1	\$30.93	2.0	\$17.26
16	Management Occupations	5.4	\$14.51	7.8	\$21.04	7.0	\$21.63
17	Military Specific Occupations	0	NA	0	NA	0	NA
18	Office and Administrative Support Occupations	13.0	\$13.67	13.4	\$13.00	15.0	\$13.00
19	Personal Care and Service Occupations	2.7	\$11.75	3.4	\$11.04	5.0	\$11.54
20	Production Occupations	3.8	\$9.00	6.1	\$10.00	9.0	\$8.52
21	Protective Service Occupations	0	NA	0.6	\$11.00	1.0	\$9.50
22	Randolph-Sheppard vending facility clerk*	0	NA	0	NA	0	NA
23	Randolph-Sheppard vending facility operator*	1.9	\$15.00	2.8	\$26.63	2.0	\$22.53
24	Sales and Related Occupations	10.7	\$10.51	4.5	\$10.59	7.0	\$10.00
25	Transportation and Material Moving Occupations	8.0	\$12.00	6.1	\$12.50	8.0	\$10.53
26	Total competitive employment outcomes		\$12.00		\$13.00		\$12.14

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. New Jersey Blind 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	130	35.0	103	33.1	92	35.0
2	Disability too significant to benefit from VR services - ineligible	2	0.5	1	0.3	2	0.8
3	No longer interested in receiving services or further services	114	30.7	100	32.2	93	35.4
4	Death	6	1.6	11	3.5	9	3.4
5	Transferred to another agency	27	7.3	27	8.7	10	3.8
6	No disabling condition – ineligible	3	0.8	4	1.3	4	1.5
7	No impediment to employment - ineligible	4	1.1	1	0.3	1	0.4
8	Transportation not feasible or available	0	0.0	0	0.0	1	0.4
9	Does not require VR services - ineligible	7	1.9	1	0.3	4	1.5
10	All other reasons	74	19.9	62	19.9	44	16.7
11	Extended employment	0	0.0	0	0.0	2	0.8
12	Individual in institution other than a prison or jail	3	0.8	1	0.3	0	0.0
13	Individual is incarcerated in a prison or jail	1	0.3	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 9b. New Jersey Blind 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	23	28.4	17	27.9	15	45.5
2	Disability too significant to benefit from VR services - ineligible	0	0.0	0	0.0	0	0.0
3	No longer interested in receiving services or further services	13	16.0	11	18.0	10	30.3
4	Death	1	1.2	1	1.6	1	3.0
5	Transferred to another agency	22	27.2	20	32.8	3	9.1
6	No disabling condition - ineligible	2	2.5	1	1.6	2	6.1
7	No impediment to employment - ineligible	1	1.2	0	0.0	0	0.0
8	Transportation not feasible or available	0	0.0	0	0.0	0	0.0
9	Does not require VR services - ineligible	0	0.0	0	0.0	0	0.0
10	All other reasons	17	21.0	10	16.4	2	6.1
11	Extended employment	0	0.0	0	0.0	0	0.0
12	Individual in institution other than a prison or jail	2	2.5	1	1.6	0	0.0
13	Individual is incarcerated in a prison or jail	0	0.0	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 9c. New Jersey Blind 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	107	36.9	86	34.4	77	33.5
2	Disability too significant to benefit from VR services - ineligible	2	0.7	1	0.4	2	0.9
3	No longer interested in receiving services or further services	101	34.8	89	35.6	83	36.1
4	Death	5	1.7	10	4.0	8	3.5
5	Transferred to another agency	5	1.7	7	2.8	7	3.0
6	No disabling condition - ineligible	1	0.3	3	1.2	2	0.9
7	No impediment to employment - ineligible	3	1.0	1	0.4	1	0.4
8	Transportation not feasible or available	0	0.0	0	0.0	1	0.4
9	Does not require VR services - ineligible	7	2.4	1	0.4	4	1.7
10	All other reasons	57	19.7	52	20.8	42	18.3
11	Extended employment	0	0.0	0	0.0	2	0.9
12	Individual in institution other than a prison or jail	1	0.3	0	0.0	0	0.0
13	Individual is incarcerated in a prison or jail	1	0.3	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.

Fiscal Data Tables

Table 6.1 New Jersey-Blind (NJ-B) VR Resources and Expenditures—FFYs 2015–2017

VR Resources and Expenditures	2015	2016	2017
Total program expenditures	\$17,342,303	\$18,159,394	\$18,502,446
Federal expenditures	\$12,816,748	\$13,985,443	\$13,950,187
State agency expenditures (4 th quarter)	\$4,740,595	\$4,612,767	\$4,565,483
State agency expenditures (latest/final)	\$4,525,555	\$4,173,951	\$4,552,259
Federal formula award amount	\$11,516,748	\$11,985,443	\$11,950,187
MOE penalty from prior year	\$0	\$26,013	\$430,048
Federal award amount relinquished during reallotment	\$0	\$0	\$0
Federal award amount received during reallotment	\$1,300,000	\$2,000,000	\$2,000,000
Federal funds transferred from State VR agency	\$0	\$0	\$0
Federal funds transferred to State VR agency	\$0	\$0	\$0
Federal award amount (net)	\$12,816,748	\$13,959,430	\$13,950,187
Federal award funds deobligated	\$0	\$0	\$0
Federal award funds used	\$12,816,748	\$13,959,430	\$13,950,187
Percent of formula award amount used	111.29%	116.47%	116.74%
Federal award funds matched but not used	\$0	\$0	\$0

Table 6.1 New Jersey-Blind - 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
Federal award funds used	Amount of Federal award funds expended.

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

Table 6.2 New Jersey-Blind (NJ-B) 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	\$3,468,828	\$3,785,133	\$3,659,199
Match provided (actual)	\$4,525,555	\$4,173,951	\$4,552,259
Match difference**	-\$1,056,727	-\$388,818	-\$893,060
Federal funds matched (actual)	\$12,816,748	\$13,959,430	\$16,819,849
Percent Federal funds matched	100.00%	100.00%	100.00%
MOE required	\$4,551,568	\$4,603,999	\$4,525,555
MOE: Establishment/construction expenditures	\$0	\$0	\$0
MOE actual	\$4,525,555	\$4,173,951	\$4,552,259
MOE difference**	\$26,013	\$430,048	-\$26,704

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

Table 6.2 New Jersey-Blind - 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
Maintenance of Effort (MOE) required	Maintenance of effort (MOE) is the level of non-Federal expenditures, minus establishment/construction expenditures for CRPs, established by the State’s non-Federal expenditures two years prior, i.e. Recipient Share of Expenditures. Source/Formula: (For FFY two year prior) SF-425 4 th quarter or latest/final report: line 10j minus line 12a. If non-Federal share is added in the prior carryover year, the additional amount is added to the MOE required. If an agency increases their Establishment/Construction expenditures in the prior carryover year, the increase is deducted from the FFY’s total non-Federal share for MOE purposes.
MOE: Establishment / construction expenditures	Non-Federal share of expenditures for construction of facilities for community rehabilitation program (CRP) purposes and the establishment of facilities for community rehabilitation purposes. Source/Formula: SF-425 latest/final report: line 12a

Non-Federal Share (Match) and Maintenance of Effort (MOE)	Source/Formula
MOE actual	<p>Non-Federal share provided by agency minus establishment/construction expenditures for CRPs.</p> <p>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.</p>
MOE difference**	<p>The difference between MOE required and the actual MOE provided.</p> <p>Source/Formula: MOE required minus MOE actual</p>

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

Table 6.3 New Jersey-Blind (NJ-B) Program Income and Carryover—FFYs 2015–2017

Program Income and Carryover	2015	2016	2017
Program income received	\$81,628	\$847,545	\$536,582
Program income disbursed	\$81,628	\$847,545	\$536,582
Program income transferred	\$0	\$0	\$0
Program income used for VR program	\$81,628	\$847,545	\$536,582
Federal grant amount matched	\$12,816,748	\$13,959,430	\$16,819,849
Federal expenditures 9/30	\$9,019,696	\$8,651,593	\$9,552,378
Federal unliquidated obligations 9/30	\$1,857,240	\$1,909,553	\$1,702,200
Carryover amount	\$1,939,812	\$3,424,297	\$2,695,609
Carryover as percent of award	15.13%	24.53%	19.94%

Table 6.3 New Jersey-Blind - 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 New Jersey-Blind (NJ-B) RSA-2 Expenditures—FFYs 2015–2017*

RSA-2 Expenditures	2015	2016	2017
Total expenditures	\$17,567,152	\$18,947,286	\$20,647,273
Administrative costs	\$3,012,912	\$3,219,902	\$3,716,557
Administration as Percent expenditures	17.15%	16.99%	18.00%
Purchased services expenditures	\$4,136,175	\$4,460,291	\$5,024,696
Purchased services as a Percent expenditures	23.54%	23.54%	24.34%
Services to groups	\$1,865,479	\$1,560,964	\$3,125,557
Services to groups percentage	10.62%	8.24%	15.14%

*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 New Jersey-Blind - 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 without required documentation	Percent with required documentation	Percent without required documentation
Date of Application	30	0	100%	0%
Date of Eligibility Determination	28	2	93%	7%
Date of IPE	29	1	97%	3%
Start Date of Employment in Primary Occupation at Exit or Closure	7	8	47%	53%
Weekly Earnings at Exit or Closure	10	5	67%	33%
Employment Status at Exit or Closure	10	5	67%	33%
Type of Exit or Closure	30	0	100%	0%
Date of Exit or Closure	26	4	87%	13%

Summary	Number (of 30)	Percent (of 30)
Files with all required documentation	18	60%
Files with documentation for four or more data elements examined	30	100%
Files with no required documentation	0	0

APPENDIX C: 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	7		11		5	
Competitive employment outcomes	6	85.7%	11	100.0%	5	100.0%
Median hourly earnings for competitive employment outcomes	\$10.00		\$9.00		\$9.50	
Average hours worked for competitive employment outcomes	22.3		25.1		21.4	

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.

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

**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
Diagnosis and treatment of impairment	80.0%
Vocational rehab counseling and guidance	80.0%
Disability-related skills training	60.0%
Job placement assistance	60.0%
On-the-job supports-SE	60.0%

Data source: RSA-911

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

Note: Job placement assistance, On-the-job supports-short term, Disability-related skills training, Rehabilitation technology; Technical assistance services, and Other services are tie.

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
Building and Grounds Cleaning and Maintenance	20.0	\$9.00
Office and Administrative Support Occupations	20.0	\$13.50
Production Occupations	20.0	\$10.24
Protective Service Occupations	20.0	\$9.50
Sales and Related Occupations	20.0	\$8.52

Data source: RSA-911

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