

**FEDERAL FISCAL YEAR 2019  
MONITORING REPORT  
ON THE  
WISCONSIN DIVISION OF  
REHABILITATION SERVICES'  
VOCATIONAL REHABILITATION  
AND  
SUPPORTED EMPLOYMENT PROGRAMS**



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

**March 9, 2020**

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# SECTION 1: THE SCOPE OF THE REVIEW

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## **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 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 Wisconsin Division of Vocational Rehabilitation (DVR) in Federal fiscal year (FFY) 2019, 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 State Vocational Rehabilitation Services and State Supported Employment Services Programs;
  - Pre-Employment Transition Services for Students with Disabilities; and
  - Financial Management of the State Vocational Rehabilitation Services and State Supported Employment Services Programs.

The nature and scope of this off-site review conducted from August 15, 2019 through September 11, 2019, and the process by which RSA carried out its monitoring activities is described in detail in the State Vocational Rehabilitation Services and State Supported Employment Services Programs Federal Fiscal Year 2019 Monitoring and Technical Assistance Guide.

## **B. Review Team Participants**

Members of the RSA review team included Tonya Stellar (Vocational Rehabilitation Program Unit), Rimal Desai and Vernita Washington (Data Collection and Analysis Unit), Samuel Pierre and Caneshia McAllister (Technical Assistance Unit), and Sean Barrett (Fiscal Unit). Although not all team members participated fully in the off-site review, 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 DVR 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 AND STATE SUPPORTED EMPLOYMENT SERVICES PROGRAMS**

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### **A. Purpose**

Through this focus area, RSA assessed the achievement of employment outcomes, including the quality of those outcomes, by individuals with disabilities served in the VR program by conducting an analysis of VR program data and a review of individual service records. The analysis below is based on a review of the programmatic data contained in Appendix A of this report. The data used in the analysis are those collected and reported by the VR agency.

### **B. Analysis of the Performance of the VR Program**

#### **VR Agency Profile**

**Resources:** Appendix A—Tables 1, 2, and 3

For program year (PY) 2017, DVR reported 12,882 applicants and 12,196 individuals determined eligible for the VR program on the Case Service Report (RSA-911). The greatest percentages of participants served by DVR in PY 2017, were individuals with cognitive disabilities (38.7 percent), psychological or psychosocial disabilities (27.5 percent), and physical impairments (24.6 percent).

Of those individuals with an individualized plan for employment (IPE) in PY 2017, 8,707 participants received services, while 3,080 individuals did not receive any services. DVR communicated that it should have reported a higher number of participants in receipt of services; however, the agency underreported individuals who had received services provided directly by the VR counselors in PY 2017. DVR communicated that prior to a PY 2018 training of VR counselors on the reporting of the provision of direct (e.g., in-house services) and purchased services, the agency reported only those services purchased by DVR on the RSA-911. As a result, individuals who received services provided directly by VR counselors were underreported during the period under review.

Of all the individuals who exited the VR program from various stages of the VR process during PY 2017, 37 percent (4,797 individuals) exited after the receipt of services under an IPE without an employment outcome, 0.1 percent (16 individuals) exited after the receipt of services under an IPE in noncompetitive and/or nonintegrated employment, and 32.0 percent (4,143 individuals) achieved competitive integrated employment. Of the 4,143 individuals who achieved competitive employment, 468 individuals were reported as having achieved supported employment. During the same period, DVR achieved an employment rate of 46.3 percent.

DVR communicated that the agency experienced significant staff turnover during PY 2017, which affected outreach to individuals with disabilities and the timely delivery of services. Since PY 2017, DVR has focused its efforts on staff training in apprenticeship opportunities,

customized employment, supported employment, adjustment to disability services, and trauma-informed care. DVR is engaged in analyzing its Milwaukee county workforce development areas to understand and increase the quality of services available and employment opportunities for targeted communities, including minorities with disabilities living in poverty. The agency shared strategies implemented to improve client engagement and service delivery, including a 30-day contact requirement, and the use of dashboards to assess performance. DVR also hopes to use artificial intelligence and technology to engage students and youth with disabilities in VR services.

## **The VR Process**

**Resources:** Appendix A—Tables 1, 2, 4, and 5

As reported on the RSA-113, the total number of applicants declined by 6.8 percent from 15,174 individuals in FFY 2016, to 14,133 individuals in FFY 2018, while the total number of eligible individuals decreased 9.5 percent from 15,364 individuals in FFY 2016, to 13,904 individuals in FFY 2018.

Based on data from the RSA-911 for PY 2017, 99.1 percent of eligibility determinations were made within 60 days from the date of application. DVR reported that eligibility determinations are completed (on average) within 25 days from the date of application. Since the Workforce Investment Act (WIA) of 1998, DVR has streamlined its eligibility determination process, presuming that all individuals with disabilities can benefit from VR services without requiring trial work experiences. As required, all individuals receiving Supplemental Security Income and beneficiaries of Social Security Disability Insurance seeking competitive integrated employment are presumed eligible for VR services. Approximately six years ago, DVR created performance dashboards to assess the timeliness of eligibility determinations. In addition, the agency assesses the performance of its VR counselors, in part, based on the timely determination of eligibility for their individual caseloads.

DVR implemented an order of selection and closed all priority categories in FFY 2004. In FFY 2006, DVR opened priority categories one and two for individuals with most significant and significant disabilities, respectively. Per the PY 2018 State Plan (description m), order of selection priority category three (i.e., non-significant disability) remained closed for PYs 2018 and 2019; however, the number of individuals on the waiting list decreased from 137 individuals in FFY 2016, to 73 individuals in FFY 2018. To prioritize serving individuals with most significant and significant disabilities, DVR did not elect to serve applicants or eligible individuals, regardless of any established order of selection, who are in danger of losing employment and require specific services or equipment to maintain employment in its PY 2018 State Plan.

In PY 2017, 67.3 percent of IPEs were developed within 90 days from the date of eligibility determination. During the same period of time, DVR reported that 1,520 of the 22,548 participants in receipt of VR services received vocational rehabilitation counseling and guidance, which accounted for 6.7 percent of the career services provided to participants. This specific career service is necessary to determine an individual's strengths, resources, abilities, capabilities, interests and informed choice to develop the IPE. DVR reported that vocational

guidance and counseling is provided by the majority of its counselors, as needed; however, counselors used to report this service at closure, rather than at the time services were provided. As a result, it appeared, based on data reported by DVR through the RSA-911, that the services for a significant proportion of the IPEs developed in PY 2017 were not immediately initiated through the provision of vocational rehabilitation counseling and guidance. During the review, RSA clarified that vocational rehabilitation counseling and guidance should be included on all IPEs, whether provided in-house by counselors or purchased from another provider. DVR shared that it recently trained its staff to report services, including vocational counseling and guidance, when provided, rather than at case closure.

In addition, VR agencies report through the version of the RSA-911 in PD-16-04 the date of the most recent or amended IPE, which may or may not be the date on which the IPE was first developed. When calculating the period between the date of eligibility determination and the date the IPE was developed for each individual, RSA uses the date reported on which services on the IPE were first initiated if that date is earlier than that reported for the most recent or amended IPE. Again, this date may not be the date on which the IPE was signed though it may be closer than the date of the most recent or amended IPE. RSA has addressed these limitations in its calculations of timely IPE development through the revised RSA-911 in PD-19-03 to be implemented by VR agencies on July 1, 2020, which will require the agencies to report the date on which the IPE was signed. Nonetheless, during the review, DVR clarified that it requires VR counselors to develop an IPE within 90 days from the date of eligibility determination and uses the date the initial IPE was signed to determine whether the Federal 90-day timeframe was met, rather than the start date of the most recent IPE or IPE amendment. DVR communicated that RSA's use of the most recent IPE or IPE amendment, or the date on which services were first initiated in some instances, rather than the start date of the initial IPE, gives the appearance of a delay in IPE development. Specifically, an IPE amendment may be signed months or years after an initial IPE. Based on DVR's calculations, it reported that 90 percent of its IPEs were developed within 90 days from the date of eligibility determination, and with IPE extensions, 97 percent of IPEs were completed within the 90-day Federal time frame.

The percentage of eligible individuals with an IPE who were not in receipt of services decreased from 36.2 percent in FFY 2016, to 22.6 percent in FFY 2018. The number of individuals with an IPE receiving services fluctuated from FFY 2016, to FFY 2018, increasing 3.9 percent, from 23,626 individuals in FFY 2017 to 24,571 individuals in FFY 2018.

Of the 12,952 individuals who exited the VR program in PY 2017, 3,106 individuals (24.0 percent) of individuals exited after eligibility determination, prior to a signed IPE, while 4,797 individuals (37.0 percent) exited after an IPE, without an employment outcome. During the same period, 4,143 individuals, 32.0 percent of all individuals who exited at any point in the VR process, exited with competitive integrated employment, or supported employment. In PY 2017, 68.0 percent of individuals exited the VR system without employment. The employment rate in PY 2017 was 46.3 percent. During the same period of time, 33.7 percent of individuals exited due to "no longer interested in receiving services or further services" and 21.1 percent of individuals exited as "unable to locate or contact."

DVR reported that its staff presume that all individuals with disabilities may benefit from VR services. As such, the agency's practice is not to close the case for anyone as too significantly disabled to benefit from VR services. However, six individuals were reported as exiting the VR process due to their disability being too significant to benefit from services, while no individuals exited the VR system during or after a trial work experience in PY 2017. DVR clarified that its coding manual definitions align with the RSA-911 definitions and acknowledged that there may be some staff confusion related to reporting. DVR will review the reasons for exit definitions and codes and determine if staff training is necessary.

DVR attributed a significant proportion of the attrition after eligibility, prior to IPE, to the receipt of numerous referrals for individuals employed in or seeking subminimum wage employment who did not wish to pursue competitive integrated employment or supported employment in PY 2017. DVR communicated that the Wisconsin Department of Health's pay for performance contracts provide incentive payments to managed care providers for those individuals who are in receipt of managed care services (i.e., Medicaid waiver services) and referred to DVR. As a result, DVR reported that a substantial number of individuals are determined eligible and their cases are closed once an individual declines VR services and supports necessary to achieve competitive integrated employment.

## **VR Services**

**Resources:** Appendix A—Tables 6 and 7

Of the 22,548 participants who received VR services in PY 2017, less than ten percent received postsecondary education (6.7 percent) or occupational or vocational training (3.2 percent), while 19.6 percent received job readiness training. DVR clarified that it does support postsecondary education; however, the job skill needs and high rate of job readiness training is reflective of the populations it serves (e.g., recipients of SSI and SSDI and individuals with significant cognitive disabilities) and the three largest industries in Wisconsin (i.e., food service, health care, and manufacturing). In PY 2017, the greatest number of individuals served by DVR achieved employment in office and administrative support, food preparation and serving, building and grounds cleaning and maintenance, and production occupations.

DVR's policies require that maximum efforts be made by the VR agency and individual to secure grant assistance in whole or part before the VR agency funds training or training services in an institution of higher education (Vocational Rehabilitation Program Policy Manual DVR-11074-P (revised August 2017)). After financial aid award information is provided through the Free Application for Federal Student Aid (FAFSA), DVR calculates the financial need for assistance up to \$2,500 per academic term, or \$5,000 per academic year for full-time attendance, as defined by the institution. However, administrative approval is needed for any financial assistance exceptions and attendance that may exceed three years for the completion of an Associate's degree or six years for the completion of a Bachelor's degree. Although preference is given for public in-State postsecondary institutions, administrative approval can also be granted for private and/or out-of-State postsecondary institutions.

In PY 2017, 30.3 percent of participants were eligible for measurable skill gains based on data reported through the RSA-911. During the same period of time, 1,198 individuals earned

measurable skill gains based on the reported data. Of those, 654 individuals achieved a secondary diploma and 473 individuals had a postsecondary transcript or report card in PY 2017. DVR reported that it calculates measurable skill gains based on enrollment, graduation, and withdrawal dates, and communicated that RSA's data element 22 (student with a disability) reported at application or start date of pre-employment transition services, does not omit those individuals who have graduated and withdrawn from educational programs since their application date. RSA clarified that RSA data element 78 (enrolled in secondary education) is reported at initial IPE and can be updated, as needed; however, RSA data element 84 (enrolled in postsecondary education) is reported at initial IPE or upon enrollment and cannot be updated. DVR shared it developed edit checks that require measurable skill gains be uploaded into the case management system in order to be reported and that it developed policies specific to measurable skill gains, including joint guidance with workforce partners in spring 2016. DVR also conducted statewide training on measurable skill gains across its eleven workforce development areas.

In PY 2017, 42.5 percent of career services provided to participants included job search, while placement services did not account for any career services provided. DVR communicated that it contracts the majority of its job search and placement services, which may need to be coded and reported as separate and distinct services. RSA staff clarified that VR counselors also provide job development and placement services and should be coding and reporting both services. DVR agreed staff training with respect to the coding and reporting of VR services, including job development and placement provided directly (i.e., in-house) by VR counselors and purchased from service providers, was necessary.

In PY 2017, 7.8 percent of career services were supported employment services, and no extended services were provided to youth with most significant disabilities. DVR communicated it has service agreements with 114 different supported employment service providers that provide VR services prior to placement, and supported employment services after placement. All extended services in the State are provided through managed care (i.e., State Medicaid agency). RSA and DVR discussed VR agency policies related to supported employment (issued June 2019), and RSA clarified that supported employment services are for individuals with most significant disabilities pursuant to 34 C.F.R. § 361.5(c)(53), not individuals with other disabilities. Additional technical assistance related to supported employment is described in Section E of this focus area.

During the same period of time, other services provided to participants included transportation (19.0 percent), maintenance (11.1 percent), and rehabilitation technology such as vehicular modifications (4.9 percent). One of the largest barriers to employment identified through the most recent comprehensive statewide needs assessment (CSNA) was transportation. DVR policies allow for the provision of transportation, including training in the use of public transportation vehicles/systems, in connection with the provision of a VR service necessary to achieve an employment outcome.

### **Quality of Employment Outcomes**

**Resources:** Appendix A—Tables 1, 4, 5, 6, 8, 9, and 10

In PY 2017, the median hourly earnings for the 4,010 participants, who exited in competitive integrated employment or supported employment, was \$10.00 per hour, and the median hours worked was 24 hours per week. DVR communicated that its average earnings were \$13.00 per hour during the same period of time. Of individuals who achieved competitive integrated employment, including supported employment, DVR reported that 88.0 percent indicated personal income and 9.3 percent indicated public support as their primary source of support at exit. Approximately 14.0 percent of participants served received benefits counseling during PY 2017. DVR shared that it would like to increase the percentage of individuals in receipt of benefits counseling to improve the median hours worked and wages earned per week for those individuals who achieve employment.

### **Pre-Employment Transition Services**

**Resources:** Appendix A—Tables 11 and 12

In PY 2017, 50.0 percent of the 10,770 students reported received pre-employment transition services. Of the 5,449 students who received pre-employment transition services, only 37 were potentially eligible for the VR program. DVR reported that the discrepancy between the number of students reported in Table 11 (Appendix A) and students who received pre-employment transition services may be due to RSA-911 data element 22 (previously discussed under VR Services), which defines an individual at program entry (application or start date of pre-employment transition services, whichever comes first) as a “student with a disability” and is not updated. As a result, a student may exit an educational program or reach the age of 21, and still be coded as a student for the entire life of the service record. DVR clarified that it is not a requirement that students with disabilities apply for VR services (except for students seeking subminimum wage employment in accordance with Section 511), but most do in order to receive individualized VR services. DVR communicated that it is in the process of implementing changes to its case management system in order to address this issue.

Work-based learning experiences represent the greatest percentage of pre-employment transition services provided to students with disabilities. The majority of these services are arranged through service providers. Instruction in self-advocacy is typically provided by local educational agencies (LEAs), and VR counselors provide job exploration counseling and counseling on enrollment opportunities in comprehensive transition and postsecondary educational programs at institutions of higher education (IHEs).

### **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 expenditures 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**

Prior to the monitoring review, RSA requested documentation from DVR outlining its internal control policies and procedures related to case service record reviews and reporting on the RSA-911. DVR provided RSA with a description of various attributes of its case management system that facilitate the accurate, reliable, and timely collection/reporting of data on the RSA-911, including a coding manual, links to its case management help pages, case management edits, and performance dashboards. DVR also developed a quality assurance workgroup and conducts periodic statewide and workforce development area peer reviews using programmatic and fiscal case review instruments.

DVR developed a coding manual that includes the RSA-911 coding elements to ensure staff have the resources and definitions to accurately capture and code information, as well as a fiscal manual that includes financial documentation requirements. DVR shared that it implemented topic-specific case management help pages that provide additional clarification of the coding and reporting processes for accurately documenting information related to referral and application, order of selection, eligibility, IPE and IPE amendments, service provision, and supporting documentation.

In addition, DVR developed case management system edit checks (e.g., service record closure requires 90-day employment and wage verification) that permit it to use technology for efficient case management, and to monitor the timely processing of referrals, applications, eligibility determinations, IPE development, provision of services, and daily operations through performance dashboards.

DVR developed a quality assurance (QA) team comprised of 11 DVR staff representing field, central office, and management-level staff who are responsible for developing an annual workplan, conducting periodic statewide case reviews, and coordinating peer reviews. At the time of the review, DVR was recruiting for a QA policy analyst. In PY 2018, the QA team conducted one activity and three case reviews, including reviews of DVR's education training module to determine if educational program enrollment dates were accurate and whether supporting documentation met DVR's requirements. The case reviews included a statewide review of 614 cases by representatives from all eleven workforce development areas to assess timely presumption of eligibility, eligibility determinations, and IPE development; documentation of labor market information; disability and informed choice; completion of fiscal responsibilities; and inclusion of required supporting documentation. During the same year, the QA team also reviewed the accuracy of information reported for pre-employment transition services, measurable skill gains, and credential attainment in 360 cases. DVR reported that it also conducts periodic reviews of timely eligibility determinations, order of selection priority category assignment, IPE development, service provision, and case closure.

In PY 2019, DVR's QA team initiated a fiscal review to determine if procedures in the fiscal manual were being followed and to verify services received by individuals. A statewide review of case closure and wage verification is scheduled for the summer 2020, and DVR will again

review the accurate reporting of measurable skill gains and credential attainment in fall 2020 to determine if the accuracy of reporting has improved since the PY 2018 QA review.

Additional quality assurance reviews (e.g., performance and service record reviews) are conducted by VR counselors, supervisors, and directors. The frequency of these reviews is ongoing and dependent upon need, consumer inquiries, and performance dashboard reports. DVR's data coordinator conducts ad hoc queries on a quarterly basis related to the reporting data elements on the RSA-911.

These annual and periodic QA case reviews are used to inform policies and whether additional staff training is necessary. Although the QA team conducted a targeted review of measurable skill gains in PY 2018, the case review instrument used by DVR staff and submitted to RSA did not include information related to measurable skill gains. RSA recommended that DVR's programmatic case review instrument (used by all DVR staff) be updated to include information related to participants who earned measurable skill gains outlined in Appendix D of the FFY 2019 Monitoring and Technical Assistance Guide (MTAG).

Although RSA did not conduct a service record review, DVR reported that it conducts internal service record reviews to ensure high quality services are delivered in accordance with applicable Federal and State laws and policies. DVR staff in the central and field offices, as well as managerial staff, assess the reliability and validity of data reported in the case file, case management system, and RSA-911. DVR communicated that it uses the periodic and annual review results to verify whether accurate reporting and supporting case file documentation is being maintained. These reviews and results also inform staff training needs and further identify policies to be reviewed and/or revised.

Workforce development area directors also evaluate service providers using outcome reports and dashboard reports to assess services including, but not limited to, job development and placement, supported employment, and customized employment. The directors are able to track service and benchmark outcome payments to each specific client and monitor progress towards achieving employment goals. DVR's field office staff serve on the local-level annual review panels and assess service provider performance.

#### **D. Findings and Corrective Actions**

RSA's review of the performance of DVR in this focus area did not result in the identification of findings to improve performance.

#### **E. Technical Assistance**

In the course of conducting monitoring activities, RSA provided technical assistance to DVR as described below.

#### **Definition of an Individual with a Significant Disability**

DVR's definition of an individual with a significant disability on the case management OOS Help Page does not align with the definition of "an individual with a significant disability" in the

State of Wisconsin Administrative Code for the Department of Workforce Development (DWD), Chapter 65 (Vocational Rehabilitation, Chapters 60-75), Section 65.03 (12) (July 2018), the PY 2018 State Plan, or DVR's VR Policy Manual, as there is a note on the IRIS OOS Help Page that the extended period of time referenced means "six months or more" and multiple services means "requiring two or more primary services." RSA provided technical assistance on the definition of "an individual with a significant disability," and clarified that the definition of "an individual with a significant disability" must align with the Federal regulatory definition in 34 C.F.R. § 361.5(c)(30).

## **Policies and Procedures**

RSA staff reviewed and provided technical assistance on DVR's performance-related policies and procedures described below:

- Credentials Guidance (issued in February 2019) and coding high school diplomas as "miscellaneous training" in accordance with RSA-PD-16-04;
- Measurable Skill Gains Guidance (issued in February 2019) and reporting measurable skill gains within the reportable PY timeframe;
- IPE Service Page and Amendments and processes for ensuring IPEs, including IPE extensions and amendments, are signed by clients and VR counselors to document consent and agreement;
- Supported Employment (issued in June 2019) and the development of policies related to the requirement that 50 percent of the Title VI supported employment funds be reserved for youth with most significant disabilities, and no more than 2.5 percent of administrative costs can be charged to supported employment funds in accordance with 34 C.F.R. §§ 363.22 and 363.51, respectively;
- The inclusion of necessary information to be submitted with pre-employment transition services referrals (e.g., race, ethnicity, social security number or identification number) in the VR Program Policy Manual (issued in August 2017) pursuant to RSA-PD-16-04; and
- The Education Resource Guide for Students and Families (updated in January 2018) and revisions to include pre-employment transition services.

## **SECTION 3: FOCUS AREA –PRE-EMPLOYMENT TRANSITION SERVICES FOR STUDENTS WITH DISABILITIES**

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### **A. Purpose**

The Rehabilitation Act, as amended by Title IV of WIOA, places heightened emphasis on the provision of services, including pre-employment transition services under Section 113, to students 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 the RSA review team assessed the VR agency's performance and technical assistance needs related to the provision of pre-employment transition services to students with disabilities.

### **B. Implementation of Pre-Employment Transition Services**

The VR agency must consider various requirements in providing or arranging for the provision of pre-employment transition services for students with disabilities under Section 113 of the Rehabilitation Act and 34 C.F.R. § 361.48(a). Students with disabilities may receive pre-employment transition services as either potentially eligible or eligible individuals for the VR program. A discussion of DVR's service delivery system and implementation of pre-employment transition services follows.

#### **Structure of Service Delivery**

DVR provides pre-employment transition services statewide to students with disabilities, beginning at age 14 and until a student turns 22 years of age, who are potentially eligible and eligible for VR services through approximately 187 VR counselors assigned to 11 workforce development areas serving 72 counties. Of those, 20 VR counselors are assigned as liaisons to public high schools in their local areas and are solely dedicated to providing or arranging for the provision of pre-employment transition services and other VR services, including transition services, to students with disabilities. The majority of VR counselors have combined caseloads and serve high school students, out-of-school youth, and adults with disabilities. DVR staff serve on transition advisory councils in each county with school, parent, and service provider representatives.

Students with disabilities may self-refer, or be referred to DVR by personnel in LEAs, including school guidance counselors, psychologists, teachers, and nursing staff. VR counselors conduct school and community-based orientations, attend IEP meetings and transition fairs to share information about pre-employment transition services and other VR services. DVR reported that all five of the required activities under pre-employment transition services are provided statewide through its VR counselors and fee-for-service agreements with service providers and centers for independent living (CILs), and Project SEARCH programming with LEAs. At the time of the off-site review, pre-employment transition services were not being provided through third-party cooperative arrangements or establishment projects.

## **Outreach and Planning for the Delivery of Pre-Employment Transition Services**

DVR reported that its VR counselors, including the dedicated transition counselors, are responsible for conducting outreach to their assigned schools and assisting with transition planning for those students with disabilities identified as being enrolled in public schools by the Wisconsin Department of Public Instruction (DPI). VR counselors conduct outreach to all students with disabilities, including students with IEPs and those who may receive accommodations under Section 504 of the Rehabilitation Act. VR counselors attend orientations, IEP meetings, transition fairs, and participate in career exploration activities.

The formal interagency agreement between DVR and DPI (effective August 20, 2018) states that DVR will perform outreach activities that help inform LEAs, students with disabilities, and their families about the VR program, including the purpose of the program, VR eligibility requirements, referral and application procedures, and the scope of services. DVR committed to conducting outreach for students with disabilities who may benefit from VR services as early as appropriate during the transition planning process. DVR counselors work to foster the referral of students with disabilities to the VR agency at least two years prior to graduation.

### **State Educational Agency (SEA) Agreement**

The formal interagency agreement between DVR and the DPI was executed during the review period on August 20, 2018, and is a comprehensive agreement that meets all the requirements under 34 C.F.R. § 361.22(b). Technical assistance provided on the SEA agreement is further described in Section D of this focus area.

DVR issued a Transition Action Guide (TAG) in March 2015 to coordinate and facilitate the provision of pre-employment transition services with the SEA and LEAs. The TAG identifies the process for programmatic and fiscal responsibilities for each agency.

### **Provision of Pre-Employment Transition Services**

In addition to direct service provision of all five required activities under pre-employment transition services by VR counselors, DVR also provides pre-employment transition services to students who are potentially eligible and determined eligible for VR services through fee-for-service agreements with service providers and CILs, and Project SEARCH programming with LEAs.

Pre-employment transition services provided through fee-for-service agreements include internships, on-the-job training experiences, auxiliary aids and services, orientation and mobility, job shadowing experiences, self-advocacy, and work-based learning services. In PY 2018, DVR implemented a group-based workplace readiness training (i.e., Skills to Pay the Bills) for students with disabilities that includes soft skills training in order to prepare students for successful employment. In addition, DVR counselors coordinate paid internships with State government agencies. DVR also provides work-based learning experiences and internships to students with disabilities through joint Project SEARCH programming with 34 LEAs available in all 11 DVR workforce development areas at 27 sites.

DVR implemented codes for reporting pre-employment transition services and TASK Profile IDs for reporting staff time spent on coordinating pre-employment transition services for students with disabilities from 14 through 21 years of age. Pre-employment transition services provided directly by VR counselors are documented through case notes. VR counselors use an agency issued “Pre-ETS desk top reference” guide to ensure accurate reporting of “pre-ETS” and “fiscal account” codes. DVR reported a process for tracking DVR staff time spent on the direct provision of required and pre-employment transition coordination activities. DVR’s case management system includes pre-employment transition services project codes. In addition, DVR’s QA team reviews pre-employment transition services provided through fee-for-service agreements, the codes assigned to the services provided, purchase orders, and invoices from service providers. The QA team, regional directors, and field supervisors also follow-up with students to ensure satisfaction with the services received and its service providers to evaluate and improve the effectiveness of service provision.

DVR’s most recent triennial CSNA covered FFY 2015 through FFY 2017, and its next triennial CSNA will cover FFYs 2018, 2019, and 2020. The CSNA must include an assessment of the needs of individuals with disabilities in the State of Wisconsin, including the need for pre-employment transition services and transition services. DVR may include the CSNA projections in its fiscal forecasting model to assist with determining the number of students in need of required activities, the cost to provide or arrange for required activities, the cost to engage in pre-employment transition coordination activities, and the funds available and remaining to fund authorized activities in subsequent years. At the time of the off-site review, DVR was focused on the provision of required activities to students with disabilities and had not begun to engage in authorized activities.

### **C. Findings and Corrective Actions**

RSA’s review of DVR performance in this focus area did not result in the identification of findings to improve performance.

### **D. Technical Assistance**

During the course of conducting monitoring activities, RSA provided technical assistance on DVR’s pre-employment transition services policies and procedures and made recommendations as described below:

- Pre-Employment Transition Services Policy Guide (issued in February 2018) should describe the Wisconsin LTE and Project SEARCH programs and the scope of services that are provided as pre-employment transition services in accordance with 34 C.F.R. § 361.48(a)(2);
- Potentially Eligible Guidance and Process (issued in April 2018) should describe the process for entering referrals for students who are potentially eligible for VR services;
- Pre-ETS Desk Top Reference Guide (issued in November 2017) should include the third required activity of career counseling on opportunities for enrollment in comprehensive

transition or postsecondary educational programs at IHEs pursuant to 34 C.F.R. § 361.48(a)(2)(iii); and

- Transition Guide for Post-School Planning (TAG) (issued in 2015) should be updated to align with the Federal requirements in the Rehabilitation Act, including a description of pre-employment transition services available statewide to students with disabilities beginning at the age of 14 through the age of 21. In addition, outreach activities should include not only information related to the scope of VR services, application and eligibility processes, and IPE timelines, but also the availability of pre-employment transition services to students with disabilities who are potentially eligible and eligible for VR services.

RSA also provided technical assistance on the SEA agreement. RSA recommended that the next iteration of the SEA agreement include—

- When transition services under IDEA and pre-employment transition services under the Rehabilitation Act begin (i.e., 14 years of age);
- The referral process for students with disabilities in need of pre-employment transition services; and
- The time frame for IPE development prior to exit from high school and within 90-days from the date of eligibility determination.

## **SECTION 4: FOCUS AREA – FINANCIAL MANAGEMENT OF THE STATE VOCATIONAL REHABILITATION SERVICES AND STATE SUPPORTED EMPLOYMENT SERVICES PROGRAMS**

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### **A. Purpose**

Through this focus area RSA assessed the financial management and fiscal accountability of the VR and Supported Employment programs to ensure that: funds were being used only for intended purposes; there were sound internal controls and reliable reporting systems; available resources were maximized for program needs; and funds supported the achievement of employment outcomes for individuals with disabilities, including those with the most significant disabilities, and the needs of students with disabilities for pre-employment transition services.

### **B. Scope of Financial Management Review**

During the monitoring process, RSA reviewed the following areas related to financial management and accountability.

#### **Period of Performance**

Period of performance is the time during which the non-Federal entity (grantee) may incur new obligations to carry out the work authorized under the Federal award (2 C.F.R. § 200.77). To accurately account for Federal and non-Federal funds, the VR agency must ensure that allowable non-Federal and Federal obligations and expenditures are assigned to the correct FFY award. RSA uses the financial information reported by the grantee to determine each VR agency's compliance with fiscal requirements (e.g., reservation of funds, matching, maintenance of effort (MOE), etc.).

The RSA review team assessed DVR's performance with respect to meeting the period of performance requirements related to the proper assignment of obligations and expenditures to the correct grant awards.

#### **VR Program Match**

VR program regulations require that the State must incur a portion of expenditures under the VR services portion of the Unified or Combined State Plan from non-Federal funds to meet its cost sharing requirements (34 C.F.R. § 361.60). The required Federal share for expenditures made by the State, including expenditures for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan, is 78.7 percent. The State's share is 21.3 percent. The RSA review team assessed DVR's performance in meeting the matching requirements for the VR program, including whether the matching level was met, as well as whether the sources of match were consistent with Federal requirements and any applicable MOE issues.

The RSA review team addressed requirements pertaining to the following sources of non-Federal share used by the State as the match for the VR program:

- State appropriations and interagency transfers; and
- Randolph-Sheppard set-aside.

### **Supported Employment Program Match**

Supported Employment program regulations require that the State expend 50 percent of its total Supported Employment program allotment for the provision of supported employment services, including extended services, to youth with the most significant disabilities. The Supported Employment program funds required to be reserved and expended for services to youth with the most significant disabilities are awarded through the SE-B grant award. The Federal share for expenditures from the State's SE-B grant award is 90 percent. The statutorily required 10 percent match requirement applies to the costs of carrying out the provision of supported employment services, including extended services, to youth with the most significant disabilities. This means that the 10 percent is applied to total expenditures, including both the Federal and non-Federal shares, incurred for this purpose, and that the non-Federal share must also be spent on the provision of supported employment services, including extended services, to youth with the most significant disabilities.

The RSA review team assessed the matching requirements for the Supported Employment program, including an assessment of whether the matching level was met, as well as whether the sources of the match were consistent with Federal requirements.

### **Prior Approval**

The Uniform Guidance (2 C.F.R. § 200.407) requires prior written approval (prior approval) for various grant award activities and proposed obligations and expenditures. RSA reviews and approves prior approval requests on behalf of the Department of Education. The RSA review team examined DVR's internal controls to ensure that the VR agency is meeting the prior approval requirements.

### **Vendor Contracts**

The RSA team reviewed three areas related to vendor contracts:

- Determining rates of payment;
- Supporting documentation for payments; and
- Contract monitoring.

This review area included the review of fee-for-service agreements for the provision of pre-employment transition services.

### **C. Findings and Corrective Actions**

RSA's review of DVR's performance in this focus area did not result in the identification of findings. DVR had extensive and clearly defined policies and procedures for financial management in the areas reviewed. Furthermore, through numerous conversations and

interactions, DVR demonstrated a comprehensive understanding of fiscal requirements. Effective fiscal administration appeared to be an agency priority on multiple levels.

#### **D. Technical Assistance**

In the course of the monitoring activities, RSA provided technical assistance to DVR clarifying similarities and differences between the fiscal terminology used by DVR and Federal nomenclature.

# **APPENDIX A: STATE VOCATIONAL REHABILITATION SERVICES AND STATE SUPPORTED EMPLOYMENT SERVICES PROGRAMS PERFORMANCE TABLES**

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Note: Calculations for these tables can be found in Appendix C of the MTAG.

Table 1—DVR VR Agency Profile (PY 2017)

Table 2—DVR Summary Statistics from RSA 113 (FFYs 2016-2018)

Table 3—DVR Number and Percentage of Participants Served by Primary Disability Type (PY 2017)

Table 4—DVR Number and Percentage of Individuals Exiting at Various Stages of the VR Process (PY 2017)

Table 5—DVR Number and Percentage of Individuals Exiting by Reason during the VR Process (PY 2017)

Table 6—DVR VR Services Provided to Participants (PY 2017)

Table 7—DVR Number of Measurable Skill Gains Earned, Number of Participants Who Earned Measurable Skill Gains, and Types of Measurable Skill Gain (PY 2017)

Table 8—DVR Median Hourly Earnings, Median Hours Worked per Week, Sources of Support, and Medical Insurance Coverage for Participants Who Exited with Competitive Integrated Employment or Supported Employment (PY 2017)

Table 9—DVR Standard Occupational Classification (SOC) Titles (Major Groups): Percentages of Employment Outcomes and Median Hourly Earnings for Participants Who Exited with Competitive Employment or Supported Employment (PY 2017)

Table 10—DVR Number of Participants Who Exited with Competitive Integrated Employment or Supported Employment by the Most Frequent SOC Title (PY 2017)

Table 11—DVR Number of Students with Disabilities Reported, and the Number and Percentage of Students with Disabilities Who Received Pre-Employment Transition Services (PY 2017)

Table 12—DVR Number and Percentage of Required Pre-Employment Transition Services Provided (PY 2017)

**Table 1—DVR VR Agency Profile (PY 2017)**

<b>VR Agency Profile Data</b>	<b>Number/Percentage</b>
Employment Rate	46.3%
Number of Participants Exiting in Competitive Integrated Employment or Supported Employment	4,143
Measurable Skill Gains Performance Indicator	17.5%
Percentage of Participants Eligible for Measurable Skill Gains	30.3%
Percentage of Timely Eligibility Determinations	99.1%
Percentage of Eligibility Determination Extensions	3.5%
Percentage of Timely IPE Development	67.3%
Number of Applicants	12,882
Number of Individuals Determined Eligible	12,196
Number of Individuals with an IPE and No VR Services Provided	1,715
Number of Participants (with an IPE and VR Services Provided)	8,707

**Table 2—DVR Summary Statistics from RSA-113 (FFYs 2016-2018)**

<b>Performance Category</b>	<b>FFY 16</b>	<b>FFY 17</b>	<b>FFY 18</b>
Total Applicants	15,174	13,729	14,133
Total Eligible Individuals (Before IPE)	15,364	13,368	13,904
Agency Implementing Order of Selection	Yes	Yes	Yes
Individuals on Order of Selection Waiting List at Year-End	137	110	73
Percentage of Eligible Individuals with IPE Who Received No Services	36.2%	29.8%	22.6%
Individuals with IPE Receiving Services	24,306	23,626	24,571

**Table 3—DVR Number and Percentage of Participants Served by Primary Disability Type (PY 2017)**

<b>Primary Disability Type by Group</b>	<b>Number of Participants</b>	<b>Percent</b>
Visual	557	2.5%
Auditory or Communicative	1,527	6.8%
Physical	5,539	24.6%
Cognitive	8,720	38.7%
Psychological or Psychosocial	6,205	27.5%

<b>Detailed Primary Disability Type</b>	<b>Number of Participants</b>	<b>Percent</b>
Blindness	266	1.2%
Other Visual Impairments	291	1.3%
Deafness, Primary Communication Visual	223	1.0%
Deafness, Primary Communication Auditory	110	0.5%
Hearing Loss, Primary Communication Visual	105	0.5%
Hearing Loss, Primary Communication Auditory	411	1.8%
Other Hearing Impairments (Tinnitus, Meniere's Disease, hyperacusis, etc.)	32	0.1%
Deaf-Blindness	31	0.1%
Communicative Impairments (expressive/receptive)	615	2.7%
Mobility Orthopedic/Neurological Impairments	1,333	5.9%
Manipulation/Dexterity Orthopedic/Neurological Impairments	414	1.8%
Both Mobility and Manipulation/Dexterity Orthopedic/Neurological Impairments	642	2.8%
Other Orthopedic Impairments (e.g., limited range of motion)	508	2.3%
Respiratory Impairments	119	0.5%
General Physical Debilitation (e.g., fatigue, weakness, pain, etc.)	1,585	7.0%
Other Physical Impairments (not listed above)	938	4.2%
Cognitive Impairments (e.g., impairments involving learning, thinking, processing information and concentration)	8,720	38.7%
Psychosocial Impairments (e.g., interpersonal and behavioral impairments, difficulty coping)	5,107	22.6%
Other Mental Impairments	1,098	4.9%

**Table 4—DVR Number and Percentage of Individuals Exiting at Various Stages of the VR Process (PY 2017)**

<b>Number of Individuals Who Exited the VR Program</b>	<b>12,952</b>
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<b>Exit Type</b>	<b>Number of Individuals</b>	<b>Percent</b>
Individual exited as an applicant, prior to eligibility determination or trial work experience	807	6.2%
Individual exited during or after a trial work experience	-	0.0%
Individual exited after eligibility, but from an order of selection waiting list	38	0.3%
Individual exited after eligibility, but prior to a signed IPE	3,106	24.0%
Individual exited after an IPE without an employment outcome	4,797	37.0%
Individual exited after an IPE in noncompetitive and/or nonintegrated employment	16	0.1%
Individual exited after an IPE in competitive and integrated employment or supported employment	4,143	32.0%
Individual exited as an applicant after being determined ineligible for VR services	46	0.4%
Potentially eligible individual exited after receiving pre-employment transition services and has not applied for VR services	-	0.0%

<b>Supported Employment</b>	<b>Number of Participants</b>
Number of Participants Who Exited with a Supported Employment Outcome in Competitive Integrated Employment	468
Number of Participants Who Exited with a Supported Employment Outcome in Noncompetitive and/or Nonintegrated Employment	-

**Table 5—DVR Number and Percentage of Individuals Exiting by Reason during the VR Process (PY 2017)**

<b>Reason for Exit</b>	<b>Number of Individuals</b>	<b>Percent</b>
Individual is No Longer Available for Services Due to Residence in an Institutional Setting Other Than a Prison or Jail	20	0.2%
Health/Medical	247	1.9%
Death of Individual	58	0.4%
Reserve Forces Called to Active Duty	2	0.0%
Foster Care	-	0.0%
Ineligible after determined eligible	22	0.2%
Criminal Offender	71	0.5%
No Disabling Condition	31	0.2%
No Impediment to Employment	12	0.1%
Does Not Require VR Service	14	0.1%
Disability Too Significant to Benefit from Service	6	0.0%
No Long-Term Source of Extended Services Available	5	0.0%
Transferred to Another Agency	9	0.1%
Achieved Competitive Integrated Employment Outcome	4,142	32.0%
Extended Employment	9	0.1%
Extended Services Not Available	2	0.0%
Unable to Locate or Contact	2,735	21.1%
No Longer Interested in Receiving Services or Further Services	4,366	33.7%
All Other Reasons	1,203	9.3%
<b>Number of Individuals Who Exited the VR Program</b>		<b>12,952</b>

**Table 6—DVR VR Services Provided to Participants (PY 2017)**

<b>Total Number of Participants Who Received VR Services</b>	22,548
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<b>Training Services Provided to Participants</b>	<b>Number of Participants</b>	<b>Percent</b>
Graduate Degree Training	46	0.2%
Bachelor’s Degree Training	511	2.3%
Junior or Community College Training	952	4.2%
Occupational or Vocational Training	714	3.2%
On-the-Job Training	184	0.8%
Apprenticeship Training	4	0.0%
Basic Academic Remedial or Literacy Training	24	0.1%
Job Readiness Training	4,419	19.6%
Disability Related Skills Training	283	1.3%
Miscellaneous Training	944	4.2%
Randolph-Sheppard Entrepreneurial Training	-	0.0%
Customized Training	1	0.0%

<b>Career Services Provided to Participants</b>	<b>Number of Participants</b>	<b>Percent</b>
Assessment	7,056	31.3%
Diagnosis and Treatment of Impairment	165	0.7%
Vocational Rehabilitation Counseling and Guidance	1,520	6.7%
Job Search Assistance	9,585	42.5%
Job Placement Assistance	2	0.0%
Short-Term Job Supports	3,728	16.5%
Supported Employment Services	1,764	7.8%
Information and Referral Services	413	1.8%
Benefits Counseling	3,154	14.0%
Customized Employment Services	120	0.5%
Extended Services (for youth with the most significant disabilities)	-	0.0%

<b>Other Services Provided to Participants</b>	<b>Number of Participants</b>	<b>Percent</b>
Transportation	4,285	19.0%
Maintenance	2,501	11.1%
Rehabilitation Technology	1,100	4.9%
Personal Attendant Services	15	0.1%
Technical Assistance Services	119	0.5%
Reader Services	2	0.0%
Interpreter Services	253	1.1%
Other Services	974	4.3%

**Table 7—DVR Number of Measurable Skill Gains Earned, Number of Participants Who Earned Measurable Skill Gains, and Types of Measurable Skill Gains (PY 2017)**

<b>Measurable Skill Gains Earned and Participants Earning Measurable Skill Gains</b>	<b>Number</b>
Number of Measurable Skill Gains Earned	1,216
Number of Participants Who Earned a Measurable Skill Gains	1,198

<b>Types of Measurable Skill Gains</b>	<b>Number</b>
Educational Functioning Level	9
Secondary Diploma	654
Postsecondary Transcript/Report Card	473
Training Milestone	2
Skills Progression	78

**Table 8—DVR Median Hourly Earnings, Median Hours Worked per Week, Sources of Support and Medical Insurance Coverage for Participants Who Exited with Competitive Integrated Employment or Supported Employment (PY 2017)**

**Median Hourly Earnings and Hours Worked per Week at Exit**

Number of Participants Who Exited in Competitive and Integrated Employment or Supported Employment	4,010
Median Hourly Earnings at Exit	\$ 10.00
Median Hours Worked per Week at Exit	24

<b>Primary Source of Support at Exit</b>	<b>Number of Participants</b>	<b>Percent</b>
Personal Income	3,530	88.0%
Family and Friends	105	2.6%
Public Support	373	9.3%
Other Sources	2	0.0%

<b>Public Support at Exit</b>	<b>Number of Participants</b>	<b>Percent</b>
Social Security Disability Insurance (SSDI) at Exit	1,049	26.2%
Supplemental Security Income (SSI) for the Aged, Blind, or Disabled at Exit	675	16.8%
Temporary Assistance for Needy Families (TANF) at Exit	9	0.2%
General Assistance (State or local government) at Exit	53	1.3%
Veterans' Disability Benefits at Exit	11	0.3%
Workers' Compensation at Exit	-	0.0%
Other Public Support at Exit	42	1.0%

<b>Medical Insurance Coverage at Exit</b>	<b>Number of Participants</b>	<b>Percent</b>
Medicaid at Exit	1,845	46.0%
Medicare at Exit	797	19.9%
State or Federal Affordable Care Act Exchange at Exit	148	3.7%
Public Insurance from Other Sources at Exit	99	2.5%
Private Insurance Through Employer at Exit	542	13.5%
Not Yet Eligible for Private Insurance Through Employer at Exit	58	1.4%
Private Insurance Through Other Means at Exit	819	20.4%

**Table 9—DVR Standard Occupational Classification (SOC) Titles (Major Groups): Percentages of Employment Outcomes and Median Hourly Earnings for Participants Who Exited with Competitive Integrated Employment or Supported Employment (PY 2017)**

<b>SOC Title</b>	<b>Number of Participants</b>	<b>Median Hourly Earnings</b>
Office and Administrative Support Occupations	814	9.9
Food Preparation and Serving Related Occupations	636	8.5
Building and Grounds Cleaning and Maintenance Occupations	485	9.0
Production Occupations	467	10.7
Sales and Related Occupations	310	9.5
Transportation and Material Moving Occupations	264	10.0
Personal Care and Service Occupations	217	9.0
Community and Social Services Occupations	88	14.4
Education, Training, and Library Occupations	82	12.9
Healthcare Support Occupations	81	11.5
Installation, Maintenance, and Repair Occupations	81	12.0
Healthcare Practitioners and Technical Occupations	77	19.6
Management Occupations	77	17.0
Architecture and Engineering Occupations	53	21.0
Arts, Design, Entertainment, Sports, and Media Occupations	51	11.8
Business and Financial Operations Occupations	49	18.9
Computer and Mathematical Occupations	49	16.0
Protective Service Occupations	45	12.0
Constructive and Extraction Occupations	35	18.0
Farming, Fishing, and Forestry Occupations	23	9.5
Life, Physical, and Social Science Occupations	18	15.9
Legal Occupations	7	25.2
Randolph-Sheppard vending facility clerk	1	30.0
Unpaid Family Worker	0	0.0
Homemaker	0	0.0

**Table 10—DVR Number of Participants Who Exited with Competitive Integrated Employment or Supported Employment by the Most Frequent SOC Title (PY 2017)**

<b>No.</b>	<b>SOC Title</b>	<b>Number of Participants</b>	<b>Median Hourly Earnings</b>
1	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	358	9.0
2	Stock Clerks and Order Fillers	294	9.0
3	Customer Service Representatives	226	10.0
4	Dishwashers	164	8.0
5	Food Preparation Workers	131	8.6
6	Cashiers	113	9.0
7	Retail Salespersons	109	9.0
8	Dining Room and Cafeteria Attendants and Bartender Helpers	97	8.0
9	Combined Food Preparation and Serving Workers, Including Fast Food	94	8.5
10	Personal Care Aides	71	10.0

**Table 11—DVR Number of Students with Disabilities Reported, and the Number and Percentage of Students with Disabilities Who Received Pre-Employment Transition Services (PY 2017)**

<b>Students with Disabilities</b>	<b>Number/Percentage of Students</b>
Total Students with Disabilities Reported	10,770
Students with Disabilities Reported with 504 Accommodation	247
Students with Disabilities Reported with IEP	9,922
Students with Disabilities Reported without 504 Accommodation or IEP	604
Total Students with Disabilities Who Received a Pre-Employment Transition Service	5,449
Potentially Eligible Students with Disabilities Who Received a Pre-Employment Transition Service	37
Students with Disabilities, Who Applied for VR Services, and Received a Pre-Employment Transition Service	5,412
Percentage of Students with Disabilities Reported Who Received a Pre-Employment Transition Service	50.6%

**Table 12—DVR Number and Percentage of Required Pre-Employment Transition Services Provided (PY 2017)**

<b>Pre-Employment Transition Services</b>	<b>Number of Pre-Employment Transition Services Provided</b>	<b>Percent of Total Pre-Employment Transition Services Provided</b>
Total Pre-Employment Transition Services Provided	15,248	
Job Exploration Counseling	4,215	27.6%
Work Based Learning Experiences	7,588	49.8%
Counseling on Enrollment Opportunities	426	2.8%
Workplace Readiness Training	2,042	13.4%
Instruction in Self Advocacy	977	6.4%

## APPENDIX B: FISCAL DATA TABLES

Table 1—DVR VR Resources and Expenditures—FFYs 2016–2018\*

VR Resources and Expenditures	2016	2017	2018*
Total program expenditures	\$82,659,874	\$80,348,932	\$82,659,874
Federal expenditures	\$65,053,321	\$62,801,169	\$65,053,321
State agency expenditures (4th quarter)	\$17,606,553	\$17,745,199	\$17,606,553
State agency expenditures (latest/final)	\$17,606,553	\$17,547,763	\$17,606,553
Federal formula award amount	\$59,870,610	\$59,695,636	\$60,929,519
Reserve amount required for pre-employment transition services (15 percent)	\$9,757,998	\$9,420,175	\$9,757,998
Amount expended on pre-employment transition services	10,234,783	10,605,704	11,707,432
Percentage expended on pre-employment transition services	15.73%	16.89%	18.00%
MOE penalty from prior year	\$0	\$0	\$0
Federal award amount relinquished during reallocation	\$0	\$0	\$0
Federal award amount received during reallocation	\$5,182,711	\$3,105,533	\$4,123,802
Federal funds transferred from State VR agency	\$0	\$0	\$0
Federal funds transferred to State VR agency	\$0	\$0	\$0
Federal award amount (net)	\$65,053,321	\$62,801,169	\$65,053,321
Federal award funds deobligated	\$0	\$0	\$0
Federal award funds used	\$65,053,321	\$62,801,169	\$65,053,321
Percent of formula award amount used	108.66%	105.20%	106.77%
Federal award funds matched but not used	-\$1	\$0	-\$1

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

**Table 1—DVR VR Resources and Expenditures—Descriptions, Sources and Formulas**

<b>VR Resources and Expenditures</b>	<b>Source/Formula</b>
Total program expenditures	The sum of the Federal and non-Federal expenditures. Source/Formula: Table 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 (4th quarter)	The cumulative amount of disbursements and unliquidated obligations from State funds through September 30th of the award period. Source/Formula: SF-425-line 10j from 4th 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
Reserve amount required for pre-employment transition services	The amount of Federal funds required to be reserved and expended (15percent) for the provision of pre-employment transition services. Formula/Source: (((((SF-425-line 10j lesser of the 4th quarter or latest/final) divided by .213) multiplied by .787) multiplied by .15) or (4th quarter grant award amount multiplied by .15)) whichever is less
Amount expended on pre-employment transition services	The amount of Federal funds the agency spent on the provision of pre-employment transition services. Formula/Source: SF-425-line 12b from latest/final report
Percentage expended on pre-employment transition services	The percent of Federal funds the agency spent on the provision of pre-employment transition services. Formula/Source: Amount expended on pre-employment transition services divided by (((SF-425-line 10j lesser of the 4th quarter or latest/final) divided by .213) multiplied by .787) or (4th quarter grant award amount) whichever is less)
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 V.2: MOE difference from prior year
Federal award amount relinquished during reallocation	Amount of Federal award voluntarily relinquished through the reallocation process. Formula/Source: RSA-692

Federal award received during reallocation	Amount of funds received through the reallocation 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, reallocation and transfers). Formula/Source: Federal formula award calculation, RSA-692, agency documentation, SF-425: Federal formula calculation minus MOE penalty minus funds relinquished in reallocation plus funds received in reallocation plus funds transferred from agency minus funds transferred to agency
Federal award funds deobligated	Federal award funds deobligated at the request of the agency or as part of the award closeout process. These funds may include matched or unmatched Federal funds. Source/Formula: Agency deobligation request documentation, G5 closeout reports
Federal award funds used	Amount of Federal award funds expended. Source/Formula: Federal formula calculation, RSA-692, agency documentation, SF-425 lesser of the 4th 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 V.2 Federal award funds matched (actual) minus Table V.1 Federal award funds used

**Table 2—DVR Non-Federal Share and Maintenance of Effort—FFYs 2016–2018\***

<b>Non-Federal Share (Match) and Maintenance of Effort (MOE)</b>	<b>2016</b>	<b>2017</b>	<b>2018*</b>
Match required per net award amount	\$17,606,553	\$16,997,013	\$17,606,553
Match provided (actual)	\$17,606,553	\$17,547,763	\$17,606,553
Match difference**	\$0	-\$550,750	\$0
Federal funds matched (actual)	\$65,053,320	\$62,801,169	\$65,053,320
Percent Federal funds matched	100.00%	100.00%	100.00%
MOE required	\$17,169,967	\$17,547,763	\$17,606,553
MOE: Establishment/construction expenditures	\$0	\$0	\$0
MOE actual	\$17,606,553	\$17,547,763	\$17,606,553
MOE difference**	-\$436,586	\$0	\$0

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

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

**Table 2—DVR Non-Federal Share and Maintenance of Effort—Descriptions, Sources and Formulas**

<b>Non-Federal Share (Match) and Maintenance of Effort (MOE)</b>	<b>Source/Formula</b>
Match required per net award amount	Non-Federal funds required based upon the net amount of the Federal award. Source/Formula: (Table V.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 4th 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 4th 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: SF-425 4th quarter or latest/final report: line 10j minus line 12a
MOE: Establishment / construction expenditures	Non-Federal share of expenditures for construction of facilities for community rehabilitation program (CRP) purposes and the establishment of facilities for community rehabilitation purposes. Source/Formula: SF-425 latest/final report: line 12a
MOE actual	Non-Federal share provided by agency minus establishment/construction expenditures for CRPs. Source/Formula: SF-425: Match provided actual minus establishment/construction expenditures.
MOE difference**	The difference between MOE required and the actual MOE provided. Source/Formula: MOE required minus MOE actual

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

**Table 3—DVR Program Income and 4th Quarter Data—FFYs 2016–2018\***

<b>Program Income and Carryover</b>	<b>2016</b>	<b>2017</b>	<b>2018*</b>
Program income received	\$6,847,224	\$4,441,778	\$7,010,361
Program income disbursed	\$6,847,224	\$4,441,778	\$7,010,361
Program income transferred	\$600,000	\$600,000	\$600,000
Program income used for VR program	\$6,247,224	\$3,841,778	\$6,410,361
Federal grant amount matched (4th quarter)	\$65,053,320	\$62,801,169	\$65,053,320
Federal expenditures (4th quarter)	\$35,445,552	\$38,440,151	\$41,719,574
Federal unliquidated obligations (4th quarter)	\$12,215,476	\$17,752,569	\$18,133,072

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

**Table 3—DVR Program Income and 4th Quarter Data—Descriptions, Sources and Formulas**

<b>Program Income and Carryover</b>	<b>Source/Formula</b>
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 (4th quarter)	Federal funds an agency is able to draw down based upon on reported non-Federal reported on the 4th quarter SF-425 for the FFY of appropriation, not to exceed net award amount. Source/Formula: Table V.2 Federal funds matched actual
Federal expenditures (4th quarter)	Federal funds expended as reported on the 4th quarter SF-425 for the FFY of appropriation. This does not include unliquidated obligations. Source/Formula: SF-425 4th quarter: line 10e
Federal unliquidated obligations (4th quarter)	Federal funds obligated but not liquidated as reported on the 4th quarter SF-425 for the FFY of appropriation. Source/Formula: SF-425 4th quarter: line 10f

