

**FEDERAL FISCAL YEAR 2021
MONITORING REPORT ON THE REVIEW
OF THE IDAHO DIVISION OF VOCATIONAL
REHABILITATION (IDVR)
VOCATIONAL REHABILITATION
AND SUPPORTED EMPLOYMENT
PROGRAMS**



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

March 7, 2022

TABLE OF CONTENTS

	Page
Section 1: The Scope of the Review	1
Section 2: Focus Area – Performance of the State Vocational Rehabilitation Services and State Supported Employment Services Programs.....	3
Section 3: Focus Area – Financial Management of the State Vocational Rehabilitation Services and State Supported Employment Services Programs.....	24
Appendix A: State Vocational Rehabilitation Services and State Supported Employment Services Programs Performance Tables	31
Appendix B: Fiscal Data Tables	44

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. Though 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 Idaho Division of Vocational Rehabilitation (IDVR) 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 June 1 through August 19, 2021, was defined by information, documents, and data submitted by IDVR, taking into account the goals, unique circumstances, and technical assistance needs of IDVR.

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 Tonya Stellar (Vocational Rehabilitation Program Unit); Caneshia McAllister and Samuel Pierre (Technical Assistance Unit); Jessica Hawes (Workforce Innovation and Opportunity Act (WIOA) Team Coordinator); Rimal Desai and Vernita Washington (Data Collection and Analysis Unit); and Patricia Dickerson (Fiscal Unit). Although not all team members participated in all aspects of the off-site monitoring 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 IDVR for the cooperation and assistance extended throughout the review process. RSA also appreciates the participation of others, such as the State Rehabilitation Council (SRC), the Client Assistance Program, advocates, and other stakeholders 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 IDVR on the Case Service Report (RSA-911) and the WIOA Statewide Performance Report (ETA-9169) for program years (PYs) 2017 through 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 IDVR uses data to inform program performance and management of the VR and Supported Employment programs.

Performance Data Summary and Analysis

During the review period, the number of applicants, number of individuals determined eligible for VR services, and number of individuals with an individualized plan for employment (IPE) decreased significantly from PY 2017 through PY 2019. IDVR attributed the decline in applicants to a reduction in referrals and decreased outreach, as a result of the need to pivot to remote service provision due to the COVID-19 pandemic, and the strong economy in Idaho and significantly low unemployment rate. Additionally, the expiration of behavioral health contracts with the Idaho Department of Health and Welfare offices in PY 2019, which readily supported referrals and applicants due to the co-location of VR staff in mental health offices, may have contributed to the decrease in applicants.

During the review, IDVR shared strategies implemented to increase outreach to individuals with disabilities, including the use of public service announcements intended for special populations, such as students and youth with disabilities, and individuals with disabilities served through the Idaho Department of Juvenile Corrections and Department of Correction (IDOC) systems. Regional offices also conducted targeted outreach. IDVR reported the use of letters to outreach to previously served IDVR customers who may have lost employment due to the COVID-19 pandemic. IDVR also reported collaborating with the Department of Health and Welfare, as well as provider agencies, to leverage resources and ensure that individuals with psychosocial

disabilities in need of VR services to achieve competitive integrated employment, including supported employment, are referred to the VR program.

From PY 2017 through PY 2019, IDVR sustained compliance with the statutory 60-day eligibility determination requirement and achieved compliance in PY 2019 with the 90-day required timeline for development of the individualized plan for employment (IPE).

Of the individuals receiving services under an IPE in PY 2019, 49.8 percent were individuals with psychological or psychosocial disabilities and 22.0 percent were individuals with cognitive disabilities. IDVR reported assigning a dedicated counselor to serve individuals who are deaf and hard of hearing in an effort to increase the percentage of individuals with auditory and communicative impairments served (10.8 percent in PY 2019). IDVR communicated additional efforts to partner with organizations and other programs such as the Council for the Deaf and Hard of Hearing, Developmental Disabilities Council, centers for independent living (CIL), and workforce development partners to increase outreach, referral, and services to individuals with disabilities in both rural and urban areas.

Consistent with the decrease in the number of applicants and individuals determined eligible for the VR program, the number of individuals with disabilities who exited the VR program also decreased from PY 2017 through PY 2019. The greatest number of individuals who exited the VR program did so after receiving services under an IPE without an employment outcome, followed by those who exited after the determination of eligibility prior to developing an IPE. In an effort to decrease attrition prior to and after IPE development, IDVR reported implementing strategies to improve customer engagement, such as requiring counselors to contact clients every 30 days.

From PY 2017 through PY 2019, the number and percentage of participants in receipt of services decreased as well. Specifically, the percentage of participants receiving VR services in PY 2019 decreased by 10 percent across all four quarters from 67.56 percent (Quarter 1) to 56.95 percent (Quarter 4). Prior to July 1, 2019, IDVR's case management system did not capture direct services provided by VR counselors. IDVR indicated that its new ability to capture and report agency provided services, coupled with training conducted for staff in November and December 2020 on service categories in accordance with the revised Case Service Report (RSA-911) will result in more accurate reporting of services, including career services such as vocational rehabilitation counseling and guidance, job search and placement assistance, information and referral services, and customized employment services, as well as purchased training services such as job readiness training and customized training. IDVR also anticipates a decreased use of "miscellaneous training" as a result of efforts to train counselors on proper reporting.

From PY 2017 through PY 2019, IDVR's measurable skill gains (MSG) rate increased; however, the reporting of credential attainment rates proved to be more challenging for IDVR due to case management programming issues during the period of time under review. Specifically, IDVR was unable to accurately report the credential attainment rate for PYs 2017 and 2018 due to the VR agency's misunderstanding of RSA data specifications. During the review period, RSA clarified data specifications and provided technical assistance to improve coding and reporting of the credential attainment rate so that over 40 percent, rather than 4 percent, was reported in PY 2020. Technical assistance is further described in Section C of this focus area.

The number of competitive employment outcomes, including supported employment, achieved by participants decreased from PY 2017 through PY 2019; however, the median wage earned by those who achieved employment increased during the same period.

The VR Process

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

Over a three-year period, the number of total applicants decreased from 4,878 individuals in PY 2017, to 2,881 individuals in PY 2019, according to information reported by the VR agency on the RSA-911 reports. Similarly, the number of individuals determined eligible for VR services decreased from 4,245 individuals in PY 2017, to 2,667 individuals in PY 2019. During PY 2019, 290 individuals (7.21 percent) exited from application status before an eligibility determination was made and 945 individuals (23.5 percent) exited after being determined eligible for VR services, but prior to a signed IPE.

During the review period, IDVR consistently made timely eligibility determinations, achieving 97.9 percent of eligibility determinations within 60 days from the date of application in PY 2019. IDVR stated that it requires VR counselors to determine presumptive eligibility within 15 days from the receipt of social security administration benefits verification . In PY 2019, approximately 45.74 percent of all eligibility determinations (1,220 eligibility determinations) were made within 30 days from the date of application (Measure 3 ID-G Profile: VR Process Efficiency). IDVR reported that it also requires eligibility determination extensions be developed in collaboration with the applicant and in accordance with 34 C.F.R. § 361.41(b)(1)(i). As a result, only 36 eligibility determination extensions were made in PY 2019, supporting the VR agency's assertion that its timely eligibility determination practices have resulted in a decline in the use of eligibility determination extensions.

The percentage of IPEs developed within the statutory 90-day time frame from the date of eligibility determination increased from 81.8 percent in PY 2017 to 92.1 percent in PY 2019. IDVR's heightened emphasis on timely IPE development led the agency to provide regular staff training on the requirements and best practices used by VR counselors to ensure compliance. The VR agency has built "activity due" alerts into its case management system to remind VR counselors and supervisors of impending case management due dates, which are monitored by regional managers and enforced by the Chief of Field Services.

Consistent with the decline in VR applicants and eligible individuals from PY 2017 to PY 2019, the number of individuals in receipt of VR services under an IPE also decreased during the three-year period. IDVR attributed the decline in the number of participants in receipt of services under an IPE to the decline in applicants, eligible individuals and an increase in VR counselor vacancies that may have affected client engagement.

As a result of the reduction in the number of individuals seeking services from the VR system, and limited staff capacity to manage cases, the number of participants who exited the VR program also decreased from 5,545 participants in PY 2017 to 4,020 participants in PY 2019. Of the 4,020 individuals who exited the program in PY 2019, over one-third (1,497 individuals or 37.2 percent) exited after an IPE, without an employment outcome, and almost one quarter (945 individuals or 23.5 percent) exited after eligibility, but prior to a signed IPE.

During the review, RSA and IDVR discussed the reported reasons individuals exited the VR program from PY 2017 through PY 2019. The percentage of individuals who exited due to “no longer interested in receiving services or further services” increased from 43.5 percent to 55.7 percent. This was also the most reported reason for exit in PY 2019, followed by the achievement of competitive integrated employment (20.1 percent) and unable to locate or contact (13.4 percent in PY 2019). In October 2020, IDVR conducted a targeted post-closure service record review to determine reasons for client disengagement, and identified a need for benefits planning in at least four cases reviewed, as well as the need to code and report vocational rehabilitation counseling and guidance services provided by VR counselors. In an effort to decrease attrition and case closure due to “no longer interested in services,” IDVR implemented a required managerial review of all potential closures without employment outcomes, prior to case closure in PY 2020. IDVR communicated its specific concerns regarding client disengagement after an IPE has been developed, and after eligibility but prior to a signed IPE. RSA and IDVR discussed additional strategies used to decrease the number of all individuals exiting from the VR program due to lack of interest or engagement, including requiring that VR counselors contact individuals every 30 days at a minimum and prior to case closure.

The number of competitive integrated employment outcomes decreased from 1,466 individuals in PY 2017 to 808 individuals in PY 2019. Of the 808 individuals exiting the VR program with competitive integrated employment in PY 2019, 108 individuals exited with supported employment. When comparing the number of individuals who exited the VR program with employment after receiving services to the total number of individuals who exited with or without employment after receiving services, IDVR had an employment rate of 35.0 percent in PY 2019, a 9 percent decrease from 44 percent in PY 2017. However, for those who achieved employment, the median wage earned increased \$1.19 from \$10.50 in PY 2017 to \$11.69 in PY 2019. In an effort to increase its rehabilitation rate, as well as median wage earned, IDVR reported that it encouraged the provision of training and postsecondary education to prepare individuals with disabilities for careers and quality employment outcomes.

VR Services

RSA reviewed and analyzed data and policies in consultation with IDVR related to career, training, and other services provided to VR program 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.

During PY 2019, IDVR provided VR services to a total of 5,896 individuals. Of those individuals, eighteen individuals (0.3 percent) received graduate degree training, 268 individuals (4.5 percent) received bachelor’s degree training, 112 individuals (1.9 percent) received junior or

community college training, 316 individuals (5.4 percent) received occupational or vocational training, 80 individuals (1.4 percent) received job readiness training, 2 individuals received apprenticeship training, and no individuals were reported as receiving customized training.

In PY 2019, only 6.7 percent of the services provided were college degree or community college training. In an effort to improve postsecondary education training services, IDVR communicated its commitment to exploring how it can more effectively partner with postsecondary education and disability support services to address student support needs at institutions of higher education (IHEs). In an effort to make postsecondary education tuition assistance available to all individuals, including those without comparable benefits, IDVR removed thresholds or limitations specific to IDVR tuition assistance in July 2017. IDVR shared that it will be working with the Idaho Department of Labor's apprenticeship program, through a recently awarded U.S. Department of Labor (DOL) grant, that will enable registered apprenticeship staff to be co-located in VR offices, in an effort to increase the number of apprenticeship programs available to applicants and recipients of IDVR services.

Of the 5,896 participants served in PY 2019, 24.34 percent of participants were eligible for measurable skill gains (MSG). Of the 1,435 participants reported eligible for MSG, 53.7 percent, or 771 participants, were reported as having earned an MSG in PY 2019. This was an increase from 26.1 percent in PY 2017. RSA and IDVR discussed increasing the MSG rate during the next round of negotiations in PY 2022 based on IDVR's past performance. In an effort to continue to improve the reporting of MSG, IDVR re-emphasized the importance of VR counselors' and regional managers' review of cases with participants in postsecondary education to ensure timely request for and submission of supporting documentation to enable accurate quarterly reporting of MSGs.

IDVR inaccurately reported its credential attainment rate as 4 percent in PY 2019, due to the limited capabilities of its case management system to capture credential attainment. RSA provided technical assistance to IDVR during the review that is further described in Section C of this focus area. As a result of the technical assistance, IDVR was able to review data provided for those individuals enrolled in educational programs and increased its credential attainment rate to 40 percent for PY 2020.

During PY 2019, IDVR inaccurately reported or did not provide certain career services and other services, as demonstrated by the RSA-911 report. For example, in PY 2019, IDVR reported providing no job placement assistance and information and referral services. IDVR communicated that during the period under review, job placement was reported as job search assistance or short-term job supports; however, to correct this error, the VR agency provided training to staff in PY 2020 on the new reporting requirements in RSA-PD-19-03 (issued May 6, 2019). During the same period of time, less than half of the participants served (43.2 percent) received vocational rehabilitation counseling and guidance and only 18 percent of participants served received job search assistance (e.g., resume writing and interview skills).

Vocational rehabilitation counseling, job search and placement services, and information and referral services are typically services provided by VR counselors. IDVR's inability to capture services provided directly by IDVR until July 1, 2019, affected the agency's ability to accurately

report services provided directly by the VR agency. As a result, the majority of services reported for most of PY 2019, were services purchased by IDVR. Service authorizations began capturing direct services provided by VR counselors in July 2019. A more comprehensive list that includes the number and percent of participants who received training, career, and other services for PY 2019 is in Appendix A, Table 5 of this report.

In an effort to improve and increase the career and training services provided, IDVR reported increased expenditures to address the needs of its consumers, including the use of comprehensive assessments to identify necessary training opportunities and enable individuals to make an informed choice specific to the career path they wish to pursue. In addition, IDVR committed more staff and funds to service delivery and consumer engagement. Specifically, IDVR communicated its commitment to supporting individuals who are pursuing two- and four-year postsecondary education programs at IHEs, partnerships with Career Index Plus, and client access to career pathways programming. IDVR will be co-locating staff from the Idaho Registered Apprenticeship program in VR offices using a recently awarded PY 2021 grant from the U.S. DOL. This will enable IDVR to expand student and youth apprenticeship opportunities.

In its effort to increase outreach and serve the deaf and hard of hearing community, IDVR reported filling a six-month vacancy with a VR counselor fluent in American Sign Language (ASL). When needed, IDVR uses contracted ASL interpreters.

Quality of Employment Outcomes

The RSA review team examined data reported by IDVR, 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 (MSGs) and credentials;
- Efforts to assist participants in achieving parity with the general working population; and
- Strategies to promote job retention.

As previously discussed under VR Process in Section B, the number of competitive integrated employment outcomes decreased 55.11 percent from PY 2017 to PY 2019. Of those individuals who achieved competitive integrated employment in PY 2019, 20 percent exited with supported employment. The rehabilitation rate also decreased from 44 percent in PY 2017 to 35 percent in PY 2019.

For those who achieved employment, the median wages earned increased \$1.19 from \$10.50 in PY 2017 to \$11.69 in PY 2019, with median hours worked in PY 2019 at 34 hours. In PY 2019, over 76 percent of the 808 individuals who achieved employment reported personal income as the primary source of support, while 19.4 percent reported public support as the primary source of support. IDVR attributed the smaller percentage of individuals in receipt of public support at closure to the receipt of VR services. IDVR began providing benefits planning in March 2020. Of those individuals with insurance coverage at exit, 33.7 percent were in receipt of insurance through their employer, 31.4 percent were in receipt of Medicaid and 18.3 percent were in receipt of Medicare at exit.

During PY 2019 the five most common employment types using the Standard Occupational Classification (SOC) titles were Locker Room, Coatroom, and Dressing Room Attendants (123 individuals), which IDVR indicated to be a reporting error that was corrected in PY 2020; Heavy and Tractor-Trailer Truck Drivers (51 individuals); Helpers- Production Workers (46 individuals); Food Preparation and Serving Related Workers, All Other (34 individuals); and Office Clerks, General (30 individuals). During the review period, IDVR took steps to decrease the use of “Locker Room, Coatroom, and Dressing Room Attendant,” which was in the case management system as “All Other Service Workers.” The choice of “All Other Service Workers” has since been retired and staff can no longer use it on IPEs as an employment goal. IDVR did not report locker room attendants as employment outcomes achieved in PY 2020.

IDVR reported implementing dashboards to compare the average wage earned by service provided and the rehabilitation rate to better determine the impact of services on the achievement of employment. Through its own analysis of performance data, IDVR noted a higher employment rate for persons with most significant disabilities receiving supported employment services (i.e., ongoing supports after job placement), and a relatively lower employment rate for individuals receiving higher education. IDVR surmised that the variation in employment rates may be due to the level of supports provided or arranged by the VR agency.

In an effort to increase its rehabilitation rate, as well as median wages earned, IDVR reported that it is exploring strategies to assess student education support needs to identify areas IDVR needs to improve upon to support students transitioning from secondary to postsecondary education, including the use of comprehensive assessments to identify support needs, career paths, vocational interests, employment goals and necessary training, as well as the coordination of disability support services at IHEs. IDVR communicated that it has encouraged agency supported training and postsecondary education in order to prepare individuals with disabilities for career pathways, believing that postsecondary educational supports are necessary to ensure success.

To further improve upon and promote career advancement, IDVR reported strategies implemented to increase the availability of postsecondary education and apprenticeships, and to

prepare individuals for industries with projected job gains in the State of Idaho, including healthcare, manufacturing, and construction jobs. IDVR is hopeful that its partnership with the Idaho Registered Apprenticeship program will also improve the employment opportunities and outcomes in skilled trades for IDVR participants.

IDVR reported that it is evaluating its personnel structure to better align agency positions to support comprehensive assessments, VR services, and outcomes. After the passage of the WIOA amendments to the Rehabilitation Act, the VR agency realigned central office staff to include the addition of transition, senior training and business engagement specialists, as well as a program analyst responsible for assessing agency performance, such as that on the WIOA performance measures.

IDVR attributed some of the reduction in successful employment outcomes to its employment verification and supporting documentation requirements that must be met in order for a service record to be closed for an individual who achieved successful competitive integrated employment. Specifically, IDVR reported that VR counselors are closing service records as unsuccessful if employment cannot be verified and substantiated with supporting documentation. Prior to the review, IDVR ran a query of unsuccessful closures and confirmed that 30 service records were closed unsuccessfully for individuals who were successfully employed, due to the lack of supporting documentation to substantiate and verify employment. RSA clarified that IDVR appears to be correctly implementing the record of services requirements in 34 C.F.R. § 361.47, and encouraged IDVR to consider strategies that may be implemented in order to prevent unsuccessful case closure, and improve staff guidance in the absence of employment verification, for appropriate successful case closure. Subsequent to the off-site review discussions, IDVR communicated that all cases prepared for unsuccessful closure will be reviewed by management staff prior to unsuccessful case closure, rather than using previously implemented post-closure reviews.

Similarly, IDVR staff are not permitted to report MSG until all supporting documentation is received and saved in the service record for the quarter in which the MSG was received. The MSG rate continued to improve when comparing PYs 2017, 2018 and 2019. A validation process is executed every quarter by IDVR's program analyst in an effort to continue to improve the accurate reporting of MSG.

IDVR signed a State Wage Interchange System (SWIS) Data Sharing Agreement (SWIS agreement) in PY 2020. As a result, IDVR indicated that it had not experienced delays obtaining, using, tracking, and reporting quarterly wage data from its State Unemployment Insurance Agency. Rather, IDVR reported a timelier exchange of data since the agreement was signed.

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 IDVR 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 other measures that matter data tables and performance data related to the number of students with disabilities who received pre-employment transitions 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.

The number of students with disabilities who applied for VR Services and received a pre-employment transition service decreased from 747 students in PY 2017 to 394 students in PY 2019, while the number of potentially eligible students in receipt of pre-employment transition services increased significantly from 339 students in PY 2017 to 834 students in PY 2019. Of the 2,173 students with disabilities reported by IDVR in PY 2019, 56.5 percent received pre-employment transition services. Sixty-eight percent of the 1,228 students with disabilities in receipt of pre-employment transition services were potentially eligible (834 students) for the VR program, while 32 percent (394 students) were VR applicants. In PY 2019, only 2.3 percent of potentially eligible students applied for VR services (Measure 6 ID-G Profile: Pre-Employment Transition Services). As a result, IDVR is exploring career mapping to determine services necessary for improved outcomes, and is expanding outreach to families so that families understand the continuum of services available to students during and after secondary education through the VR program.

IDVR reported that during the period under review, pre-employment transition services were provided to potentially eligible and VR eligible students under an IPE directly by VR counselors, community rehabilitation providers (CRPs), employers, as well as local educational agencies (LEAs) and IHEs through contracts. IDVR reported using two case types, a pre-case type to report the provision of services to potentially eligible students and a traditional VR-case type to report students after eligibility determination.

IDVR currently has the capacity to track agency provided and purchased services through case service authorizations; however, it was unable to track and report VR agency provided (i.e., in-house) services until July 1, 2019. Therefore, IDVR was unable to track and report the pre-employment transition services provided directly by VR counselors during the period of time under review. As a result, less than 24 percent of the pre-employment transition services provided in PY 2019 included required activities typically provided by counselors, including job exploration counseling (7.8 percent), counseling on enrollment opportunities (7.4 percent) and instruction in self-advocacy (8.8 percent).

In October 2020, IDVR implemented three area transition counselor positions that cover all eight regions across the State and support the 70 VR counselors and VR specialists assigned to work collaboratively with 150 LEAs in order to identify students in need of VR and pre-employment transition services. VR counselors and specialists directly provide job exploration counseling, counseling on enrollment opportunities in comprehensive transition programs or postsecondary educational programs at IHEs, workplace readiness training, and instruction in self-advocacy. Staff are able to track and report staff-time spent on the provision of required, authorized and pre-employment transition coordination activities using designated codes on their timesheets.

During the review, IDVR provided RSA with a formal interagency agreement with the Idaho State Department of Education, the State educational agency (SEA), executed on November 3, 2020. RSA reviewed the SEA agreement and provided technical assistance specific to the requirements in Section 101(a)(11)(D) of the Rehabilitation Act and 34 C.F.R. § 361.22(b) as further described in Section C of this focus area.

During the period under review, RSA verified that IDVR had implemented policies, procedures, and internal controls specific to the provision, tracking and reporting of pre-employment transition services, as well as the direct staff time spent on the arrangement or provision of required pre-employment transition services or pre-employment transition coordination activities. RSA provided technical assistance specific to the requirements in Section 101(a)(10)(C) and 34 C.F.R. § 361.40, further described in Sections C and D of this focus area.

Factors Influencing Performance

As previously discussed, IDVR's inability to capture in-house services provided directly by VR counselors in its case management system until July 1, 2019, affected its ability to report all VR services provided, including pre-employment transition services provided directly by VR counselors, on the RSA-911.

IDVR's ability to capture credential attainment was impeded by incorrect data specifications in its case management system. The VR agency worked with its case management system contractor to upgrade data specifications in accordance with technical assistance provided by RSA. IDVR reported that it has been exploring how to better enhance data sharing through the Idaho State Board of Education and IHEs. RSA and IDVR discussed including data sharing in not only the SEA agreement required by 34 C.F.R. § 361.22(b), but also the IHE agreement required in 34 C.F.R. § 361.53(d). IDVR reported receiving postsecondary data from its State Longitudinal Data Sharing agreement.

IDVR's organizational structure, conflicting priorities of the extended services program and IDVR, and the lack of supported employment services providers have affected the provision of supported employment services and supported employment outcomes achieved by individuals with most significant disabilities in the State of Idaho.

IDVR is comprised of three components including the VR agency, the Council for the Deaf and Hard of Hearing (CDHH), an independent agency, and an extended employment services (EES) program. The EES program is a \$4 million State appropriated program that provides supports to individuals with most significant disabilities (e.g., developmental disabilities, traumatic brain injury, learning disabilities and chronic mental illness), who do not qualify for other sources of long-term supports in competitive integrated employment or non-integrated, non-competitive employment.

Although the EES is organized under IDVR, the focus of the VR program is to assist individuals with disabilities who are in need of VR services to achieve competitive integrated employment, including supported employment. As such, the VR program may not expend Federal funds or any non-Federal funds used as match on non-integrated, non-competitive employment services or programming. IDVR has assigned three FTEs to provide oversight and support to the EES

program. RSA clarified during the review that the time and effort of these three individuals spent on non-integrated, non-competitive programming or administration functions must be appropriately cost allocated to the EES. This will be further discussed in Section C of this focus area.

It is RSA's understanding that all referrals are processed through the VR program, and the same service providers are used by the VR program and the EES program to provide supported employment services and extended services, as well as sheltered workshops through the EES program. Community stakeholders interviewed during the review reported that there have been challenges as a result of the obverse goals and services offered by the two programs. Specifically, individuals referred by IDVR to service providers for supported employment services have been encouraged by service providers to instead seek non-integrated non-competitive employment. RSA clarified that once an individual communicates that he or she does not want to pursue competitive integrated employment, or that they wish to pursue non-integrated, non-competitive employment, that individual's case should be closed as ineligible for the VR program and served solely by the EES program; however, if an individual expresses that he or she would like to pursue competitive integrated employment, then the VR and EES program may collaborate to leverage resources and assist the individual with the supports necessary to achieve competitive integrated employment, including supported employment. RSA provided technical assistance specific to competitive integrated employment, as well as organizational structure in Section C of this focus area.

IDVR is further developing its partnership with Medicaid waiver services through the Idaho Department of Health and Welfare in order to improve outreach to and serve individuals with mental health needs who are eligible for VR services and Medicaid waiver services.

Use of Data to Inform Performance and Management

IDVR reported using data to inform data accuracy and program management in multiple ways. Specifically, IDVR developed data visualization dashboards to allow VR counselors, VR counselor assistants, and managers to review real time caseload-level data. This includes information on timely eligibility determinations and IPE development, as well as client engagement (e.g., counselor contact with customers), as evidenced by case notes. The visualization dashboards also reflect the frequency of VR agency provided and purchased services, and levels of MSG attainment. Quarterly reports summarizing errors and anomalies are generated and distributed to counselors as a final reminder to review and verify service record data, prior to the submission of quarterly performance data to RSA.

IDVR communicated that its management team has access to daily reports to monitor performance, including timely case movement per caseload, the types of pre-employment transition services provided to students with disabilities, overdue presumptive eligibilities and IPE development, employer services, and closure reasons. The quarterly RSA dashboards have also been replicated so that the IDVR management team can review preliminary dashboard data prior to the end of each quarter. Management staff are also provided with quarterly updates on post-exit performance data by the program analyst to identify and inform necessary staff training. Data are reviewed at least quarterly with regional management staff, and regularly at executive leadership meetings that are facilitated by central office management.

IDVR's planning and evaluation team analyzes data and provides information to the agency's executive leadership team to assist with appropriate decision making for program improvement. Specifically, performance data are used for planning purposes, policy or procedural changes, and to identify the need for specific program improvement (e.g., pre-employment transition services and supported employment services). IDVR also uses performance data to assess the performance of CRPs' programs and staff, and to inform fiscal forecasting, monitoring activities, and office/region realignment. Data assist the agency with its strategic planning process, including the identification of agency performance goals, priorities, objectives, and timelines. The VR agency also uses data to inform presentations to external stakeholders, such as legislators, other State agencies, vendors/CRPs, other partners, and the State Rehabilitation Council.

Internal Controls and Policies

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

The VR agency is required to maintain verifying documentation in an individual's service record, particularly regarding eligibility determination, IPE development, services provided, and case closure. In accordance with joint policy guidance outlined in [RSA-TAC 19-01](#), VR agencies are required to maintain supporting documentation for several RSA-911 data elements used to calculate the WIOA performance indicators. In addition, VR agencies must maintain supplemental wage information for some participants, as outlined in the joint policy guidance in [RSA-TAC-17-04](#). The use of an electronic case management system does not remove the requirement for the agency to maintain either hard copies or scanned copies of required supporting documentation in the individual's service record.

Prior to the on-site monitoring review, RSA requested documentation from IDVR outlining policies and procedures related to the management of case service records, supporting documentation requirements, reporting data on the RSA-911 and internal control processes (e.g. ensuring data accuracy, reliability, and timely submission), as well as case file description tools used by VR agency staff to organize case files.

IDVR provided RSA with case management system adaptations and security parameters that were implemented at the system, case and personnel levels for vocational rehabilitation counselors, vocational rehabilitation specialists, regional managers, and vocational rehabilitation assistants). IDVR also provided processes and system checks implemented to prevent erroneous case movement and reporting of data. System checks included the requirement that a case be reviewed and signed by a qualified professional or approval authority before eligibility

determination, eligibility extensions, IPE and IPE extension, before dates can be entered into the case management system. Specifically, eligibility extensions and IPE extensions, after an initial 30-day extension, must be approved and dated by regional managers or assistant regional managers. Furthermore, IPEs cannot be developed in the case management system until an eligibility determination has been completed. Systematic case management checks have also been implemented to improve the accuracy of reported data. For example, IDVR's case management system includes "activity due" alerts to remind staff to review MSG and credential attainment after the second and fourth quarters of a program year. System controls limit the types of MSGs available based on education level and the reporting of MSGs without supporting documentation.

IDVR's program analyst developed and implemented a program analyst desk manual that is used by IDVR staff to run quarterly reviews of service records opened in the previous quarter in order to identify any anomalies in the data, including any performance data that appear to be outside of the expected range for data values (e.g., wages over a specific amount (i.e., \$40 per hour)), or data that are clearly erroneous (e.g., educational goal end date prior to the Start date). Errors and anomalies are communicated to the field staff through regional management staff, and regional help desk staff. Field staff are expected to review issues associated with their caseloads for verification or correction prior to submission of RSA-911 data.

Regional managers conduct monthly regional and statewide case reviews as part of IDVR's internal control process, and errors are identified and issued to counselors as "pink slips." Discrepancies identified during the review process inform the development of staff training and are discussed during bi-weekly staff meetings with regional managers.

IDVR reported that it also conducts statewide targeted program/case and fiscal reviews on an annual basis. Targeted VR cases reviews have included a focus on purchases such as hearing aids, auto repairs, tools, tuition (greater than \$9,000), medical records and transportation (greater than 90 days and \$180). For example, in FFY 2020, fiscal case reviews were executed to determine whether the dates on a CRP report and invoice fell within the appropriate timeframe for those goods purchased (over \$500 and less than \$10,000) where a state contract was not available. The agency uses targeted reviews to aggregate results, identify training needs and to schedule "Did You Know" training sessions to address areas of concerns identified during the reviews. IDVR's planning and evaluation (P&E) unit uses the RSA data dashboards and IDVR dashboards to validate the accuracy of its data and use the information for program improvement. The P&E unit also presents data to the Executive Leadership Team for further review, input, and analysis.

IDVR's Internal Controls System Evaluation is based on the "Government Accountability Office (GAO) Green Book and Orange Book documentation requirements" that were used to develop a performance report guide, establish activity level objectives and conduct a risk management analyses. IDVR reported the implementation of internal control activities with common categories, including trend analyses and the review of performance reports. Financial and program managers jointly review and compare financial budgetary and operational performance to planned or expected results. These activities also include information processing, validation of data through automatic edit checks, and the review of performance measures, indicators, and transition expectations.

IDVR's internal controls also include spending authority limits on staff's ability to authorize funds based on their staff-level/role within the agency. IDVR reported using an auto-budget functionality in its case management system to manage the appropriate fund source selection for authorizations. The auto-budget function automatically assigns an authorization to a specific fund source based on the customer's characteristics and the nature of the purchased service. This automatic assignment of funds eliminates most potential fund source errors that would otherwise occur if staff were required to select funds on their own.

C. Technical Assistance and Recommendations

RSA provided technical assistance in the following topical areas to IDVR 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 IDVR to achieve continuous improvement in performance. RSA is available to provide follow-up technical assistance and has referred the VR agency to the RSA Technical Assistance Center on Quality Management to improve its CRP report cards implemented in 2015 and explore customized employment.

Credential Attainment Rate

- RSA provided technical assistance specific to coding, tracking, and calculating the credential attainment rate based on enrollment data reported through data element 78 "enrolled in secondary education" and data element 84 "enrolled in postsecondary education," and using the calculations specified in RSA-PD-19-03, as a result of IDVR's inability to capture accurate credential attainment data through its case management system.
- RSA clarified that data elements 78 and 84 should indicate whether an individual was enrolled in an educational program during his or her participation in the VR program, and should continue to report code 1 even after the individual completes the educational program in which he or she was enrolled.
- RSA further clarified that the credential attainment rate includes outcomes that participants may achieve within one year of exiting the VR program. As such, the reporting cohort for any given program year reverts to the prior calendar year. RSA and IDVR discussed the point from which to review cohorts during a reporting period for enrollment data and removing training services from the calculations.
- In an effort to address this issue, IDVR developed an agency dashboard which allowed them to work directly with RSA's data unit to capture credentials attained in the same quarter in which individuals were enrolled in an educational program. RSA also provided technical assistance specific to earning and reporting short-term credentials.
- RSA further clarified that the PY 2020 Annual Report (ETA-9169) will include participants reported during PY 2020, with exit dates between January 1, 2019, through December 31, 2019. RSA will verify whether enrollment was reported during program participation or within one year of exiting the program.
- As a result of the technical assistance provided, the credential attainment rate reported by IDVR increased from 4 percent in PY 2019, to 40 percent in PY 2020.

Customized Employment

- RSA provided technical assistance on customized training and customized employment, and referred IDVR to the Director of Business Relations at the Council of State Administrators of Vocational Rehabilitation (CSAVR) to connect with the National Employment Team (NET) to discuss the potential development of a corporate partnership with companies that have a strong presence in the State of Idaho, such as Marriott International, a hotel company with 24 locations across the State.
- RSA identified and provided the contact information for a few VR agencies that have developed or are in the process of developing customized employment opportunities that may serve as a resource to IDVR in its development of programming.

Performance Policies

- RSA reviewed and provided technical assistance on IDVR policies specific to application, including residency requirements, assessment, eligibility determination, IPE development and projected post-school employment outcomes, employment and closure-related policies.
- RSA and IDVR discussed concerns related to IDVR policies on initial interviews that allow counselors to backdate initial interviews and edit or delete case notes for up to 119 days (Section III. 3 Initial Interviews policy and Case Note Guidance). RSA recommended that policies be revised to limit reasons for backdating and the edit/delete functions (e.g., duplicative case notes or documentation uploaded to an incorrect service record).
 - **TA with Recommendation.** Individuals have a right to their record of services, and functionality to edit or delete information in a service record should be limited. RSA recommended that IDVR review its policies and evaluate scenarios that necessitate the use of backdating and editing a service record, and revise policies to limit the reasons (e.g., update MSGs 45 days after a quarter ends), ability and the timeframe (e.g., five business days) for which backdating, and case note editing may occur. It should also be noted that the case management system may stamp the note to identify who edited the case note. This ability to edit case notes and service records could be called into question if the individual seeks advocacy services from the Client Assistance Program, and case notes have been edited.
- RSA clarified that Section III. Employment Policies specific to financial participation (Section 7) needs to be revised to reflect that States may expend funds reserved for the provision of pre-employment transition services on auxiliary aids and services for students with disabilities with sensory and communicative disorders who require such services to access pre-employment transition services in accordance with the Notice of Interpretation (NOI) published in the Federal Register on February 28, 2020 by the Department of Education’s Office of Special Education and Rehabilitative Services regarding the use of Federal VR funds reserved for pre-employment transition services.

SEA Agreement

RSA provided TA on the SEA agreement (executed November 2020), and requested that IDVR clarify in the next iteration of the SEA agreement that—

- Only students with disabilities may receive pre-employment transition services (pages 4 and 8 also reference youth);
- Pre-employment transition services will be made available to students beginning at the age of 14 to align with its policies and procedures in order to align with career and technical education, as well as the Idaho Commission for the Blind, the other VR program in the State of Idaho;
- Auxiliary Aids and services are to be provided to students with sensory and communicative impairments (page 6); and
- The timeline for IPE development should reflect prior to exit, and within 90 days from the date of eligibility determination (Section 6 (page 11) under transition planning).

Pre-Employment Transition Services

RSA provided technical assistance on agency field guidance issued to IDVR staff on October 18, 2020, and updated on January 7, 2021. Specifically, RSA requested that the—

- Five required activities under pre-employment transition services described in IDVR policy align with the regulatory requirements in 34 C.F.R. § 361.48(a)(2). Specifically, IDVR only included counseling on opportunities for enrollment in postsecondary educational programs at IHEs and did not include comprehensive transition programs in its policies. At the time of the review, IDVR communicated that there were no comprehensive transition programs (CTPs) in the State of Idaho and the agency chose not to include reference to CTPs in policy until such programming is available in the State. The VR agency shared that the University of Idaho was in the process of developing a CTP; and
- Pre-employment transition services section specific to IPEs include reference to, and the allowability for, projected post-school employment outcomes for students with disabilities in accordance with 34 C.F.R. § 361.46(a)(1).

RSA provided technical assistance on IDVR policies specific to pre-employment transition services (February 1, 2021). Specifically, RSA requested that IDVR—

- Include 60-day eligibility timelines from the date of application for students with disabilities and clarify that auxiliary aids and services may be provided to students with communicative and sensory impairments in order to access pre-employment transition services;
- Include descriptions of the five required activities, and recommended it include examples of required activities from the preamble to the Final Rule (81 FR 55629, 55694 - 55695 (August 19, 2016));
- Include procedures specific to tracking and reporting pre-employment transition services. The review team recommended that IDVR consider cross-referencing the field guidance/procedures that include tracking and reporting pre-employment transition services in its policies;
- Revise references to pre-employment transition services to ensure only students with disabilities, not youth with disabilities, may receive these services. RSA and IDVR also

discussed including projected post-school employment goals for students and youth with disabilities in Section 6 (pages 23 and 24) of its IPE policy; and

- Clarify that pre-employment transition services can be provided to students with disabilities who are potentially eligible and eligible for VR services. Until a student with a disability is determined eligible for VR services, he or she is technically still “potentially eligible” for VR services (although reported as an applicant) and may receive pre-employment transition services as an applicant of VR services.

Rate Setting Methodology

- RSA and IDVR discussed its rate setting methodology, realignment of rate structure (e.g., paying \$47.80 for job coaching and “other CRP fees” and paying \$40.00 per hour for youth extended services versus \$32 Medicaid rates), and improvement of the quality of services provided by and outcomes achieved for individuals by CRPs (e.g., a CRP report card).
- In an effort to set a higher expectation and service rate to improve the quality of competitive integrated employment, including supported employment, IDVR shared that it was considering the use of incentive payments to CRP for employment outcomes with commensurate benefits, wages and over 30 hours worked per week. RSA clarified that fees need to be tied to actual services provided, rate-specific policies, and a standard rate. For example, IDVR may establish milestone payments based on services provided and quality outcomes achieved.
- RSA further clarified that IDVR is not permitted to pay for services not rendered (Dear Director Letter issued December 17, 2019).
- RSA suggested that IDVR contact VR directors in three specific States (MS, AZ, IN), as well as the VRTAC-QM, to discuss how agencies are establishing rates of payment, improving CRP report cards, and improving the quality of CRP services.

Residential Costs Associated with Pre-Employment Transition Services

- During the review, IDVR communicated that it provides some pre-employment transition services through residential camps for those students with disabilities who have a full VR case and an IPE. It is RSA’s understanding that residential costs are charged to the funds reserved for the provision of pre-employment transition services, as there is one fee for the provision of pre-employment transition services that also includes room and board.
- RSA clarified that the Notice of Interpretation (NOI) on Pre-Employment Transition Services Flexibility Regarding the Use of Federal Vocational Rehabilitation Funds issued on February 27, 2020, allows for funds reserved under Section 110(d)(1) of the Rehabilitation Act and implementing regulations in 34 C.F.R. § 361.65(a)(3)(i) to be used to pay for other VR services needed by VR-eligible students with IPEs to benefit from pre-employment transition services. As such, if room and board are necessary for students to participate in pre-employment transition services, as well as those individualized VR services that are also necessary to participate in pre-employment transition services, then those costs would be allowable costs. However, if the scope of services provided is beyond pre-employment transition services and those individualized VR services necessary to benefit from pre-employment transition services, then those residential costs would need to be appropriately cost allocated to the appropriate

programs and associated funds to ensure that the funds reserved for the provision of pre-employment transition services are only expended on or in support of such services.

- RSA further clarified that the residential component of IDVR contracts, including IDVR's contract with Boise State University, may be an allowable cost chargeable to funds reserved for the provision of pre-employment transition services, if the residential component is provided to students with disabilities only to participate in pre-employment transition services; however, if there are other services provided through the program, then those residential costs would have to be appropriately cost allocated.

Competitive Integrated Employment

- RSA provided Frequently Asked Questions (FAQ 22-02) [Criterion for an Integrated Employment Location in the Definition of “Competitive Integrated Employment” and Participant Choice](https://rsa.ed.gov/sites/default/files/subregulatory/RSA-FAQ-22-02.docx). <https://rsa.ed.gov/sites/default/files/subregulatory/RSA-FAQ-22-02.docx>
- RSA also provided FAQs specific to competitive integrated employment and what portion of “meaningful day” programming may be supported by the VR program from the State of Maryland and Ohio.
 - Maryland DDA - Meaningful Day
FAQ https://www.montgomerycountymd.gov/HHS-Program/Resources/Files/A&D%20Docs/CPWD/MeaningfulDayFAQApproved411_19.pdf; and
 - FAQ #6 CIE Ohio Employment First - Meaningful Day Webinar Series <https://dodd.ohio.gov/wps/portal/gov/dodd/about-us/training/department-provided-training/meaningful-day-recorded-webinars>.

Extended Services

- RSA clarified that IDVR policies related to extended services for youth should reflect youth with most significant disabilities, as should procedures used to implement the YES program for youth (funded by IDVR) and EES programming for adults. As such, RSA also recommended that IDVR revise its extended services-related policies to ensure these services are limited to youth with most significant disabilities (pages 4 of 12, and page 56).
- IDVR reported to RSA that the staff who worked under the EES program were not paid from VR funds; and that staff activities were supported by time and effort reports. RSA's review of IDVR's financial data and policies and procedures raised no concerns regarding cost allocation with respect to EES activities.
 - RSA recommends IDVR continue to follow standards and procedures designed to ensure costs are allocated in accordance with Federal and State standards.

Organizational Structure

In 2005, the EES program was moved and organized under IDVR from the Department of Health and Welfare; however, it was not reflected on the organizational structure chart requested by RSA during the review.

Although IDVR only supports competitive integrated employment outcomes, by virtue of its organizational structure, the VR agency is also responsible for assessing individuals and their level of need for Medicaid Waiver (Health and Welfare) and EES services. As a result, three of the 150 total IDVR full-time employees (FTEs) have been assigned to provide supervision or support to the EES program. RSA clarified that the cost of IDVR staff working on programs other than the VR program must be cost allocated and charged to those specific program cost objectives.

As discussed under Section B of this focus area, the EES program provides community supported employment in competitive integrated settings, and also supports individuals in non-integrated, non-competitive sheltered workshop settings. In addition to providing VR and supported employment services, many of the CRPs used by IDVR provide Medicaid and extended employment services as well. During the review, RSA clarified that the purpose of the VR program is to assist individuals with disabilities who choose to seek “competitive integrated employment,” including supported employment and customized employment, which constitutes an “employment outcome” under the VR program as defined in Section 7(11) of the Rehabilitation Act and 34 C.F.R. § 361.5(c)(15). Thus, an individual who chooses to pursue non-competitive and/or non-integrated employment is not eligible for services under the VR program. To the extent an individual with a disability, through their representative as appropriate, chooses to pursue work that is beyond the scope of the VR program, VR agency personnel play a critical role in making the proper referrals to other community resources, as required by 34 C.F.R. § 361.37(b). Since the mandated purpose of the VR and Supported Employment programs is to assist individuals with disabilities to achieve competitive integrated employment, IDVR’s administration of the non-integrated, non-competitive scope and aspects of the EES program appears inconsistent and incompatible with the responsibilities of VR agencies set forth in the Rehabilitation Act.

- RSA provided technical assistance to IDVR specific to organizational structure requirements for a State agency primarily concerned with VR or VR and other rehabilitation of individuals with disabilities, as the DSU includes a Council for the Deaf and Hard of Hearing, and an EES program. It was agreed that the primary purpose of all three programs was the vocational rehabilitation or other rehabilitation of individuals with disabilities.
- RSA provided the link to [RSA-TAC-12-03: Organizational Structure and Non-Delegable Responsibilities of the Designated State Unit for the Vocational Rehabilitation Program](#) for IDVR to review. Specifically, RSA recommended that IDVR review the requirements specific to the administration of the VR program and “other rehabilitation.”
- RSA provided IDVR with the requirements in RSA-FAQ-22-02: Criterion for an Integrated Employment Location in the Definition of “Competitive Integrated Employment” and Participant Choice issued October 29, 2021.

D. Findings and Corrective Actions

RSA’s review of the performance of IDVR in this focus area resulted in the identification of the following finding to improve performance.

Finding 2.1 Unallowable Residency Requirements

Issue: Is IDVR out of compliance with Section 101(a)(12) of the Rehabilitation Act and 34 C.F.R. § 361.42(c) of the VR program regulations, which prohibit a DSU from imposing a duration of residence requirement that excludes from services any applicant who is present in the State as part of its eligibility determination process.

Requirement: Pursuant to 34 C.F.R. § 361.42(c)(1), the VR services portion of the Unified or Combined State Plan must assure that the State unit will not impose, as part of determining eligibility under this section, a duration of residence requirement that excludes from services any applicant who is present in the State. The designated State unit may not require the applicant to demonstrate a presence in the State through the production of any documentation that under State or local law, or practical circumstances, results in a de facto duration of residence requirement.

Analysis: A number of sections in IDVR’s Field Services Policy Manual (effective February 1, 2021) include policy statements and requirements that applicants be residing or living in the State of Idaho. Specifically, there is a statement under the general provisions section that, “Applicants must be living in the State of Idaho and legally able to work in the United States” (Section III. Purpose and General Requirements, page 2). There is another statement under Section III. Applying for Services that, “Any individual who is legally eligible to work in the United States, is residing in the State of Idaho, and available to participate in the IDVR process has the right to apply for IDVR services.” However, agency policies in Section XV. Order of Selection (OOS), include a statement that, “duration of residency, provided the customer is present in the State, as a factor that will not be used as criteria for establishing an OOS priority.”

During the off-site review, RSA was unable to confirm how IDVR verifies whether an individual is residing or living in the State of Idaho, or whether formal documentation that identifies whether an applicant is a resident of the State of Idaho is required before eligibility may be determined.

During the review process, IDVR provided RSA with its intake form (revised January 14, 2020) from its website (vr.idaho.gov) for applicants of the VR program. The intake form does not require the individual to bring documentation to the initial intake that would verify the individual is a resident of or living in the State of Idaho.

RSA clarified that VR agencies are not permitted to impose a duration of residence requirement for applicants who are present and available for services in the State. As such, a VR agency may not require the applicant demonstrate a presence in the State through the production of any documentation that under State or local law, or practical circumstances, result in a de facto duration of residence requirement (34 C.F.R. § 361.42(c)(1)). Therefore, IDVR cannot require residency or that an individual live in the State of Idaho to receive services.

IDVR communicated that it will revise the policies to reflect that any individual only need be present and available to receive VR services in the State of Idaho.

Conclusion: IDVR policies are not in compliance with 34 C.F.R. § 361.42(c)(1), which prohibits a DSU from requiring the applicant be a resident of (i.e., residing or living in) a State in order to receive VR services.

Corrective Action 2.1: RSA requires that IDVR—

- 2.1.1 Revise IDVR’s policies and procedures by removing any requirements that applicants or eligible individuals reside or live in the State of Idaho so that these policies are in compliance with 34 C.F.R. § 361.42(c)(1);
- 2.1.2 Revise all applicable forms and resource materials that require any documentation of an applicant’s residency in the State of Idaho and ensure its distributed to the offices, one-stops and other stakeholders; and
- 2.1.3 Conduct training for all staff on the new policies and procedures.

VR Agency Response: IDVR agrees with finding 2.1, Unallowable Residency Requirements. Furthermore, the technical assistance provided by RSA during the review process was beneficial to the point that the Division took immediate action to resolve the issue. Specifically, IDVR has taken the following steps to begin addressing the corrective actions under this finding as described below:

Corrective Action 2.1.1: The Division has already taken action to revise policies and procedures to ensure compliance with 34 C.F.R. § 361.42(c)(1). The Division revised the Field Services Policy Manual (FSPM) and Application Procedures January 1, 2022, by removing language requiring an individual to reside or live in the State of Idaho. IDVR submitted modified documents to RSA on February 11, 2022, for review and to substantiate this response. These documents are hosted on IDVR’s internal agency portal. The FSPM is also posted on the Division’s public website (absent the yellow highlights).

Corrective Action 2.1.2: None of the Division’s forms or materials have ever required documentation of an applicant’s residency in the State of Idaho, therefore no further changes were necessary to additional forms or materials.

Corrective Action 2.1.3: Training for all field staff regarding the policy and procedure changes was completed by the end of December 2021. This training was provided virtually by the Division’s staff trainer.

RSA Response: RSA appreciates the urgency with which IDVR took action to address the corrective actions relevant to this finding. RSA and IDVR will develop a corrective action plan within 45-days from the issuance of this report, and RSA will review the revised policy, as well as documentation of staff training, to determine if the respective corrective actions can be resolved through the corrective action plan process. Under corrective action 2.1.2, as a relevant documentation requirement of an applicant’s residency in the State of Idaho, RSA also requests that IDVR review and address the Idaho Administrative Code for the Idaho Division of Vocational Rehabilitation (IDAPA 47.01.01), which only offers financial participation to residents of Idaho, under corrective action 2.1.2.

VR Agency Request for Technical Assistance: The Division does not request technical assistance for this finding.

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 IDVR'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 IDVR'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; and
- Other non-Federal funds.

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 IDVR 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.

One-Stop Infrastructure Funding Agreements

The RSA team reviewed the one-stop infrastructure funding agreements to ensure any costs funded by the VR agency are allowable, allocable, reasonable and proportionate to be benefit received by the VR program. Under the workforce development system, Idaho has two local areas, which under an approved waiver from USDOL, operates as a single-area State with a statewide memorandum of understanding (MOU) that covers all six regions and 44 counties in

Idaho. Since the passage of WIOA until the time of the review, no cost-sharing agreements were developed and IDVR did not contribute financially to infrastructure costs during PY 2017 through PY 2019. During the review, IDVR submitted infrastructure funding agreements for the two comprehensive one-stops, one in each local area, Region 2 – North Central (formally known as Balance of State) Idaho American Job Center Network (SDA-2) and Region 6 – East Central Idaho American Job Center Network (SDA-6), that were signed by the IDVR administrator on July 9, 2021, and executed on August 12, 2021. IDVR and its workforce development partners are currently using co-enrollment data and cross-matching it with actual services provided, as the agreed upon methodology to determine infrastructure costs. Specifically, Idaho reported that data were collected between January 1 and March 31, 2021, on direct and virtual services provided to individuals at the one-stop. This data was matched against co-enrollments, and an estimate for cost-sharing was determined based on the PY 2020 budget, to provide the workforce development partners with the information necessary to develop the current agreements and plan for PY 2021 cost-sharing.

C. Technical Assistance and Recommendations

RSA provided technical assistance in the following topical areas to IDVR 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 IDVR 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.

Contract Monitoring

RSA provided TA related to contract monitoring. Specifically, the need for contracts to be written in a way that provides meaningful, measurable objective monitoring data. This includes, but is not limited to, the following elements—

- **Goals** are outcomes to be achieved. Goals are defined by the awarding agency;
- **Scope of services** describes how the goal will be achieved;
- **Tasks, activities and deliverables** that arise from the scope. Interim progress may be measured against activities or milestones;
- **Objectively measurable performance standard(s);** and
- **Cost data** sufficiently detailed to allow the awarding agency to review for reasonable and allowable costs. In addition, the proposed costs must be tied directly to and in support of the scope, deliverables, tasks and activities stated in the agreement.

All agreements must meet the requirements of Appendix II to 2 C.F.R. Part 200, where appropriate. Suspension and debarment, Byrd anti-lobbying certificates and termination for cause or convenience are conditionally required for contracts. These items, as well as state requirements cited by IDVR, should be reviewed for compliance during the monitoring review sessions.

RSA referred IDVR to the Idaho Division of Purchasing's Contract Administration and Management Guide for details of "what" as well as the "how" of contract monitoring. RSA provided an example of a contract monitoring manual for use as a reference.

Contract Performance Objectives

The contracts RSA reviewed did not contain sufficient performance measures because they did not reflect measures specific to deliverables. RSA reviewed contracts with Idaho State University, Boise State University, Idaho Parents Unlimited and the Boise School District. None contained clearly defined and objectively measurable performance metrics as required by State contracting processes. To be meaningful and effectively measurable, a performance standard should contain a baseline and either an amount or a percentage of change or variance (increase/decrease) from the baseline.

Federal regulations at 2 C.F.R. § 200.317 require that a State follow its standard policies and procedures when making procurements with Federal funds. State regulations under Chapter 4 of the Idaho Department of Administration, Division of Purchasing's Procurement Desk Manual and Sections V and Vi of the State's Contract Management and Administration Guide require performance objectives and measures to be identified in a contract. Section VI, Part 6.4.1.3 of the contract management guide states that,

"Performance metrics must be clearly stated in the solicitation. Requiring a Contractor to produce time-consuming reports or to meet requirements that were not identified in the solicitation is grounds for legal challenge and at the very least may result in a request for increased cost for the added requirement. It is important that Agencies develop and include a monitoring strategy prior to issuing the solicitation."

Performance objectives and measurements should be written in such a way as to provide a meaningful and accurate report of services delivered and unbiased assessment of the vendor's performance. It is a fundamental component of effective contract monitoring. Effective monitoring of vendor performance may be accomplished by measuring the stated objectives against objectives actually achieved. When such metrics are insufficient or absent, it diminishes the value and usefulness of monitoring.

IDVR should develop and implement policies and procedures for establishing measurable performance standards and objectives in all Federally funded contracts that contribute to accurate reporting of allowable fiscal expenditures and contract deliverables.

Match

RSA conducted an in-depth review of the general ledger (GL) reports submitted by IDVR to support match expenditures for VR and Supported Employment. The report data was matched to G5 (Grants Management System) drawdown information and information contained in the State's chart of accounts, the STARS User Manual Expenditure Subobjects List, the Crosswalk by Fund Number, and the Financial Management of VR and SE Programs, Period of Performance guidance documents. RSA's review disclosed no inconsistencies with these policies and practices with respect to match.

The GL reports provided sufficient detail for RSA to determine whether the costs were timely and sufficient in amount to meet the match requirements. The report for Supported Employment (H187B190017) disclosed that match costs were incurred during the period of performance; they were allowable (charged to expenditure sub-object 7190, “rehab services – vendors”); the sum of the costs was in the required amount; and it matched the amount reported in the final SF-425 report. RSA also tested for compliance with the Cash Management Improvement Act of 1990 (P.L. 101-453) and found no instances of non-compliance.

- RSA determined the GL report for VR (H126A190019) did not match the amount reported on line 10.j of the final SF-425 (total match expenditures). Line 10.j showed \$4,404,596 and the GL report showed \$3,944,523, a variance of \$460,073. IDVR explained that the variance is due to indirect expenses not recorded in the GL under the current accounting system. IDVR is in the process of obtaining a new financial system which it expects to be in place within the next year or so. The new system will be capable of capturing indirect expenses in the general ledger.
 - **TA with Recommendation:** RSA recommends that IDVR continue to follow standards and procedures designed to ensure match costs are allocated, recorded, expended and reported in accordance with Federal and State standards.

D. Findings and Corrective Actions

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

Finding 3.1 Lack of Contract Monitoring

Issue: Whether IDVR conducted contract monitoring activities sufficient to meet the requirements of 2 C.F.R. § 200.329(a) and Sections II and 6.4 of Idaho’s Contract Management and Administration Guide.

Requirements: Federal regulations state that the non-Federal entity is responsible for oversight of the operations of the Federal award supported activities (2 C.F.R. § 200.329(a)). The non-Federal entity must monitor its contracted activities under Federal awards to ensure compliance with applicable Federal requirements and that performance expectations are achieved. Monitoring by the non-Federal entity must cover each program, function, or activity.

Section II of the Contract Management and Administration Guide states that it is the duty of the contracting agency to monitor, “contractor performance for compliance with the terms of the Contract (milestones achieved; deliverables accepted) through its Contract Manager and/or Project Manager.”

Performance objectives and measures should be identified in the contract. Program monitoring may include any or all of the following:

- Reviewing the service provisions of the contract to determine what the contractor is to provide and the desired quality;

- Reviewing the contractor’s reports and other materials to determine if services are being provided;
- Interviewing direct delivery staff and others to determine if the services are being performed according to the contract; and
- Conducting on-site reviews, when appropriate, to check the nature and quality of the services being provided.

Section 4.2 of IDVR’s contract policy states all contracts implemented by the IDVR will be cost effective. The Contract Manager is responsible for ensuring that the IDVR contracts comply with law, rule and policy.

Analysis: RSA did not receive any monitoring reports for the contracts under review. However, IDVR indicated it conducts monitoring activities. RSA was not provided any documentation that systemic contract monitoring was occurring. The monitoring reports would have shown the degree to which the grantee and the vendors have complied with the stated contract requirements.

Conclusion: RSA was not provided with monitoring reports to demonstrate compliance with the requirements cited in 2 C.F.R. § 200.329(a) and in the State’s contract management policy. Consequently, the agency was determined not to be following the contract monitoring requirements. IDVR requested technical assistance on contract monitoring which is further described under Section C of this focus area.

Corrective Actions 3.1 RSA requires that IDVR—

- 3.1.1 Develop, implement, and monitor policies and procedures that incorporate the standards described in 2 C.F.R. § 200.329 and in IDVR’s contract management policy with respect to contract monitoring. A monitoring component must include not only written processes, but also: 1) a process to evaluate and monitor the agency’s own compliance with the requirements; and 2) a process to resolve issues when noncompliance is identified. This should include remedies to correct noncompliance, such as updated processes, staff training, returning of Federal funds, etc.

VR Agency Response: IDVR agrees with Finding 3.1, Lack of Contract Monitoring. The Division recognized this as an area of need and hired a Business Operations Specialist in June 2021, to act as the Division lead for contract monitoring. To address Corrective Action 3.1.1. IDVR will develop, implement, and monitor policies and procedures that incorporate the standards described in 2 C.F.R. § 200.329 and in IDVR’s contract management policy with respect to contract monitoring, including: 1) a process to evaluate and monitor the agency’s own compliance with the requirements; and 2) a process to resolve issues when noncompliance is identified to include remedies to correct noncompliance, such as updated processes, staff training, returning of Federal funds, etc.

RSA Response: RSA looks forward to receiving IDVR’s contract monitoring policies and procedures, including processes to evaluate and monitor compliance with the requirements and resolve any areas of noncompliance as identified.

VR Agency Request for Technical Assistance: IDVR appreciates the technical assistance already provided by RSA during the monitoring review and will use resources developed by the Vocational Rehabilitation Technical Assistance Center for Quality Management (VRTAC-QM).

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—ID-G VR Agency Profile (PYs 2017-2019)

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

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

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

Table 5—ID-G VR Services Provided to Participants (PYs 2017-2019)

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

Table 7—ID-G 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—ID-G Number of Participants Who Exited with Competitive Integrated Employment or Supported Employment by the Most Frequent SOC Title (PYs 2017-2019)

Table 9—ID-G 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—ID-G Number and Percentage of Required Pre-Employment Transition Services Provided (PYs 2017-2019)

Vocational Rehabilitation Program Other Measures That Matter

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

Measure 2—ID-G Profile: Quality Employment (PY 2019)

Measure 3—ID-G Profile: VR Process Efficiency (PY 2019)

Measure 4—ID-G Profile: VR Service Provision (PY 2019)

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

Measure 6—ID-G Profile: Pre-Employment Transition Services (PY 2019)

Table 1—ID-G VR Agency Profile (PYs 2017-2019)

VR Agency Profile Data	2017	2018	2019
Employment Rate	44.0%	37.0%	35.0%
Number of Participants Exiting in Competitive Integrated Employment or Supported Employment	1,466	1,032	808
Percentage of Timely Eligibility Determinations	98.1%	96.5%	97.9%
Percentage of Eligibility Determination Extensions	6.1%	2.2%	1.3%
Percentage of Timely IPE Development	81.8%	89%	92.1%
Number of Applicants	4,878	4,007	2,881
Number of Individuals Determined Eligible	4,245	3,476	2,667
Number of Individuals with an IPE and No VR Services Provided	-	-	-
Number of Participants (with an IPE and VR Services Provided)	7,688	6,702	5,896
WIOA Performance Indicators (Statewide)	2017	2018	2019
Measurable Skill Gains Rate	26.1%	35.5%	53.6%
Employment Rate in 2 nd Qtr After Exit	N/A	55.3%	60.4%
Median Earnings in 2 nd Qtr After Exit	N/A	\$3,733	\$4,044.15
Employment Rate in 4 th Qtr After Exit	N/A	N/A	56%
Credential Attainment Rate	N/A	N/A	4%

Table 2—ID-G 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	20	0.3%	27	0.4%	29	0.5%
Auditory or Communicative	885	11.5%	769	11.5%	634	10.8%
Physical	1,193	15.5%	1,066	15.9	1,000	17.0
Cognitive	1,746	22.7%	1,504	22.4	1,297	22.0
Psychological or Psychosocial	3,844	50%	3,336	49.8	2,936	49.8
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	9	0.1%	12	0.2%	13	0.2%
Other Visual Impairments	11	0.1%	15	0.2%	16	0.3%
Deafness, Primary Communication Visual	85	1.1%	67	1.0%	55	0.9%
Deafness, Primary Communication Auditory	111	1.4%	88	1.3%	68	1.2%
Hearing Loss, Primary Communication Visual	15	0.2%	17	0.3%	15	0.3%
Hearing Loss, Primary Communication Auditory	530	6.9%	460	6.9%	393	6.7%
Other Hearing Impairments (Tinnitus, Meniere's Disease, hyperacusis, etc.)	81	1.1%	74	1.1%	45	0.8%

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
Deaf-Blindness	4	0.1%	6	0.1%	5	0.1%
Communicative Impairments (expressive/receptive)	59	0.8%	57	0.9%	53	0.9%
Mobility Orthopedic/Neurological Impairments	174	2.3%	194	2.9%	202	3.4%
Manipulation/Dexterity Orthopedic/Neurological Impairments	42	0.5%	32	0.5%	36	0.6%
Both Mobility and Manipulation/Dexterity Orthopedic/Neurological Impairments	88	1.1%	91	1.4%	90	1.5%
Other Orthopedic Impairments (e.g., limited range of motion)	242	3.1%	191	2.8%	182	3.1%
Respiratory Impairments	20	0.3%	23	0.3%	21	0.4%
General Physical Debilitation (e.g., fatigue, weakness, pain, etc.)	126	1.6%	106	1.6%	93	1.6%
Other Physical Impairments (not listed above)	501	6.5%	429	6.4%	376	6.4%
Cognitive Impairments (e.g., impairments involving learning, thinking, processing information and concentration)	1,746	22.7%	1,504	22.4%	1,297	22.0%
Psychosocial Impairments (e.g., interpersonal and behavioral impairments, difficulty coping)	2,792	36.3%	2,560	38.2%	2,310	39.2%
Other Mental Impairments	1,052	13.7%	776	11.6%	626	10.6%

Table 3—ID-G 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			5,545	5,014	4,020	
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	422	7.6%	305	6.1%	290	7.21%
Individual exited during or after a trial work experience	121	2.2%	135	2.7%	75	1.87%
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	1,388	25.0%	1,216	24.3%	945	23.5%
Individual exited after an IPE without an employment outcome	1,871	33.7%	1,743	34.8%	1,497	37.2%
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	1,466	26.4%	1,032	20.6%	808	20.1%
Individual exited as an applicant after being determined ineligible for VR services	163	2.9%	156	3.1%	12	0.3%
Potentially eligible individual exited after receiving pre-employment transition services and has not applied for VR services	114	2.1%	427	8.5%	393	9.8%
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			155	120	108	
Number of Participants Who Exited with a Supported Employment Outcome in Noncompetitive and/or Nonintegrated Employment			-	-	-	

Table 4—ID-G 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	13	0.2%	8	0.2%	6	0.1%
Health/Medical	148	2.7%	122	2.4%	87	2.2%
Death of Individual	21	0.4%	14	0.3%	18	0.4%
Reserve Forces Called to Active Duty	-	0.0%	-	0.0%	-	0.0%
Foster Care	-	0.0%	-	0.0%	-	0.0%
Ineligible after determined eligible	3	0.1%	1	0.0%	1	0.0%
Criminal Offender	217	3.9%	146	2.9%	108	2.7%
No Disabling Condition	74	1.3%	48	1.0%	24	0.6%
No Impediment to Employment	87	1.6%	110	2.2%	54	1.3%
Does Not Require VR Service	74	1.3%	77	1.5%	33	0.8%
Disability Too Significant to Benefit from Service	30	0.5%	24	0.5%	13	0.3%
No Long Term Source of Extended Services Available	-	0.0%	-	0.0%	-	0.0%
Transferred to Another Agency	5	0.1%	7	0.1%	4	0.1%
Achieved Competitive Integrated Employment Outcome	1,466	26.4%	1,032	20.6%	808	20.1%
Extended Employment	9	0.2%	4	0.1%	-	0.0%
Extended Services Not Available	9	0.2%	1	0.0%	1	0.0%
Unable to Locate or Contact	763	13.8%	685	13.7%	539	13.4%
No Longer Interested in Receiving Services or Further Services	2,410	43.5%	2,435	48.6%	2,241	55.7%
All Other Reasons	216	3.9%	306	6.1%	85	2.1%
Number of Individuals Who Exited the VR Program	5,545		5,014		4,020	

Table 5—ID-G 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			7,688	6,702	5,896	
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	26	0.3%	22	0.3%	18	0.3%
Bachelor Degree Training	321	4.2%	267	4.0%	268	4.5%
Junior or Community College Training	144	1.9%	118	1.8%	112	1.9%
Occupational or Vocational Training	407	5.3%	368	5.5%	316	5.4%
On-the-Job Training	10	0.1%	29	0.4%	27	0.5%
Apprenticeship Training	4	0.1%	2	0.0%	2	0.0%
Basic Academic Remedial or Literacy Training	21	0.3%	12	0.2%	5	0.1%
Job Readiness Training	59	0.8%	81	1.2%	80	1.4%
Disability Related Skills Training	-	0.0%	-	0.0%	1	0.0%
Miscellaneous Training	601	7.8%	412	6.1%	232	3.9%
Randolph-Sheppard Entrepreneurial Training	-	0.0%	-	0.0%	-	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	1,411	18.4%	1,488	22.2%	1,296	22.0%
Diagnosis and Treatment of Impairment	578	7.5%	411	6.1%	287	4.9%
Vocational Rehabilitation Counseling and Guidance	7,142	92.9%	3,950	58.9%	2,545	43.2%
Job Search Assistance	1,690	22.0%	1,290	19.2%	1,062	18.0%
Job Placement Assistance	-	0.0%	-	0.0%	-	0.0%
Short-Term Job Supports	807	10.5%	610	9.1%	424	7.2%
Supported Employment Services	332	4.3%	331	4.9%	296	5.0%
Information and Referral Services	-	0.0%	-	0.0%	-	0.0%
Benefits Counseling	166	2.2%	189	2.8%	240	4.1%
Customized Employment Services	28	0.4%	10	0.1%	4	0.1%
Extended Services (for youth with the most significant disabilities)	5	0.1%	2	0.0%	1	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	1,224	15.9%	825	12.3%	566	9.6%
Maintenance	874	11.4%	526	7.8%	324	5.5%
Rehabilitation Technology	489	6.4%	332	5.0%	253	4.3%
Personal Attendant Services	1	0.0%	-	0.0%	-	0.0%
Technical Assistance Services	4	0.1%	5	0.1%	3	0.1%
Reader Services	-	0.0%	-	0.0%	-	0.0%
Interpreter Services	37	0.5%	53	0.8%	42	0.7%
Other Services	859	11.2%	593	8.8%	422	7.2%

Table 6— ID-G 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	36	49	18
Secondary Diploma	445	455	305
Postsecondary Transcript/ Report Card	194	248	282
Training Milestone	11	14	23
Skills Progression	146	143	147
Total	832	909	775
Participants Who Earned Measurable Skill Gains	2017	2018	2019
Number of Participants Who Earned Measurable Skill Gains	813	901	771

Table 7— ID-G 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		1,466	1,032	808		
Median Hourly Earnings at Exit		\$10.50	\$11.00	\$11.69		
Median Hours Worked per Week at Exit		35	35	34		
Primary Source of Support at Exit	PY 17 Number of Participants	PY 17 Percent	PY 18 Number of Participants	PY 18 Percent	PY 19 Number of Participants	PY 19 Percent
Personal Income	1,138	77.6%	801	77.6%	620	76.7%
Family and Friends	69	4.7%	48	4.7%	28	3.5%
Public Support	252	17.2%	180	17.4%	157	19.4%
Other Sources	7	0.5%	3	0.3%	3	0.4%
Public Support at Exit	PY 17 Number of Participants	PY 17 Percent	PY 18 Number of Participants	PY 18 Percent	PY 19 Number of Participants	PY 19 Percent
Social Security Disability Insurance (SSDI) at Exit	224	15.3%	162	15.7%	158	19.6%
Supplemental Security Income (SSI) for the Aged, Blind, or Disabled at Exit	196	13.4%	146	14.1%	127	15.7%
Temporary Assistance for Needy Families (TANF) at Exit	2	0.1%	4	0.4%	6	0.7%
General Assistance (State or local government) at Exit	-	0.0%	-	0.0%	-	0.0%
Veterans' Disability Benefits at Exit	1	0.1%	-	0.0%	-	0.0%
Workers' Compensation at Exit	-	0.0%	-	0.0%	1	0.1%
Other Public Support at Exit	50	3.4%	32	3.1%	26	3.2%
Medical Insurance Coverage at Exit	PY 17 Number of Participants	PY 17 Percent	PY 18 Number of Participants	PY 18 Percent	PY 19 Number of Participants	PY 19 Percent
Medicaid at Exit	347	23.7%	247	23.9%	254	31.4%
Medicare at Exit	251	17.1%	178	17.2%	148	18.3%
State or Federal Affordable Care Act Exchange at Exit	16	1.1%	11	1.1%	7	0.9%
Public Insurance from Other Sources at Exit	12	0.8%	5	0.5%	6	0.7%
Private Insurance Through Employer at Exit	396	27.0%	336	32.6%	272	33.7%
Not Yet Eligible for Private Insurance Through Employer at Exit	58	4.0%	44	4.3%	15	1.9%
Private Insurance Through Other Means at Exit	171	11.7%	112	10.9%	88	10.9%

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

No.	PY 17 SOC Title	PY 17 Number of Participants	PY 17 Median Hourly Earnings
1	Locker Room, Coatroom, and Dressing Room Attendants	476	\$8.50
2	Heavy and Tractor-Trailer Truck Drivers	89	\$16.48
3	Helpers--Production Workers	68	\$9.50
4	Food Preparation and Serving Related Workers, All Other	38	\$8.83
5	Office Clerks, General	36	\$13.19
6	Managers, All Other	27	\$17.00
7	Geoscientists, Except Hydrologists and Geographers	24	\$10.50
8	Installation, Maintenance, and Repair Workers, All Other	23	\$13.50
9	Welders, Cutters, Solderers, and Brazers	22	\$13.00
10	Social and Human Service Assistants	22	\$14.00
No.	PY 18 SOC Title	PY 18 Number of Participants	PY 18 Median Hourly Earnings
1	Locker Room, Coatroom, and Dressing Room Attendants	310	\$8.75
2	Heavy and Tractor-Trailer Truck Drivers	45	\$16.50
3	Helpers--Production Workers	44	\$9.97
4	Geoscientists, Except Hydrologists and Geographers	30	\$12.50
5	Office Clerks, General	27	\$10.50
6	Laundry and Dry-Cleaning Workers	24	\$10.00
7	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	23	\$8.50
8	Social and Human Service Assistants	16	\$10.44
9	Food Preparation and Serving Related Workers, All Other	16	\$8.50
10	Nursing Assistants	15	\$10.75
No.	PY 19 SOC Title	PY 19 Number of Participants	PY 19 Median Hourly Earnings
1	Locker Room, Coatroom, and Dressing Room Attendants	123	\$8.75
2	Heavy and Tractor-Trailer Truck Drivers	51	\$18.00
3	Helpers--Production Workers	46	\$8.50
4	Food Preparation and Serving Related Workers, All Other	34	\$8.00
5	Office Clerks, General	30	\$12.25
6	Stock Clerks and Order Fillers	28	\$10.00
7	Geoscientists, Except Hydrologists and Geographers	27	\$16.00
8	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	24	\$9.00
9	Laundry and Dry-Cleaning Workers	18	\$8.25
10	Light Truck or Delivery Services Drivers	13	\$15.00

Table 9— ID-G 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	2,956	2,385	2,173
Students with Disabilities Reported with 504 Accommodation	60	121	118
Students with Disabilities Reported with IEP	564	1,279	1,451
Students with Disabilities Reported without 504 Accommodation or IEP	2,332	1,071	745
Total Students with Disabilities Who Received a Pre-Employment Transition Service	1,086	989	1,228
Potentially Eligible Students with Disabilities Who Received a Pre-Employment Transition Service	339	579	834
Students with Disabilities, Who Applied for VR Services, and Received a Pre-Employment Transition Service	747	410	394
Percentage of Students with Disabilities Reported Who Received a Pre-Employment Transition Service	36.7%	41.5%	56.5%

Table 10— ID-G 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	3,362	100%	2,304	100%	3,468	100%
Job Exploration Counseling	207	6.2%	60	2.6%	269	7.8%
Work-Based Learning Experiences	1,555	46.3%	1,041	45.2%	1,576	45.4%
Counseling on Enrollment Opportunities	182	5.4%	80	3.5%	255	7.4%
Workplace Readiness Training	1,074	31.9%	854	37.1%	1,064	30.7%
Instruction in Self-Advocacy	344	10.2%	269	11.7%	304	8.8%

Vocational Rehabilitation Program Other Measures That Matter

Measure 1—ID-G 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)	1,227
Number Employed in Second Quarter after Exit AND Fourth Quarter after Exit	871
Percent Sustaining Employment	70.98%

Measure 2—ID-G 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	3	0.37%	\$9.00	20	3	3	20.00%
Communication	209	25.87%	\$16.26	40	196	21	66.35%
Physical	95	11.76%	\$12.50	37	79	34	26.54%
Intellectual	147	18.19%	\$9.00	20	130	90	31.14%
Psychosocial	354	43.80%	\$11.00	35	286	111	30.92%
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	225	27.85%	\$11.50	35	183	73	28.23%
Most Significant	285	35.27%	\$9.25	20	261	185	31.39%
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—ID-G 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	2,881		
Number of Individuals Determined Eligible in PY 2019	2,667		
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:	1,220	1,356	91
Percent Determined Eligible within:	45.74%	50.84%	3.41%
Number Determined Eligible in PY 2019 Who Exited with Employment during PY 2019 within	47	30	-
Number Determined Eligible in PY 2019 Who Exited without Employment during PY 2019 within	48	50	5

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—ID-G 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	Program Year 2019 Annual
Number of Participants Receiving VR Services	3,068	2,825	2,767	2,323	11,349
Total Number of Participants	4,541	4,348	4,258	4,079	20,728
Percent Receiving VR Services	67.56%	64.97%	64.98%	56.95%	54.75%

**Measure 5—ID-G 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
1,435	5,896	24.34%

Measure 6—ID-G 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	7	221	304	12	45	364
Number of Students Who Received Service under IPE	12	58	84	17	2	123
Number of Students Who Received Service as Both Potentially Eligible and under an IPE	0	0	0	0	0	0
Number of Students Who Exited with Employment during PY	0	0	0	0	0	0
Number of Students Who Exited without Employment during PY	0	0	0	1	0	1

	Number/ Percent
Total Number of Participants in VR Program	5,896
Number of Potentially Eligible Students with Disabilities Who Received Pre-Employment Transition Services	364
Percent of Potentially Eligible Students with Disabilities Who Received Pre-Employment Transition Services	40.9%
Total Number of Applicants to VR Program	2,881
Number of Potentially Eligible Students with Disabilities Who Applied to VR Program	67
Percent of Potentially Eligible Students with Disabilities Who Applied to VR Program	2.3%

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.