

**FEDERAL FISCAL YEAR 2021  
REPORT ON THE REVIEW OF  
SOUTH CAROLINA VOCATIONAL  
REHABILITATION DEPARTMENT  
VOCATIONAL REHABILITATION  
AND  
SUPPORTED EMPLOYMENT PROGRAMS**



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

**March 1, 2022**

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# SECTION 1: THE SCOPE OF THE REVIEW

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## **A. Background**

Section 107 of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by Title IV of the Workforce Innovation and Opportunity Act (WIOA), requires the Commissioner of the Rehabilitation Services Administration (RSA) to conduct annual reviews and periodic 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 the South Carolina Vocational Rehabilitation Department (SCVRD) 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 May 12 through June 11, 2021, was defined by information, documents, and data submitted by SCVRD, taking into account the goals, unique circumstances, and technical assistance needs of SCVRD.

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 Christyne Cavataio and Zera Hoosier (VR Program Unit); Joseph Doney and Andrea Hall (Technical Assistance Unit); Arseni Popov, Damond Smith, and David Steele (Fiscal Unit); and Andrew Kerns (Data Collection and Analysis Unit). Although not all team members participated in all aspects of the off-site review, each contributed to the gathering and analysis of information, along with the development of this report.

## **C. Acknowledgements**

RSA wishes to express appreciation to the representatives of SCVRD for the cooperation and assistance extended throughout the review process. RSA also appreciates the participation of others, such as the Independent Commission Board, 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**

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

### **Performance Data Summary and Analysis**

The information presented below represents a summary of relevant data related to the performance of SCVRD. The VR agency reported experiencing turnover in key leadership positions since 2017 when the current Commissioner began leading the agency. The agency has 25 local offices serving 46 counties throughout the State and is co-located in 33 one-stop centers across all 12 Workforce Development Areas in the state. SCVRD operates a work training center (WTC) at each of its 25 area office locations that function as typical community rehabilitation providers. Throughout the review, the agency maintained that this service delivery model makes them unique and able to provide VR services more effectively and efficiently to consumers in South Carolina.

### **The VR Process**

**Resources:** Appendix A—Tables 1, 2, 3, 4, and 5

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 SCVRD 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.

SCVRD reported a substantial downward trend in referrals and applicants for the VR program. From PY 2017 through PY 2019, the number of applicants for the VR program dropped from 15,240 individuals to 10,889 individuals. The agency attributed the decline in applicants, in part, to the provision of pre-employment transition services to potentially eligible students with disabilities who did not need to apply for other VR services to have their needs met. In addition, SCVRD identified the coronavirus pandemic as a more recent contributing factor, recognizing that this would have affected only the last quarter of PY 2019. In PYs 2017, 2018, and 2019, 1,579 individuals, 1,452 individuals, and 1,398 individuals, respectively, exited as applicants prior to eligibility determination or trial work experiences (more than 10 percent of all applicants). SCVRD reported that the SC Department of Health and Human Services, the SC Department of Juvenile Justice, local businesses, and self-referrals are its major sources of referrals.

Across all three program years reviewed, a significant number of eligible individuals with disabilities exited without an employment outcome, prior to or after the development of an individualized plan for employment (IPE) (7,427 in PY 2017, 7,763 in PY 2018, and 6,765 in PY 2019). Generally, this attrition could suggest a lack of engagement or delays in service delivery.

Of all individuals who received services with an approved IPE in PY 2019, most were participants with psychological or psychosocial disabilities (37.4 percent), followed by individuals with cognitive disabilities (33.1 percent), followed by individuals with physical disabilities (23.6 percent). SCVRD indicated that these primary disability types were consistent with its long-standing history of serving these populations of South Carolinians. SCVRD noted its commitment to serving unserved and underserved populations consistent with its review of census information. As a result, SCVRD has focused its efforts toward serving those with auditory impairments and increasing services to those with cognitive impairments.

#### *Eligibility and IPE Development*

SCVRD determined eligibility for applicants of the VR program consistently within the mandated 60-day timeframe. IPEs were developed within the mandated 90-day timeframe or with extensions. Notably, however, the number of extensions for the development of IPEs rose from 933 in PY 2017 to 1,646 in PY 2019, suggesting the need to review agency practices or policies that may present obstacles to the timeliness of developing IPEs.

SCVRD reported that consumers referred for VR services received an assessment to determine the need for comprehensive vocational evaluation services. Most consumers then received a comprehensive vocational evaluation to assist in the development of the IPE and needed services. SCVRD reported 100 percent of all consumers received assessment services, which may, along with the comprehensive vocational evaluations, contribute to the delay in the development of IPEs. Using existing information and an individualized approach based upon need, rather than routinely providing assessments and evaluations for each individual, might improve the timeliness of IPE development, reduce attrition, and increase engagement in the VR process.

## *Attrition*

SCVRD reported a significant percentage of individuals exited the program at various stages of the VR process for the following reasons: agency staff were unable to locate or contact them or the individuals were no longer interested in receiving or continuing to receive services. In PYs 2017, 2018, and 2019, 51.0 percent, 58.4 percent, and 42 percent, respectively, exited for one of those two reasons, the most frequent reason being that the individual was no longer interested in receiving services. In PY 2019, the agency reported 31.0 percent of individuals exited for all other reasons. These data signify substantial attrition, which may be due to either a lack of continuing agency engagement with individuals and participants, the provision of services that are not adequately meeting the needs of participants, or the lack of or delay in the provision of needed services. SCVRD and RSA discussed the need to further analyze the reasons for the decline in the number of VR applicants and eligible individuals; develop goals to increase the number of individuals who apply and are determined eligible for VR services; and develop strategies to engage and retain individuals from the time of application through the receipt of VR services.

Of the 15,834 individuals who exited the VR program in PY 2017, 4,495 individuals (28.4 percent) exited from various stages of the VR process prior to the development of an IPE. In addition, 4,653 individuals (29.4 percent) exited the VR program after an IPE, but without an employment outcome. Comparatively, of the 17,667 individuals who exited the VR program in PY 2019, 3,802 individuals (21.5 percent) exited from various stages of the VR process prior to the development of an IPE and 4,445 individuals (25.2 percent) exited the VR program after an IPE, but without an employment outcome. As previously noted, the level of engagement of individuals during the VR process may have played a role in the attrition. SCVRD communicated that the level of attrition and engagement may be related to the various populations served, such as transient populations or those recovering from addiction who may not cooperate with aspects of the VR process or engage in timely communication or follow-up with VR counselors and agency staff.

SCVRD is exploring strategies for more consistent engagement throughout the VR process. One such strategy is the use of My Action Plan (MAP), which is initiated for each consumer who enters a WTC following the vocational evaluation. The MAP allows the consumer, the VR counselor, and the business development specialist to engage in monthly discussions around short-term goals related to the job objectives on the IPE. It adds an extra level of engagement for those consumers who otherwise might lack agency staff engagement as they progress toward competitive integrated employment.

## **VR Services**

**Resources:** Appendix A—Tables 1, 6, and 7.

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

SCVRD operates 25 WTCs statewide to provide VR services, which incorporate assessment, evaluation, foundational skills training, real work experiences, occupational/vocational training, customized training, and job readiness training for VR consumers. In the WTC's, VR consumers participate in training activities such as production, manufacturing, machine and equipment operation, carpentry, machining, customer service, shipping, logistics, distribution, and custodial training. The agency describes the WTCs as being connected to the local labor market and each WTC partners with local businesses who sub-contract specific work training activities that are completed in the WTCs. These activities offer mutual benefits and are advantageous to both local businesses and VR consumers.

SCVRD routinely provides assessments to all eligible individuals. In PY 2017, 77 percent of individuals received diagnosis and treatment services as well, which decreased in PY 2019 to 55 percent. Assessments led to delivery of job readiness training services conducted at the 25 WTCs and in PY 2017, 64.9 percent of participants who received VR services went on to receive job readiness training in a WTC decreasing in PY 2019 to 53.8 percent of participants. SCVRD attributed the decline in job readiness training services to the decline in overall referrals to the VR program and the increased number of students receiving pre-employment transition services, especially those receiving those services as potentially eligible students. The agency also indicated the shift in WIOA's focus to services related to career paths contributed to their decline in job readiness training services in the WTCs, which were primarily in the manufacturing and production areas.

SCVRD consumers are referred to the WTC following their vocational evaluation and the development of the IPE. SCVRD reports that the average time a participant attends the WTC is based on their evaluation results, individual job goal, and resulting IPE, but averages about five hours per day for six months for most participants. While at the WTC, participants interact with their VR counselor and a business development specialist in preparation for entering the competitive labor market.

Participants attending these WTCs receive compensation for the hours worked and receive a W-2 Internal Revenue Service tax reporting form as a record of this compensation. However, SCVRD internally calls this compensation a "training stipend." SCVRD maintains there is no employer-employee relationship because participants are not actually working for SCVRD but receiving training and the stipends offset their costs while attending training.

SCVRD provided RSA with a series of data tables spanning State fiscal years (SFYs) 2018, 2019, and 2020. These data tables provided cumulative success rates for consumers closed by various service categories. SCVRD and RSA discussed the success rate in the category of job readiness training that SCVRD defined as those participants who attended the 25 WTCs and successfully exited in competitive integrated employment divided by those participants who attended the WTCs and whose cases were closed without a competitive integrated employment outcome. SCVRD reported success rates in SFYs 2018, 2019, and 2020 (56.6 percent, 31.5 percent, and 40.5 percent, respectively) for participants receiving job readiness training in the WTCs. SCVRD maintained declines in performance demonstrated in both the agency's performance tables shared by RSA and the agency-generated success rate tables were the result of an overall decrease in the number of participants receiving VR services and the VR agency's emphasis on serving youth and students with disabilities during PYs 2017, 2018, and 2019.



In discussions with agency staff, RSA noted that staff consistently referenced SCVRD's emphasis on informed choice and the use of "real work experiences" through the 25 WTCs. Given the data around the performance of the WTCs in assisting individuals to successfully enter competitive integrated employment, coupled with the attrition rate and unsuccessful closures for those with an IPE, RSA suggested the agency analyze the current use and cost-benefit of the WTCs for the majority of VR participants and explore future strategies to address participants' unique needs and informed choice in its service delivery, including alternative roles and services for the WTCs. For example, contracts with local businesses could include hiring commitments, on-the-job training opportunities, or apprenticeship opportunities while participants are engaged in or following training and work experiences in the WTCs. Additionally, the WTCs could explore career pathways in areas other than currently offered.

During PY 2019, SCVRD provided VR services to a total of 21,849 individuals. No participants received graduate degree training, 867 individuals (4 percent) received bachelor's degree training, 361 individuals (1.7 percent) received junior or community college training, 649 individuals (3 percent) received occupational or vocational training, and no one was reported as receiving customized training. A significant decline in apprenticeship training occurred from PY 2017 (130 participants) to 2019 (17 participants).

In PY 2017, SCVRD reported 134 participants achieving 169 measurable skill gains (MSG). SCVRD attributed the significant increase in the reported number of participants and MSGs earned in PYs 2018 (772 participants and 855 MSGs earned) and 2019 (832 participants and 901 MSGs earned) to the implementation of training strategies, including the review of MSG processes with staff, and the identification of areas in need of improvement. SCVRD provided MSG and credential attainment training, issued guidance, and updated its case management system to report and track performance elements, which resulted in an improvement in the agency's MSG rate from 7.1 percent in PY 2017 to 28 percent in PY 2019, above the PY 2020 State negotiated rate of 22 percent.

At the time of the review, SCVRD had begun updating its entire VR policy and procedure manual and had provided drafts of all the updated policies and procedures through February 2021. The agency informed RSA the last updated policies and procedures dated back to 2015. The agency communicated that it was planning to purchase a commercial electronic policy and procedure tracking system that would allow for the constant review and updating of agency policies. This electronic system was like one purchased and implemented by other VR programs and SCVRD was working toward purchasing and implementing that system. Thus, except for its pre-employment transition services procedures, all policies were marked as drafts and had not been fully implemented at the time of the review. SCVRD staff reported they frequently used policy memoranda and email updates to clarify existing policies or change a current policy. These policy documents were reportedly not contained in one central location for staff to access or use. Throughout the review, RSA stressed the need for having updated policies, procedures, and internal controls that staff could follow to implement the VR program.

## Quality of Employment Outcomes

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

The RSA review team examined data reported by SCVRD, as well as agency 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.

Of all individuals who exited the VR program in PY 2017 (15,834), 6,605 or 41.7 percent exited with an employment outcome. In PY 2019, of the 17,667 individuals who exited the VR program, 4,007 or 22.7 percent exited with an employment outcome.

Although an agency's employment rate (of all individuals who receive services under an IPE and exit the VR program, the percentage who achieve an employment outcome) is no longer a required indicator under the Rehabilitation Act, it is useful to a VR agency for monitoring its performance. SCVRD's employment rate was 59 percent in PY 2017, with 6,605 participants exiting the program with competitive integrated employment. The employment rate fell to 49 percent in PY 2018, with 4,930 participants exiting with competitive integrated employment and decreased to 47 percent in PY 2019, with 4,007 participants exiting with competitive integrated employment. Of the participants who exited with a supported employment outcome in competitive integrated employment each year of the review period, SCVRD reported a sharp decline, from 225 participants in PY 2017, to 135 participants in PY 2018, to 21 participants in PY 2019. SCVRD attributed the drop in supported employment outcomes in competitive

integrated employment to coding errors in PY 2019, and noted it is reviewing the accuracy of reported data in PYs 2017 and 2018.

Most employment outcomes achieved were in occupations paying less than the 2020 median wage in South Carolina of \$17.36. Over the three-year period, the highest paying occupations included: customer service representatives, laborers and freight, stock, and material movers, stock clerks and order fillers, helpers-production workers, packers, and hand packagers. In PYs 2017, 2018, and 2019, the median hourly earnings for participants who achieved competitive integrated employment were \$10.00, \$11.00, and \$11.50 respectively, which exceeded the State and Federal minimum wage of \$7.25 per hour. Additionally, the median hours worked per week indicated full-time employment at 40 hours in each of the three program years reviewed. Over the three program years reviewed, private medical insurance coverage through employers for participants who exited in competitive integrated employment or supported employment, increased from 15.6 percent in PY 2017 to 28.8 percent in PY 2019.

RSA identified some areas that may have affected both SCVRD's performance and the quality of its outcomes including drafted but unimplemented VR service delivery policies and procedures such as unfinished policies on tuition assistance, difficulty in interpreting financial needs test requirements, and a decrease in training services overall during the program years reviewed. SCVRD's data does not reflect the use of apprenticeships or customized trainings with limited use of customized employment services, which can lead to quality employment outcomes. Although SCVRD communicated different partnership projects within its WTCs for on-the-job training opportunities as providing a path for direct placement in manufacturing jobs or IT jobs, no formal agreements were noted. SCVRD and RSA discussed ways the agency could partner with various WIOA programs to develop and implement apprenticeship training, customized employment opportunities, and on-the-job training opportunities for its participants.

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

Early career exploration through pre-employment transition services increases the likelihood of achieving high-quality competitive integrated employment and improving postsecondary educational and employment options for students with disabilities. RSA reviewed data reported by SCVRD related to the provision of pre-employment transition services to students with disabilities, including potentially eligible students and those determined eligible for the VR program. The review team analyzed data on the number of students with disabilities, the number of those receiving pre-employment transition services, and the types of services provided. In addition, RSA reviewed data in the other measures that matter related to the breakout of students with disabilities who received pre-employment transition services as potentially eligible students with disabilities and students with disabilities who received these services under an IPE, as well as the number of students with disabilities who advanced 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.

SCVRD reported 16,917 students with disabilities in PY 2017, 20,743 in PY 2018, and 22,884 in PY 2019. Of the students with disabilities reported by SCVRD, 5,157 students (30.5 percent) received pre-employment transition services in PY 2017, 9,832 students (47.4 percent) in PY

2018, and 13,867 students (60.6 percent) in PY 2019. SCVRD attributed this significant increase from PY 2017 to PY 2019 to its outreach efforts with the local education agencies (LEAs) and the use of pre-employment transition service contracts focused on the delivery of the five required services.

In PY 2017, SCVRD reported that of the 5,157 students with disabilities who received a pre-employment transition service, 209 (4.1 percent) were potentially eligible students. In PY 2018, of the 9,832 students with disabilities who received a pre-employment transition service, 2,670 (27.2 percent) were potentially eligible students. In PY 2019, of the 13,867 students with disabilities who received a pre-employment transition service, 7,018 (50.6 percent) were potentially eligible students. SCVRD attributed the increase from PY 2017 to PY 2019 to a concerted effort to increase the provision of pre-employment transition services to students with disabilities who were potentially eligible.

Of the 106,086 pre-employment transition services provided in PY 2019, the greatest percentage of services were job exploration counseling (23.9 percent), instruction in self-advocacy (23.0 percent), work-based learning experiences (18.7 percent), and workplace readiness training (17.6 percent). The smallest percentage of pre-employment transition services provided during the same period was counseling on enrollment opportunities (16.8 percent).

In PY 2019, 7,018 potentially eligible students with disabilities received pre-employment transition services. However, only 302 individuals, or 2.8 percent applied to the VR program. This indicates that in PY 2019, 97.2 percent of all potentially eligible students who received a pre-employment transition service, did not apply for, and receive a VR service. SCVRD and RSA discussed engaging potentially eligible students in more career-oriented services and the development of strategies to increase the number of students with disabilities who apply for VR services.

SCVRD reported helping to create a position to assist with partnering with the schools to determine appropriate referrals of students with disabilities and providing some of the pre-employment transition services in the classroom. These VR staff positions are called Transition Specialist (TSS). For those VR offices that do not have a TSS assigned, the VR counselor provides those pre-employment transition services in the classrooms working directly with the schools and with other sub-offices that share their TSS.

### **Factors Influencing Performance**

The decline and attrition experienced in the number of VR applicants and eligible individuals throughout the VR process significantly influences the agency's performance overall and SCVRD would benefit from an in-depth analysis of the reasons for this decline, which could suggest strategies for improved engagement throughout the VR process or alternative approaches to effective service delivery. RSA discussed the value of critically analyzing strategies to increase the number of potentially eligible students with disabilities who apply for the VR program as a means to increase the numbers served and the potential for positive outcomes. Attributing overall declines in performance to the provision of pre-employment transition services to potentially eligible students or the economy, while factors, do not offer substantial or the only explanations. SCVRD could benefit from a review of the overall effectiveness and

performance of its WTCs, which, while meeting the needs of local employers, have not excelled in producing competitive integrated employment outcomes for VR program participants. Considering the strong investment in these centers, SCVRD may benefit from exploring alternative services that could be provided, a revised referral policy based more on individual needs and informed choice, contract revisions with local businesses that result in hiring commitments, on-the-job training opportunities, or apprenticeships following training in the WTCs.

RSA suggested SCVRD establish reciprocal referral services with the South Carolina Commission for the Blind (SCCB); establish dual cases, where appropriate, for individuals with multiple disabilities, including blindness and visual impairment; coordinate the provision of services on IPEs to avoid duplication; and otherwise ensure cooperation necessary to appropriately provide effective services in accordance with 34 C.F.R. § 361.24(e). The MOU established between SCVRD and SCCB was last reviewed and updated in 2018 and is not consistent with guidance provided in TAC-12-04. The MOU does not ensure that each agency only uses its VR funds to serve the respective population in accordance with the approved VR portion of the Unified or Combined State plan. SCVRD should appropriately address dual service delivery methods with SCCB and working with individuals with multiple disabilities through a functioning MOU that would eliminate purchasing of services by one VR agency from another.

The lack of revised policies and their implementation also is a potential factor influencing performance. Without updated policies, VR counselors may struggle with the appropriate provision of VR services that will result in competitive integrated employment outcomes for the participants. Similarly, policies can assist in setting the expectations for practices and requirements leading to more effective participant engagement during the VR process, thus reducing attrition.

### **Use of Data to Inform Performance and Management**

Although SCVRD acknowledged the value of using accurate and valid data to inform and improve performance, it was unclear how the agency uses referral, applicant, participant, service delivery, and outcome data to inform program and financial decisions and to prioritize and implement strategies and practices leading to improved performance in the VR and Supported Employment programs. The examination of data elements in several of the data tables raised questions among agency staff during the course of the review about how SCVRD leaders use the analysis of the data to generate program and financial decisions around strategies to ensure that the agency is meeting its goals and priorities.

During the review, SCVRD reported using data elements derived from its case management system to generate reports to assist senior leadership and managers to drive needed changes to improve performance. For example, SCVRD shared that it was investigating several initiatives such as an investment of establishment funds for a 'LEARN' center to enhance the delivery of VR services and coordinate the use of occupational/vocational and customized training.

The RSA team suggested that SCVRD conduct a systemic, programmatic, and fiscal review of trend data related to the operation and performance of the 25 WTCs to demonstrate the value of

exploring the use of data in its decision-making processes. RSA further suggested that SCVRD conduct a cost-benefit analysis to inform decisions as it proceeds with the next comprehensive statewide needs assessment (CSNA) to align the agency's strategic priorities with the functional uses of the WTCs. This type of analysis would assist the agency as it works strategically with its business partners in the State to develop successful outcomes for individuals served at the WTC facilities.

An analysis of individuals who exited the program prior to and after receiving services without employment and the types of services they received could prove helpful to SCVRD in determining VR service strategies such as marketing outreach to increase referrals, customized training, customized employment, on-the-job training, work-based learning experiences, benefits counseling, etc. to increase the expectation of quality competitive integrated employment outcomes. RSA suggested that this analysis could lead to a refining of the VR service delivery system and build on the business partnerships established for contracted work within the WTCs that ultimately could lead to competitive integrated employment within the local businesses that SCVRD serves. RSA encouraged SCVRD to use routine data analyses to determine effectiveness of policies and practices related to service delivery, generate reports that measure progress and are most meaningful to the leadership and decision-makers, analyze trends to provide real-time adjustments, and communicate performance with staff and stakeholders regarding both positive and negative trends and how the agency plans to address them to improve performance.

### **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. RSA staff reviewed SCVRD's draft policies, procedures, and internal controls.

The RSA review team identified that SCVRD possessed fundamental deficiencies in its policies and procedures. Specifically, SCVRD has been functioning without fully finalized or approved

policies and procedures that were in draft form at the outset and through the completion of this review. The agency was operating primarily from policies and procedures dating back to 2015, the last time VR service policies were finalized according to agency leadership. SCVRD's draft policies provided to RSA for this review process were mostly dated drafts from February 2021 and were in various stages of development. The agency shared it was in the process of updating all policies and procedures and SCVRD leadership informed RSA that plans were in place to purchase a commercially available software program that would contain, track, and modify policies and procedures. SCVRD and RSA discussed the need for finalized policies and procedures that would lead to updated internal controls processes that would guide the agency in its management of the Federal award. Further, SCVRD recognized the need to finalize and implement all agency policies and procedures and develop a mechanism to fully inform and train agency staff.

Although SCVRD provided RSA copies of its draft policies and procedures that were in various stages of development at the outset and through the completion of this review, the agency had developed internal controls that were sufficient to validate and report reliable, accurate and timely consumer data to RSA. The processes for data validation and reviews by quality assurance staff were standardized processes that were consistent with draft policies and procedures and produced reliable, accurate and timely RSA-911 reports. SCVRD and RSA discussed the need to review all internal control processes once finalized policies and procedures were implemented to ensure alignment with new or revised data collection and quality assurance processes. SCVRD assured RSA that this was part of its planned updates to agency policies and procedures.

### **C. Technical Assistance and Recommendations**

RSA provided technical assistance in the following topical areas to SCVRD 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 SCVRD to achieve continuous improvement in performance. RSA is available to provide follow-up technical assistance in addition to that received by SCVRD from the RSA-funded VR Technical Assistance Center on Quality Management.

Based upon the requests of the VR agency and the performance analysis, RSA shared recommendations to assist SCVRD in achieving continuous improvement in its program performance. Throughout the process, SCVRD was receptive and appreciative of the information shared by the RSA team. Outlined below is a summary of technical assistance highlights along with recommendations and suggestions for SCVRD that could improve performance.

RSA clarified statutory and regulatory requirements in several areas including, but not limited to, independent commissions, establishment authority, innovation and expansion, trial work experiences and eligibility determination, informed choice, IPE development, supported employment, written policies, and WIOA performance measures. RSA provided technical assistance and reviewed policy considerations for SCVRD as it revises its policies and updates internal controls, including, but not limited to, specific areas such as postsecondary training and education and career advancement, financial needs testing, the VR process, tracking and reporting of data, and pre-employment transition services. Following are recommendations

resulting from RSA's observations and discussions with SCVRD during the review process in several key areas.

**Work Training Centers:** SCVRD routinely provides VR services through WTCs that include assessment, evaluation, foundational skills training, real work experiences, and job readiness training in several industries in the local labor market. Each WTC partners with local businesses who sub-contract for work training activities that are completed in the SCVRD WTCs. Given the investment in this service delivery model, RSA recommends that SCVRD—

- Analyze the recent performance trends in the achievement of employment outcomes for participants receiving WTC services to determine their effectiveness in contributing to employment outcomes and the quality of those outcomes, including for individuals with the most significant disabilities;
- Consider ways in which the WTCs may be used to build upon the local business relationships, including strategies to engage these businesses in hiring, on-the-job training, and apprenticeship opportunities for individuals with disabilities as they transition to employment from the VR program; and
- Explore additional services or methods to address unique needs of participants, including work experiences, that align appropriately with their informed choice and employment goals aside from routine production and manufacturing training; and given the productive nature of the work completed by the participants in the WTCs on the production and manufacturing contracts with local businesses, consult with the Wage and Hour Division of the U.S. Department of Labor to determine the potential existence of an employer-employee relationship and the parameters that must be met for a training relationship.

**Analysis of VR Agency Performance, Attrition, Consumer Needs:** SCVRD and RSA discussed the need to conduct an in-depth analysis of the reasons for the decline and attrition in the number of VR applicants and eligible individuals; develop goals to increase the number of individuals who apply and are determined eligible for VR services; and develop strategies to engage and retain individuals from the time of application to the receipt of VR services. RSA recommends that SCVRD—

- Conduct a meaningful CSNA that incorporates all of the regulatory components including the WIOA common performance measures but also is geared toward census, cost benefit analysis for specialized programming, the State's economic conditions, labor market conditions, and economic development. The CSNA should explore establishment authority projections, innovation and expansion opportunities, resource plans, and the State's Capital Improvement Plan;
- From the CSNA, develop measurable goals and priorities, performance targets, and strategic plans to effectively guide the continuous improvement of the agency;
- Implement a strategic planning process that incorporates the CSNA and a financial and programmatic risk analysis that results in goal setting and related agency priorities that meet the service needs of consumers; and
- Evaluate the current and potential use of providing VR services internally, including a cost-benefit analysis, performance outcomes, and program restructuring.



**State Independent Consumer-Controlled Commission:** The membership of the SCVRD Board of Commissioners is compliant with the requirements of the South Carolina Code of Laws (Section 43-31-40), which reads as follows:

The Governor shall appoint a State Agency of Vocational Rehabilitation to be composed of seven members, and this agency shall provide for the administration of this chapter. The members of the agency shall consist of one member from each congressional district. The Governor, upon the advice and consent of the Senate, shall appoint the members. The members shall serve a term of seven years. The terms of office must always remain staggered so that the term of one member expires every year with appointments to fill unexpired terms caused by death, resignation, or disability.

As written, the South Carolina Code of Laws does not ensure that the composition of the Board of Commissioners, although currently consumer-controlled, remains compliant with the requirements for a State Independent Consumer-Controlled Commission under Section 101(a)(21)(A)(i) of the Rehabilitation Act and 34 C.F.R. § 361.16(a)(1)(ii). As a result, RSA recommends that SCVRD—

- Work with the Governor’s office and State legislature to revise the South Carolina Code of Laws to ensure that the Board of Commissioners is compliant with the requirements under the Rehabilitation Act for an Independent Consumer-Controlled Commission.

RSA provided additional technical assistance in the following areas:

- Operationalizing Final Policies;
- Validation of information reported on the RSA-911;
- Customized Employment;
- Customized Training;
- Supported Employment services and case closures; and
- Differences between use of the establishment authority and Innovation and Expansion activities.

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

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

##### **Finding 2.1 Non-compliant Written Policies Governing the Provision of Services for Individuals with Disabilities**

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

**Requirement:** In accordance with Section 101(a)(6) of the Rehabilitation Act and 34 C.F.R. § 361.50, VR agencies are required to develop and maintain written policies governing the provision of services for individuals with disabilities as specified in Section 103 of the

Rehabilitation Act and 34 C.F.R. § 361.48. Pursuant to 34 C.F.R. § 361.50, the VR agency must develop and maintain written policies that ensure that the provision of services is based on the rehabilitation needs of each individual as identified in that individual's IPE and is consistent with the individual's informed choice in accordance with Sections 101(a)(19), 102(b)(3)(B), and 102(d) of the Rehabilitation Act, and 34 C.F.R. § 361.52.

The written policies may not establish any arbitrary limits on the nature and scope of VR services to be provided to the individual to achieve an employment outcome. The policies must be developed in accordance with provisions for out-of-state services (34 C.F.R. § 361.50(b)), payment for services (34 C.F.R. § 361.50(c)), duration of services (34 C.F.R. § 361.50(d)), and authorization of services (34 C.F.R. § 361.50(e)).

Furthermore, VR agencies must comply with the requirements for public comment in accordance with Section 101(a)(16) of the Rehabilitation Act and 34 C.F.R. § 361.20.

**Analysis:** RSA reviewed all policies and procedures submitted for this review and found that SCVRD was functioning without fully finalized or approved policies and procedures. Specifically, the agency was operating primarily from policies and procedures dating back to 2015, the last time VR service policies were finalized according to agency leadership. SCVRD did not provide RSA with a copy of the 2015 policies and procedures but maintained these were being used by the agency until the draft policies were finalized. SCVRD policies and procedures provided to RSA for this review process were mostly dated drafts from February 2021 and were in various stages of development.

RSA identified insufficiencies and areas of non-alignment with requirements in the Rehabilitation Act and the implementing regulations in 34 C.F.R. parts 361 and 363. SCVRD management staff reported that draft revisions were being made to policies and the agency had issued several guidance communications to staff that provided instructions on how to carry out various portions of VR services activities while it continued to work toward finalizing draft policies. SCVRD VR counselors reported that revised policies could be accessed easily on the agency's intranet servers, but the guidance memoranda provided to staff were not consistently found in one centralized location.

Despite SCVRD's ongoing efforts to update and revise its policies to align them with the requirements in the Rehabilitation Act and the implementing regulations, RSA identified several specific instances in the VR agency's policies effective February 2021 (or thereafter), which were either inaccurate or did not align with the requirements in place since the passage of WIOA.

For example, in the Revised version of Fees and Codes Manual-March 2021 draft policy provided for this review, SCVRD stated at the top of the document that "Note: SCVRD is in the process of redesigning our policies and procedural guide; therefore, please consider this document as part of that process." Several fees in this document were crossed out and replaced with newer figures such as those contained in section 1.1:

- Purchases not in excess of ~~\$2,500~~ \$10,000; and

- Purchases more than \$2,500.

Further in section 6.2 in the above referenced draft policy, the policy stated in bold the “Need to update calculations in this section.” Portions of this policy were highlighted for revisions in the areas of—

- Four-year university/college programs; and
- Clock hours.

These created a challenge for staff because it was unclear which figures they were to use in determining service costs to VR consumers. VR counselors consistently informed RSA during the course of the review that they were instructed to contact the Consumer Services Division for clarifications and approvals for these cost areas.

SCVRD policy in the Supported Employment draft under a section describing eligibility for supported employment services defines “A youth with a most significant disability is at least 14 years old and not older than 25 years old.” This definition is inconsistent with the definition of a youth with a disability at 34 C.F.R. § 361.5(c)(58) that defines a youth with a disability who is not—

- Younger than 14 years of age; and
- Older than 24 years of age.

SCVRD’s Analysis of Financial Need draft policy contains a reference to “extended evaluation” as a VR service though this service is no longer provided in the VR program as a result of amendments to the Rehabilitation Act made by Title IV of WIOA and the implementing regulations. Furthermore, this draft policy does not contain any reference to auxiliary aids or services as an exclusion to the application of the financial needs test or the requirement of the individual to financially participate in the costs of their VR program. Finally, the agency should consider a different format for drafting this policy as it is difficult to interpret, has several layers of sequential activities, and complicates the ability of consumers to receive VR services.

In summary, there are multiple examples in SCVRD’s policy documents that are inconsistent or do not reflect the changes related to the provision of VR and supported employment services made by the Rehabilitation Act as amended by Title IV of WIOA and the implementing regulations. Furthermore, many of the SCVRD practices related to exceptions for individuals with special circumstances require many layers of approval and all end with a determination by the agency’s Consumer Services Division. These practices as reported by SCVRD staff and stakeholders result in ongoing confusion and possible limitations or delays in the provision of needed services and the implementation of informed choice.

Finally, at the time of the review, SCVRD had developed internal controls that were sufficient to validate and report reliable, accurate and timely consumer data to RSA. SCVRD and RSA discussed the need to review all internal controls processes once finalized policies and procedures were implemented to ensure alignment with new or revised data collection and

quality assurance processes. SCVRD assured RSA that this was part of its planned updates to agency policies and procedures.

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

**Corrective Actions 2.1** RSA requires that SCVRD—

- 2.1.1 Draft and submit to RSA for review written policies related to the provision of VR and supported employment services, in accordance with 34 C.F.R. § 361.50(a) that cover the nature and scope of each VR service and the criteria under which VR services are provided as specified in Section 103 of the Rehabilitation Act and 34 C.F.R. § 361.48;
- 2.1.2 As necessary or required, obtain public input and comment including review by the SCVRD Board of Commissioners, on all policies and procedures;
- 2.1.3 Provide training to staff on revised and new policies to ensure understanding and consistent implementation of policies; and
- 2.1.4 Implement internal controls and methods to regularly evaluate staff compliance with policies.

**VR Agency Response:**

- 2.1.1 SCVRD developed a Policy & Internal Controls Unit (PICU) to update and monitor policies, in accordance with 34 C.F.R. § 361.50(a) that cover the nature and scope of each VR service and the criteria under which VR services are provided as specified in Section 103 of the Rehabilitation Act and 34 C.F.R. § 361.48. The PICU is working in conjunction with the Consumer Services and Quality Assurance departments to complete this process. The SCVRD requested and is currently receiving technical assistance from the RSA VRTAC-QM and VRTAC-QE to assist the SCVRD in the revision phase of this process.
- 2.1.2 The SCVRD will seek feedback from public providers/stakeholders of applicable policy revisions during this process. The Board of Commissioners will receive copies of the policy revisions including input and comments from stakeholders so they can review and provide additional comments.
- 2.1.3 SCVRD recognizes the importance of continuous staff training to promote the understanding of updated policies, procedures and standard operating procedures. SCVRD has begun the use of a purchased software to aid in managing policy and procedure revisions. The Consumer Services Department, Quality Assurance Department, Policy and Internal Control Unit, and the Training Coordinator will work as a team to provide the necessary training and support to agency staff to ensure consistent service delivery and understanding of policy as outlined in federal regulations.
- 2.1.4 SCVRD already has proven internal controls and methods in place to evaluate staff compliance with policies. As policies are revised and updated, these methods will be implemented.

**RSA Response:** RSA appreciates the agency’s efforts in working toward addressing the corrective action items. Once the corrective action plan is developed, RSA will work with the agency to determine if updated processes result in meeting Federal requirements and ongoing compliance. The finding and the required corrective action items remain unchanged, and RSA will coordinate technical assistance with the VRTAC-QM and VRTAC-QE as requested.

**VR Agency Request for Technical Assistance:** SCVRD respectfully requests continued technical assistance from RSA VRTAC-QM and VRTAC-QE as we work to complete all policy revisions/updates. This support includes supported employment and customized employment policy revisions.

## **Finding 2.2 Insufficient Reciprocal Referral Services**

**Issue:** Has SCVRD developed and maintained the appropriate reciprocal referral services and coordination in its agreement with SCCB as required for the provision of services that align with the Rehabilitation Act of 1973, as amended by Title IV of WIOA.

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

If there is a separate designated State unit for individuals who are blind, the two designated State units must establish reciprocal referral services, use each other's services and facilities to the extent feasible, jointly plan activities to improve services in the State for individuals with multiple impairments, including visual impairments, and otherwise cooperate to provide more effective services, including, if appropriate, entering into a written cooperative agreement.

**Analysis:** RSA reviewed the MOU established between SCVRD and SCCB that was last updated in 2018 and determined it is not consistent with Section 101(a)(11) of the Rehabilitation Act and 34 C.F.R. § 361.24(e) and guidance provided in TAC-12-04. SCVRD does not appropriately address dual service delivery methods with SCCB and working with individuals with multiple disabilities through a functioning reciprocal agreement that provides appropriate mechanisms for the two DSUs to work together. The MOU fails to permit both agencies to simultaneously serve eligible individuals with multiple disabilities, collaborate to conduct joint staff training on service provision to individuals with multiple disabilities, communicate with referral sources to effectively market the combined capability of serving eligible individuals with multiple disabilities, or eliminate purchasing of services for dual service delivery for individuals with multiple disabilities. The MOU provides that individuals with multiple disabilities, including visual impairments, who are consumers of SCCB, may take advantage of appropriate complimentary services that are available on a case-by-case basis based on an established fee schedule. The MOU establishes a billing mechanism for evaluation services stated as—

- SCVRD will provide a report and invoice SCCB for each participant upon completion of the evaluation or other service; and
- SCCB will be charged the current daily facility cost multiplied by the number of days in attendance for each participant.

The MOU does not ensure that each agency only used its VR funds to serve the respective population in accordance with the approved VR portion of the Unified or Combined State plan.

**Conclusion:** In accordance with Section 101(a)(11) of the Rehabilitation Act and 34 C.F.R. § 361.24(e), VR agencies are required to coordinate with other State agencies and other components of the workforce development system in the provision of VR services. SCVRD has a MOU in place with SCCB that does not appropriately address dual service delivery methods with SCCB and working with individuals with multiple disabilities including blindness through a functioning reciprocal agreement that provides appropriate mechanisms for the two DSUs to work together. The MOU establishes a fee for service arrangement between the two DSUs that fails to provide that each VR agency may only use its VR funds to serve its respective population in accordance with the approved VR portion of the Unified or Combined State plan.

**Corrective Actions 2.2** RSA requires that SCVRD—

- 2.2.1 Cease billing and payment processes of VR services for consumers of SCCB who receive services under the 2018 MOU with SCCB and eliminate purchasing of services by one VR agency from another;
- 2.2.2 Immediately terminate or revise the current interagency agreement with SCCB, pursuant to 34 C.F.R. § 361.24(e);
- 2.2.3 Develop and establish with SCCB a reciprocal agreement that permits both agencies to simultaneously serve eligible individuals with multiple disabilities, including blindness; collaborate to conduct joint staff training on service provision to individuals with multiple disabilities, and ensure that agency purchased services are unduplicated and assigned to the appropriate funding source (i.e., SCVRD, SCCB);
- 2.2.4 In the first quarterly update after approval of the corrective action plan (CAP), provide RSA with the draft MOU or similar reciprocal agreement for review to ensure compliance with 34 C.F.R. § 361.24(e) prior to execution; and
- 2.2.5 Execute the final MOU or similar reciprocal agreement between SCVRD and SCCB.

**VR Agency Response:** Although SCVRD agrees that the 2018 MOU is not reciprocal, SCVRD would like to clarify that the 2018 MOU between SCVRD and SCCB was developed and initiated by the previous leadership team at SCCB. While SCVRD respectfully requests that this finding be removed from the final report, SCVRD will take the corrective actions for 2.2.1, 2.2.2, 2.2.4, and 2.2.5.

- 2.2.3 SCVRD is in the process of developing a draft agreement with SCCB. A call was held on January 19, 2022 to discuss the 2018 MOU with RSA, SCCB, and SCVRD. At the conclusion of the call, SCCB agreed to take the lead on developing a new MOU that reflects a more reciprocal agreement to dually serve eligible individuals with multiple disabilities, including blindness. SCVRD is awaiting receipt of the draft agreement to review and provide input for approval.

**RSA Response:** RSA appreciates the agency's efforts in working toward addressing the corrective action items. Once the corrective action plan is developed, RSA will work with the agency to determine if updated processes result in meeting Federal requirements and ongoing compliance. The finding and the required corrective action items remain unchanged. RSA will continue to provide necessary technical assistance to support SCVRD's execution of a MOU with SCCB in accordance with 34 C.F.R. § 361.24(e).

**VR Agency Request for Technical Assistance:** SCVRD is not requesting technical assistance for Finding 2.2 because the current leadership team at SCCB has agreed to revise the 2018 MOU since it was developed by their agency.

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

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### **A. Purpose**

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

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

RSA reviewed SCVRD's fiscal performance data from FFYs 2018 through 2020, as well as internal control policies and procedures for the allocation and expenditure of VR program funds.

During the off-site review, SCVRD staff described systems the agency used to authorize, account for, and issue payment for VR services. The agency demonstrated the ability of its financial management system to record obligation and payment dates of VR program expenditures and to track those expenditures to specific periods of funding availability by award to ensure assignment of expenditures to the correct Federal fiscal year.

During reallocation, the agency relinquished no funds for the years in review. In FFY 2018, it requested \$7,500,000 in additional funding and was approved for \$6,757,897. In FFY 2019, it requested \$3,500,000 in additional funding and was approved for that amount. In FFY 2020, the agency also requested additional funds in the amount of \$3,500,000 and was awarded the requested amount.

All VR funds were expended in full by the end of the period of performance for each year in review. SCVRD has experienced staff turnover in the fiscal department in recent years. This has led, in part, to inaccurate, incomplete, and late reporting, and a lack of understanding of Federal regulations governing VR formula grant awards. New staff orientation was complicated by a lack of written processes or procedures for implementing the terms and conditions of the grant award.

RSA's off-site discussions with staff often resulted in the agency's inability to provide supporting documentation or detail how past processes were completed or previous projects implemented. As a result, current SCVRD staff have begun the process of writing procedures and implementing internal controls. Given the limited human capital resources and a lack of institutional knowledge, the RSA monitoring team discussed with SCVRD staff the need to conduct a comprehensive enterprise risk management analysis to identify areas of priority.



### **C. Technical Assistance and Recommendations**

RSA provided technical assistance to SCVRD in the following topical 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 SCVRD 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 and has recommended SCVRD seek additional technical assistance as needed through the RSA Technical Assistance Center on Quality Management.

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

#### **Prior Approval**

- The Uniform Guidance requirements for prior approval, including the use of a streamlined approach per FAQ, dated October 29, 2019, that provided additional flexibilities.

#### **Match**

- Tracking and reporting match in the year of appropriation.

#### **Internal Controls and Contract Monitoring**

- Implementation of internal controls to ensure preparation and submission of accurate, complete, and timely SF-425 financial reports;
- Formalizing delegation of authority, and
- Developing and implementing written policies and procedures regarding contract monitoring.

Additionally, RSA provided technical assistance on contract provisions for non-Federal entity contracts under Federal awards. The Uniform Guidance at 2 C.F.R. part 200, Appendix II includes a list of provisions that all contracts made by the non-Federal entity under the Federal award must contain, as applicable. RSA discussed the provisions with the VR agency and suggested that SCVRD review the requirements with State procurement and legal staff who are responsible for the contracting process.

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

RSA's review of the performance of SCVRD in the financial management area resulted in the identification of the following findings and the corresponding corrective actions to improve performance.

## Finding 3.1 Insufficient Internal Controls

### Issues:

- Whether SCVRD maintained effective internal control over the Federal award to provide reasonable assurance that it is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the award.
- Whether SCVRD satisfied prior approval requirements in 2 C.F.R. § 200.407.
- Whether SCVRD met the Federal requirements for procurement processes (2 C.F.R. § 200.317), including internal controls for such processes (2 C.F.R. § 200.302(b)(7)), determining allowability and allocability of costs (2 C.F.R. §§ 200.403 through 200.405), and establishment requirements in 34 C.F.R. §§ 361.5(c)(16) and (17), 361.29, 361.49, and 361.60(b)(3)(i).

**Requirements:** A State VR agency must assure, in the VR services portion of the Unified or Combined State Plan, that it will employ methods of administration that ensure the proper and efficient administration of the VR program. These methods of administration (i.e., the agency’s internal controls) must include procedures to ensure accurate data collection and financial accountability (34 C.F.R. § 361.12). “Internal controls” means a process, implemented by a non-Federal entity, designed to provide reasonable assurance regarding the achievement of objectives in the following categories:

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

In addition, the Uniform Guidance at 2 C.F.R. § 200.62(a)(3) defines “internal control over compliance requirements for Federal awards” as a process implemented by a grantee that provides reasonable assurance that, among other things, that transactions are accurately recorded and accounted for to demonstrate compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. In accordance with the Uniform Guidance, 2 C.F.R. § 200.303, among other things, a non-Federal entity must—

- Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award...;
- Comply with Federal statutes, regulations, and the terms and conditions of the Federal awards;
- Evaluate and monitor the non-Federal entity’s compliance with statutes, regulations and the terms and conditions of Federal awards; and
- Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings.

Additionally, 2 C.F.R. § 200.302(a) requires that a State's financial management systems, including records documenting compliance with Federal statutes, regulations, and the terms and conditions of the award, must be sufficient to permit the—

- Preparation of reports required by general and program specific terms and conditions; and
- Tracing of funds to a level of expenditures adequate to establish that such funds have been used according to the Federal statutes, regulations, and the terms and conditions of the Federal award.

Furthermore, provisions at 2 C.F.R. § 200.302(b)(4) require that the financial management system of each non-Federal entity must ensure effective control over, and accountability for, all funds, property, and other assets. The non-Federal entity must adequately safeguard all assets and assure that they are used solely for authorized purposes. In its guidance *The Role of Internal Control, Documenting Internal Control, and Determining Allowability & Use of Funds*, the U.S. Department of Education (Department) made clear to grantees that internal controls represent those processes by which an organization assures operational objectives are achieved efficiently, effectively, and with reliable, compliant reporting. Therefore, an internal control deficiency would exist when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or correct processes that might lead to noncompliance with Federal and State requirements.

### **3.1.1 Insufficient Internal Controls**

#### **Insufficient Internal Controls for Determining Reasonableness of Costs: 34 C.F.R.**

§ 361.50(c)(1) requires the designated State unit to establish and maintain written policies to govern the rates of payment for all purchased vocational rehabilitation services. While SCVRD was able to provide a schedule of fees for some purchased services, SCVRD did not identify a rate-setting methodology for the agency to use when determining the reasonable rates for pre-employment transition service contracts or when making changes to provider rates. SCVRD must have a rate setting policy that is used to ensure the reasonableness of contract costs.

For example, SCVRD entered a CareerBOOST Expansion contract with the National Federation of the Blind of South Carolina for the provision of pre-employment transition services. While the services to be provided under the contract were similar to SCVRD's other pre-employment transition service contracts, the cost of the pre-employment transition services provided by the National Federation of the Blind of South Carolina was substantially higher than other providers. When RSA requested documentation regarding how the contract costs were determined to be reasonable, SCVRD was unable to provide a justification or supporting documentation as to the reason for the increased cost for this provider.

**Undocumented or Insufficient Fiscal Policies:** RSA's review of several written process memos provided by SCVRD found deficiencies and omissions. The agency did not provide all fiscal policies and procedures per document request. The available policies did not provide reasonable assurance that the agency has adequate internal controls, including policies and procedures for program income and establishment.

During the review, including in discussions with SCVRD management and review of the agency's policy manuals, RSA found that the agency did not have sufficient policies, procedures, and internal controls to ensure compliance with applicable Federal requirements. RSA found that written processes either did not exist or did not include the details necessary to provide a reasonable assurance that the agency is managing the award in compliance with Federal statutes, requirements, and the terms and conditions of the award.

The agency was not able to provide its segregation of duties memorandum that would permit a back-up officer to sign financial reports in instances where the primary authorized official (Commissioner) is not available. The agency acknowledged the need for such documentation and expressed its intention to move forward with developing such policy.

For some of the processes, SCVRD was able to describe steps taken to address some of these concerns; however, the processes were not documented. Consequently, SCVRD was unable to demonstrate that adequate safeguards and internal controls were documented, implemented, and in compliance with Federal requirements. SCVRD indicated it had no processes for updating or creating procedures or internal controls. When considering staff turnover in key positions, the lack of documented internal control processes may result in loss of continuity necessary to identify and correct non-compliance.

### **3.1.2 Prior Approval Requirements Not Met**

The Uniform Guidance at 2 C.F.R. § 200.407, includes a list of specific circumstances for which prior approval from the Federal awarding agency in advance of the occurrence is either required for allowability or recommended to avoid subsequent disallowance or dispute based on the unreasonableness or non-allocability. For example, 2 C.F.R. § 200.439(b)(1) states that capital expenditures for general purpose equipment, buildings, and land are unallowable as direct charges, except with the prior written approval of the Federal awarding or pass through entity. The Uniform Guidance at 2 C.F.R. § 200.62(a)(3) also requires the agency have internal control over compliance requirements for Federal awards to demonstrate compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. On November 2, 2015, the Department of Education adopted the final regulations found in 2 C.F.R. part 200 (Federal Register notice 80 FR 67261). The Department issued notifications to grantees regarding the new requirements and made training and technical assistance documents available to grantees to assist in implementation of the new requirements. To ensure that RSA grantees were aware of the applicability of the prior approval requirements, RSA included a special clause on the FFY 2016 Grant Award Notifications that stated, in pertinent part: [T]he prior approval requirements listed in the Uniform Administrative Requirements, Costs Principles, and Audit Requirements for Federal Awards (Uniform Guidance) (2 C.F.R. part 200) are applicable to this award... Grantees are responsible for ensuring that prior approval, when required, is obtained prior to incurring the expenditure. Grantees should pay particular attention to the prior approval requirements listed in the Cost Principles (2 C.F.R. 200 subpart E). In addition, information regarding the requirements in 2 C.F.R. part 200 was communicated to grantees via RSA's listserv on September 23, 2015.

RSA requested the VR agency's written policies, procedures, or processes for ensuring the agency was meeting the prior approval requirements when applicable. SCVRD did not have

comprehensive policies for prior approval but provided guidance and processes for prior approval for select items of cost.

The agency was not able to provide reasonable assurance that it was in compliance with the Uniform Guidance per 2 C.F.R. § 200.407. Specific examples include—

- i. Direct administrative costs charged to the award every year in review (\$20-24 million per RSA-2 reports for the years in review) without prior approval.
- ii. The agency did not request prior approval for all equipment purchases.

### **3.1.3 Insufficient Internal Controls for Contract Monitoring**

The Uniform Guidance at 2 C.F.R. § 200.303(c) requires grantees to implement internal controls sufficient to evaluate and monitor the agency’s activities to ensure compliance with Federal requirements. In addition, 2 C.F.R. § 200.328(a) requires SCVRD to be responsible for the operation of all grant-supported activities. VR program implementing regulations at 34 C.F.R. § 361.12 require SCVRD to employ methods of administration necessary for the proper administration and for carrying out all functions under the State plan. These methods include procedures to ensure accurate data collection and financial accountability. As such, SCVRD must monitor and evaluate grant-supported activities to ensure compliance of all activities performed under the VR program. The agency did not have sufficient policies and procedures for contract monitoring (including for the Power-Up project), and discussions with the agency during the review and the VR response to the document request confirmed the agency did not have any completed fiscal vendor monitoring samples.

As stated above in this report, the VR agency did not have written processes for vendor monitoring, the terms and conditions of contracts, or agency contract expenditures. During off-site discussions, the VR agency indicated it did not conduct specific fiscal monitoring to ensure vendors followed the terms and conditions of the agreement.

The agency staff acknowledged the need to develop a more robust fiscal monitoring protocol, and to conduct contract monitoring in a more structured and formal manner, integrating programmatic and fiscal elements into a comprehensive approach.

**Conclusion:** RSA’s analysis found that—

- SCVRD had not established and maintained written policies and internal controls to govern the rates of payment for all purchased vocational rehabilitation services; therefore, SCVRD is not in compliance with 34 C.F.R. §§ 361.50(c)(1) and 361.12. SCVRD’s internal controls must ensure the agency is able to document that costs paid for the provision of VR services are reasonable;
- SCVRD did not have sufficient internal controls to ensure compliance with the prior approval requirements pursuant to the Uniform Guidance (2 C.F.R. § 200.407); and
- SCVRD did not have sufficient internal controls for contract monitoring to accurately account for all Federal and non-Federal funds spent in the VR program as it is required to do by 2 C.F.R. § 200.328.

### **Corrective Actions 3.1** RSA requires that SCVRD—

- 3.1.1 Develop, implement and/or update internal control policies to address issues identified in the finding. Internal controls must include a monitoring component to ensure compliance with the requirements is sustained;
- 3.1.2 In the first quarterly update after approval of the corrective action plan (CAP), develop and implement policies and procedures, as well as a written internal control process, including a monitoring component, to ensure ongoing compliance with the prior approval requirements and the Frequently Asked Questions (FAQs) Prior Approval – OSEP and RSA Formula Grants, issued by OSERS on October 29, 2019. Once the CAP is developed, RSA will work with the VR agency to determine if updated processes result in meeting Federal requirements and ongoing compliance; and
- 3.1.3 Implement appropriate internal controls to ensure ongoing contract monitoring and submit contract monitoring internal controls to RSA in the first quarterly update after approval of the CAP. Internal controls must be implemented effectively and RSA provided documentation of contract monitoring results and any corrective actions resulting from contract monitoring findings.

**VR Agency Response:** SCVRD agrees with the findings and corrective actions 3.1.1, 3.1.2, and 3.1.3.

**VR Agency Request for Technical Assistance:** SCVRD respectfully requests continued technical assistance from RSA VRTAC-QM and VRTAC-QE as we work to complete all policy revisions/updates, enhance internal controls, and improve contract monitoring.

### **Finding 3.2 Financial Management Deficiencies**

#### **Issues:**

- Whether SCVRD assigned obligations and expenditures to the correct Federal award in accordance with 34 C.F.R. § 361.12; 2 C.F.R. §§ 200.77, 200.302, 200.303(a), 200.309; and 34 C.F.R. § 76.702;
- Whether SCVRD established sufficient financial management over the Federal award to provide reasonable assurance that SCVRD is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the award; and
- Whether SCVRD satisfied the non-Federal share requirements of Section 101(a)(3) of the Rehabilitation Act and 34 C.F.R. § 361.60.

**Requirements:** In accordance with the Uniform Guidance at 2 C.F.R. § 200.302(a), a State's financial management systems, including records documenting compliance with Federal statutes, regulations, and the terms and conditions of the award, must be sufficient to permit the preparation of reports required by general and program specific terms and conditions; and the tracing of funds to a level of expenditures adequate to establish that such funds have been used according to the Federal statutes, regulations, and the terms and conditions of the Federal award. In addition, 34 C.F.R. § 76.702 requires States to use fiscal control and fund accounting

procedures that ensure proper disbursement of and accounting for Federal funds (see also 34 C.F.R. § 361.12).

**Analysis:** RSA's review of SCVRD's SF-425 financial reports, for FFYs 2018 through 2020, identified the following issues.

#### **a. Inaccurate Reporting of Non-Federal Share**

- In its fourth quarter report for FFY 2018, the agency reported \$16,805,350 in line 10j (Recipient share of expenditures). In its sixth quarter report for FFY 2018, the agency reported \$16,792,019. In the final SF-425 report, the agency reported \$16,792,019 in line 10j, resulting in a \$13,331.00 difference between the fourth quarter report and the final SF-425 report for FFY 2018.
- The agency indicated \$313,443 reported on the FFY 2019 RSA-2 report was for the Palmetto Center, which the agency considered as a Construction of Facilities for CRP purposes. The cost was matched at 50 percent (\$156,721.26 Federal and \$156,722.28 non-Federal). According to the agency, the match was reported on 09/30/2019 on Line 12a of the SF-425 (final) report for FFY 2018, which increased 12a in the carryover year from \$612,639 (4<sup>th</sup> quarter) to \$769,360 (final), thus increasing the matching portion for the establishment or construction of CRPs by \$156,721 in the carryover year. The obligations occurred between 11/27/2018 and 5/6/2019 (the carryover year for FFY 2018). The grantee must have provided the requisite non-Federal share for FFY 2018 VR funds by September 30 of the fiscal year in which the VR award was made.
- Additionally, per supporting documentation provided by the agency, \$101,837 of matching funds were obligated between July 27, 2017 and July 31, 2017, prior to the beginning of the Federal fiscal year for which the funds were awarded.

The agency must ensure that it has internal controls in place to accurately track and report all match in the year of appropriation. RSA uses the SF-425 fourth quarter reports to assess whether the State has met its non-Federal share requirement. Inaccurate reporting of non-Federal share prevents RSA from accurately assessing SCVRD's compliance with the matching requirement.

#### **b. Inaccurate Financial Reporting**

RSA reviewed the Federal financial reports (SF-425) and supporting documentation of expenditures reported. The following areas were not appropriately accounted for in the agency's reports:

- Cash on Hand. During the years in review, the agency reported cash on hand without providing any explanation in line 12 (Remarks) as to why the agency needed more cash than its expenditure for the reporting period;
- Establishment. The agency did not treat capital projects such as reroofing as expenditures as establishment or construction of facilities for CRP purposes and did not meet requirements for establishment. Instead, the agency treated the costs as administrative for the repair and maintenance of their current State-owned and operated facilities;

- The sixth quarter SF-425 report for FFY 2020 incorrectly reported the agency’s indirect cost rate; the issue was corrected by the agency during the review;
- Program Income. In the fourth quarter for FFY 2020, the agency reported program income as expended; however, it was not disbursed per supporting documentation. Therefore, the agency drew Federal funds prior to disbursing all available program income;
- Period of Performance. The agency was not able to demonstrate that the cost, for the obligation occurred, was for period of performance, (i.e., the agency entered into a binding agreement with the vendor within the period of performance of the award for which the cost was charged). Specifically, the agency obligated \$2,000 against FFY 2021 on July 13, 2020 (i.e., prior to the beginning of the period of performance for FFY 2021). Similarly, the agency obligated \$100,748 against FFY 2018 on July 27, 2017 and \$1,089 on July 31, 2017 (i.e., prior to the beginning of the period of performance for FFY 2018).

SCVRD lacks internal controls that include functional policies/procedures and checks/balances that produce adequate financial management processes to ensure accurate and complete reporting. The RSA Financial Management Specialist explained that the issues should have been identified by the Authorized Certifying Official during the verification process before the SF-425 report was signed and submitted to RSA. The agency must strengthen internal controls regarding report preparation and verification.

**Conclusion:** RSA’s review of SCVRD’s financial reporting found inaccuracies, inconsistencies and identified issues with the timeliness of reporting. Therefore, SCVRD did not ensure the accuracy and timeliness of reporting. As described above, SCVRD cannot assure that it is administering the VR program in a proper and efficient manner and ensuring financial accountability. For these reasons, SCVRD has not complied with the VR program provisions and internal control requirements set forth at 34 C.F.R. §§ 361.3(a) and 361.12, and 2 C.F.R. § 200.302(a) and (b)(4).

**Corrective Actions 3.2** RSA requires that SCVRD—

- 3.2.1 In the first quarterly update after approval of the corrective action plan, develop and implement policies, procedures and internal controls to accurately collect and timely report fiscal data on Federal financial reports, including the SF-425 and RSA-17; and
- 3.2.2 Revise incorrect SF-425 reports as noted in the finding.

**VR Agency Response:** SCVRD disagrees with the findings and corrective actions 3.2.1 and 3.2.2 due to inaccuracies in the findings as noted below:

- When the September 30, 2018 Report was submitted, based on our New Construction expenditures at the time the required match amount was \$16,805,350. When the March 31, 2019 report was filed SCVRD had a reduction of New Construction expenditures (50% match) that reduced our Match requirement by \$13,331. Fiscal staff were trained that showing a correction of an overmatch situation by the Final Report was acceptable in order to leverage match dollars and to avoid potential MOE penalties. Training resources only address the situation if you do not meet the match requirements by the end of the first year of



the grant. Fiscal staff were not notified at the time of the March 31, 2019 report submission that there was a concern about the reduction in the match amount.

- The supporting documentation shows our actual sources of match and that SCVRD did match the grant awards at the 21.3% requirement. The match requirement for administrative and establishment authority are the same (21.3%), therefore, no costs had to be offset. SCVRD met the match requirement for the grant award by September 30 of the fiscal year in which the VR Award was made.
- When these Purchase Orders were originally created they were obligated against the FFY 2017 Grant. The dates of July 27, 2017 and July 31, 2017 were within the Period Of Performance for the FFY 2017 Grant. When changes are made to a Purchase Order in our system it retains the date of creation as the document date on reports. A new PO was not created when the grant was changed to FFY 2018 in October of 2017. Therefore, it retained the original document date on the supporting documentation supplied to RSA. These POs were Goods Received and the invoice was paid in November of 2017. Both the PO adjustment and date of delivery of goods fell within the Period of Performance for the FFY 2018 Grant.
- The Policy Directive states that if more than three business days of cash are on hand, RSA requires an explanation on line 12, Remarks, explaining why the drawdown was made prematurely or other reasons for the excess cash. The Federal Cash On Hand did not exceed more than (3) business days of cash, therefore, SCVRD did not feel like an explanation was needed in the remarks section. The 09/30/18 Report showed \$831,415 cash on hand – on 10/01/2018 SCVRD had expenditures of \$1.6M for payroll.
- Based on our state procurement guidelines, SCVRD viewed the expenditures as administrative for the repair and maintenance of our current state-owned and operated facilities. Based on our historical knowledge and training, the Agency has consistently reported expenditures such as HVAC replacement, reroofing and pavement as administrative costs in accordance with 34 CFR 361.5(c)(2)(vii) and (viii). There are no additional programs operated in our facilities and once established as a need, the cost to maintain our agency-owned and operated CRPs was interpreted as administrative cost. Our state guidance on roof repair can be found at (<https://cg.sc.gov/guidance-and-forms-state-agencies/gaap-reporting/agencies-submit-year-end-reporting-packages>).
- Based on the Technical Assistance from RSA, SCVRD is now accounting for these types of expenditures as Establishment Authority and are seeking Prior Approval. The grant needs to be corrected.
- It was a grant that SCVRD had submitted and at the time the program would not allow SCVRD to enter an amount in the field. SCVRD stated this during the review and got the RSA technical team to assist with updating the information. SCVRD has noted technical issues with the online reporting portal previously. It was reopened, adjusted, and successfully submitted.
- SCVRD is operating on procedures regarding Program Income and Federal drawdowns that were approved by RSA in 2015.
- For the FFY 2018 Grant, please see explanation under Reporting of Non-Federal Share.

**RSA Response:** RSA appreciates the detailed response and SCVRD's efforts to review this finding, the accuracy of the data reported, and respective corrective actions. RSA agrees with SCVRD's suggested changes to the data reported and has corrected the original data accordingly

to reflect the agency's data in finding 3.2. The information provided by SCVRD did not negate the finding and, therefore, the required corrective action items remain unchanged. Once the corrective action plan is developed, RSA will work with the agency to determine if updated processes result in meeting Federal requirements and ensure ongoing compliance and the resolution of this finding and its respective corrective actions. RSA will continue to provide technical assistance if needed.

**VR Agency Request for Technical Assistance:** SCVRD is not requesting technical assistance for finding 3.2 at this time.

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

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

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

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

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

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

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

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

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

## **Vocational Rehabilitation Program Other Measures That Matter**

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

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

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

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

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

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

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

<b>VR Agency Profile Data</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Employment Rate	59.0%	49.0%	47.0%
Number of Participants Exiting in Competitive Integrated Employment or Supported Employment	6,605	4,930	4,007
Percentage of Timely Eligibility Determinations	99.8%	99.9%	99.8%
Percentage of Eligibility Determination Extensions	15.6%	17.3%	21.2%
Percentage of Timely IPE Development	91.4%	89.3%	87.9%
Number of Applicants	15,240	13,169	10,889
Number of Individuals Determined Eligible	13,605	11,555	9,561
Number of Individuals with an IPE and No VR Services Provided	-	-	-
Number of Participants (with an IPE and VR Services Provided)	26,564	24,018	21,849
IPEs Developed	11203	15411	15060
IPEs Developed in 90 days or less	10238	13760	13236
Percentage of Timely IPE Development	91.4%	89.3%	87.9%
IPEs developed after 90 days with extension	933	1393	1646
IPEs Developed without extension	10270	14018	13414
Revised Percentage of Timely IPE Development	99.7%	98.2%	98.7%
<b>WIOA Performance Indicators (General or Blind VR Agency)</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Measurable Skill Gains Rate	7.4%	30.2%	28%
Employment Rate in 2 <sup>nd</sup> Qtr After Exit	N/A	56.8%	55.4%
Median Earnings in 2 <sup>nd</sup> Qtr After Exit	N/A	\$4,057	\$4,287
Employment Rate in 4 <sup>th</sup> Qtr After Exit	N/A	N/A	51.1%
Credential Attainment Rate	N/A	N/A	12.7%
<b>WIOA Performance Indicators (Statewide)</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Measurable Skill Gains Rate	7.1%	28.3%	28%
Employment Rate in 2 <sup>nd</sup> Qtr After Exit	N/A	56.7%	55.1%
Median Earnings in 2 <sup>nd</sup> Qtr After Exit	N/A	\$4,070	\$4,293
Employment Rate in 4 <sup>th</sup> Qtr After Exit	N/A	N/A	51%
Credential Attainment Rate	N/A	N/A	12.8%

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

<b>Primary Disability Type by Group</b>	<b>PY 17 Number of Participants</b>	<b>PY 17 Percent</b>	<b>PY 18 Number of Participants</b>	<b>PY 18 Percent</b>	<b>PY 19 Number of Participants</b>	<b>PY 19 Percent</b>
Visual	73	0.3%	69	0.3%	59	0.3%
Auditory or Communicative	1,430	5.4%	1,325	5.5%	1220	5.6%
Physical	6,552	24.7%	5,745	23.9%	5,156	23.6%
Cognitive	8,138	30.6%	7,751	32.3%	7,232	33.1%
Psychological or Psychosocial	10,371	39.0%	9,128	38.0%	8,182	37.4%

<b>Detailed Primary Disability Type</b>	<b>PY 17 Number of Participants</b>	<b>PY 17 Percent</b>	<b>PY 18 Number of Participants</b>	<b>PY 18 Percent</b>	<b>PY 19 Number of Participants</b>	<b>PY 19 Percent</b>
Blindness	-	0.0%	-	0.0%	-	0.0%
Other Visual Impairments	73	0.3%	69	0.3%	59	0.3%
Deafness, Primary Communication Visual	244	0.9%	210	0.9%	179	0.8%
Deafness, Primary Communication Auditory	169	0.6%	137	0.6%	125	0.6%
Hearing Loss, Primary Communication Visual	84	0.3%	92	0.4%	81	0.4%
Hearing Loss, Primary Communication Auditory	846	3.2%	805	3.4%	764	3.5%
Other Hearing Impairments (Tinnitus, Meniere's Disease, hyperacusis, etc.)	13	0.0%	14	0.1%	9	0.0%
Deaf-Blindness	-	0.0%	-	0.0%	-	0.0%
Communicative Impairments (expressive/receptive)	74	0.3%	67	0.3%	62	0.3%
Mobility Orthopedic/Neurological Impairments	839	3.2%	767	3.2%	718	3.3%
Manipulation/Dexterity Orthopedic/Neurological Impairments	275	1.0%	243	1.0%	205	0.9%
Both Mobility and Manipulation/Dexterity Orthopedic/Neurological Impairments	448	1.7%	389	1.6%	359	1.6%
Other Orthopedic Impairments (e.g., limited range of motion)	756	2.8%	603	2.5%	564	2.6%
Respiratory Impairments	313	1.2%	272	1.1%	235	1.1%
General Physical Debilitation (e.g., fatigue, weakness, pain, etc.)	2,888	10.9%	2,534	10.6%	2,212	10.1%
Other Physical Impairments (not listed above)	1,033	3.9%	937	3.9%	863	3.9%
Cognitive Impairments (e.g., impairments involving learning, thinking, processing information and concentration)	8,138	30.6%	7,751	32.3%	7,232	33.1%
Psychosocial Impairments (e.g., interpersonal and behavioral impairments, difficulty coping)	6,233	23.5%	5,381	22.4%	4,940	22.6%
Other Mental Impairments	4,138	15.6%	3,747	15.6%	3,242	14.8%

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

<b>Individuals Who Exited the VR Program</b>				<b>PY 17</b>	<b>PY 18</b>	<b>PY 9</b>
Number of Individuals Who Exited the VR Program				15,834	14,317	17,667
<b>Exit Type</b>	<b>PY 17 Number of Individuals</b>	<b>PY 17 Percent</b>	<b>PY 18 Number of Individuals</b>	<b>PY 18 Percent</b>	<b>PY 19 Number of Individuals</b>	<b>PY 19 Percent</b>
Individual exited as an applicant, prior to eligibility determination or trial work experience	1,579	10.0%	1,452	10.1%	1,398	7.91%
Individual exited during or after a trial work experience	142	0.9%	86	0.6%	84	0.48%
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	2,774	17.5%	2,703	18.9%	2,320	13.1%
Individual exited after an IPE without an employment outcome	4,653	29.4%	5,060	35.3%	4,445	25.2%
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	6,605	41.7%	4,930	34.4%	4,007	22.7%
Individual exited as an applicant after being determined ineligible for VR services	81	0.5%	80	0.6%	59	0.3%
Potentially eligible individual exited after receiving pre-employment transition services and has not applied for VR services	-	0.0%	6	0.0%	5,354	30.3%
<b>Supported Employment</b>				<b>PY 17 Number of Participants</b>	<b>PY 18 Number of Participants</b>	<b>PY 19 Number of Participants</b>
Number of Participants Who Exited with a Supported Employment Outcome in Competitive Integrated Employment				225	135	21
Number of Participants Who Exited with a Supported Employment Outcome in Noncompetitive and/or Nonintegrated Employment						

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

<b>Reason for Exit</b>	<b>PY 17 Number of Individuals</b>	<b>PY 17 Percent</b>	<b>PY 18 Number of Individuals</b>	<b>PY 18 Percent</b>	<b>PY 19 Number of Individuals</b>	<b>PY 19 Percent</b>
Individual is No Longer Available for Services Due to Residence in an Institutional Setting Other Than a Prison or Jail	124	0.8%	84	0.6%	36	0.2%
Health/Medical	118	0.7%	142	1.0%	156	0.9%
Death of Individual	101	0.6%	84	0.6%	60	0.3%
Reserve Forces Called to Active Duty		0.0%		0.0%		0.0%
Foster Care	3		2			0.0%
Ineligible after determined eligible			4		2	0.0%
Criminal Offender	336	2.1%	301	2.1%	290	1.6%
No Disabling Condition	81	0.5%	80	0.6%	59	0.3%
No Impediment to Employment	33	0.2%	19	0.1%	16	0.1%
Does Not Require VR Service	16	0.1%	9	0.1%	6	0.1%
Disability Too Significant to Benefit from Service	80	0.5%	47	0.3%	49	0.3%
No Long Term Source of Extended Services Available	9	0.1%	6	0.0%	1	0.0%
Transferred to Another Agency	82	0.5%	77	0.5%	78	0.4%
Achieved Competitive Integrated Employment Outcome	6,605	41.7%	4,930	34.4%	4,007	22.7%
Extended Employment		0.0%		0.0%		0.0%
Extended Services Not Available		0.0%		0.0%		0.0%
Unable to Locate or Contact	1,729	10.9%	1,886	13.2%	1,950	11.0%
No Longer Interested in Receiving Services or Further Services	6,348	40.1%	6,470	45.2%	5,485	31.0%
All Other Reasons	169	1.1%	170	1.2%	5,472	31.0%
Number of Individuals Who Exited the VR Program	15,834		14,317		17,667	

**Table 5—SC-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			26,564	24,018	21,849	
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	-	0.0%	-	0.0%	-	0.0%
Bachelor Degree Training	861	3.2%	860	3.6%	867	4.0%
Junior or Community College Training	493	1.9%	427	1.8%	361	1.7%
Occupational or Vocational Training	1,179	4.4%	853	3.6%	649	3.0%
On-the-Job Training	1,027	3.9%	403	1.7%	218	1.0%
Apprenticeship Training	130	0.5%	39	0.2%	17	0.1%
Basic Academic Remedial or Literacy Training	-	0.0%	-	0.0%	-	0.0%
Job Readiness Training	17,241	64.9%	14,307	59.6%	11,756	53.8%
Disability Related Skills Training	-	0.0%	69	0.3%	115	0.5%
Miscellaneous Training	1,437	5.4%	1,467	6.1%	2,599	11.9%
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	26,564	100%	24,018	100%	21,849	100%
Diagnosis and Treatment of Impairment	20,488	77.1%	16,036	66.8%	12,062	55.2%
Vocational Rehabilitation Counseling and Guidance	18,657	70.2%	19,377	80.7%	20,043	91.7%
Job Search Assistance	17,346	65.3%	16,157	67.3%	15,556	71.2%
Job Placement Assistance	252	0.9%	6,638	27.6%	14,096	64.5%
Short-Term Job Supports	572	2.2%	284	1.2%	111	0.5%
Supported Employment Services	2,426	9.1%	2,379	9.9%	2,560	11.7%
Information and Referral Services	2,854	10.7%	3,806	15.8%	4,467	20.4%
Benefits Counseling	1,052	4.0%	2,294	9.6%	3,871	17.7%
Customized Employment Services		0.0%	1	0.0%	1	0.0%
Extended Services (for youth with the most significant disabilities)		0.0%		0.0%		0.0%



<b>Other Services Provided to Participants</b>	<b>PY 17 Number of Participants</b>	<b>PY 17 Percent</b>	<b>PY 18 Number of Participants</b>	<b>PY 18 Percent</b>	<b>PY 19 Number of Participants</b>	<b>PY 19 Percent</b>
Transportation	6,457	24.3%	5,884	24.0%	4,936	22.6%
Maintenance	4,178	15.7%	3,755	15.6%	3,430	15.7%
Rehabilitation Technology	2,988	11.2%	2,970	12.4%	3,134	14.3%
Personal Attendant Services	8	0.0%	9	0.0%	8	0.0%
Technical Assistance Services	1	0.0%	7	0.0%	7	0.0%
Reader Services		0.0%		0.0%		0.0%
Interpreter Services	333	1.3%	308	1.3%	283	1.3%
Other Services	321	1.2%	637	2.7%	1,586	7.3%

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

<b>Types of Measurable Skill Gains Earned</b>	<b>Number 2017</b>	<b>Number 2018</b>	<b>Number 2019</b>
Educational Functioning Level	17	118	75
Secondary Diploma	16	333	253
Postsecondary Transcript/ Report Card	86	289	342
Training Milestone	28	35	34
Skills Progression	22	80	197
Total	169	855	901
<b>Participants Who Earned Measurable Skill Gains</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Number of Participants Who Earned Measurable Skill Gains	134	772	832

**Table 7—SC-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)**

<b>Median Hourly Earnings and Hours Worked per Week at Exit</b>		<b>PY 17</b>	<b>PY 18</b>	<b>PY 19</b>		
Number of Participants Who Exited in Competitive and Integrated Employment or Supported Employment		6,605	4,930	4,007		
Median Hourly Earnings at Exit		\$10.00	\$11.00	\$11.50		
Median Hours Worked per Week at Exit		40	40	40		
<b>Primary Source of Support at Exit</b>	<b>PY 17 Number of Participants</b>	<b>PY 17 Percent</b>	<b>PY 18 Number of Participants</b>	<b>PY 18 Percent</b>	<b>PY 19 Number of Participants</b>	<b>PY 19 Percent</b>
Personal Income	6,196	93.8%	4,839	98.2%	4,007	100%
Family and Friends	114	1.7%	28	0.6%	-	0.0%
Public Support	277	4.2%	60	1.2%	-	0.0%
Other Sources	18	0.3%	3	0.1%	-	0.0%
<b>Public Support at Exit</b>	<b>PY 17 Number of Participants</b>	<b>PY 17 Percent</b>	<b>PY 18 Number of Participants</b>	<b>PY 18 Percent</b>	<b>PY 19 Number of Participants</b>	<b>PY 19 Percent</b>
Social Security Disability Insurance (SSDI) at Exit	589	8.9%	474	9.6%	367	9.2%
Supplemental Security Income (SSI) for the Aged, Blind, or Disabled at Exit	337	5.1%	264	5.4%	196	4.9%
Temporary Assistance for Needy Families (TANF) at Exit	98	1.5%	32	0.6%	39	1.0%
General Assistance (State or local government) at Exit	10	0.2%	17	0.3%	10	0.2%
Veterans' Disability Benefits at Exit	17	0.3%	19	0.4%	13	0.3%
Workers' Compensation at Exit	52	0.8%	-	0.0%	1	0.0%
Other Public Support at Exit	172	2.6%	122	2.5%	62	1.5%
<b>Medical Insurance Coverage at Exit</b>	<b>PY 17 Number of Participants</b>	<b>PY 17 Percent</b>	<b>PY 18 Number of Participants</b>	<b>PY 18 Percent</b>	<b>PY 19 Number of Participants</b>	<b>PY 19 Percent</b>
Medicaid at Exit	667	10.1%	569	11.5%	408	10.2%
Medicare at Exit	324	4.9%	304	6.2%	290	7.2%
State or Federal Affordable Care Act Exchange at Exit	14	0.2%	15	0.3%	29	0.7%
Public Insurance from Other Sources at Exit	36	0.5%	58	1.2%	27	0.7%
Private Insurance Through Employer at Exit	1,030	15.6%	1,239	25.1%	1,156	28.8%
Not Yet Eligible for Private Insurance Through Employer at Exit	131	2.0%	87	1.8%	49	1.2%
Private Insurance Through Other Means at Exit	464	7.0%	393	8.0%	314	7.8%

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

<b>No.</b>	<b>PY 17 SOC Title</b>	<b>PY 17 Number of Participants</b>	<b>PY 17 Median Hourly Earnings</b>
1	Stock Clerks and Order Fillers	351	\$9.00
2	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	275	\$9.00
3	Building Cleaning Workers, All Other	271	\$10.00
4	Construction Laborers	211	\$8.50
5	Office Clerks, General	186	\$10.00
6	Carpenters	171	\$9.25
7	Police and Sheriff's Patrol Officers	141	\$8.00
8	Combined Food Preparation and Serving Workers, Including Fast Food	138	\$9.00
9	Maintenance and Repair Workers, General	126	\$8.25
10	Computer User Support Specialists	118	\$8.00
<b>No.</b>	<b>PY 18 SOC Title</b>	<b>PY 18 Number of Participants</b>	<b>PY 18 Median Hourly Earnings</b>
1	Stock Clerks and Order Fillers	241	\$10.00
2	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	216	\$9.35
3	Building Cleaning Workers, All Other	174	\$11.00
4	Construction Laborers	161	\$11.00
5	Office Clerks, General	155	\$8.75
6	Carpenters	125	\$10.00
7	Police and Sheriff's Patrol Officers	96	\$9.00
8	Combined Food Preparation and Serving Workers, Including Fast Food	85	\$8.88
9	Maintenance and Repair Workers, General	82	\$9.00
10	Computer User Support Specialists	80	\$9.20
<b>No.</b>	<b>PY 19 SOC Title</b>	<b>PY 19 Number of Participants</b>	<b>PY 19 Median Hourly Earnings</b>
1	Stock Clerks and Order Fillers	172	\$10.00
2	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	170	\$9.50
3	Building Cleaning Workers, All Other	142	\$11.20
4	Construction Laborers	133	\$11.00
5	Office Clerks, General	121	\$10.00
6	Carpenters	108	\$9.00
7	Police and Sheriff's Patrol Officers	76	\$9.25
8	Combined Food Preparation and Serving Workers, Including Fast Food	71	\$10.00
9	Maintenance and Repair Workers, General	67	\$10.00
10	Computer User Support Specialists	64	\$9.00

**Table 9—SC-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)**

<b>Students with Disabilities</b>	<b>PY 17 Number/ Percentage of Students</b>	<b>PY 18 Number/ Percentage of Students</b>	<b>PY 19 Number/ Percentage of Students</b>
Total Students with Disabilities Reported	16,917	20,743	22,884
Students with Disabilities Reported with 504 Accommodation	4,233	4,310	3,804
Students with Disabilities Reported with IEP	3,964	7,752	13,245
Students with Disabilities Reported without 504 Accommodation or IEP	8,771	8,682	5,838
Total Students with Disabilities Who Received a Pre-Employment Transition Service	5,157	9,832	13,867
Potentially Eligible Students with Disabilities Who Received a Pre-Employment Transition Service	209	2,670	7,018
Students with Disabilities, Who Applied for VR Services, and Received a Pre-Employment Transition Service	4,948	7,162	6,849
Percentage of Students with Disabilities Reported Who Received a Pre-Employment Transition Service	30.5%	47.4%	60.6%

**Table 10—SC-G Number and Percentage of Required Pre-Employment Transition Services Provided (PYs 2017-2019)**

<b>Pre-Employment Transition Services</b>	<b>PY 17 Number of Pre- Employment Transition Services Provided</b>	<b>PY 17 Percent of Total Pre- Employment Transition Services Provided</b>	<b>PY 18 Number of Pre- Employment Transition Services Provided</b>	<b>PY 18 Percent of Total Pre- Employment Transition Services Provided</b>	<b>PY 19 Number of Pre- Employment Transition Services Provided</b>	<b>PY 19 Percent of Total Pre- Employment Transition Services Provided</b>
Total Pre-Employment Transition Services Provided	46,109	100%	93,854	100%	106,086	100%
Job Exploration Counseling	9,653	20.9%	22,508	24.0%	25,316	23.9%
Work-Based Learning Experiences	11,926	25.9%	19,425	20.7%	19,859	18.7%
Counseling on Enrollment Opportunities	8,348	18.1%	16,830	17.9%	17,851	16.8%
Workplace Readiness Training	7,450	16.2%	15,967	17.0%	18,663	17.6%
Instruction in Self-Advocacy	8,732	18.9%	19,124	20.4%	24,397	23.0%

## Vocational Rehabilitation Program Other Measures That Matter

### Measure 1—SC-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)	5,603
Number Employed in Second Quarter after Exit AND Fourth Quarter after Exit	3,606
Percent Sustaining Employment	64.4%

### Measure 2—SC-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	14	0.35%	\$9.75	36	6	3	66.67%
Communication	413	10.31%	\$13.00	40	276	53	74.41%
Physical	1,188	29.65%	\$13.00	40	794	230	55.23%
Intellectual	727	18.14%	\$10.00	35	364	113	36.46%
Psychosocial	1,665	41.55%	\$11.40	40	640	116	44.63%
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	3,574	89.19%	\$12.00	40	1,853	384	47.87%
Most Significant	314	7.84%	\$9.28	30	169	118	42.43%
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	336	8.39%	\$9.50	32	169	61	29.92%

**Measure 3—SC-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.

<b>Application to Eligibility (PY 2019)</b>	<b>Number</b>		
Number of Individuals Who Applied in PY 2019	10,889		
Number of Individuals Determined Eligible in PY 2019	9,561		
<b>Application to Eligibility (PY 2019)</b>	<b>30 Days after Application</b>	<b>31 and 60 Days after Application</b>	<b>61 or More Days after Application</b>
Number Determined Eligible within:	5,835	2,364	1,362
Percent Determined Eligible within:	61.03%	24.73%	14.25%
Number Determined Eligible in PY 2019 Who Exited with Employment during PY 2019 within	649	118	2
Number Determined Eligible in PY 2019 Who Exited without Employment during PY 2019 within	350	38	1

<b>Eligibility to IPE (PY 2020)*</b>	<b>Number</b>			
Number of Individuals Who Had IPEs Developed in PY 2020				
<b>Eligibility to IPE (PY 2020)</b>	<b>30 Days after Eligibility</b>	<b>31 and 60 Days after Eligibility</b>	<b>61 and 90 Days after Eligibility</b>	<b>91 or More Days after Eligibility</b>
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—SC-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.

<b>VR Program Participants</b>	<b>Program Year 2019 Q1</b>	<b>Program Year 2019 Q2</b>	<b>Program Year 2019 Q3</b>	<b>Program Year 2019 Q4</b>	<b>Program Year 2019 Annual</b>
Number of Participants Receiving VR Services	16,198	15,835	15,899	15,226	75,951
Total Number of Participants	16,198	15,835	15,899	15,226	75,951
Percent Receiving VR Services	100.00%	100.00%	100.00%	100.00%	100.00%

**Measure 5—SC-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.

<b>Program Year 2019 MSG Rate Denominator</b>	<b>Program Year 2019 Total Number of Participants Served</b>	<b>Program Year 2019 Percent of Participants Eligible to Earn MSG</b>
2,957	21,849	13.53%

**Measure 6—[SC-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.

<b>Students with Disabilities (PY 2019)</b>	<b>Job- Exploration Counseling</b>	<b>Workplace Readiness Training</b>	<b>Work-Based Learning Experience</b>	<b>Counseling on PSE Enrollment</b>	<b>Self- Advocacy Training</b>	<b>One or More Service</b>
Number of Potentially Eligible Students Who Received Service	2,800	2,657	341	1,438	2,897	7,018
Number of Students Who Received Service under IPE	2,474	1,755	2,534	1753	2,377	3,897
Number of Students Who Received Service as Both Potentially Eligible and under an IPE	14	1	6	2	2	15
Number of Students Who Exited with Employment during PY	207	181	243	167	217	336
Number of Students Who Exited without Employment during PY	569	382	473	457	565	787

	<b>Number/ Percent</b>
Total Number of Participants in VR Program	21,849
Number of Potentially Eligible Students with Disabilities Who Received Pre-Employment Transition Services	7,018
Percent of Potentially Eligible Students with Disabilities Who Received Pre-Employment Transition Services	94.1%
Total Number of Applicants to VR Program	10,889
Number of Potentially Eligible Students with Disabilities Who Applied to VR Program	302
Percent of Potentially Eligible Students with Disabilities Who Applied to VR Program	2.8%

## **APPENDIX B: FISCAL DATA TABLES**

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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.