

**FEDERAL FISCAL YEAR 2021
REPORT ON THE REVIEW OF
IOWA DEPARTMENT FOR THE BLIND
VOCATIONAL REHABILITATION
AND
SUPPORTED EMPLOYMENT PROGRAMS**



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

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SECTION 1: THE 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.

RSA works closely with its Federal partners at the U.S. Department of Labor's Employment and Training Administration (ETA) and the U.S. Department of Education's Office of Career, Technical, and Adult Education (OCTAE) to share monitoring and technical assistance activities, especially as they relate to the joint provisions under WIOA. Although the VR program is one of the six core programs in the workforce development system, it is unique in that State VR agencies provide services directly to individuals with disabilities, thus the nature and scope of RSA's monitoring process and report may appear different from the monitoring ETA and OCTAE conduct with their grantees.

In Federal fiscal year (FFY) 2021, RSA conducted an off-site review of the State Vocational Rehabilitation Services program (VR program) and the State Supported Employment Services program (Supported Employment program) administered by the Iowa Department for the Blind (IDB) in lieu of on-site monitoring due to the continuing COVID-19 pandemic. The nature, scope, and focus of this review and the process by which RSA carried out its activities from July 12 through 23, 2021, was defined by information, documents, and data submitted by IDB, taking into account the goals, unique circumstances, and technical assistance needs of IDB.

RSA—

- Assessed the performance of the VR and the Supported Employment programs with respect to the achievement of competitive integrated employment outcomes and the quality of those outcomes, for individuals with disabilities, including those with significant and most significant disabilities;
- Reviewed the financial management of the VR and Supported Employment programs;
- Identified strategies and corrective actions to improve program and fiscal performance;
- Provided technical assistance during the review and/or recommended additional technical assistance to be provided following the review. and
- Identified VR agency practices or strategies, which resulted in or are expected to improve performance.

B. Review Team Participants

Members of the RSA review team included Nicole Jeffords and April Trice (Vocational Rehabilitation Program Unit); James Billy, Terry Martin, and Shannon Moler (Technical Assistance Unit); David Miller (Fiscal Unit); and Yann-Yann Shieh (Data Collection and Analysis Unit). Although not all team members participated in all aspects of 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 IDB for the cooperation and assistance extended throughout the review process. RSA also appreciates the participation of others, such as the Iowa Commission for the Blind and the Client Assistance Program during the review process.

SECTION 2: FOCUS AREA – PERFORMANCE OF THE STATE VOCATIONAL REHABILITATION SERVICES AND STATE SUPPORTED EMPLOYMENT SERVICES PROGRAMS

A. Purpose

Through this focus area, RSA assessed programmatic performance leading to the achievement of competitive integrated employment outcomes, including the quality of those outcomes, by individuals with disabilities served in the VR program. RSA analyzed VR program data, policies and internal controls, implementation of the VR process, and service delivery. The analysis below, along with any accompanying findings and corrective actions, is based, in part, on a review of the performance 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

RSA's analysis of the VR agency's performance of the VR and Supported Employment programs incorporates a review of data reported by IDB on the Case Service Report (RSA-911) and the WIOA Statewide Performance Report (ETA-9169) for program years (PYs) 2017, 2018, and 2019, as well as the discussion and review of internal controls and policies. A summary and analysis of performance data related to the VR process, VR services, quality of employment outcomes, and pre-employment transition services is presented below in addition to a discussion of potential factors influencing program performance, including how IDB uses data to inform program performance and management of the VR and Supported Employment programs.

Performance Data Summary and Analysis

In 1925, the Iowa State Legislature established the Iowa Commission for the Blind, known today as the Iowa Department for the Blind (IDB). At the same time, a governing board was established to provide oversight to the agency. Three governor-appointed commissioners make up IDB's governing board. The Commission meets quarterly, and its primary responsibility is to review and approve IDB's policies.

IDB employs 10 vocational rehabilitation (VR) counselors throughout the State of Iowa, as well as one business engagement specialist. In addition, IDB employs one lead worker, whose primary responsibilities include training and quality assurance. IDB reported serving approximately 525 individuals annually. IDB's administrative offices, the Iowa Orientation Center for the Blind, and the Iowa Library for the Blind and Print Disabled are housed at the Iowa Commission for the Blind building in Des Moines. Iowa has nine geographic workforce regions across the State and VR counselors are assigned to each region. All VR counselors serve students and youth with disabilities as well as adults who reside within their assigned regions. VR counselors often use workforce center space to meet with individuals, conduct workshops, and share resources with workforce partners in addition to addressing accessibility issues.

IDB is exploring a potential replacement of its case management system or a major modernization of the current system. The current home-grown system is almost 20 years old and has needed many

adjustments to meet new reporting requirements, reportedly requiring significant ongoing staff time to compile data and ensure it is reported accurately. IDB expressed concern about the accessibility of a new system and has not yet determined if it will invest in a new system or continue to upgrade its current system.

During the review period, IDB reported 178 applicants in PY 2017, 195 applicants in PY 2018, and 132 applicants in PY 2019. Applicants who were found eligible for services were reported as 159 individuals in PY 2017, 184 individuals in PY 2018, and 148 individuals in PY 2019. Timely eligibility determinations decreased from 82.4 percent in PY 2017, to 82.1 percent in PY 2018, and to 79.1 percent in PY 2019. IDB attributed untimely eligibility determinations to staff performance issues, which were reportedly addressed as soon as allowable under the Iowa State government personnel rules.

IDB reported that a “return to basics” series of trainings have been developed to improve timely case management activities, including eligibility determination, and monthly reports are now generated to flag cases where movement needs to occur. In addition, VR counselors have a 95 percent objective related to timely eligibility determinations on their performance reviews, and they are now conducting their own intakes, which were previously being done by clerical staff. The agency hopes to see progress in this area since the implementation of these strategies. It should be noted that IDB’s timely individualized plan for employment (IPE) development was 99.2 percent in PY 2017 and 100 percent in both PY 2018 and PY 2019.

IDB reported the number of individuals determined ineligible increased from 26 in PY 2017 to 47 in PY 2018 and PY 2019. This increase was attributed to staff performance issues, which the VR agency addressed. In addition, IDB has been working to correct a general misunderstanding by referral sources and applicants of the VR program resulting in the inappropriate referral of individuals who wear glasses, but do not have significant vision loss. IDB often refers these individuals elsewhere.

IDB reported no trial work experiences during the review period and noted that Iowa is an employment first state. However, IDB reported two individuals in PY 2017 and one individual in PY 2019 as exiting because their disability was too significant to benefit from services. IDB shared its belief that all participants are presumed to benefit in terms of having the ability to achieve a successful employment outcome, and further stated that it considers trial work to be an unfair measure of an individual’s ability to benefit as an individual may not yet be equipped with the alternative skills of blindness necessary to successfully participate in trial work experiences. IDB did not report supported employment data during the review period, nor had supported employment funds been expended. The review team found that both IDB’s trial work and supported employment policies are outdated and require substantial revisions. The review team offered to provide technical assistance in these areas and sent the RSA Frequently Asked Questions About Supported Employment (May 10, 2017) to the agency for review and discussion. IDB was also provided information about the VR Technical Assistance Center on Quality Employment (VRTAC-QE), which is available to provide the agency further assistance.

Regarding the WIOA performance indicators, IDB reported that the number of VR program participants who could earn an MSG as they work towards a recognized postsecondary credential or employment rose each year (16 in PY 2017; 17 in PY 2018; and 78 in PY 2019). The percentages of individuals who were eligible to earn an MSG was 3.4 percent (16 of 470 participants) in PY 2017, 3.1 percent (17 of 553 participants) in PY 2018, and 13.7 percent (78 of 571 participants) in PY 2019. The agency’s MSG rate was 93.8 percent in PY 2017, 58.8 percent in PY 2018, and 76.9 percent in PY 2019; however, the

statewide MSG rate was 22 percent in PY 2017, 35.2 percent in PY 2018, and 34.6 percent in PY 2019. The majority of MSG came from postsecondary transcripts/report cards, which indicates that IDB can increase MSG by the inclusion of secondary students and by enrolling individuals in education or training programs that lead to a recognized postsecondary credential or employment. IDB reported that it has recently provided additional training on MSG and credential attainment that is proving helpful to VR counselors and will increase future reporting of both measures.

For the exiting cohort reported for the second quarter after exit in PY 2019, the agency reported that no individuals sustained employment out of the 84 individuals who exited with employment. Similarly, the agency reported zero out of 58 individuals sustained employment in fourth quarter after exit. RSA stressed that VR agencies must ensure follow-up with participants as necessary to report on the WIOA employment indicators of performance under Section 116(b) of WIOA. These data must be consistently reported, and the agency must have processes to verify post exit employment. IDB reported that it hired a data analyst to capture this necessary information.

The RSA review team recommended that the agency work with the VR Technical Assistance Center on Quality Management (VRTAC-QM). Technical assistance was provided to the agency on the need to report accurate data in the area of the WIOA performance indicators since the report of inaccurate data by a VR agency effectively influences the representation of national performance of the VR program as well as the State's performance on the WIOA performance accountability measures. See Section C of this focus area for more information.

The VR Process

RSA reviewed trend data, including the most recent program year, to understand the engagement and movement of individuals with disabilities through the VR process. The analysis assisted RSA and IDB in identifying potential obstacles to efficient service delivery, as well as agency initiatives, practices, or policies that have contributed to continuous improvement or declines in performance.

The number of individuals who exited the VR program increased from 129 in PY 2017, to 150 in PY 2018, and to 168 in PY 2019. According to data reported by IDB, during the program years under review, of the 129 individuals who exited the VR program in PY 2017, 57 individuals (44.2 percent) exited from various stages of the VR process prior to the development of an IPE (34 individuals exited as applicants and 23 individuals exited after eligibility but before signing an IPE). In PY 2018, 17 of 150 individuals (11.3 percent) exited prior to the development of an IPE. In PY 2019, 20 of 168 individuals (11.9 percent) exited prior to the development of an IPE.

Of those individuals who exited the VR program in the period under review, the following data indicate that a significant number of individuals with disabilities exited the VR program after an IPE without an employment outcome. In PYs 2017, 2018, and 2019, 30 individuals (23.3 percent), 50 individuals (33.3 percent), and 74 individuals (44 percent), respectively, exited after an IPE without an employment outcome. Conversely, of those individuals who exited the VR program, 28 individuals (21.7 percent) in PY 2017, 36 individuals (24.0 percent) in PY 2018, and 28 individuals (16.7 percent) in PY 2019 exited after an IPE with an employment outcome. Additionally, in PY 2019, out of the 168 individuals who exited the VR program, 69 individuals exited as no longer interested in services and 40 individuals exited as unable to locate, which may be indicative of a lack of engagement.

To improve engagement, IDB communicated that it has implemented practices to decrease attrition of individuals from the VR process, including increased communication with consumers and the creation of monthly reports of unserved individuals that are reviewed by the supervisor, who informs VR counselors so that contact can be made. IDB has developed virtual workshops surrounding the VR process including job search, benefits counseling, preparing for employment, how to disclose a disability, and how to ask for accommodations. IDB developed these virtual workshops to keep consumers engaged during the COVID-19 pandemic and has found them to be effective.

IDB shared that some applicants may see the agency as a means to acquire equipment and technology and may initially state their intention to obtain competitive integrated employment outcomes, but do not intend to go to work. The review team suggested that IDB explore the language used in equipment contracts in order to emphasize that the provision of goods and services is for the express purpose of preparing for work.

VR Services

RSA reviewed and analyzed data and policies in consultation with IDB related to career, training, and other services provided to VR and Supported Employment program participants to explore the degree to which individuals were afforded informed choice, engaged in timely service provision, and provided quality services needed to maximize the achievement of their employment goals.

IDB data indicate that 470 individuals received services in PY 2017, 553 received services in PY 2018, and 571 individuals received services in PY 2019. According to IDB data, the service that was most frequently provided, aside from VR counseling and guidance, was rehabilitation technology. In PYs 2017, 2018, and 2019, 208 individuals (44.3 percent), 191 individuals (34.5 percent), and 222 individuals (38.8 percent) respectively, received rehabilitation technology services. IDB data suggest that disability related skills training was also one of the most frequently provided services as 99 individuals (21.1 percent) in PY 2017, 170 individuals (30.7 percent) in PY 2018, and 214 individuals (34.7 percent) in PY 2019 received disability related skills training. IDB's philosophy of blindness, in conjunction with its own residential rehabilitation center, plays a significant role in the provision of disability related skills training. IDB places a great deal of emphasis on the need for alternative skills of blindness, such as the ability to use assistive technology effectively, travel independently using a white cane, and perform tasks of daily living to prepare for and engage in future work.

In PY 2017, IDB reported 15 individuals in junior or community college training, 49 individuals in bachelor's degree training, and 13 individuals in graduate degree training. In PY 2018, 13 individuals participated in junior or community college training, 40 in bachelor's degree training, and 13 in graduate degree training. In PY 2019, 17 individuals participated in junior or community college training, 43 individuals participated in bachelor's degree training, and 10 individuals participated in graduate degree programs. In addition, IDB data indicate 12 individuals in PY 2017, 12 individuals in PY 2018, and eight individuals in PY 2019 participated in occupational or vocational training. The review team observed that while IDB values postsecondary education, additional attention may need to be placed on vocational and occupational training programs that are likely to yield quality employment outcomes. Additionally, IDB data indicates job readiness training was provided to 78 participants (16.6 percent) in PY2017, 46 participants (8.3 percent) in PY 2018, and 85 participants (14.9 percent) in PY2019. Placing a greater emphasis on job readiness training may result in a higher possibility for competitive integrated employment.

Quality of Employment Outcomes

The RSA review team examined data reported by IDB, policies, and practices to determine how the VR agency is maximizing employment opportunities and quality employment leading to self-sufficiency for participants with disabilities, including those with the most significant disabilities. To guide the analysis and discussion of quality employment outcomes, the RSA team reviewed a variety of data elements, including data from the other measures that matter developed jointly by RSA and VR agency representatives, along with VR agency efforts, including the following:

- Employment status at exit;
- Employment rate;
- Median wages earned;
- Median weekly hours worked;
- Health insurance at exit;
- Social security benefits at exit;
- Participants who exited with competitive integrated employment, including supported employment;
- Employment status of participants in the second and fourth quarters after exit;
- Percentage of participants who retained employment;
- Types of occupations that VR participants obtain;
- Efforts to promote career advancement;
- The attainment of measurable skill gains (MSG) and credentials;
- Efforts to assist participants in achieving parity with the general working population; and
- Strategies to promote job retention.

Although the employment rate is no longer a required indicator under the Rehabilitation Act, it is useful to a VR agency for monitoring its performance. During the review period, IDB's employment rate was reported at 48 percent in PY 2017 (28 individuals exited in competitive integrated employment), 42 percent in PY 2018 (36 individuals exited in competitive integrated employment), and 27.5 percent in PY 2019 (28 individuals exited in competitive integrated employment). Again, IDB attributes reduced outcomes to poor staff performance, and in PY 2019, the COVID 19 Pandemic played a significant role in the low number of individuals who exited in competitive integrated employment.

In PYs 2017, 2018, and 2019, the median hourly earnings for participants who achieved competitive integrated employment were \$10.00, \$12.00, and \$14.00 respectively, which exceeded the State and Federal minimum wage of \$7.25 per hour. Median hours worked were reported as 30 hours in PY 2017, 30 hours in PY 2018, and 33 hours in PY 2019.

According to IDB data, seven individuals exited receiving Social Security Disability Insurance (SSDI) benefits and three individuals receiving Supplemental Security Income (SSI) in PY 2017. In PY 2018, 14 individuals exited receiving SSDI benefits and four individuals receiving SSI. In PY 2019, eight individuals exited receiving SSDI and four individuals receiving SSI. A significant number of participants who exited in competitive integrated employment began or continued to receive Social Security benefits. IDB attributes these numbers to Social Security work incentives and other rules that allow individuals who are blind to earn more income, while retaining benefits.

In looking at medical insurance coverage at exit in competitive integrated employment, IDB reported that in PY 2017, six individuals received Medicaid, 10 individuals received Medicare, and seven individuals received insurance through their employer. In PY 2018, 11 individuals received Medicaid, 13 received Medicare, and 13 received medical insurance coverage through their employer. In PY 2019, nine individuals received Medicaid at exit, nine individuals received Medicare, and 11 individuals reported medical insurance provided through their employer. In PYs 2017, 2018, and 2019, six individuals, eight individuals, and seven individuals, respectively, reported private health insurance at exit. Much like Social Security, both Medicaid and Medicare have adopted work incentives that allow individuals to retain their medical coverage while employed, which may be the reason individuals are retaining public health insurance even after exit in competitive integrated employment.

RSA reviewed the most common Standard Occupational Classification (SOC) titles during the review period. Two customer service representatives were reported at \$8.00 per hour in PY 2017; two massage therapists were reported at \$11.50 per hour and two janitors at \$8.00 per hour in PY 2018; and two stock clerks at \$8.00 per hour were reported in PY 2019. The review team assessed no more than two individuals placed in any one type of employment during a program year, which may suggest that VR counselors and participants are identifying employment opportunities that are consistent with an individual's identified employment goal, rather than placing individuals in employment that has been cultivated by the agency.

During the period under review, the highest median hourly earnings reported according to SOC title were parts salespersons at \$33 per hour (PY 2017); general and operations managers at \$32 per hour (PY 2018); and clinical, counseling, and school psychologists at \$46 per hour (PY 2019). These data suggest that postsecondary training and education are contributing factors to higher paying jobs and career advancement opportunities leading to improved performance in the quality of employment outcomes. As mentioned previously, IDB values postsecondary education, which is likely to yield quality employment outcomes.

The director of IDB's residential rehabilitation center (Center) spoke with RSA during the review and discussed various vocational components included in the curriculum, such as informational interviews, resume development, and interview skills. Monthly reports are provided to VR counselors by the Center to track consumer progress towards the achievement of independent living and employment goals. These reports, in tandem with consumer staffings, are essential to refining the rehabilitation program when necessary, ensuring the consumer remains accountable, and that the entire rehabilitation team is in agreement about where the consumer must focus to make progress in their rehabilitation program.

IDB shared that it is working toward using customized employment and seeking out credential attainment programs that may be well-suited to individuals who are blind in order to increase opportunities.

Pre-Employment Transition Services

Early career exploration through pre-employment transition services increases the likelihood of achieving high-quality competitive integrated employment. RSA reviewed data reported by IDB related to the provision of pre-employment transition services to students with disabilities, including potentially eligible students and those determined eligible for the VR program. The review team analyzed data on the number of students with disabilities, the number of those receiving pre-employment transition

services, and the types of services provided. In addition, RSA reviewed data in the Other Measures that Matter related to the breakout of students with disabilities who received pre-employment transition services as potentially eligible students with disabilities and students with disabilities who received these services under an IPE, as well as the number of students with disabilities who advance from potentially eligible status to VR program participant status and their outcomes. These data are useful in evaluating the relationship between the provision of pre-employment transition services, participation in the VR process, and employment outcomes.

IDB data indicate that 108 students were reported eligible to receive a pre-employment transition service in PY 2017, 146 students were eligible to receive a pre-employment transition service in PY 2018, and 180 students were reported eligible to receive a pre-employment transition service in PY 2019. The number of students receiving pre-employment transition services increased each year of the review period as follows: three in PY 2017; 40 in PY 2018; and 60 in PY 2019. The two pre-employment transition services provided most frequently during the review period were workplace readiness training and work-based learning experiences (see Appendix A, Table 10). The agency did not report providing instruction in self-advocacy in PY 2017; however, it did report providing this service increasingly in PY 2018 and PY 2019. Similarly, the agency did not report providing counseling on enrollment opportunities in PY 2017, although it did report providing this service in PYs 2018 and 2019. Notably, IDB did not report serving any potentially eligible students with disabilities during the period of review.

Students are reportedly referred to IDB for services through the Iowa Educational Services for the Blind and Visually Impaired (IESBVI), and the agency provides both in-house and contracted pre-employment transition services to students with disabilities in need of such services. IDB reported that students are served in-house under an IPE by VR counselors and the rehabilitation instructors located within their region. There are also opportunities for students to participate in summer and weekend programs located in Des Moines, where the largest concentration of students reside. Contracted services are provided through four contract providers: Easter Seals, Mosaic Haven, Sky's the Limit, and Norman and Associates. Reportedly, the contracts were put in place during late PY 2018 and early PY 2019 to serve students with disabilities statewide; however, the Easter Seals contract only serves those who reside in the six-county Des Moines area. The review team noted that contract invoices do not contain sufficient information to accurately track pre-employment transition services to individual students or sufficiently describe the pre-employment transition services required activities provided. See Section C of this focus area for more information.

Prior to the execution of the contracts, all pre-employment transition services were provided in-house or through IVRS' Transition Alliance Program (TAP), which IDB considered erroneously as a comparable benefit. IDB has a Memorandum of Agreement (MOA) with IVRS to provide pre-employment transition services to students eligible for IDB services through the TAP program. IDB explained that it is often the case that only one student is served within a local school district, whereas IVRS may be serving many students, and that the blind student can benefit from participating in TAP with their peers. Currently, IDB does not have a mechanism in place to provide payment to IVRS for a student's participation in an IVRS pre-employment transition service through the TAP program. Furthermore, the MOA indicates that students who are eligible for IDB services may participate in IVRS' TAP program as potentially eligible students for IVRS if deemed appropriate by an IDB VR counselor. The review team informed IDB that the MOA must be re-written to clarify that only those students with disabilities who have not yet applied or been determined eligible for IDB's VR program are considered to be

potentially eligible for pre-employment transition services. See Section C of this focus area for more information.

The State Educational Agency (SEA) agreement was not implemented for the 2017 through 2019 program years since it was not signed until June 21, 2021. The signed SEA agreement includes information found under Section 101(a)(11)(D) of the Rehabilitation Act and 34 C.F.R. § 361.22(b); however, the SEA agreement contained outdated information. See Section C of this focus area for technical assistance provided to the agency, including the need to update the agreement in accordance with the Section 511 guidance issued on April 8, 2021, [RSA-FAQ-21-05.pdf \(ed.gov\)](#).

In regard to IDB's policy and procedures related to pre-employment transition services, RSA noted that the pre-employment transition policy had been developed and implemented; however, the Vocational Rehabilitation Policy Manual, which was last updated in July 2017, does not contain the pre-employment transition services policy. This policy is made available to staff on the agency's intranet site, but the effective date is not documented on the policy. RSA recommended that the agency update the policy to reflect the flexibilities outlined in the notice of interpretation (NOI) issued in the Federal Register (85 FR 11848 (February 28, 2020)). See Section C of this focus area for more information on the provision of auxiliary aids and services for students with disabilities receiving pre-employment transition services.

The RSA review team also noted that IDB's determination of the reservation of funds for pre-employment transition services has not been updated since 2017. The agency reported that it does not purchase authorized activities; however, the review team noted that the agency reported expenditures for authorized activities totaling \$341.83 in FFY 2019. IDB attributed this to staff incorrectly categorizing time spent providing pre-employment transition services coordination activities. The agency reported that training has since been provided to help staff correctly categorize the provision of pre-employment transition services on timesheets, which are then reviewed by supervisors. IDB did not have sufficient internal controls necessary to track the provision of pre-employment transition services in effect during the period of review. Technical assistance was provided to the agency on the need for internal controls, time charging and assigning cost for the provision of pre-employment transition services, as well as the pre-employment transition services reserved funds determination. See Section C of this focus area for more information.

Factors Influencing Performance

IDB embraces a positive philosophy of blindness and places a great deal of emphasis on providing participants the ability to build competence and confidence through participation in comprehensive blindness skills rehabilitation training. It is evident when speaking with IDB staff that they believe in the capabilities of the individuals they serve.

In regard to factors that may negatively affect IDB's performance, it was noted that internal processes may need to be improved to ensure that individuals who apply for the VR program do not face unnecessary delays in receiving services under an IPE. More individuals determined eligible for VR services exited the VR program without an employment outcome after an IPE was signed than exited with an employment outcome. Based on these observations, it is recommended that IDB develop goals with measurable targets to decrease the number of individuals exiting the VR program along with

strategies to keep participants engaged in the VR process with the goal of achieving quality employment outcomes.

IDB would benefit from clarifying the differences between policies, which must be approved by the Commission board, and procedures to implement those policies. To reduce any confusion or misapplication, IDB should incorporate information housed on its intranet into its policies and procedures manual so there is no confusion as to where information may be located. The agency should also make the policies and procedures manual available to the public electronically through its website to promote transparency. IDB can benefit from the creation of a comprehensive technology policy that includes timeframes, an up-to-date listing of equipment eligible for loan, and an equipment agreement that specifies IDB's expectations for use of the equipment as a condition of its purchase, that is signed by participants receiving rehabilitation technology. The agency's policies and procedures are an essential component of a successful agency and IDB should work with the VRTAC-QM to develop a robust policies and procedures manual.

IDB can improve its performance through increased emphasis on serving students and youth with disabilities by developing a comprehensive marketing plan to include outreach methods and creative ways to serve the most students with limited resources. In addition, local service providers should be identified to provide pre-employment transition services to students who cannot travel to programs being held in different parts of the State. These efforts will increase MSG and better equip students and youth with disabilities for future work.

Use of Data to Inform Performance and Management

IDB provided a demonstration of its case management system and how data is entered into the system for students with disabilities and participants. IDB maintains both paper and electronic case records, and information is entered into the system by clerical staff and VR counselors.

IDB has had difficulty tracking employment data after exit, which is required and vital to evaluating program standards and performance indicators established under Section 106 of the Rehabilitation Act. During the period of review, the agency reported that its newly hired data analyst misunderstood the process and did not enter data correctly into a spreadsheet, which has since been corrected through training. Reportedly, the agency hopes that this effort will enable it to capture the necessary performance data correctly in future reports.

The RSA review team inquired about the limited numbers of secondary and tertiary disabilities reported during the review period. IDB stated that while VR counselors use a health history tool, they are often not made aware of additional disabilities as participants do not report them. It is not uncommon for these disabilities to become apparent as participants move through the VR process. It may be the case that VR counselors are not going back to identify these disabilities in the case management system, but rather, they are reported in case notes. Technical assistance was provided to the agency on this issue, and IDB was informed that disabilities identified after eligibility determination should be reported.

Internal Controls and Policies

The RSA review team assessed performance accountability in relation to the internal control requirements in 2 C.F.R. § 200.303. "Internal controls" means 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.

The review team identified that IDB has fundamental deficits in its internal controls and in its policies and procedures. Specifically, IDB must await Commission approval of policies prior to implementing them, which may result in some delay in applying them. Although IDB provided RSA copies of some of its policies that were in a state of draft at the outset and through the completion of this review, staff were operating primarily from policies and procedures that are out of date, many pre-dating WIOA. In addition, the review team became aware that many policies were housed on IDB's intranet and not provided to RSA prior to the review. The RSA review team was provided an updated eligibility policy draft and a pre-employment transition services policy draft for review. Updates should be made to IDB's supported employment policy so that it may be implemented in order to increase competitive integrated employment outcomes, and the review team has repeatedly offered to provide technical assistance surrounding supported employment. Additionally, although IDB believes that all applicants who are blind can benefit from VR services, trial work experiences with the necessary supports should be incorporated in its policy when determining eligibility.

The agency's Quality Assurance and Monitoring Continuous Improvement Procedures document had not been implemented as of the dates of the review, and the draft document was not sufficient to ensure data integrity, to include accurate service record documentation and the tracking and reporting of all measurable skill gains and credentials attained. Technical assistance was provided on data performance issues, such as RSA-911 reporting and the WIOA performance indicators. See Section C of this focus area for more information. IDB will benefit from working with the VRTAC-QM in order to further update its internal controls and policies.

C. Technical Assistance and Recommendations

RSA provided technical assistance in the following topical areas to IDB in response to areas identified during the review process and in response to specific technical assistance needs identified by the VR agency. Technical assistance and recommendations provided by RSA are intended to assist IDB to achieve continuous improvement in performance. RSA is available to provide follow-up technical assistance and has referred the VR agency to the VRTAC-QM, the VRTAC-QE, and the National Technical Assistance Center on Transition: The Collaborative (NTACT: C).

Policy Manual

RSA reviewed the IDB draft eligibility policy and provided comments to the agency. RSA included a global comment within the document stating that the entire policy manual should be updated since it contains outdated information throughout. The review of the draft eligibility policy stands as an example of some of the outdated information. RSA recommends that IDB work with the VRTAC-QM to ensure that the entire policy manual is updated to include the changes brought about by WIOA.

RSA Performance Technical Assistance

RSA provided technical assistance documents to IDB to include the following: RSA-TAC-19-01; RSA-PD-19-03; and the RSA-PD-19-03 training slides and transcript. These documents will be helpful to IDB when developing policy, procedures, internal controls, and future trainings for IDB staff. Note the following for each of the documents:

- RSA-TAC-19-01: Outlines the source documentation needed to verify that performance data are valid and reliable;
- RSA-PD-19-03: Outlines the requirements that each State VR agency must follow to collect and report on the RSA-911. Each State VR agency’s internal controls should ensure that its—
 - Data collection system is capable of capturing and reporting all the required Data Elements contained in RSA-PD-19-03;
 - Staff have completed training necessary to ensure the collection and reporting of the required Data Elements; and
 - Internal control processes to ensure the accuracy and validity of the data are implemented; and
- RSA-Workforce Innovation Technical Assistance Center (WINTAC) Case Service Report (RSA-911) RSA-PD-19-03 training: This training goes into more detail about the requirements outlined in RSA-PD-19-03, including the requirement that VR agencies must have policies and procedures in place that—1) document how to determine training and education programs that meet the definition of WIOA Credential and MSG; 2) require source documentation; and 3) explain how these are documented in the case management system. Slide 42 of the presentation further states the following regarding internal controls:
 - VR agencies must have policies and procedures in place that document how to determine training and education programs that meet the definition of WIOA Credential and MSG, require source documentation, and how these are documented in the case management system;
 - Internal controls should ensure accurate tracking and reporting of all measurable skill gains and credentials attained;
 - Internal controls should ensure valid, supporting documentation for Credentials and MSG; and
 - Internal controls should prevent agencies from reporting Credentials and MSG for individuals who are not enrolled in recognized education or training program.

Collaboration with Iowa Vocational Rehabilitation Services (IVRS)

The memorandum of agreement (MOA) between IDB and IVRS indicates that IVRS may provide pre-employment transition services to students eligible for IDB services through its Transition Alliance Program (TAP). The MOA indicates these eligible students may participate in the TAP program as potentially eligible students if deemed appropriate by an IDB VR counselor; however, reportedly, this practice has not been implemented by either agency.

Section 113 of the Rehabilitation Act requires VR agencies to provide pre-employment transition services to students with disabilities who are eligible or potentially eligible for vocational rehabilitation services. In 34 C.F.R. § 361.48(a), “potentially eligible” means all students with disabilities who satisfy the definition in 34 C.F.R. § 361.5(c)(51), regardless of whether they have applied, and been determined

eligible, for the VR program. If a student was determined eligible or ineligible for VR services, the student would no longer be considered potentially eligible.

Iowa Code § 7E.5 outlines the principal departments and primary responsibilities of the executive branch and states that IDB has primary responsibility for services relating to blind persons. Iowa Code § 56.6(7) indicates that individuals who meet the IDB's definition of "blind" are to be served primarily by the IDB. Individuals with multiple disabilities who also are blind may receive technical assistance and consultation services from IVRS while IDB provides their rehabilitation plan. Joint cases are served in the Iowa self-employment program and other contracts developed by IVRS.

Section 101(a)(11) of the Rehabilitation Act requires the VR agency to coordinate with other state agencies and other components of the workforce development system in the provision of VR services. The implementing VR regulations at 34 C.F.R. § 361.24(e) make clear that, when a State has established a second VR agency to serve individuals who are blind or visually-impaired, both VR agencies in the State must coordinate and cooperate to provide more effective services to individuals with multiple disabilities.

RSA recommends that IVRS and IDB correct the MOA so that eligible students with disabilities served by one VR agency are not served as potentially eligible by another VR agency. The MOA should be updated to reflect that IDB will coordinate and cooperate with IVRS to provide more effective pre-employment transition services to students with multiple disabilities by coordinating services to potentially eligible students, and with joint cases served by both agencies, developing an IPE for those students determined eligible for the VR program. The agencies should also update policies, procedures, and internal controls, and ensure training is provided to staff on the provision of pre-employment transition services to students with disabilities who are served jointly by IDB and IVRS.

SEA agreement

RSA provided technical assistance to IDB on the requirements for an executed SEA agreement that complies with Section 101(a)(11)(D) of the Rehabilitation Act, as amended by Title IV of WIOA and 34 C.F.R. § 361.22(b). In accordance with Section 101(a)(11)(D) of the Rehabilitation Act, as amended, 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 and 34 C.F.R. § 361.22(b), the formal interagency agreement 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 for students with disabilities that facilitates development and implementation of their individualized education programs (IEP) under Section 614(d) of the Individuals with Disabilities Education Act (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;
- Coordination necessary to satisfy documentation requirements set forth in Section 511 of the Rehabilitation Act and 34 C.F.R. part 397, with regard to students and youth with disabilities who are seeking subminimum wage employment; and
- An assurance that neither the SEA nor the local education agency (LEA) will enter into an agreement with an employer holding a Section 14(c) certificate under the Fair Labor Standards Act (FLSA) for the purpose of operating a program in which students or youth with disabilities are paid subminimum wage.

IDB's formal interagency agreement with the Iowa Department of Education (IDE) was executed on June 21, 2021, effective until May 2023; however, IDB reported that the prior SEA agreement signed in 2003 had not been updated since it was executed or since the passage of WIOA. Although IDB worked with the WINTAC in 2017 to develop an SEA agreement with IDE, the VR agency reported difficulty in coordinating with IDE to obtain the needed signatures from IDE to implement the agreement.

In reviewing the current executed agreement, RSA concluded that it appears to meet the minimum requirements of a formal interagency agreement with a SEA pursuant to Section 101(a)(11)(D) of the Rehabilitation Act, as amended by Title IV of WIOA (effective July 22, 2014), and 34 C.F.R. § 361.22(b) (effective September 19, 2016). However, RSA provided technical assistance on the requirements for formal interagency agreements to strengthen future iterations of the agreement, such as the following:

- Elaborate on how VR counselors will work closely with individual high schools to coordinate and/or provide pre-employment transition services delivered by IDB staff, the LEA, or a VR service provider;
- Indicate the process for coordinating referrals with LEA staff and educational service providers;
- Outline the process for sharing information with LEAs; and
- Update the agreement in accordance with the Section 511 joint FAQ issued on April 8, 2021.

Recommendation: It is incumbent upon IDB, for the benefit of students with disabilities served, to communicate and coordinate with IDE in developing a collaborative working relationship through the implementation of the SEA agreement, particularly with respect to the provision of transition services, including pre-employment transition services to prepare students who are blind or have vision loss for successful employment upon graduating or exiting high school. Furthermore, RSA strongly recommends that IDB provide training to its staff, as well as joint training with IDE and LEAs, on the statutory responsibilities and requirements for the provision of transition services, including pre-employment transition services to students with disabilities who are blind or have vision loss statewide. IDB will benefit from working with the NTACTION on issues related to the SEA agreement.

Time Charging and Assigning Staff Costs for the Provision of Pre-Employment Transition Services

In regard to tracking and reporting staff costs and services paid for with funds reserved for pre-employment transition services, these must be reported on Federal reports, including the RSA-911 and the RSA-17 reports, which have different requirements. The RSA-911 report captures both expenditures

and service type (individual required activity) when under a contract for purchased consumer services, but it also requires reporting of which required activity is provided to a student with a disability when the activity is provided “in-house.” While tracking of service provision is always required, personnel costs for pre-employment transition services provided by VR agency staff are only reported on the VR program financial reports (SF-425 and RSA-17), and these costs are also used to determine the amount of reserved funds for pre-employment transition services necessary to provide required and coordination activities before spending funds on authorized activities. Therefore, there is no need for VR agency staff to track personnel costs down to the level of each of the five required activities to determine overall costs for reporting reserve expenditures. This is also true of coordination and authorized activities, which can be included on VR program financial reports as part of reserve expenditures.

This means that VR agency staff must have a method to identify, track and report the provision of the five specific required pre-employment transition services activities provided to students with disabilities as a service type. In addition, the VR agency personnel costs associated with providing pre-employment transition services may be assigned and tracked by activity category using the following example cost objectives, which will assist with financial reporting and set-aside determination:

- Time spent providing required and coordination activities combined together; and
- Time spent providing authorized activities as its own cost objective.

Uniform Guidance states that personnel activity reports (PARs), or other record keeping systems, may be used to track VR agency staff time and personnel costs, and assign them to cost objectives (2 C.F.R. § 200.430). As an example, for the RSA-911, if a VR counselor is providing work readiness training, the VR Agency will report that the service was provided on the RSA-911. However, the VR counselor personnel costs associated with the time spent providing the required activity will be reported on the RSA-17 report and will be factored into the pre-employment transition services reserved funds determination. The tracking of costs for the RSA-911 is only required for purchased required activities, including those purchased under a contract providing required activities to students with disabilities. Purchased service costs from the reserve are also reported on the SF-425 and RSA-17 reports.

Charging and Assigning Contracted Costs for the Provision of Pre-Employment Transition Services

In regard to tracking contracted pre-employment transition services costs for individual students, RSA clarified that State VR agencies that reimburse vendors for actual costs through contracts must be able to account for the contract expenditures in a manner that permits the agency to report individual student services on the RSA-911. In addition, if a VR agency develops a contract with a provider for the reimbursement of actual vendor expenses and includes the provision of “required,” “coordination,” and “authorized” pre-employment transition service activities, the VR agency must ensure there is sufficient information from the vendor to permit allocation of the contract costs to the appropriate service categories (i.e., required and coordination activities, or authorized activities) for reporting purposes. Since only the actual contract expenditures associated with the direct provision of “required” and “coordination” pre-employment transition services are reported on a per-student basis on the RSA-911, the VR agency must be able to differentiate those costs from the costs associated with the provision of pre-employment transition “authorized” activities. Therefore, the VR agency must receive data from the

vendor regarding each of the categories of pre-employment transition services provided during the billing period, as well as a breakdown of the students who received such services, in order to report the requisite data.

Additionally, in regard to the pre-employment transition services reserved funds determination, VR agencies are required to expend funds reserved for pre-employment transition services in a specific manner, and they must have internal controls that ensure the requirements are met (2 C.F.R. §§ 200.302 and 200.303). Therefore, the VR agency's processes should be well documented and include the reasons for selection of the data elements used. Documentation should be maintained to demonstrate the agency has met the requirement for the provision of pre-employment transition services required and coordination activities before assigning authorized pre-employment transition services to reserved funds. The process described below should be updated on a regular basis as additional or more recent or accurate data becomes available.

The RSA review team noted that the Iowa Department for the Blind Federal Fiscal Year 2017 Pre-Employment Transition Services Fiscal Forecasting document submitted for RSA's review should be updated to include current information. The method used to determine if a VR agency has enough funds available to provide authorized activities after determining costs for providing required and coordination activities includes the following:

1. Determining the cost for the provision of required and coordination activities, in light of the following factors:
 - The total number of "students with disabilities" in the State, which includes those students eligible for the VR program as well as those "potentially eligible" students with disabilities;
 - The number of students with disabilities in the State who need required and coordination activities, including those currently receiving such services; and
 - The clearly documented basis for any reduction in the number of students with disabilities;
2. Determining the amount of funds reserved for the provision of pre-employment transition services that must be set aside for the provision of required and coordination activities to students with disabilities in need of the services; and
3. Determining the amount of funds available for the provision of authorized activities, as applicable.

It is also important to note that VR services on an IPE provided in support of the pre-employment transition services NOI (85 FR 11848 (February 28, 2020)) may be charged to the 15 percent reserve to the extent they are necessary for eligible individuals to participate in required activities. If charged to the reserve, the NOI VR services estimates (purchased and agency-provided) should be included in the determination along with required and coordination estimates before an agency commits funds for authorized activities.

Auxiliary Aids and Services for Students with Disabilities Receiving Pre-Employment Transition Services

RSA reviewed with IDB information related to the provision of auxiliary aids and services for students with disabilities receiving pre-employment transition services based upon the NOI dated February 28, 2020.

D. Findings and Corrective Actions

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

Finding 2.1 Insufficient Internal Controls for Management of the Federal Award, Data Accuracy and Validity, and Supporting Documentation

Issue: Did IDB maintain effective internal control over the Federal award to provide reasonable assurance that IDB was 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. 2 C.F.R. § 200.303 requires that VR agencies develop an internal controls process to provide a reasonable assurance regarding the achievement of objectives in the effectiveness and efficiency of operations, and reliability of reporting for internal and external use; and that this process is established and implemented as a measure of checks and balances to ensure proper expenditures of funds, including the evaluation and monitoring of compliance with statutes, regulations and the terms and conditions of Federal awards.

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 (COSO);
- Comply with Federal statutes, regulations, and the terms and conditions of the Federal awards;
- Evaluate and monitor the non-Federal entity's compliance with statutes, 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.

Analysis:

a. Untimely Eligibility Determinations

Over a three-year period, the percentage of timely eligibility determinations decreased from 82.4 percent in PY 2017 to 82.1 percent in PY 2018, and to 79.1 percent in PY 2019. 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 standard intake procedures in one-stop centers under Section 121 of WIOA, within 60 days, unless there are exceptional and unforeseen circumstances beyond the control of the designated State unit (DSU) and the individual and DSU agree to a specific extension of time or an exploration of the individual's abilities, capabilities, and capacity to perform in work situations is carried out in accordance with 34 C.F.R. § 361.42(e).

IDB was not in compliance with Section 102(a)(6) of the Rehabilitation Act and 34 C.F.R. § 361.41(b)(1) because IDB did not make eligibility determinations within the required 60-day period for all individuals who applied for VR services in PY 2017, PY 2018, and PY 2019.

b. Data Integrity

As part of the review process, RSA analyzed the internal controls implemented by IDB. RSA reviewed the IDB policies and procedures manual as well as documents housed on IDB's intranet and engaged in discussions to learn about the case review quality assurance process. Based on the document review and discussions about the case review quality assurance practices, IDB, as described earlier in this report, does not have a comprehensive system of effective internal controls nor sufficient policies and procedures to ensure consistency with applicable Federal requirements in accordance with 2 C.F.R. § 200.303.

During the period of review, IDB reported that it did not have a system in place to ensure quality assurance, nor was there a process in place for case review. Further, sufficient internal controls necessary to track the provision of pre-employment transition services were not in effect during the period of review. IDB indicated that a lead counselor position has recently been created and filled and this staff member will be responsible for both quality assurance and case reviews.

IDB communicated that it is in the process of developing written data integrity and validation procedures and processes and provided documents in draft form to RSA for review. The agency was unable to provide written data validation procedures as a part of its internal controls to safeguard data integrity, promote the timely resolution of data anomalies and inaccuracies, or to ensure accurate reporting of data collected through the RSA-911.

Conclusion: In accordance with 34 C.F.R. § 361.12, IDB must implement policies and procedures that ensure the proper and efficient administration of the VR program, including those necessary to carry out all functions for which the VR agency is responsible. IDB must develop and implement policies and procedures to collect accurate data and verify its accuracy through the required supporting documentation. IDB must also monitor and evaluate performance through the agency's internal controls, in accordance with 2 C.F.R. § 200.303. Based on IDB's existing procedures, RSA determined that IDB was not in compliance with the requirements in 34 C.F.R. § 361.12 or 2 C.F.R. § 200.303.

Corrective Actions 2.1 RSA requires that IDB—

2.1.1 IDB must ensure that eligibility determinations are developed in a timely manner and within the established timeframe, pursuant to Section 102(a)(6) of the Rehabilitation Act and 34 C.F.R.

- § 361.41(b)(1), unless an extension of that timeframe to a specific date is agreed to by the VR counselor and individual;
- 2.1.2 Develop internal control policies and procedures to ensure that the provisions of 34 C.F.R. § 361.47 have been met, and through service record documentation, the requirements at 34 C.F.R. § 361.40 and RSA PD-19-03 (now in effect for the reporting of RSA-911 data since July 1, 2020) for the accurate reporting of its data are met;
 - 2.1.3 Assess and evaluate current procedures for tracking and monitoring VR counselor performance and efficient practices used by high performing VR counselors and supervisors, including the use of case management tools to ensure supporting documentation requirements and the verification of employment are met;
 - 2.1.4 Develop mechanisms to collect and aggregate the results of these reviews and use the results to inform and conduct necessary training and evaluation of staff; and assess the results of the policies and procedures governing its internal control procedures to ensure compliance with the reporting of data.

VR Agency Response: In response to 2.1.1, it was stated during the virtual monitoring that the poor eligibility numbers were due to personnel issues. IDB terminated the counselors as quickly as allowed within the rules of Iowa State government. In PY 2020, eligibilities were 97.6% on time and during the first six months of PY 2021, eligibilities have been 100% on time. IDB is forcing compliance through performance evaluations and disciplinary procedures to achieve and maintain 100 percent compliance.

RSA Response: RSA appreciates IDB’s response and will work with the agency through its corrective action plan to ensure the proper and efficient administration of the VR program.

VR Agency Request for Technical Assistance: IDB requests technical assistance. IDB has submitted currently active updated quality assurance procedures, and has also shared how it presents targeted data to all VR service providers monthly to help with use in work planning. IDB would like to know if the documentation of practices shared with RSA is sufficient and, if not, what else is required.

Finding 2.2 Non-compliant Written Policies Governing the Provision of Services for Individuals with Disabilities

Issue: Has IDB developed and maintained written policies as required for the provision of services that align with the Rehabilitation Act of 1973, as amended by Title IV of WIOA.

Requirement: In accordance with Section 101(a)(6) of the Rehabilitation Act and 34 C.F.R. § 361.50, VR agencies are required to develop and maintain written policies governing the provision of services for individuals with disabilities. Pursuant to 34 C.F.R. § 361.50, the VR agency must develop and maintain written policies that ensure that the provision of services is based on the rehabilitation needs of each individual as identified in that individual’s IPE and is consistent with the individual’s informed choice in accordance with Sections 101(a)(19), 102(b)(3)(B), and 102(d) of the Rehabilitation Act, and 34 C.F.R. § 361.52.

Analysis: As part of the off-site review process, RSA analyzed the agency’s policies and procedures manual and documents provided that reside on IDB’s intranet. Although some updates were made to the manual to reflect the requirements that went into effect with the reauthorization of the Rehabilitation Act by WIOA, some chapters still contain incorrect or insufficient information, or have not been updated

with the changes brought about by WIOA. IDB worked with the WINTAC for several years prior to RSA's review on updating its manual, including its pre-employment transition services policy. However, these changes have not yet been operationalized or released for staff or public use.

For example, the review team found that IDB's entire policy manual contains references to 34 C.F.R. part 361 from 2002, to include its eligibility, IPE, and trial work policies. RSA provided comment on a recent draft of IDB's eligibility policy, which also contained references to 34 C.F.R. part 361 from 2002.

Additionally, it was noted that IDB's supported employment policy erroneously states that supported employment services will be provided for a period of time that will not exceed eighteen months when the timeframe for the provision of supported employment services has been extended under the Rehabilitation Act from 18 months to no longer than 24 months, unless, under special circumstances, the eligible individual and the rehabilitation counselor jointly agree to extend the time to achieve the employment outcome identified in the IPE. The supported employment policy also does not reference the provision of extended services to youth with the most significant disabilities as authorized under Section 604(b)(2) of the Rehabilitation Act nor does it mention that extended services may not be provided by the VR agency using funds allotted under either the Supported Employment program or the VR program to an individual who is not a youth with a disability (see Section 604(b)(1) of the Rehabilitation Act).

Conclusion: In accordance with Section 101(a)(6) of the Rehabilitation Act and 34 C.F.R. § 361.50(a), VR agencies must develop and maintain written policies covering the nature and scope of each VR service and the criteria under which each service is provided as specified in Section 103 of the Rehabilitation Act and 34 C.F.R. § 361.48. RSA determined that IDB did not have adequate policies in place to ensure that the provision of VR services complied with statutory and regulatory requirements.

Corrective Actions 2.2 RSA requires that IDB—

- 2.2.1 Draft and submit to RSA for review written policies related to eligibility, IPE development, the conduct of trial work experiences, and the provision of pre-employment transition services and supported employment services that comply with statutory and regulatory requirements;
- 2.2.2 As necessary or required, implement a timely process for IDB Board of Commissioners review and approval of all policies and procedures;
- 2.2.3 Provide training to staff on revised and new policies to ensure understanding and consistent implementation; and
- 2.2.4 Implement internal controls and methods to regularly evaluate staff compliance with policies.

VR Agency Response: IDB believes in continuous improvement and is continuously updating procedures to deal with changes, which has made it more agile in responding to the changes that RSA has made in PD-19-03 and other places in recent years. However, it requires more document control and versioning procedures. While we were using many of the procedures and internal controls RSA is saying that we lacked during the evaluation period, we did not keep properly dated versions of documents, so we were unable to show this during the review. We are in the process of making all policies and procedures available on our website and accessible to the public. IDB values transparency and welcomes this opportunity.

RSA Response: RSA appreciates IDB’s response and will work with the agency through its corrective action plan to ensure that the provision of VR services complies with statutory and regulatory requirements.

VR Agency Request for Technical Assistance: IDB requests technical assistance to determine whether the draft procedures submitted during the review are sufficient. IDB also requests clarity on what level of procedure review RSA expects from the Commission Board and in what ways RSA finds current Commission Board’s policy on approvals insufficient.

Finding 2.3 Inconsistent and Inaccurate Reporting of Post Exit Employment Data

Issue: Has IDB accurately and consistently reported post exit employment data in the second and fourth quarters after exit as required by Section 116(b) of the Workforce Innovation and Opportunity Act (WIOA) and implemented in regulations set forth in 34 C.F.R. part 361.

Requirement: In accordance with 34 C.F.R. § 361.40(b), VR agencies must submit reports that include performance indicators for the VR program, which are subject to the performance accountability provisions described in Section 116(b) of WIOA and implemented in regulations set forth in subpart E of 34 C.F.R. part 361. The RSA-911 is used to describe the performance of the VR and Supported Employment programs in the Annual Report to the Congress and the President, as required by Sections 13 and 101(a)(10) of the Rehabilitation Act.

Analysis: During the course of this review, IDB was unable to provide written data validation procedures surrounding the collection of post exit employment data as a part of its internal controls to safeguard data integrity, promote the timely resolution of data anomalies and inaccuracies or to ensure accurate reporting of post exit data collected through the RSA-911. Furthermore, for the exiting cohort reported for the second quarter after exit in PY 2019, the agency reported that no individuals sustained employment out of the 84 individuals who exited with employment, and the agency reported zero out of 58 individuals sustained employment in the fourth quarter after exit.

In addition, performance data highlighted inconsistencies between the post exit quarterly data submitted to RSA. As a result, IDB did not submit accurate reports as required by 34 C.F.R. § 361.40. During the period under review, IDB had not developed or implemented written internal controls nor agency policies and procedures to ensure that the information reported for post exit data was substantiated with supporting documentation in the service record.

Conclusion: In accordance with 34 C.F.R. § 361.40(a), VR agencies are required to submit reports, including reports required under Section 116(b) of WIOA and implemented in regulations set forth in subpart E of 34 C.F.R. part 361, and comply with any requirements necessary to ensure the accuracy and verification of those reports. As a result of the lack of data validation and internal control processes related to the collecting and reporting of data, IDB and RSA were unable to substantiate the accuracy of the data reported on the RSA-911, and whether the VR agency met the Federal requirements for reporting.

Corrective Actions 2.3 RSA requires that IDB—

- 2.3.1 Draft and submit to RSA for review written data validation procedures surrounding the accurate and consistent collection of post exit employment data and;
- 2.3.2 Demonstrate three quarters in which post exit employment data is collected and reported to RSA.

VR Agency Response: As stated during virtual monitoring, during the transition between one data analyst to another, the new analyst misinterpreted the instructions for putting wage data into the system and RSA-911 report. This was corrected and procedures have been clarified. Better edit checkers are now available to help us catch any similar errors as well.

RSA Response: RSA appreciates IDB's response and will work with the agency through its corrective action plan to ensure compliance with the Federal requirements for reporting.

VR Agency Request for Technical Assistance: IDB request technical assistance. IDB has submitted currently active updated quality assurance procedures. IDB would like to know if the documentation of its practices shared with RSA is sufficient and, if not, what else is required. IDB also requests technical assistance on whether the wage data it is now submitting meets expectations.

SECTION 3: FOCUS AREA – FINANCIAL MANAGEMENT OF THE STATE VOCATIONAL REHABILITATION SERVICES AND STATE SUPPORTED EMPLOYMENT SERVICES PROGRAMS

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 competitive integrated employment 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. § 200.1). 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 Federal fiscal year 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, MOE, etc.). The RSA review team assessed IDB's performance in meeting the period of performance requirements related to the proper assignment of obligations and expenditures to the correct grant award(s).

VR Program Match

VR program regulations require the State to 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 IDB'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 maintenance of effort (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;
- 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 IDB'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 contracts for the provision of pre-employment transition services.

C. Technical Assistance and Recommendations

RSA provided technical assistance in the following topical areas to IDB in response to areas identified during the review process and in response to specific technical assistance needs identified by the VR agency. Technical assistance and recommendations provided by RSA are intended to assist IDB to achieve continuous improvement in the financial management and performance of the VR and Supported Employment programs. RSA is available to provide follow-up technical assistance.

RSA-17

IDB requested technical assistance on the RSA-17. RSA staff provided clarification on reporting services to groups and will be available to provide additional clarification and assistance as needed.

D. Findings and Corrective Actions

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

Finding 3.1 Period of Performance Requirements Not Met

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

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

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

An obligation means "orders placed for property and services, contracts and subawards made, and similar transactions during a given period that require payment by the non-Federal entity during the same or a future period" (2 C.F.R. § 200.71). For expenditures to be allowable under the Federal

award, agencies must demonstrate that the obligation occurred within the period of performance of the Federal award. Regulations at 34 C.F.R. § 76.707 explain when a State incurs an obligation for various kinds of services and property. Therefore, to properly account for and liquidate expenditures, grantees must be able to assign an obligation to a Federal award based upon the date the obligation was made (34 C.F.R. §§ 76.703 and 76.709). Grantees must assign all Federal and non-Federal obligations and expenditures, on a FFY basis, to the correct Federal award in accordance with the period of performance.

Analysis: RSA reviewed the agency's policies and procedures regarding the assignment of Federal and non-Federal obligations and expenditures to the correct Federal award. RSA also reviewed supporting documentation of obligations and expenditures to ensure IDB was correctly assigning and reporting obligations and expenditures to the proper period of performance in accordance with Federal requirements. Through the review of agency policies and discussions with agency staff RSA found that, depending on the type of obligation or expenditure, IDB does not always assign obligations to a FFY award based upon the date obligation of the expenditure occurred.

According to IDB staff interviewed during the review, staff interpreted SF-425 instructions for Line 10f, "Federal portion of unliquidated obligations incurred by the grantee," to mean the amount of expenditures the grantee has paid using its own State funds to be later drawn down for reimbursement. This misinterpretation may be related to IDB's use of a cash-based system of accounting without including expenditure-tracing modifications necessary to meet Education Department General Administrative Requirements (EDGAR) for recording the date an expenditure is obligated. While the grantee may use a cash-based system of accounting, it must also have in place a system to record obligation dates for the specific types of expenditure required by EDGAR and the Uniform Guidance, as noted above in the requirement section of this finding.

While IDB staff take steps to ensure some expenditures, such as service authorizations, are assigned to the correct period of performance based on inspection of the authorization date recorded in IDB's case management system, IDB records other expenditures, such as contracts and equipment purchases, based on the date the expenditure was entered into the State's cash-based system of accounting—which does not record the date of obligation separately from the date an expenditure is liquidated.

Importantly, IDB was unable to generate lists of expenditures including obligation and liquidation dates (or other documentation that these dates were properly recorded, such as through the assignment of corresponding accounting codes) as requested by RSA. IDB staff indicated they had misinterpreted the SF-425 instructions for Line 10f, and later suggested the need for additional accounting staff to track obligations as required by EDGAR and the Uniform Guidance.

Conclusion: Based upon the information above, RSA has determined that IDB is not in compliance with the Federal requirements (34 C.F.R. § 361.12, 34 C.F.R. § 76.702, and 2 C.F.R. § 200.302) to accurately account for and report obligations and ensure expenditures are paid from the correct Federal award. As a result, RSA cannot determine whether the agency satisfied requirements related to match, MOE, and the reservation of funds for the provision of pre-employment transition services. As a recipient of Federal VR and Supported Employment funds, IDB must have procedures in place that ensure proper and efficient administration of its VR program, and that enable IDB to carry out

all required functions. The methods of administration must ensure accurate data collection and financial accountability (34 C.F.R. § 361.12 and 2 C.F.R. § 200.302).

Corrective Actions 3.1 RSA requires that IDB—

- 3.1.1 Update and implement policies, procedures, and systems as necessary, to accurately account for and report Federal and non-Federal obligations and expenditures to the correct period of performance; and
- 3.1.2 Develop and implement a written internal control process, including a monitoring component, to ensure ongoing compliance with Federal requirements for the areas identified in this finding.

VR Agency Response: During the virtual monitoring, IDB accounting staff explained that the State Accounting System is daily recorded on a cash basis and annually adjusted to accrual basis. The State procedure couples with the major program codes established by IDB and records expenditures into the correct performance period under the Accrual Basis of accounting. We believe that the policy for recording obligations provided to RSA in the file IDB’s Obligations Encumbrances is in compliance with EDGAR (34 CFR 76-707) and Uniform Guidance. All State Accounting procedures and policies are in compliance with Uniform Guidance and IDB is required to comply with these procedures and policies. All accounting codes were provided to RSA. The assignment of the program code records the expenditure in the correct grant and correct performance period. The grant is represented by the major program code. The list of program codes, major program codes, and corresponding transactions were provided to RSA.

IDB could not produce a listing showing obligation dates as the State Accounting system does not provide this information. IDB is seeking technical assistance to ensure that the internal department procedures drafted and temporarily enacted pending approval and review will be able to produce the requested listing and ensure that all expenditures are reported in compliance with 34 CFR 76-707 and EDGAR.

RSA Response: RSA appreciates IDB’s response and will work with the agency through its corrective action plan to ensure compliance with the Federal requirements to accurately account for and report obligations and ensure expenditures are paid from the correct Federal award.

VR Agency Request for Technical Assistance: No request.

Finding 3.2 Insufficient Documentation of Internal Controls

Issue: Does IDB 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.

Requirements: 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, as previously identified in Section 2, Part D of this report, 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...;
- 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.

Furthermore, provisions at 2 C.F.R. § 200.302(b)(4) require that the financial management system of each non-Federal entity must ensure effective control over, and accountability for, all funds, property, and other assets. The non-Federal entity must adequately safeguard all assets and assure that they are used solely for authorized purposes.

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 noncompliance with Federal and State requirements.

Analysis: RSA found four areas of concern during its review of IDB internal controls.

a. Incorrect Procedures for Assigning, Tracking and Reporting Expenditures

The IDB policy titled “Procedures for the assignment, tracking and reporting of non-Federal and Federal obligations and liquidation of expenditure” is incomplete, noting that funds are obligated “when goods and services are received and paid for within the grant award period.” This is inconsistent with EDGAR requirements at 34 C.F.R. § 76.707. Several other policy documents discuss obligation of funds; however, none address EDGAR requirements regarding when an obligation is made.

b. Incomplete Procedures for Reporting Pre-employment Transition Services

Pre-employment transition services contracts describe activities as “...varied experiences that include, but are not limited to, fully accessible presentations, interactive discussions, community involvement, networking, and interviews.” In one example, IDB staff participated in an overnight camp with VR consumers, but it was unclear how the agency reported the costs for its VR staff providing direct pre-employment transition services and whether the costs of the camp vendor were also recorded as pre-employment transition purchased services.

c. Inaccurate Match Reporting

Documentation identifies \$2,797 in match was provided for FFY 2020 via “BEP 3rd party commissions,” however match reported for the FFY 2020 VR award did not include this amount, and \$0 in non-Federal share had been reported by the time of the review for FFY 2021. The mistake will need to be corrected in the appropriate Federal financial report(s).

d. Missing WIOA One-stop Infrastructure Funding and Shared Cost Agreements

The one-stop MOUs IDB has entered in to with its one-stop partners do not include Infrastructure Funding Agreements or Other Shared Cost Agreements which are required components of the one-stop MOU per VR program regulations at 34 C.F.R. §§ 361.755 and 361.760.

When asked how VR determines what share of these costs to contribute, IDB staff responded that no cash is changing hands, contributions of support have been “in-kind” only, and that “no shared space” is involved. IDB noted the agency partakes in cooperative training with one-stop partners; however, IDB does not fund the activities.

In addition to the MOUs lacking required funding and costs agreements, IDB also did not have a documented process for how it reviews and approves the costs of one-stop centers it pays (or will pay) using VR funds, nor did it have a documented methodology for identifying IDB’s allocable share of costs at the one-stop centers as required by 2 C.F.R. §§ 200.302(b)(4) and 200.405.

Conclusion: In the areas noted above, IDB did not maintain effective internal controls over the Federal award that provide reasonable assurances that the non-Federal entity is managing the Federal 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, noted above, include documentation of control activities to ensure the proper tracking and reporting of expenditures including pre-employment transition services expenditures, accurate non-Federal share reporting, and one-stop infrastructure cost review and approval.

Corrective Actions 3.2 RSA requires that IDB—

- 3.2.1 Update policies and procedures, and implement a monitoring component, for assigning, tracking and reporting expenditures;
- 3.2.2 Develop and implement a written internal control process, including a monitoring component, to ensure ongoing compliance with Federal requirements for assigning, tracking, and reporting pre-employment transition services costs identified in this finding;
- 3.2.3 Develop and implement a written internal control process, including a monitoring component, to ensure ongoing compliance with Federal requirements for non-Federal share reporting; and
- 3.2.4 Develop and execute a written plan to collaborate with appropriate stakeholders to generate the required WIOA One-stop Infrastructure Funding and Shared Cost Agreements, and to include the agreements in MOUs within a year after the date of the final monitoring report; and ensure selection of allocation bases and cost allocation methodologies that meet the specific and unique needs of each one-stop facility.

VR Agency Response: In response to 3.2.4, IDB has participated in efforts with State partners to assist in local area reorganization, to develop relevant State policies, to assist with local planning, the development of one-stop certification standards, and the development of MOUs. Infrastructure Funding and Shared Cost Agreements had been postponed until these other activities had been completed. IDB will continue to partner with our WIOA core partners as we move forward in the development of the Infrastructure Funding and Shared Cost agreements.

RSA Response: RSA appreciates IDB's response and will work with the agency through its corrective action plan to ensure it maintains effective internal controls over the Federal award that provide reasonable assurances that the non-Federal entity is managing the Federal 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.

VR Agency Request for Technical Assistance: IDB requests technical assistance. Differences in the needs of each of the agencies involved in regard to co-location, programmatic accessibility, and other issues create challenges in crafting this agreement. IDB believes that it is unreasonable to financially support workforce centers that cannot serve our clients or software that is inaccessible to blind staff or customers. IDB would appreciate any technical assistance that can help us overcome these barriers.

Finding 3.3 Inappropriate Assignment of Costs for Pre-Employment Transition Services for Individuals Who Are Blind

Issue: Did IVRS and IDB assign costs for pre-employment transition services for blind consumers to IVRS, and not IDB, the VR agency in Iowa authorized to pay such costs.

Requirements: Section 113 of the Rehabilitation Act requires VR agencies to provide pre-employment transition services to students with disabilities who are eligible or potentially eligible for VR services. Section 101(a)(11) of the Rehabilitation Act requires the VR agency to coordinate with other State agencies and other components of the workforce development system in the provision of VR services. The implementing VR regulations at 34 C.F.R. § 361.24(e) make it clear

that, when a State has established a second VR agency to serve individuals who are blind or visually impaired, both VR agencies in the State must coordinate and cooperate to provide more effective services to individuals with multiple disabilities.

As noted in Finding 3.1, 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.

Provisions at 2 C.F.R. § 200.302(b)(4) require that the financial management system of each non-Federal entity must ensure effective control over, and accountability for, all funds, property, and other assets. The non-Federal entity must adequately safeguard all assets and assure that they are used solely for authorized purposes.

Additionally, Iowa Code § 7E.5 outlines the principal departments and primary responsibilities of the executive branch and states that IDB has primary responsibility for services relating to blind persons. Iowa Code § 56.6(7) indicates that individuals who meet the IDB's definition of "blind" are to be served primarily by the IDB. Individuals with multiple disabilities who also are blind may receive technical assistance and consultation services from IVRS while IDB provides their rehabilitation plan. Joint cases are served in the Iowa self-employment program and other contracts developed by IVRS.

Analysis: The memorandum of agreement (MOA) between IVRS and the Iowa Department for the Blind (IDB) indicates that IVRS may provide pre-employment transition services to students eligible for IDB services through its TAP program. The MOA indicates these eligible students may participate in the TAP program as potentially eligible students if deemed appropriate by an IDB VR counselor. IVRS reported eight such cases occurring since PY 2016 out of 50 total dual cases with IDB during this timeframe.

The MOA states that dual cases require that IDB and IVRS Counselors consult with one another on the services to be provided, and that meetings to develop an IPE or to complete a review will be conducted jointly; however, an IPE was not developed jointly for the provision of pre-employment transition services for eight students with disabilities who were determined eligible for the VR program. Furthermore, the TAP contract generated by IVRS does not indicate how the contractor would trace and report costs for services to IDB consumers separately from costs for services to IVRS consumers as the TAP contract does not mention IDB consumers at all.

Based on RSA's review of financial documentation, IVRS paid cost for pre-employment transition services on behalf of IDB, the entity authorized to pay such costs for the consumers in accordance with the Unified State Plan. Therefore, RSA questions costs IVRS paid for pre-employment transition services to blind consumers that IVRS is not authorized to pay; simultaneously, IDB failed to make payments for such costs as required under its State Plan.

Conclusion: IVRS and IDB did not sufficiently coordinate to ensure each agency paid only its allocable share of costs for pre-employment transition services to blind students in at least 8 instances, and IVRS paid costs for the provision of services when IVRS was not authorized to do so and that IDB was required to pay. As a result, students who may be determined eligible for VR services by IDB were provided pre-employment transition services by IVRS and not IDB.

Corrective Actions 3.3 RSA requires that IVRS—

- 3.3.1 Determine costs paid by IVRS for pre-employment transition services to IDB blind students that IVRS was not authorized to pay for FFYs 2016 – 2020; and submit documentation of these costs to RSA, and upon RSA’s approval, distribute the amount of approved costs to IVRS and update IDB financial reports accordingly; and
- 3.3.2 Update policies, procedures, and internal controls (including MOAs as necessary) to ensure staff properly allocate costs to IDB and IVRS for services to individuals served jointly by IDB and IVRS.

VR Agency Response: In response to 3.3.1, IDB recognizes the importance of following regulations and has requested technical assistance to rectify this situation going forward. IDB believes that the number of students affected by this thus far is low and that the majority of blind students being served by IVRS as potentially eligible had not applied for services with IDB. We are concerned that the cost of the staff time needed for calculating, transferring funds, and updating previously submitted State and Federal reports for both agencies will be a significant burden, and cost more than the total amount transferred.

RSA Response: RSA appreciates IDB’s response and will work with the agency through its corrective action plan to ensure it sufficiently coordinates with IVRS to provide pre-employment transition services to blind students.

VR Agency Request for Technical Assistance: IDB is requesting joint technical assistance with IVRS to modify our MOA and comply with these corrective actions. IDB would like clarification on which situations require repayment and how to alter previous reporting to accurately reflect these payments.

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

Vocational Rehabilitation Services and State Supported Employment Program Performance Tables

Table 1—IA-B VR Agency Profile (PYs 2017-2019)

Table 2—IA-B Number and Percentage of Participants Served by Primary Disability Type (PYs 2017-2019)

Table 3—IA-B Number and Percentage of Individuals Exiting at Various Stages of the VR Process (PYs 2017-2019)

Table 4—IA-B Number and Percentage of Individuals Exiting by Reason during the VR Process (PYs 2017- 2019)

Table 5—IA-B VR Services Provided to Participants (PYs 2017-2019)

Table 6—IA-B Types of Measurable Skill Gains Earned and Number of Participants Who Earned Measurable Skill Gains (PYs 2017-2019)

Table 7—IA-B 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 (PYs 2017-2019)

Table 8—IA-B Number of Participants Who Exited with Competitive Integrated Employment or Supported Employment by the Most Frequent SOC Title (PYs 2017-2019)

Table 9—IA-B Number of Students with Disabilities Reported, and the Number and Percentage of Students with Disabilities Who Received Pre-Employment Transition Services (PYs 2017-2019)

Table 10—IA-B Number and Percentage of Required Pre-Employment Transition Services Provided (PYs 2017-2019)

Vocational Rehabilitation Program Other Measures That Matter

Measure 1—IA-B Sustaining Employment After Exit (January 1, 2018 – December 31, 2018)

Measure 2—IA-B Profile: Quality Employment (PY 2019)

Measure 3—IA-B Profile: VR Process Efficiency (PY 2019)

Measure 4—IA-B Profile: VR Service Provision (PY 2019)

Measure 5—IA-B Percent of Participants Enrolled in Education/Training Program Leading to a Recognized Credential/Employment (PY 2019)

Measure 6—IA-B Profile: Pre-Employment Transition Services (PY 2019)

Table 1—IA-B VR Agency Profile (PYs 2017-2019)

VR Agency Profile Data	2017	2018	2019
Employment Rate	48.0%	42.0%	27.5%
Number of Participants Exiting in Competitive Integrated Employment or Supported Employment	28	36	28
Percentage of Timely Eligibility Determinations	82.4%	82.1%	79.1%
Percentage of Eligibility Determination Extensions	15.7%	14.7%	7.5%
Percentage of Timely IPE Development	99.2%	100.0%	100.0%
Number of Applicants	178	195	132
Number of Individuals Determined Eligible	159	184	148
Number of Individuals with an IPE and No VR Services Provided	20	39	-
Number of Participants (with an IPE and VR Services Provided)	470	553	571
WIOA Performance Indicators (General/Blind VR agency)	2017	2018	2019
Measurable Skill Gains Rate	93.8%	58.8%	76.9%
Employment Rate in 2 nd Qtr After Exit	N/A	41.7%	0%
Median Earnings in 2 nd Qtr After Exit	N/A	\$4,120	0
Employment Rate in 4 th Qtr After Exit	N/A	N/A	0%
Credential Attainment Rate	N/A	N/A	0%
WIOA Performance Indicators (Statewide)	2017	2018	2019
Measurable Skill Gains Rate	22%	35.2%	34.6%
Employment Rate in 2 nd Qtr After Exit	N/A	52%	59.5%
Median Earnings in 2 nd Qtr After Exit	N/A	\$4,291	\$3,598
Employment Rate in 4 th Qtr After Exit	N/A	N/A	54.1%
Credential Attainment Rate	N/A	N/A	54.8%

Table 2—IA-B Number and Percentage of Participants Served by Primary Disability Type (PYs 2017-2019)

Primary Disability Type by Group	PY 17 Number of Participants	PY 17 Percent	PY 18 Number of Participants	PY 18 Percent	PY 19 Number of Participants	PY 19 Percent
Visual	464	98.7%	547	98.9%	565	99.0%
Auditory or Communicative	2	0.4%	2	0.4%	2	0.3%
Physical	1	0.2%	1	0.2%	-	0.0%
Cognitive	1	0.2%	2	0.4%	2	0.3%
Psychological or Psychosocial	-	0.0%	1	0.2%	2	0.3%
Detailed Primary Disability Type	PY 17 Number of Participants	PY 17 Percent	PY 18 Number of Participants	PY 18 Percent	PY 19 Number of Participants	PY 19 Percent
Blindness	351	74.7%	414	74.9%	429	75.1%
Other Visual Impairments	113	24.0%	133	24.1%	136	23.8%
Deafness, Primary Communication Visual	-	0.0%	-	0.0%	-	0.0%

Detailed Primary Disability Type	PY 17 Number of Participants	PY 17 Percent	PY 18 Number of Participants	PY 18 Percent	PY 19 Number of Participants	PY 19 Percent
Deafness, Primary Communication Auditory	-	0.0%	-	0.0%	-	0.0%
Hearing Loss, Primary Communication Visual	-	0.0%	-	0.0%	-	0.0%
Hearing Loss, Primary Communication Auditory	-	0.0%	-	0.0%	-	0.0%
Other Hearing Impairments (Tinnitus, Meniere's Disease, hyperacusis, etc.)	-	0.0%	-	0.0%	-	0.0%
Deaf-Blindness	2	0.4%	2	0.4%	2	0.3%
Communicative Impairments (expressive/receptive)	-	0.0%	-	0.0%	-	0.0%
Mobility Orthopedic/Neurological Impairments	1	0.2%	1	0.2%	-	0.0%
Manipulation/Dexterity Orthopedic/Neurological Impairments	-	0.0%	-	0.0%	-	0.0%
Both Mobility and Manipulation/Dexterity Orthopedic/Neurological Impairments	-	0.0%	-	0.0%	-	0.0%
Other Orthopedic Impairments (e.g., limited range of motion)	-	0.0%	-	0.0%	-	0.0%
Respiratory Impairments	-	0.0%	-	0.0%	-	0.0%
General Physical Debilitation (e.g., fatigue, weakness, pain, etc.)	-	0.0%	-	0.0%	-	0.0%
Other Physical Impairments (not listed above)	-	0.0%	-	0.0%	-	0.0%
Cognitive Impairments (e.g., impairments involving learning, thinking, processing information and concentration)	1	0.2%	2	0.4%	2	0.3%
Psychosocial Impairments (e.g., interpersonal and behavioral impairments, difficulty coping)	-	0.0%	-	0.0%	-	0.0%
Other Mental Impairments	-	0.0%	1	0.2%	2	0.3%

Table 3—IA-B Number and Percentage of Individuals Exiting at Various Stages of the VR Process (PYs 2017-2019)

Individuals Who Exited the VR Program			PY 17	PY 18	PY 9	
Number of Individuals Who Exited the VR Program			129	150	168	
Exit Type	PY 17 Number of Individuals	PY 17 Percent	PY 18 Number of Individuals	PY 18 Percent	PY 19 Number of Individuals	PY 19 Percent
Individual exited as an applicant, prior to eligibility determination or trial work experience	34	26.4%	-	0.0%	1	0.60%
Individual exited during or after a trial work experience	-	0.0%	-	0.0%	-	0.00%
Individual exited after eligibility, but from an order of selection waiting list	-	0.0%	-	0.0%	-	0.0%
Individual exited after eligibility, but prior to a signed IPE	23	17.8%	17	11.3%	19	11.3%
Individual exited after an IPE without an employment outcome	30	23.3%	50	33.3%	74	44.0%
Individual exited after an IPE in noncompetitive and/or nonintegrated employment	-	0.0%	-	0.0%	-	0.0%
Individual exited after an IPE in competitive and integrated employment or supported employment	28	21.7%	36	24.0%	28	16.7%
Individual exited as an applicant after being determined ineligible for VR services	26	20.2%	47	31.3%	47	28.0%
Potentially eligible individual exited after receiving pre-employment transition services and has not applied for VR services	-	0.0%	-	0.0%	-	0.0%
Supported Employment			PY 17 Number of Participants	PY 18 Number of Participants	PY 19 Number of Participants	
Number of Participants Who Exited with a Supported Employment Outcome in Competitive Integrated Employment			-	-	-	
Number of Participants Who Exited with a Supported Employment Outcome in Noncompetitive and/or Nonintegrated Employment			-	-	-	

Table 4—IA-B Number and Percentage of Individuals Exiting by Reason during the VR Process (PYs 2017- 2019)

Reason for Exit	PY 17 Number of Individuals	PY 17 Percent	PY 18 Number of Individuals	PY 18 Percent	PY 19 Number of Individuals	PY 19 Percent
Individual is No Longer Available for Services Due to Residence in an Institutional Setting Other Than a Prison or Jail	-	0.0%	-	0.0%	-	0.0%
Health/Medical	2	1.6%	1	0.7%	1	0.6%
Death of Individual	4	3.1%	-	0.0%	3	1.8%
Reserve Forces Called to Active Duty	-	0.0%	-	0.0%	-	0.0%
Foster Care	-	0.0%	-	0.0%	-	0.0%
Ineligible after determined eligible	-	0.0%	-	0.0%	-	0.0%
Criminal Offender	-	0.0%	-	0.0%	-	0.0%
No Disabling Condition	10	7.8%	6	4.0%	7	4.2%
No Impediment to Employment	4	3.1%	7	4.7%	5	3.0%
Does Not Require VR Service	6	4.7%	5	3.3%	4	2.4%
Disability Too Significant to Benefit from Service	2	1.6%	-	0.0%	1	0.6%
No Long Term Source of Extended Services Available	-	0.0%	-	0.0%	-	0.0%
Transferred to Another Agency	5	3.9%	5	3.3%	7	4.2%
Achieved Competitive Integrated Employment Outcome	28	21.7%	36	24.0%	28	16.7%
Extended Employment	-	0.0%	-	0.0%	-	0.0%
Extended Services Not Available	-	0.0%	-	0.0%	-	0.0%
Unable to Locate or Contact	29	22.5%	37	24.7%	40	23.8%
No Longer Interested in Receiving Services or Further Services	35	27.1%	45	30.0%	69	41.1%
All Other Reasons	4	3.1%	8	5.3%	3	1.8%
Number of Individuals Who Exited the VR Program	129		150		168	

Table 5—IA-B VR Services Provided to Participants (PYs 2017-2019)

Participants Who Received Services			PY 17	PY 18	PY 19	
Total Number of Participants Who Received VR Services			470	553	571	
Training Services Provided to Participants	PY 17 Number of Participants	PY 17 Percent	PY 18 Number of Participants	PY 18 Percent	PY 19 Number of Participants	PY 19 Percent
Graduate Degree Training	13	2.8%	13	2.4%	10	1.7%
Bachelor’s Degree Training	49	10.4%	40	7.2%	43	7.5%
Junior or Community College Training	15	3.2%	13	2.4%	17	3.0%
Occupational or Vocational Training	12	2.6%	12	2.2%	8	1.4%
On-the-Job Training	4	0.9%	1	0.2%	-	0.0%
Apprenticeship Training	1	0.2%	1	0.2%	2	0.3%
Basic Academic Remedial or Literacy Training	1	0.2%	2	0.4%	1	0.2%
Job Readiness Training	78	16.6%	46	8.3%	85	14.9%
Disability Related Skills Training	99	21.1%	170	30.7%	214	37.4%
Miscellaneous Training	4	0.9%	22	4.0%	14	2.4%
Randolph-Sheppard Entrepreneurial Training	1	0.2%	2	0.4%	-	0.0%
Customized Training	-	0.0%	-	0.0%	-	0.0%
Career Services Provided to Participants	PY 17 Number of Participants	PY 17 Percent	PY 18 Number of Participants	PY 18 Percent	PY 19 Number of Participants	PY 19 Percent
Assessment	88	18.7%	82	14.8%	30	5.3%
Diagnosis and Treatment of Impairment	21	4.5%	8	1.4%	24	4.2%
Vocational Rehabilitation Counseling and Guidance	267	56.8%	327	59.1%	389	68.1%
Job Search Assistance	96	20.4%	56	10.1%	60	10.5%
Job Placement Assistance	-	0.0%	-	0.0%	-	0.0%
Short-Term Job Supports	3	0.6%	3	0.5%	10	1.7%
Supported Employment Services	15	3.2%	11	2.0%	4	0.7%
Information and Referral Services	21	4.5%	17	3.1%	28	4.9%
Benefits Counseling	27	5.7%	29	5.2%	38	6.7%
Customized Employment Services	6	1.3%	-	0.0%	-	0.0%
Extended Services (for youth with the most significant disabilities)	-	0.0%	-	0.0%	-	0.0%

Other Services Provided to Participants	PY 17 Number of Participants	PY 17 Percent	PY 18 Number of Participants	PY 18 Percent	PY 19 Number of Participants	PY 19 Percent
Transportation	118	25.1%	103	18.6%	115	20.1%
Maintenance	76	16.2%	84	15.2%	105	18.4%
Rehabilitation Technology	208	44.3%	191	34.5%	222	38.8%
Personal Attendant Services	1	0.2%	-	0.0%	-	0.0%
Technical Assistance Services	6	1.3%	5	0.9%	8	1.4%
Reader Services	23	4.9%	14	2.5%	8	1.4%
Interpreter Services	3	0.6%	3	0.5%	3	0.5%
Other Services	14	3.0%	22	4.0%	25	4.4%

Table 6—IA-B Number of Measurable Skill Gains Earned, Number of Participants Who Earned Measurable Skill Gains, and Types of Measurable Skill Gains (PYs 2017-2019)

Types of Measurable Skill Gains Earned	Number 2017	Number 2018	Number 2019
Educational Functioning Level	2	-	-
Secondary Diploma	2	-	20
Postsecondary Transcript/ Report Card	13	10	40
Training Milestone	-	-	-
Skills Progression	-	1	-
Total	17	11	60
Participants Who Earned Measurable Skill Gains	2017	2018	2019
Number of Participants Who Earned Measurable Skill Gains	15	10	60

Table 7—IA-B 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 (PYs 2017-2019)

Median Hourly Earnings and Hours Worked per Week at Exit		PY 17	PY 18	PY 19		
Number of Participants Who Exited in Competitive and Integrated Employment or Supported Employment		23	36	28		
Median Hourly Earnings at Exit		\$10.00	\$12.00	\$14.00		
Median Hours Worked per Week at Exit		30	30	33		
Primary Source of Support at Exit	PY 17	PY 17	PY 18	PY 18	PY 19	PY 19
	Number of Participants	Percent	Number of Participants	Percent	Number of Participants	Percent
Personal Income	16	69.6%	27	75.0%	22	78.6%
Family and Friends	-	0.0%	2	5.6%	1	3.6%
Public Support	6	26.1%	7	19.4%	5	17.9%
Other Sources	1	4.3%	1	2.8%	-	0.0%
Public Support at Exit	PY 17	PY 17	PY 18	PY 18	PY 19	PY 19
	Number of Participants	Percent	Number of Participants	Percent	Number of Participants	Percent
Social Security Disability Insurance (SSDI) at Exit	7	30.4%	14	38.9%	8	28.6%
Supplemental Security Income (SSI) for the Aged, Blind, or Disabled at Exit	3	13.0%	4	11.1%	4	14.3%
Temporary Assistance for Needy Families (TANF) at Exit	-	0.0%	-	0.0%	1	3.6%
General Assistance (State or local government) at Exit	-	0.0%	-	0.0%	1	3.6%
Veterans' Disability Benefits at Exit	-	0.0%	-	0.0%	-	0.0%
Workers' Compensation at Exit	-	0.0%	-	0.0%	-	0.0%
Other Public Support at Exit	1	4.3%	1	2.8%	1	3.6%
Medical Insurance Coverage at Exit	PY 17	PY 17	PY 18	PY 18	PY 19	PY 19
	Number of Participants	Percent	Number of Participants	Percent	Number of Participants	Percent
Medicaid at Exit	6	26.1%	11	30.6%	9	32.1%
Medicare at Exit	10	43.5%	13	36.1%	9	32.1%
State or Federal Affordable Care Act Exchange at Exit	-	0.0%	-	0.0%	-	0.0%
Public Insurance from Other Sources at Exit	-	0.0%	-	0.0%	-	0.0%
Private Insurance Through Employer at Exit	7	30.4%	13	36.1%	11	39.3%
Not Yet Eligible for Private Insurance Through Employer at Exit	-	0.0%	-	0.0%	-	0.0%
Private Insurance Through Other Means at Exit	6	26.1%	8	22.2%	7	25.0%

Table 8—IA-B Number of Participants Who Exited with Competitive Integrated Employment or Supported Employment by the Most Frequent SOC Title (PYs 2017-2019)

No.	PY 19 SOC Title	PY 17 Number of Participants	PY 17 Median Hourly Earnings
1	Customer Service Representatives	2	\$8.00
2	Food Preparation Workers	2	\$8.00
3	Receptionists and Information Clerks	1	\$8.00
4	Ushers, Lobby Attendants, and Ticket Takers	1	\$10.00
5	Teacher Assistants	1	\$9.00
6	Parts Salespersons	1	\$33.00
7	Dishwashers	1	\$8.00
8	Personal Care Aides	1	\$12.00
9	Producers and Directors	1	\$10.00
10	Graphic Designers	1	\$14.00
No.	PY 19 SOC Title	PY 18 Number of Participants	PY 18 Median Hourly Earnings
1	Massage Therapists	2	\$11.50
2	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	2	\$8.00
3	Dining Room and Cafeteria Attendants and Bartender Helpers	2	\$8.50
4	Stock Clerks and Order Fillers	2	\$10.50
5	Personal Care Aides	1	\$10.00
6	Lodging Managers	1	\$19.00
7	General and Operations Managers	1	\$32.00
8	Counter Attendants, Cafeteria, Food Concession, and Coffee Shop	1	\$10.00
9	Cooks, Institution and Cafeteria	1	\$9.00
10	Customer Service Representatives	1	\$13.00
No.	PY 19 SOC Title	PY 19 Number of Participants	PY 19 Median Hourly Earnings
1	Stock Clerks and Order Fillers	2	\$8.00
2	Customer Service Representatives	2	\$14.00
3	Occupational Therapists	1	\$23.00
4	Loan Officers	1	\$12.00
5	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	1	\$10.00
6	Clinical, Counseling, and School Psychologists	1	\$46.00
7	Massage Therapists	1	\$12.00
8	Rehabilitation Counselors	1	\$24.00
9	Child, Family, and School Social Workers	1	\$15.00
10	Bookkeeping, Accounting, and Auditing Clerks	1	\$10.00

Table 9—IA-B Number of Students with Disabilities Reported, and the Number and Percentage of Students with Disabilities Who Received Pre-Employment Transition Services (PYs 2017-2019)

Students with Disabilities	PY 17 Number/ Percentage of Students	PY 18 Number/ Percentage of Students	PY 19 Number/ Percentage of Students
Total Students with Disabilities Reported	108	146	180
Students with Disabilities Reported with 504 Accommodation	12	19	25
Students with Disabilities Reported with IEP	93	123	150
Students with Disabilities Reported without 504 Accommodation or IEP	3	4	5
Total Students with Disabilities Who Received a Pre-Employment Transition Service	3	40	60
Potentially Eligible Students with Disabilities Who Received a Pre-Employment Transition Service	0	0	0
Students with Disabilities, Who Applied for VR Services, and Received a Pre-Employment Transition Service	3	40	60
Percentage of Students with Disabilities Reported Who Received a Pre-Employment Transition Service	2.8%	27.4%	33.3%

Table 10—IA-B Number and Percentage of Required Pre-Employment Transition Services Provided (PYs 2017-2019)

Pre-Employment Transition Services	PY 17 Number of Pre- Employment Transition Services Provided	PY 17 Percent of Total Pre- Employment Transition Services Provided	PY 18 Number of Pre- Employment Transition Services Provided	PY 18 Percent of Total Pre- Employment Transition Services Provided	PY 19 Number of Pre- Employment Transition Services Provided	PY 19 Percent of Total Pre- Employment Transition Services Provided
Total Pre-Employment Transition Services Provided	5	100%	243	100%	441	100%
Job Exploration Counseling	0	0.0%	34	14.0%	50	11.3%
Work-Based Learning Experiences	3	60.0%	30	12.3%	40	9.1%
Counseling on Enrollment Opportunities	0	0.0%	19	7.8%	47	10.7%
Workplace Readiness Training	2	40.0%	114	46.9%	183	41.5%
Instruction in Self-Advocacy	0	0.0%	46	18.9%	121	27.4%

Vocational Rehabilitation Program Other Measures That Matter

Measure 1—IA-B Sustaining Employment After Exit (January 1, 2018 – December 31, 2018)

This measure is the percent of VR program participants who are employed at exit and employed in the Second and Fourth Quarters after Exit.

	Number/Percent
Number Exited with Employment (01/01/2018-12/31/2018)	33
Number Employed in Second Quarter after Exit AND Fourth Quarter after Exit	0
Percent Sustaining Employment	0%

Measure 2—IA-B Profile: Quality Employment (PY 2019)

This profile provides information related to employment status at exit and four quality indicators of employment:

1. Median Hourly Earnings.
2. Median Hours Worked per Week.
3. Employer-Provided Health Insurance; and
4. Social Security beneficiary information

Primary Disability	Number of Participants Exiting with Employment	Percent of Total Exiting with Employment	Median Hourly Earnings at Exit	Median Hours Worked per Week at Exit	Number with Health Insurance at Exit	Number with SS Benefits at Exit	Percent Employed at Exit
Visual	28	100.00%	\$14.00	32.50	28	12	27.72%
Communication							
Physical							
Intellectual							
Psychosocial							
Significance of Disability	Number of Participants Exiting with Employment	Percent of Total Exiting with Employment	Median Hourly Earnings at Exit	Median Hours Worked per Week at Exit	Number with Health Insurance at Exit	Number with SS Benefits at Exit	Percent Employed at Exit
Significant	19	67.86%	\$16.00	35	19	7	29.69%
Most Significant	9	32.14%	\$10.00	30	9	5	24.32%
Students with Disabilities	Number of Participants Exiting with Employment	Percent of Total Exiting with Employment	Median Hourly Earnings at Exit	Median Hours Worked per Week at Exit	Number with Health Insurance at Exit	Number with SS Benefits at Exit	Percent Employed at Exit
Received Pre-Employment Transition Service under IPE							

Measure 3—[Insert] Profile: VR Process Efficiency (PY 2019)

This profile provides information related to how efficiently individuals with disabilities were determined eligible for the VR program and received an Individualized Plan for Employment (IPE) within the Program Year. This profile will also show the outcomes these individuals if they exited during the Program Year.

Application to Eligibility (PY 2019)		Number		
Number of Individuals Who Applied in PY 2019		132		
Number of Individuals Determined Eligible in PY 2019		148		
Application to Eligibility (PY 2019)	30 Days after Application	31 and 60 Days after Application	61 or More Days after Application	
Number Determined Eligible within:	32	85	31	
Percent Determined Eligible within:	21.62%	57.43%	20.95%	
Number Determined Eligible in PY 2019 Who Exited with Employment during PY 2019 within	-	-	-	
Number Determined Eligible in PY 2019 Who Exited without Employment during PY 2019 within	-	3	1	

Eligibility to IPE (PY 2020)		Number			
Number of Individuals Who Had IPEs Developed in PY 2020					
Eligibility to IPE (PY 2020)	30 Days after Eligibility	31 and 60 Days after Eligibility	61 and 90 Days after Eligibility	91 or More Days after Eligibility	
Number with IPEs Developed within:					
Percent of IPEs Developed within:					
Number with IPEs Developed in 2020 Who Exited with Employment during PY 2020					
Number with IPEs Developed in 2020 Who Exited without Employment during PY 2020					

*PY 2020 data was not available at the time of this FFY 2021 monitoring review.

Measure 4—[Insert] Profile: VR Service Provision (PY 2019)

This profile shows the number of VR program participants who received at least one VR service divided by the total number of VR program participants.

VR Program Participants	Program Year 2019 Q1	Program Year 2019 Q2	Program Year 2019 Q3	Program Year 2019 Q4
Number of Participants Receiving VR Services	276	293	300	309
Total Number of Participants	492	499	506	500
Percent Receiving VR Services	56.10%	58.72%	59.29%	61.80%

Measure 5—[Insert] Percent of Participants Enrolled in Education/Training Program Leading to a Recognized Credential/Employment (PY 2019)

This measure shows the number of VR program participants who could earn a Measurable Skill Gains, as they work towards a Recognized Postsecondary Credential or Employment, divided by the total number of VR program participants being served. This measure uses the MSG Rate denominator as its numerator while the denominator is the total number of VR program participants.

Program Year 2019 MSG Rate Denominator	Program Year 2019 Total Number of Participants Served	Program Year 2019 Percent of Participants Eligible to Earn MSG
78	571	13.66%

Measure 6—[Insert] Profile: Pre-Employment Transition Services (PY 2019)

These profiles provide information related to the breakout of students with disabilities who received pre-employment transitions services in terms of the potentially eligible students with disabilities and the students with disabilities who received these services under an IPE and the number of students with disabilities who advance from potentially eligible status to VR program participant status and their outcomes. This data may be used to evaluate the relationship between the provision of pre-employment transition services, movement in the VR process, and employment outcomes.

Students with Disabilities (PY 2019)	Job- Exploration Counseling	Workplace Readiness Training	Work-Based Learning Experience	Counseling on PSE Enrollment	Self- Advocacy Training	One or More Service
Number of Potentially Eligible Students Who Received Service						
Number of Students Who Received Service under IPE	29	41	17	23	43	59
Number of Students Who Received Service as Both Potentially Eligible and under an IPE						
Number of Students Who Exited with Employment during PY						
Number of Students Who Exited without Employment during PY						

	Number/ Percent
Total Number of Participants in VR Program	571
Number of Potentially Eligible Students with Disabilities Who Received Pre-Employment Transition Services	0
Percent of Potentially Eligible Students with Disabilities Who Received Pre-Employment Transition Services	N/A
Total Number of Applicants to VR Program	132
Number of Potentially Eligible Students with Disabilities Who Applied to VR Program	8
Percent of Potentially Eligible Students with Disabilities Who Applied to VR Program	6.1%

APPENDIX B: FISCAL DATA TABLES

The fiscal data tables generally included in RSA's monitoring reports are reflective of the latest version of the SF-425 financial data submitted by the VR agency as of the date of the review. Due to the transition of the RSA Management Information System (RSAMIS) during the period of review, fiscal staff used the individual report submissions in lieu of the fiscal data tables. Consequently, RSA has not included the fiscal tables in this report to avoid any confusion or misinterpretation. The agency's individual SF-425 and RSA-2 submissions are publicly available on the RSAMIS website. Any questions about the fiscal data used for the review should be addressed to the Financial Management Specialist that conducted the review.