

**FEDERAL FISCAL YEAR 2018
MONITORING REPORT
ON THE
NEW YORK ADULT CAREER AND
CONTINUING EDUCATION SERVICES-
VOCATIONAL REHABILITATION
AND
SUPPORTED EMPLOYMENT PROGRAMS**



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

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SECTION 1: THE FEDERAL MANDATE AND SCOPE OF THE REVIEW

A. Background

Section 107 of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by Title IV of the Workforce Innovation and Opportunity Act (WIOA), requires the Commissioner of the Rehabilitation Services Administration (RSA) to conduct annual reviews and periodic onsite monitoring of programs authorized under Title I of the Rehabilitation Act to determine whether a vocational rehabilitation (VR) agency is complying substantially with the provisions of its State Plan under Section 101 of the Rehabilitation Act and with the evaluation standards and performance indicators established under Section 106 of the Rehabilitation Act subject to the performance accountability provisions described in Section 116(b) of WIOA. In addition, the Commissioner must assess the degree to which VR agencies are complying with the assurances made in the State Plan Supplement for Supported Employment Services under Title VI of the Rehabilitation Act.

Through its monitoring of the State Vocational Rehabilitation Services program (VR program) and the State Supported Employment Services program (Supported Employment program) administered by the New York Adult Career and Continuing Education Services-Vocational Rehabilitation (ACCES-VR) in Federal fiscal year (FFY) 2018, RSA:

- Assessed the performance of the VR and the Supported Employment programs with respect to the achievement of quality employment outcomes for individuals with disabilities, including those with significant and most significant disabilities;
- Identified strategies and corrective actions to improve program and fiscal performance related to the following focus areas:
 - Performance of the VR Program;
 - Transition Services, including Pre-Employment Transition Services, for Students and Youth with Disabilities;
 - Supported Employment Program;
 - Allocation and Expenditure of VR and Supported Employment Program Funds; and
 - Joint WIOA Final Rule Implementation.

In addition, RSA reviewed a sample of individual case service records to assess internal controls for the accuracy and validity of RSA-911 data, and provided technical assistance to the VR agency to enable it to enhance its performance.

The nature and scope of this review and the process by which RSA carried out its monitoring activities, including the conduct of an onsite visit from February 20 through 23, 2018, is described in detail in the [FFY 2018 Vocational Rehabilitation Program Monitoring and Technical Assistance Guide](#).

B. Review Team Participants

Members of the RSA review team included Tonya Stellar and Jessica Davis (Vocational Rehabilitation Program Unit); Christopher Pope (Office of the Director of State Monitoring and Program Improvement Division); Terrence Martin (Technical Assistance Unit); Melinda Giancola, Vernita Washington and Andy Kerns (Data Collection and Analysis Unit); and David Miller (Fiscal Unit). Although not all team members participated in the onsite visit, each contributed to the gathering and analysis of information, along with the development of this report.

C. Acknowledgements

RSA wishes to express appreciation to the representatives of ACCES-VR for the cooperation and assistance extended throughout the monitoring process. RSA also appreciates the participation of others, such as the State Rehabilitation Council (SRC), the Client Assistance Program (CAP), advocates, and other stakeholders in the monitoring process, including partners from the New York State Department of Education's Office of P-12 Education and Office of Special Education and the Adult Career and Continuing Education Services' Adult Education Program and Policy (AEPP); the New York State Department of Labor; and the Office of Children and Family Services' New York State Commission for the Blind (NYSCB).

SECTION 2: FOCUS AREA – PERFORMANCE OF THE STATE VOCATIONAL REHABILITATION SERVICES PROGRAM

A. Purpose

Through this focus area, RSA assessed the achievement of employment outcomes, including the quality of those outcomes, by individuals with disabilities served in the VR program by conducting an in-depth and integrated analysis of core VR program data and review of individual case service records. The analysis below, along with any accompanying observations, recommendations, or findings, is based on a review of the programmatic data contained in Tables 1 through 9 found in Appendix A of this report. The data used in the analysis are those collected and reported by VR agencies based on Policy Directive 14-01, which was implemented prior to changes in reporting requirements in Section 101(a)(10) of the Rehabilitation Act made by WIOA, as well as the establishment in Title I of WIOA of common reporting requirements and performance indicators for all core programs in the workforce development system, including the VR program.

B. Analysis of the Performance of the VR Program

RSA reviewed ACCES-VR's performance for FFYs 2015, 2016, and three quarters of FFY 2017, with particular attention given to the number and quality of outcomes achieved by individuals with disabilities in the State. Additionally, the review addressed the number of individuals who were determined eligible for VR services and who received services through the VR program. The data used in this review were provided by ACCES-VR to RSA on the Quarterly Cumulative Caseload Report (RSA-113) and the Case Service Report (RSA-911).

The VR Process

Resources: Program Performance Data Table 1 Summary Statistics from RSA 113: FFYs 2015-2017; Program Performance Data Tables 2a, 2b, and 2c Agency Case Status Information, Exit Status, and Employment Outcomes—FFYs 2015–2017; and Program Performance Data Tables 3a, 3b, and 3c Source of Referral--FFYs 2015-2017.

From FFY 2015 through FFY 2016, the total number of applicants increased from 40,336 individuals to 45,715 individuals; and the total number of individuals with disabilities determined eligible for VR services increased from 37,818 to 41,103 individuals. This expansion is also evident for individuals under the age of 25 at the time of exit. Similarly, the number of individuals with an IPE who received services increased from 57,259 individuals in FFY 2015 to 61,049 individuals in FFY 2016. However, for each year of the period, roughly one out of five individuals, who had an individualized plan for employment (IPE), did not receive any VR services. From FFY 2015 through FFY 2017, ACCES-VR was not operating under an order of selection (OOS).

From FFY 2015 through the first three quarters of FFY 2017, of the 20,677 individuals who exited as applicants, 37 percent were under the age of 25. During the same time period, the number of individuals who exited from the VR system without employment outcomes, after

eligibility determination, but before an IPE was signed and VR services provided was 23,232; 44 percent were under the age of 25. Relatively few individuals exited the VR system during the provision of trial work experiences.

Employment Outcomes

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

All Individuals Served

The number of individuals served whose service records were closed after achieving an employment outcome decreased slightly from 11,284 individuals in FFY 2015, to 11,272 individuals in FFY 2016, which accounts for a decrease in the percentage from 33.4 percent to 30.7 percent, respectively. At the same time, the number and percentage of individuals who did not achieve employment, and whose service records were closed, increased from 7,713 individuals, or 22.8 percent, in FFY 2015, to 8,322 individuals, or 22.6 percent, in FFY 2016. As a result, ACCES-VR's employment rate decreased from 59.4 percent in FFY 2015 to 57.5 percent in FFY 2016.

The number of individuals who achieved supported employment outcomes increased from 3,016 individuals or 26.6 percent of all individuals whose service records were closed, in FFY 2015, to 3,077 individuals, or 26 percent, in FFY 2016. Of these supported employment outcomes, 99.6 percent were in competitive employment in FFY 2015, which decreased to 95.1 percent in FFY 2016.

From FFY 2015 through FFY 2016, the median hourly earnings for individuals who achieved competitive employment outcomes remained constant at \$10.00 per hour. The median hours worked by individuals achieving these outcomes also remained at 30 hours per week over the same period. From FFY 2015 to FFY 2016, the percentage of individuals achieving competitive employment outcomes meeting substantial gainful activity (SGA) increased slightly from 59.8 percent to 62.1 percent; however, the percentage of individuals achieving competitive employment outcomes with employer-provided medical insurance decreased from 16.7 percent to 14.3 percent.

Individuals Served Under the Age of 25

From FFY 2015 through the first three quarters of FFY 2017, of the 30,551 individuals who exited with employment, 29,437 individuals, or 96.4 percent, exited the VR system with competitive employment outcomes. In terms of individuals who exited with non-competitive employment outcomes, 288 individuals (26 percent of the 1,114 individuals) were under the age of 25.

The number of individuals under the age of 25 whose service records were closed after achieving an employment outcome also increased from 4,428 individuals, or 33.2 percent, in FFY 2015, to 4,461 individuals, or 30.5 percent, in FFY 2016. At the same time and similar to all individuals served, the number and percentage of individuals under the age of 25 who did not achieve employment and whose service records were closed increased from 2,742 individuals, or 20.6

percent, in FFY 2015, to 3,120 individuals, or 21.4 percent, in FFY 2016. As a result, ACCES-VR's employment rate also decreased for individuals under the age of 25 from 61.8 percent in FFY 2015 to 58.8 percent in FFY 2016.

From FFY 2015 through FFY 2016, the median hourly earnings for individuals under the age of 25 who achieved competitive employment outcomes increased from \$9.00 to \$10.00 per hour. As with all individuals served whose service records were closed, the median hours worked for these outcomes remained constant at 30 hours per week. From FFY 2015 to FFY 2016, the percentage of individuals achieving competitive employment outcomes meeting SGA increased slightly from 56.2 percent to 59.3 percent; however, the percentage of individuals achieving competitive employment outcomes with employer-provided medical insurance decreased from 14.5 percent to 11.9 percent.

VR Services Provided

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

In terms of postsecondary education for the individuals whose service records were closed in FFY 2016:

- 6.4 percent received junior or community college training;
- 4.2 percent received bachelor's degree training; and
- 0.3 percent received graduate degree training.

ACCES-VR provided more community college training to individuals under the age of 25 (8.5 percent) compared to individuals over the age of 25 (5.1 percent) in FFY 2016.

In terms of other training-related services in FFY 2016 for all individuals served whose service records were closed:

- 19.2 percent received occupational or vocational training;
- 9.4 percent received miscellaneous training; and
- 7.0 percent received job readiness training.

From FFY 2015 through the first three quarters of FFY 2017, ACCES-VR provided minimal on-the-job training (0.9 percent) and no registered apprenticeship training (0.0 percent) or basic academic remedial or literacy training (0.0 percent).

Of all individuals who received career services whose service records were closed in FFY 2016:

- 52.8 percent received assessment services;
- 43.2 percent received job search assistance;
- 19.8 percent received job placement assistance;
- 18.8 percent received on-the-job supports (supported employment);
- 11.1 percent received on-the-job supports (short term); and

- 5.8 percent received benefits counseling.

ACCES-VR reported that none of the individuals whose service records were closed in FFY 2015 or FFY 2016 received VR counseling and guidance or information and referral services. In terms of other services provided by ACCES-VR to all individuals in FFY 2016, the agency reported that:

- 35.9 percent received transportation services;
- 31.3 percent received other services;
- 21.3 percent received maintenance services; and
- 6.8 percent received rehabilitation technology.

ACCES-VR reported that very few individuals whose service records were closed received interpreter services (1.5 percent); personal attendant services (0.1 percent); and technical assistance services (0.1 percent).

These percentages largely mirror the types of career services and other services that the ACCES-VR provided to individuals under the age of 25 whose service records were closed from FFY 2015 through FFY 2017.

Outcomes by Disability Type

Resources: Program Performance Data Tables 4a, 4b, and 4c Agency Outcomes by Disability Type—FFYs 2015–2017.

Of all the individuals ACCES-VR served in FFY 2016, the top three types of disabilities consisted of the following:

- Individuals with intellectual/learning disabilities (40.4 percent of all individuals and 71.7 percent of individuals below the age of 25);
- Individuals with psychosocial/psychological disabilities (37.5 percent of all individuals and 19.1 percent of individuals under the age of 25); and
- Individuals with physical disabilities (16.0 percent of all individuals and 4.5 percent of individuals under the age of 25).

Further, ACCES-VR reported the following employment rates for the above disability types in FFY 2016:

- Individuals with intellectual/learning disabilities: 61.6 percent for all individuals and 60.1 percent for individuals under the age of 25;
- Individuals with psychosocial/psychological disabilities: 52.9 percent for all individuals and 54.1 percent for individuals under the age of 25; and
- Individuals with physical disabilities: 51.5 percent for all individuals and 54.0 percent for individuals under the age of 25.

In FFY 2016, ACCES-VR's highest employment rate for all individuals served and for individuals under the age of 25 was for those individuals with auditory/communicative impairments (76.4 percent for all individuals and 60.1 percent for individuals under the age of 25). However, this disability type represents a low percentage (5.3 percent) of all the individuals ACCES-VR served in FFY 2016.

In FFY 2016, ACCES-VR served very few individuals with visual impairments (0.3 percent), which reflects the fact that New York State has established a separate VR agency that serves individuals who are blind or visually impaired.

Compliance with the Statutory Time Frame for Application to Eligibility Determination

Resources: Tables 5a, 5b, and 5c Number of Days from Application to Eligibility Determination—FFYs 2015–2017.

From FFY 2015 to FFY 2016, the percentage of individuals served who were determined eligible within 60 days from the date of application decreased from 79.5 percent to 79 percent, while the total number of these individuals increased from 21,492 to 22,344 individuals. For the first three quarters of FFY 2017, ACCES-VR completed timely eligibility determinations for 78.3 percent of the individuals whose service records were closed in those quarters.

In terms of serving individuals under the age of 25, ACCES VR's performance was similar to its performance for all individuals. From FFY 2015 to FFY 2016, the percentage of individuals under the age of 25 who were determined eligible within 60 days from the date of application increased from 78.1 percent to 79.2 percent, while the total number of these individuals increased from 8,326 to 9,168 individuals. For the first three quarters of FFY 2017, ACCES-VR completed timely eligibility determinations for 78.8 percent of the individuals under the age of 25 it served whose service records were closed in those quarters.

Compliance with the Statutory Time Frame from Eligibility Determination to IPE Development

Resources: Tables 6a, 6b, and 6c Number of Days from Eligibility Determination to IPE—FFYs 2015–2017.

From FFY 2015 to FFY 2016, the percentage of individuals served for whom ACCES-VR developed an IPE within 90 days from the date of application decreased from 87 percent to 73.2 percent. ACCES-VR developed timely IPEs for 66.4 percent of the individuals whose service records were closed in the first three quarters of FFY2017.

In terms of serving individuals under the age of 25, ACCES-VR's performance was similar to its performance for all individuals. From FFY 2015 to FFY 2016, the percentage of individuals under the age of 25 who received timely IPEs decreased from 85.7 percent to 72.3 percent. ACCES-VR developed timely IPEs for 63.9 percent of the individuals under the age of 25 whose service records were closed in the first three quarters of FFY2017.

Types of Occupational Outcomes for Individuals Who Achieved Employment

Resources: Tables 8a, 8b, and 8c Standard Occupational Classification (SOC) Codes Percentages of Employment Outcomes and Median Hourly Earnings for Individuals Who Achieved Competitive Employment Outcomes at Closure - FFYs 2015-2017.

In FFY 2016, the following are the three occupations with the highest percentages for all individuals whose service records were closed and who achieved employment:

- Office and Administrative Support Occupations: 15.5 percent (Median Hourly Wage: \$10.00);
- Building and Grounds Cleaning and Maintenance Occupations: 13.3 percent (Median Hourly Wage: \$10.00); and
- Food Preparation and Serving Related Occupations: 11.7 percent (Median Hourly Wage: \$9.75).

In terms of those individuals who obtained an employment outcome in supported employment, the above occupations are similar to the most commonly occurring occupations for these outcomes in FFY 2016, and the median hourly wages are also consistent with wages earned for those occupations during the same time period.

For individuals under the age of 25 who exited the VR system in FFY 2016 with an employment outcome, the following are the occupations with the three highest percentages for all individuals whose service records were closed:

- Food Preparation and Serving Related Occupations: 16 percent (Median Hourly Wage: \$9.50);
- Sales and Related Occupations: 14 percent (Median Hourly Wage: \$9.24); and
- Office and Administrative Support Occupations: 13.7 percent (Median Hourly Wage: \$9.74).

In FFY 2016, individuals who obtained employment outcomes as Healthcare Practitioners and in Technical Occupations earned the highest median hourly wage (\$16.25 per hour), while the lowest median hourly wage was for individuals who obtained an employment outcome in Sales and Related Occupations (\$9.33 per hour).

Reasons for Exit for Individuals Who Did Not Achieve an Employment Outcome

Resources: Tables 9a, 9b, and 9c Reason for Exit for All Individuals Who Did Not Achieve an Employment Outcome at Closure- FFYs 2015-2017.

The following reasons for exit represent the highest percentages that ACCES-VR reported for individuals served who did not achieve an employment outcome and whose service record was closed in FFY 2016:

- No longer interested in receiving services or further services: 44.7 percent of all individuals;
- Unable to locate or contact: 30.2 percent of all individuals; and

- All other reasons: 18.3 percent of all individuals.

For individuals under the age of 25 at the time of exit who did not achieve an employment outcome, ACCES-VR reported the same reasons for exit listed above as occurring most frequently.

C. Internal Controls

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

Policies and Procedures

ACCES-VR provided RSA with a copy of its Quality Assurance/Monitoring Review Report of its Syracuse District Office conducted in June of 2017. The introduction to the report explains that ACCES-VR's Quality Assurance/Monitoring Unit conducts both internal and external service record reviews to ensure high quality services are delivered in accordance with applicable laws and policies. The Unit's internal service record reviews occur in each of the District Offices across the State. These reviews allow ACCES-VR to monitor District Office performance, identify strengths, success, and areas in need of improvement. ACCES-VR uses the review results to inform training needs and policies. The Unit conducts reviews on a three-year cycle wherein five district offices are reviewed each year. The current review cycle began in 2017 and will run through 2019. When the Unit conducts these reviews, which typically last three days and cover roughly 100 service records, staff from other District Offices also participate.

ACCES-VR provided RSA with a copy of its "Consumer Case Folder Filing Order" from FFY 2008, which outlines how ACCES-VR staff are to organize individual service records and "Case File Format Instructions" that the agency updated in FFY 2017. In addition, ACCES-VR shared two recent PowerPoint presentations used to train staff on changes to the RSA-911, and reporting data using the case management system (described below).

- "RSA-911 Data Training," dated November 30, 2017, provided an overview of the changes WIOA made in terms of performance accountability. The training also provided detailed instructions for ACCES-VR on the changes made to its case management system to comply with WIOA requirements.
- "CaMS/Data: Train-the-Trainer," dated December 1, 2017, reviewed the RSA-911 data elements, corresponding changes made in the case management system (CaMS), and best practices for data collection.

ACCES-VR also shared with RSA a document titled “Data Documentation Chart,” dated December 2017, which served as guidance for VR counselors and other VR agency staff related to the requirements for source documentation for a variety of data elements necessary for performance reporting (e.g., date of application and hourly wage at IPE). This guidance defines each element and lists examples of supporting documentation for each in order of preference. For example, the guidance outlines that a paystub identifying an individual’s hourly wage is the preferred source documentation for the data element hourly wage at IPE. ACCES-VR acknowledged, during the onsite portion of the monitoring review, that training VR counselors and other staff on source documentation needed to validate the data reported through the RSA-911 is an ongoing process.

Data Verification Review

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

Of the 30 service records reviewed, 43 percent did not include a signed application, or the date the individual signed the application was different from the date entered in the case management system. 23 percent of all service records reviewed did not have documentation that ACCES-VR notified individuals of their eligibility determination, while 93 percent of all service records reviewed failed to meet the necessary documentation requirements for the IPE. For example, the individual or the VR counselor did not sign or date the IPE; the date the individual signed the IPE did not match the date entered in the case management system; or, in one instance, the case service record did not include a copy of the IPE.

Of the service records reviewed where the individual achieved employment, 12 percent did not include verification of the start date for employment, while 39 percent did not include verification of the individual’s employment status at closure. Additionally, 56 percent of the service records reviewed did not include documentation of the hourly wage at closure or exit, while 7 percent did not include documentation of the type of closure or exit. Finally, all of the service records reviewed included documentation of the date of closure or exit, which matched the date ACCES-VR entered in the case management system.

D. Observations and Recommendations

RSA’s review of the performance of ACCES-VR in this focus area resulted in the identification of the following observations and recommendations to improve performance.

Observation 2.1: Attrition

Individuals with disabilities, including those under the age of 25, in need of and eligible for VR services exited the VR system without receiving the necessary services to achieve an

employment outcome during the period of review.

In terms of individuals who exited the VR program as applicants:

- From October 1, 2014 to June 30, 2017, 20,677 individuals exited the VR program as applicants prior to receiving eligibility determinations. 37 percent, or 7,642 of these individuals, were individuals under the age of 25 over this time period;
- In FFY 2016, 21.8 percent, or 7,996 individuals, exited as applicants. In FFY 2015, 18.1 percent, or 6,114 individuals, exited as applicants. In the first three quarters of FFY 2017, 20.3 percent, or 6,567 individuals, exited as applicants; and
- In FFY 2016 2,844 individuals under the age of 25 exited as applicants. In FFY 2015, 2,437 individuals under the age of 25 exited as applicants and in the first three quarters of FFY 2017, 2,361 individuals under the age of 25 exited as applicants.

In terms of individuals determined eligible for VR services who exited the VR program without employment outcomes, before an IPE was signed or before receiving services:

- From October 1, 2014 to June 30, 2017, 23,232 individuals or 44 percent, were under the age of 25; and
- 23.8 percent, or 8,033 individuals, exited in FFY 2015; 23.6 percent, or 8,685 individuals, exited in FFY 2016; and 20.2 percent, or 6,514 individuals, exited in the first three quarters of FFY 2017.

Recommendation 2.1: Attrition

RSA recommends that ACCES-VR:

- 2.1.1 Conduct surveys of individuals, particularly of those under the age of 25, who exit prior to IPE development, to determine the reasons why these individuals are withdrawing from the VR program; and
- 2.1.2 Based on the information obtained through these surveys, develop goals with measurable targets to decrease the number of individuals exiting the VR program at these stages of the process, and strategies to achieve these goals.

Agency Response: As part of a contract to conduct participant surveys, ACCES-VR will include individuals under the age of 25 who exit prior to IPE development to determine why they are withdrawing from VR services. Feedback from the surveys will be used to develop goals to improve the delivery of VR services to individuals under the age of 25 and decrease the number of individuals who exit prior to IPE development.

RSA Response: RSA appreciates ACCES-VR's efforts to identify and address the reasons individuals under the age of 25 are exiting the VR system prior to IPE development.

Request for Technical Assistance: None

Observation 2.2: Employment Outcomes and Rehabilitation Rate

From FFY 2015 to FFY 2016, the number of individuals exiting the VR program with employment decreased, while the number of individuals exiting the VR program without employment increased.

- In FFY 2015, 33.4 percent, or 11,284 individuals, exited with employment compared to 30.7 percent, or 11,272 individuals, in FFY 2016; and
- In FFY 2015, 22.8 percent, or 7,713 individuals, exited without employment compared to 22.6 percent, or 8,322 individuals, in FFY 2016.

Individuals under the age of 25 similarly exited the VR system from FFY 2015 to FFY 2016.

- In FFY 2015, 33.2 percent, or 4,428 individuals under the age of 25, exited with employment compared to 30.5 percent, or 4,461 individuals under the age of 25, in FFY 2016; and
- In FFY 2015, 20.6 percent, or 2,742 individuals under the age of 25, exited without employment compared to 21.4 percent, or 3,120 individuals under the age of 25, in FFY 2016.

As a result, the employment rate for all individuals and individuals under the age of 25 decreased from FFY 2015 to FFY 2016.

- For all individuals, the employment rate decreased from 59.4 percent in FFY 2015 to 57.5 percent in FFY 2016; and
- For individuals under the age of 25, the employment rate decreased from 61.8 percent in FFY 2015 to 58.8 percent in FFY 2016.

Recommendation 2.2: Employment Outcomes and Rehabilitation Rate

RSA recommends that ACCES-VR:

- 2.2.1 Develop measurable goals and strategies to improve the agency's employment rate; and
- 2.2.2 Evaluate the decline in performance and determine if the necessary VR services, including effective job search and placement services, and other supports are being provided to assist individuals with achieving employment.

Agency Response: ACCES-VR will review FFY 2016-FFY 2018 employment outcome data to identify trends and do an analysis of year-to-year variations in employment outcomes. A multi-year strategy with measurable goals will be created to increase the number of individuals exiting VR with a successful employment outcome and to reduce the number of individuals who exit VR without employment.

RSA Response: RSA appreciates ACCES-VR's willingness to evaluate employment outcome data; and develop strategies to improve its rehabilitation rate by increasing the number of individuals who achieve employment; and decreasing the number of individuals who exit the VR system without employment.

Request for Technical Assistance: None

Observation 2.3: VR Services Reported

ACCES-VR appears to be underreporting, on the RSA-911, the VR services it provides to applicants and eligible individuals, including those individualized VR services it provides under an IPE. During the onsite monitoring review, ACCES-VR acknowledged that the following VR services do not account for actual service provision by ACCES-VR, its contracted service providers, or other entities in FFY 2016:

- Training: On-the-job training: 0.9 percent;
- Training: Apprenticeship training: 0.0 percent;
- Training: Basic academic remedial or literacy training: 0.0 percent;
- Training: Disability-related skills training: 0.0 percent;
- Career: Vocational rehabilitation counseling and guidance: 0.0 percent; and
- Career: Information and referral services: 0.0 percent.

Furthermore, ACCES-VR acknowledged that it incorrectly categorized some of the VR services it provided to applicants and eligible individuals as “Other Services” or “Miscellaneous Training” when a more specific VR service should have been reported on the RSA-911.

- In FFY 2016, ACCES-VR reported that 31.3 percent of all individuals served, whose cases were closed, received “Other Services;”
- ACCES-VR reported that 29.2 percent of individuals under the age of 25, whose cases were closed, received “Other Services” in the same period;
- In FFY 2016, ACCES-VR reported that 9.4 percent of all individuals served, whose cases were closed, received “Miscellaneous Training;” and
- ACCES-VR reported that 11.2 percent of individuals under the age of 25, whose cases were closed, received “Miscellaneous Training” in the same period.

Recommendation 2.3: VR Services Reported

RSA recommends that ACCES-VR:

- 2.3.1 Analyze the data to determine why some VR services are being inaccurately reported on the RSA-911;
- 2.3.2 Develop internal controls to ensure VR counselors are accurately recording and reporting on the IPE the entire scope of VR services provided to individuals, whether those services are provided by ACCES-VR in-house (e.g., vocational rehabilitation counseling and guidance) or by other entities; and
- 2.3.3 Provide training to ensure that VR counselors and their supervisors understand the RSA-911 reporting requirements.

Agency Response: Several steps have already been taken to improve the reporting of RSA-911 data including: staff training and technical assistance, modifications to the current case management system and data tests prior to RSA-911 data submissions. Data Liaisons were identified in each District Office and provided with in-depth training on RSA-911. We found it

valuable to have data experts in each office for staff to ask questions and provide a conduit for continued clarity via Central Office. These data liaisons often take the lead in ensuring the data is correct for their respective offices. ACCES-VR will continue to review and make improvements to the accuracy of RSA-911 data to ensure that: categories are correct, services previously listed as other or miscellaneous training are listed as the appropriate VR service, and counselors and supervisors are fully aware of reporting requirements.

RSA Response: RSA acknowledges ACCES-VR's efforts to improve the accurate reporting of RSA-911 data.

Request for Technical Assistance: None

E. Findings and Corrective Actions

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

2.1 Untimely Eligibility Determination

Issue: Did ACCES-VR determine the eligibility of applicants for VR services within the required 60-day Federal timeframe from the date of application.

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

Analysis: As part of the monitoring process, RSA analyzed the length of time it took ACCES-VR to make eligibility determinations for VR applicants. FFY 2016 data reported by ACCES-VR on the RSA-911 show that:

- 79 percent of all individuals served whose service records were closed in FFY 2016 had an eligibility determination made within the required 60-day period; and
- 79.2 percent of individuals under the age of 25 at exit whose service records were closed in FFY 2016 had an eligibility determination made within the required 60-day period.

During the onsite monitoring visit, RSA noted that it identified the same performance issue during the monitoring review of ACCES-VR in FFY 2012, and the corrective actions related to this compliance finding were resolved and closed in FFY 2015. ACCES-VR agreed that performance has declined since the resolution of the FFY 2012 corrective action plan, and this is a performance issue that requires improvement. At the time of the onsite review, ACCES-VR reported that some of the individuals who did not receive a timely eligibility determination may have agreed to an extension of the 60-day eligibility timeframe with his or her VR counselor in

accordance with 34 C.F.R. § 361.41(b)(1)(i). As a result, ACCES-VR requested additional time to query the necessary case files to provide RSA with supporting data. Following the onsite portion of the monitoring review, ACCES-VR determined that the supporting data for these individuals would not substantiate compliance with the regulations and declined to submit the supporting data.

Conclusion: As demonstrated by performance data, ACCES-VR did not make eligibility determinations within the required 60-day period for those individuals whose service records were closed in FFY 2016. As a result of the analysis, RSA determined that the agency did not satisfy the eligibility determination requirements in 34 C.F.R. § 361.41(b)(1).

Corrective Action Steps:

RSA requires that ACCES-VR:

- 2.1.1 Comply with 34 C.F.R. § 361.41(b)(1) by making eligibility determinations within the required 60-day period;
- 2.1.2 Assess and evaluate VR counselor performance and identify effective practices that ensure timely eligibility determinations are made within 60 days from the date of application, including the use of case management tools for, and supervisory review of, timely eligibility determinations; and
- 2.1.3 Develop procedures for VR counselors and supervisors to track and monitor timely and untimely eligibility determinations.

Agency Response: ACCES-VR has developed a plan to comply with the requirement to make eligibility determinations within the required 60-day period. The plan includes a weekly review of data broken out by District Office, VRC and participant. Reports will be used by District Office Managers and Senior VRCs to assess and evaluate VRC performance in meeting the 60-day timeline. District Office Managers will use this data to identify effective practices that will ensure timely eligibility determination, including the use of case management tools, such as ticklers, to track and monitor timeliness. Regional Coordinators will monitor District Office improvement on a regular basis. The corrective action plan will be finalized within 30 days of receiving the Final FFY 2018 Monitoring Report.

RSA Response: RSA maintains the finding and appreciates ACCES-VR's commitment to addressing the corrective actions to increase timely eligibility determinations made within 60 days from the date of application, for at least 90 percent of individuals determined eligible for VR services.

Request for Technical Assistance: None

2.2 Untimely Development of the IPE

Issue: Did ACCES-VR develop IPEs within 90 days from the date of eligibility determination for each individual.

Requirement: In accordance with 34 C.F.R. § 361.45 (a), the VR services portion of the Unified or Combined State plan must assure that an IPE meeting the requirements of this section and 34 C.F.R. § 361.46 is developed and implemented in a timely manner for each individual determined to be eligible for VR services or, if the DSU is operating under an order of selection pursuant to 34 C.F.R. § 361.36, for each eligible individual to whom the State unit is able to provide services; and that services will be provided in accordance with the provisions of the IPE. In addition, under 34 C.F.R. § 361.45(e), the IPE must be developed as soon as possible, but not later than 90 days after the date of eligibility determination, unless the State unit and the eligible individual agree to the extension of that deadline to a specific date by which the IPE must be completed.

Analysis: As part of the monitoring process, RSA analyzed the length of time it took for ACCES-VR to develop IPEs for individuals determined eligible for VR services. In particular, FFY 2016 data reported by ACCES-VR on the RSA-911 show that:

- Only 73.2 percent of all individuals served whose service records were closed in FFY 2016 had an IPE developed within the Federally required 90-day period; and
- Only 72.3 percent of individuals under the age of 25 at exit whose service records were closed in FFY 2016 had an IPE developed within the Federally required 90-day period.

During the onsite monitoring visit, RSA noted that it identified the same performance issue during the monitoring review of ACCES-VR in FFY 2012, and the corrective actions related to this compliance finding were resolved and closed in FFY 2015. ACCES-VR acknowledged that performance has declined since the resolution of the FFY 2012 corrective action plan, and this is a performance issue that requires improvement.

Conclusion: As the FFY 2016 performance data demonstrate, ACCES-VR did not develop IPEs for each eligible individual whose service record was closed within 90 days following the date of eligibility determination. As a result of the analysis, ACCES-VR did not develop IPEs in a timely manner pursuant to 34 C.F.R. § 361.45(a)(1) and within the Federally required 90-day period pursuant to 34 C.F.R. § 361.45(e).

Corrective Action Steps:

RSA requires that ACCES-VR:

- 2.2.1 Comply with 34 C.F.R. §§ 361.45(a)(1) and (e) to ensure IPEs are developed within the 90-day Federal timeframe from the date of eligibility determination;
- 2.2.2 Assess and evaluate current procedures for tracking and monitoring counselor performance and efficient practices used by high performing VR counselors and supervisors to ensure timely IPE development, including the use of case management tools for, and supervisory review of, timely IPE development; and
- 2.2.3 Develop goals and strategies to improve VR counselor performance specific to timely IPE development.

Agency Response: ACCES-VR is assessing and evaluating current procedures for the tracking and monitoring of IPEs. Based on this analysis, a plan will be created to improve the timeliness of IPE development. The plan will include a weekly review of data broken out by District Office, VRC and participant. District Office Managers and Senior VRCs will use the data to identify efficient practices used by high performing VRCs. Technical assistance and training will be provided to improve VRC timeliness in developing IPEs. Regional Coordinators will monitor District Office improvement on a regular basis. The corrective action plan will be finalized within 30 days of receiving the Final FFY 2018 Monitoring Report.

RSA Response: RSA maintains the finding and appreciates ACCES-VR's commitment to addressing the corrective actions to increase timely development of an IPE within the 90-day Federal timeframe from the date of eligibility determination, for at least 90 percent of individuals for whom an IPE is developed.

Request for Technical Assistance: None

2.3 Internal Controls for Case File Documentation

Issue: Do ACCES-VR's internal controls ensure that case files adhere to the record of service requirements at 34 C.F.R. § 361.47. Specifically, in fulfilling these requirements, do the internal controls ensure that ACCES-VR adheres to the requirements for processing referrals and applications pursuant to 34 C.F.R. § 361.41; the development of the IPE pursuant to 34 C.F.R. § 361.45; and the requirements for closing the record of services of an individual who has achieved an employment outcome pursuant to 34 C.F.R. § 361.56.

Requirement: Pursuant to 34 C.F.R. § 361.47(a), VR agencies must maintain for each applicant and eligible individual a record of services that includes, to the extent pertinent, documentation including, but not limited to the individual's application for VR services, the individual's IPE, and information related to closing the service record of an individual who achieves an employment outcome. Further, VR agencies, in consultation with the State Rehabilitation Council, if the State has such a Council, must determine the type of documentation that the VR agency must maintain for each applicant and eligible individual in order to meet these requirements in accordance with 34 C.F.R. § 361.47(b).

VR agencies must, in accordance with 34 C.F.R. § 361.41(a), establish and implement standards for the prompt and equitable handling of referrals of individuals for VR services, including referrals of individuals made through the one-stop service delivery system under Section 121 of WIOA. The standards must include timelines for making good faith efforts to inform these individuals of application requirements and to gather information necessary to initiate an assessment for determining eligibility and priority for services. Further, once an individual has submitted an application for VR services, including applications made through common intake procedures in one-stop centers under Section 121 of WIOA, an eligibility determination must be made within 60 days (34 C.F.R. § 361.41(b)(1)), unless specific circumstances prohibit this in accordance with 34 C.F.R. § 361.41(b)(1)(i) and (ii). In fulfilling these requirements, the VR agency records the date it receives the application for VR services from the individual.

Federal regulations at 34 § 361.45 include options for developing the IPE and outline how VR agencies must document that the eligible individual with a disability agrees to the contents of his or her IPE and any amendments made to it. The requirements for what must be included in the IPE are set forth in the Federal regulations at 34 C.F.R. § 361.46.

Pursuant to 34 C.F.R. § 361.56, the service records for individuals who have achieved an employment outcome may only be closed if: an employment outcome described in the individual's IPE in accordance with 34 C.F.R. § 361.46(a)(1) has been achieved and is consistent with an individual's unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice; the employment outcome is maintained for an appropriate period of time, but not less than 90 days to ensure stability of the employment outcome and the individual no longer needs VR services; the outcome is considered to be satisfactory and agreed to by the qualified rehabilitation counselor employed by the DSU and the individual who must agree that they are performing well in the employment; and the individual has been informed of post-employment services through appropriate modes of communication. Under 34 C.F.R. § 361.47(a)(15), prior to closing a service record, VR agencies must maintain documentation verifying that the provisions of 34 C.F.R. § 361.56 have been satisfied. More specifically, under 34 C.F.R. § 361.47(a)(9), VR agencies must maintain documentation verifying that an individual who obtains employment is compensated at or above minimum wage and that the individual's wage and level of benefits are not less than that customarily paid by the employer for the same or similar work performed by individuals without disabilities.

Analysis: While onsite, RSA reviewed 30 service records, which included service records of individuals who did, and did not, achieve employment. Of the service records reviewed, 13 records, or 43 percent of all service records, included discrepancies with the date of application. According to ACCES-VR procedures, when ACCES-VR receives an application for VR services, District Office staff date stamp the paper application and this date is then entered into the case management system. In some of the service records reviewed, the date recorded in the case management system did not match the date stamp on the application. In some of the service records reviewed, the applicant did not sign or date the application. District Office staff, in some instances, did not date stamp the form when the application was received.

In recording the start date of VR services under the IPE, ACCES-VR reported that it uses the date the VR counselor finalizes the IPE in the case management system. As a result, this date was often different from the date the VR counselor and/or the eligible individual signed the IPE. Specifically, 28 records, or 93 percent of all service records reviewed, included dates in the case management system that did not match the date that the VR counselor and/or the eligible individual signed the IPE. In following these procedures, ACCES-VR initiated VR services, under the IPE, before these eligible individuals agreed to their IPEs. During the onsite monitoring review, ACCES-VR acknowledged that these procedures, which are followed across the State, should be revised to align with its policies. ACCES-VR affirmed that VR services provided under IPEs should not begin until the eligible individual signs and dates the IPE.

For the individuals whose service records ACCES-VR closed with an employment outcome, results of the service record review demonstrated that the documentation ACCES-VR maintained in its service records was insufficient in terms of verifying the employment status of

the individuals at the time of closure. Of these service records reviewed, 10 records, or 56 percent, did not include documentation that verified the hourly wage of the individual at the time of exit. Often times, the VR counselor's case note, which provided these details, was a copy of a previous case note when the individual began employment and based on the eligible individual's self-report. Further, seven of these records, or 39 percent, did not include sufficient documentation to substantiate the individual's employment status at the time of exit. Similarly, these case notes were copies of previous case notes and, in some instances, RSA could not find any evidence that ACCES-VR verified that the individual remained employed before ACCES-VR closed the service record. In these instances, RSA observed that the service records reviewed lacked documentation to support that VR counselors verified that the individual maintained employment for at least 90 days and that the employment continued to be stable at the time of closure, as required in 34 C.F.R. § 361.56(b). Furthermore, the service records reviewed lacked documentation as to whether the individual no longer needed VR services, the individual and VR counselor considered the employment outcome to be satisfactory, and both agreed that the individual is performing well in employment in accordance with 34 C.F.R. § 361.56(c). Due to the lack of supporting documentation, RSA was not able to verify whether ACCES-VR informed the individual of the availability of post-employment services as required by 34 C.F.R. § 361.56(d).

ACCES-VR must maintain documentation (either hardcopy or electronic documents) to verify the accuracy of reporting in accordance with Federal requirements, including the individual's date of application, the date VR services began under the IPE, and specific information related to the employment outcome. For some of the service records reviewed, ACCES-VR did not maintain case files that substantiated these reporting requirements, indicating that its internal controls regarding service record documentation must be improved. Therefore, without documentation that the data elements were valid, RSA was unable to verify whether the date of application, the date VR services began under the IPE, and the employment outcomes that ACCES-VR reported on the RSA-911 were accurate.

Conclusion: As a result of the analysis, RSA determined that ACCES-VR's internal controls did not ensure the service record requirements at 34 C.F.R. § 361.47 were met. Specifically, ACCES-VR's internal controls failed to ensure the following requirements were met: processing referrals and applications pursuant to 34 C.F.R. § 361.41; the development of the IPE pursuant to 34 C.F.R. § 361.45; and the requirements for closing the record of services of an individual who has achieved an employment outcome pursuant to 34 C.F.R. § 361.56.

Corrective Action Steps:

RSA requires that ACCES-VR:

- 2.3.1 Develop internal control policies and procedures to ensure that the provisions of 34 C.F.R. § 361.47 have been met, and through service record documentation, the requirements at 34 C.F.R. §§ 361.41, § 361.45, and § 361.46 are met;
- 2.3.2 Review and develop instrumentation for conducting both management-led and peer service record reviews; and

2.3.3 Develop mechanisms to collect and aggregate the results of these reviews and use the results to inform the training and evaluation of staff.

Agency Response: ACCES-VR will develop a plan with internal controls to improve case file documentation. The plan will include: (1) training and technical assistance, including updates to policies and procedures to ensure that VRCs comply with case file documentation requirements; (2) a process for informing vendors and participants that services start after the IPE is signed and dated, and that verification of employment and wages must be confirmed prior to case closure; and, (3) management and peer service record reviews that obtain information that will be utilized as part of case file documentation trainings.

RSA Response: RSA maintains the finding and appreciates ACCES-VR's heightened emphasis on developing a plan to improve its internal controls to ensure service record requirements are met.

Request for Technical Assistance: None

F. Technical Assistance

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

- RSA reviewed 2 C.F.R. § 200.303 outlining the requirements ACCES-VR must follow regarding internal controls as a non-Federal entity receiving Federal funds.
- RSA discussed how enhanced internal controls would help ACCES-VR ensure the accuracy and validity of the data being collected and reported to RSA. RSA explained that data from the RSA-911 are used to create the VR programs performance indicators, reported to Governors, Congress, and the public to ensure that the VR program is functioning at a level that meets expectations. The RSA-911 is also a tool used for fiscal reporting. RSA reiterated that it is imperative that a system of internal controls be implemented as a measure of checks and balances to ensure proper expenditure of funds. Internal controls serve as a mechanism to prevent waste, fraud, abuse, and mismanagement of funds and other resources.
- RSA explained that ACCES-VR should implement controls to look at data reasonableness to verify, for example, that the wage an individual earns is consistent with the occupation in which the individual is employed. RSA also recommended that the agency review its data at a macro-level prior to submission to assess potential coding errors or trends that would not be caught by individual record edit checks. For example, ACCES-VR indicated that it was surprised to learn that the agency's performance data indicated that no individuals received VR counseling and guidance. RSA explained that if the data is reviewed at a macro-level, these issues can be addressed through training or policy clarification.
- RSA also suggested that ACCES-VR implement case service record reviews (supervisor-led or peer-led), beyond those conducted by its Quality Assurance/Monitoring Unit, as part of its internal control procedures. These reviews would serve as a mechanism to ensure that staff are adequately trained and are following procedures. They would also

serve as a mechanism for ACCES-VR to identify policies and procedures that may need to be developed or improved.

SECTION 3: FOCUS AREA – VR SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES AND TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES

A. Purpose

The Rehabilitation Act, as amended by WIOA, places heightened emphasis on the provision of services to students and youth with disabilities, including pre-employment transition services under Section 113 to students with disabilities, to ensure they have meaningful opportunities to receive training and other VR services necessary to achieve employment outcomes in competitive integrated employment. Pre-employment transition services are designed to help students with disabilities to begin to identify career interests that will be explored further through additional VR services, such as transition services. Through this focus area RSA assessed the VR agency's performance and technical assistance needs related to the provision of VR services, including transition services to students and youth with disabilities, and pre-employment transition services to students with disabilities; and the employment outcomes achieved by these individuals.

B. Service Delivery Overview

The VR agency must consider various requirements under the Rehabilitation Act and its implementing regulations in designing the delivery of VR services, including pre-employment transition services and transition services. For example, pre-employment transition services provided under Section 113 of the Rehabilitation Act and 34 C.F.R. § 361.48(a) are available only to students with disabilities. However, transition services provided for the benefit of a group of individuals under Section 103(b)(7) of the Rehabilitation Act and 34 C.F.R. § 361.49(a)(7) may be provided to both students and youth with disabilities. Youth with disabilities who are not students may receive transition-related services identified in an IPE under Section 103(a) of the Rehabilitation Act, but may not receive pre-employment transition services because these services are limited to students with disabilities. On the other hand, students with disabilities may receive pre-employment transition services with or without an IPE under Section 113 of the Rehabilitation Act, or may receive pre-employment transition services and/or transition services under an IPE in accordance with Section 103(a)(15) of the Rehabilitation Act. A discussion of ACCES-VR's service delivery system and implementation of VR services, including pre-employment transition services and transition services, follows.

Structure of Service Delivery

ACCES-VR provides a continuum of VR services through approximately 295 VR counselors assigned to 15 district offices across the State of New York. ACCES-VR has assigned 292 VR counselors as liaisons to 1,264 public high school combinations (426 junior/senior high schools; 750 senior high schools; and 88 K-12 public high schools) in order to provide pre-employment transition services and transition services to students with disabilities. Of those VR counselors, eleven have transition-only caseloads, while 281 VR counselors serve students, youth, and adults with disabilities. ACCES-VR works closely with the New York State Education Department

(NYSED), Office of P-12 Education and the Office of Special Education (OSE), to ensure that students with disabilities are prepared for employment, postsecondary education, and community living upon exit from high school. Students with disabilities may self-refer or be referred to ACCES-VR by school personnel in local educational agencies (LEAs), including: teachers, school psychologists, guidance counselors, and individualized education program (IEP) transition planning teams.

In addition to assigning VR counselors as liaisons to public high schools, ACCES-VR implemented the Transition and Youth Services (TAYS) Team in April 2014. This team is currently staffed with a manager, associate VR counselor in central administration, and dedicated senior vocational rehabilitation counselors (SVRCs) assigned to each of the 15 district offices (15 SVRCs in total). In early FY 2015, the TAYS Team began planning to build upon the requirement to spend 15 percent of ACCES-VR's Federal allotment on the provision of pre-employment transition services for students with disabilities in order to prepare students for successful employment. VR counselors also provide three of the five required activities under pre-employment transition services to students with disabilities who have applied or been determined eligible for VR services.

In FFY 2014, prior to the enactment of WIOA amendments to the Rehabilitation Act, ACCES-VR created youth employment services (YES) as part of its core rehabilitation services (CRS) fee-for-service contracts with community rehabilitation providers (CRPs). Youth employment services were designed to develop specific work readiness and work experience programs, as well as job coaching services, for VR-eligible in-school students, and out-of-school disengaged youth under an IPE, with a critical emphasis to engage and continue to engage youth until they obtain quality competitive integrated employment outcomes. In FFY 2017, ACCES-VR developed a cross walk to align youth employment services with pre-employment transition services (i.e., workplace readiness training and work-based learning opportunities) for VR-eligible students with disabilities under an approved IPE.

In July 2015, ACCES-VR launched a Regional Vocational Rehabilitation (RVR) project across ten Regional Special Education- Technical Assistance Support Centers (RSE-TASCs), hiring a total of 32 RVR-community employment specialists (CESs) to provide consultation and technical assistance services to school districts covering 1,264 high schools related to the VR referral process, services and timelines, as well as information about other post-secondary options leading to quality employment outcomes. At the time of the onsite review, the ten contracts were with three schools, one Board of Cooperative Educational Services (BOCES), four not-for-profit providers, and three independent living centers. CESs are responsible for providing consultation and technical assistance (previously under the services to groups authority in 34 C.F.R. § 361.49(a)(7) prior to the WIOA amendments) and instruction on the scope of pre-employment transition services and transition services provided through ACCES-VR to public school personnel (34 C.F.R. § 361.48(a)(3)(iii)), including the directors of Pupil Personnel Services, Special Programs and Student Services; Committee on Special Education and Special Education Department Chairs; Supervisors of Special Programs and Career Development and Commencement Credential (CDOS); Superintendents and Principals; Assistant and Interim Principals; IPE Coordinators; Assistive Technology Specialists; School and Guidance Counselors; Transition Team Leaders and Specialists; Special Education, Resource, General Education, Career and Technical Education Teachers and Assistants; School and Clinical

Psychologists; Social Workers, Nurses, Speech and Language Pathologists; Physical and Occupational Therapists; and Job Coaches. ACCES-VR developed a joint memorandum of understanding with the Cornell University for the provision of professional development to the CESs for the length of the project through June 30, 2019.

Outreach and Identification of Students and Youth

ACCES-VR's current policies specific to the provision of pre-employment transition services and transition services, and the formal interagency agreement with the OSE, delineate the referral process of students with disabilities starting two years prior to the expected date of school exit. ACCES-VR counselors work with LEAs to identify and refer students with disabilities who may be eligible for VR services. ACCES-VR counselors are active participants in the transition planning process and attend transition planning meetings, transition fairs, and family nights when invited by LEAs. ACCES-VR offers orientation presentations statewide for students two years prior to exit from high school, as well as orientations for out-of-school youth under 25 years of age. ACCES-VR collects information and documentation from LEAs with student referrals that include parental or student consent, as appropriate, to assist VR counselors with determining student eligibility for VR services, and to expedite post-school services. After applying for VR services, the VR counselor, the student, and the student's family or representative work with the school district to coordinate VR services for students with disabilities. The VR counselor can then assist students with disabilities to prepare for and obtain employment consistent with their employment goals, including the provision of pre-employment transition services and transition services that involve preparing for the students' future.

NYSED contracted with Cornell University to conduct the FY 2017 Triennial Comprehensive Statewide Needs Assessment (CSNA) in order to assess the needs of individuals with disabilities in the State of New York, including the need for pre-employment transition services and transition services. The January 2018 two-year update report included the analysis of performance data from FY 2010 through FY 2016, three regional focus group discussions with VR counselors, and interviews with ACCES-VR leadership and State Rehabilitation Council members. Of the 190,000 students with IEPs and 33,000 students with accommodations under Section 504 of the Rehabilitation Act, tracked through NYSED P-12 data, Cornell University projected that approximately 9,000 secondary and 1,000 postsecondary education students with disabilities may be in need of pre-employment transition services from ACCES-VR during FFY 2017 and FFY 2018. ACCES-VR included the CSNA projections in its fiscal forecasting model used to determine the number of students in need of required activities; the cost to provide or arrange for required activities; the cost to engage in pre-employment transition coordination activities; and the funds available and remaining to engage in authorized activities during FY 2018.

Provision of Pre-Employment Transition Services

The agency provides pre-employment transition services to potentially eligible students with disabilities who have applied for VR services, as well as students determined eligible for VR services, through a combination of fee-for-service CRS contracts and VR counselors. At the time of the onsite review, pre-employment transition services were not available to students who had not applied for such services, but were potentially eligible for VR services.

ACCES-VR provides pre-employment transition services through the current CRS fee-for-service contracts as youth employment services, including work readiness training and work experiences provided to eligible individuals under an approved IPE. Job exploration counseling and counseling on opportunities for enrollment in postsecondary educational programs at institutions of higher education are provided by VR counselors both to potentially eligible students who have applied for VR services and students determined eligible for VR services. While onsite, some VR counselors also reported providing instruction in self-advocacy to eligible and potentially eligible students who have applied for VR services.

At the time of this review, ACCES-VR was in the process of updating its CRS contracts (CRS 2.0), and planned to offer all five required activities under pre-employment transition services to students with disabilities who have applied for VR services beginning in July 2018. The CRS 2.0 contracts will also offer other individualized VR services, including work-based coaching supports to students who have applied and been determined eligible for VR services under an approved IPE.

At the time of the review, pre-employment transition services were available to potentially eligible students who had applied for VR services, but not to those potentially eligible students who had not applied for VR services. ACCES-VR is also in the process of developing fee-for-service contracts to provide the five required activities under pre-employment transition services by October 2018 to potentially eligible students in need of such services, who have not applied for VR services. While onsite, ACCES-VR reported piloting an expansion to its CaMS, to operate a CaMS lite module in order to capture, track, and report pre-employment transition services provided to potentially eligible students who have not applied for VR services. ACCES-VR committed to making pre-employment transition services available to all potentially eligible students (non-applicants and applicants), as soon as it is able to collect the required information and documentation on students who have not applied for VR services and the fee-for-service contracts are finalized.

In October 2015, ACCES-VR issued guidance to VR staff, including VR counselor assistants, VR counselors, senior VR counselors, integrated employment specialists, and directors of counseling related to using the Time and Effort Allocation System (TEAS) code as a crosswalk to track and report VR staff time spent providing or arranging for the provision of required, authorized, and pre-employment transition coordination activities (effective November 5, 2015). ACCES-VR has engaged in authorized activities through its RVR project's 32 CES' to provide instruction on the scope of pre-employment transition services and transition services to public school personnel (34 C.F.R. § 361.48(a)(3)(iii)); and a professional development memorandum of understanding with Cornell University.

The Student and Youth Transition Services policy (Section 421.00) was revised in October 2017, to align with the statutory provisions of the Rehabilitation Act, as amended by WIOA, and VR program regulations. The policy provides requirements specific to transition planning; outreach, referral and application processes; the scope and provision of pre-employment transition services and transition services; and the roles and responsibilities of VR counselors in preparing students with disabilities for successful employment. RSA and ACCES-VR reviewed and discussed the draft transition-related policies and procedures (Section 421.00P) during the

monitoring review. RSA provided onsite technical assistance further summarized in Section E of this focus area.

Provision of Transition Services

Individualized VR services, including transition services, are provided to students and youth with disabilities who have applied and been determined eligible for the VR program, under an approved IPE. Transition services include assessments; vocational guidance and counseling; vocational training; postsecondary education; and job development, search, and placement services.

At the time of the review, ACCES-VR counselors had not begun providing group transition services to students and youth with disabilities under the services to groups authority (34 C.F.R. § 361.49(a)(7)).

State Educational Agency (SEA) Agreement

ACCES-VR considers the coordination of services to students with disabilities as one of its main priorities. ACCES-VR works closely with the NYSED's Office of P-12 Education, OSE to ensure that students with disabilities are prepared for employment, postsecondary education, and community living upon exit from secondary school. Additionally, ACCES-VR and OSE program managers jointly review and share training information and, when relevant, coordinate efforts by inviting respective staff to receive training on transition, accommodations, assessment, and knowledge of specific disabilities. Both entities continue to train staff on CDOS, a New York State educational credential that replaced the IEP Diploma for students with significant disabilities (effective July 1, 2013), as it relates to coordinated efforts to prepare students for employment. The CDOS requires students with disabilities to participate in a set of experiences related to preparing for employment. It is envisioned that this credential will provide more documentation specific to the accomplishments of students in the areas of academic instruction, career exploration and development, and provide potential businesses with documentation on which students are exiting school with demonstrated knowledge and experience for entry-level employment.

The most recent formal interagency agreement between the NYSED's Office of P-12 Education, OSE and ACCES-VR was in effect from January 1, 2013 until it expired on December 31, 2017. ACCES-VR and OSE provided RSA with a draft SEA agreement that was reviewed and discussed during the onsite monitoring review. The draft SEA agreement will include the new statutory provisions required by the Rehabilitation Act, as amended by WIOA, and implementing regulations. ACCES-VR and OSE reported that the SEA agreement will be finalized during Spring 2018. Technical assistance was provided during the monitoring review and is summarized under Section E of this focus area.

IPE Development for Students and Youth with Disabilities

ACCES-VR's draft policy (Section 421.00) requires that an IPE be developed within 90 days from the date of eligibility determination and prior to a student exiting high school. The draft policy also includes a description of a "projected post-school outcome" that may be used when

developing IPEs for students with disabilities, that is to be revised to a specific vocational goal during the career development process.

C. Observations and Recommendations

RSA's review of the ACCES-VR's performance in this focus area resulted in the identification of the following observations and recommendations to improve performance.

Observation 3.1: Accurate Reporting of Pre-Employment Transition Services

Although ACCES-VR communicated that it is providing pre-employment transition services through contracts and VR counselors, and reported expenditures for such services on the SF-425, the first and second quarter program year (PY) 2017 performance data reported on the RSA-911 does not reflect the provision of pre-employment transition services to each individual in receipt of such services.

- In the first quarter (July 1 – September 30) of PY 2017, ACCES-VR reported providing pre-employment transition services to 45 individuals, including three potentially eligible individuals. Of those individuals reported, none were reported as being in receipt of any of the five required activities on the RSA-911 Case Service Report. (Appendix A: Program and Fiscal Performance, Table 10a.)
- ACCES-VR reported providing pre-employment transition services to 221 individuals, including seven individuals potentially eligible for VR services during the second quarter (October 1 – December 30) of PY 2017. Of the individuals reported as being in receipt of pre-employment transition services, 28 individuals were reported as receiving work-based learning experiences (WBLEs); and 19 individuals were reported as receiving workplace readiness training (WRT). During this same reporting period, zero individuals were reported as being in receipt of job exploration counseling, counseling on enrollment opportunities or instruction in self-advocacy although ACCES-VR central office staff and VR counselors described the in-house provision of such services. (Appendix A: Program and Fiscal Performance, Table 10b.)
- ACCES-VR reported expending \$18,443,565 on the provision of pre-employment transition services on the FFY 2016 Final SF-425 (Final reports submitted no later than 90 days after the period of performance). (Appendix A: Program and Fiscal Performance, Table 10c.)
- In July 2017, ACCES-VR completed modifications and updates to its electronic case management system in order to include the new required data elements, collect VR consumer data in compliance with performance accountability system requirements under WIOA, and RSA-911 reporting requirements.
- ACCES-VR provided guidance to staff on October 28, 2015, as to how VR counselor assistants and counselors, senior VR counselors, and integrated employment specialists are to document actual time spent providing pre-employment transition services, including required, authorized, and pre-employment transition coordination activities to students with disabilities, using Time and Effort Allocation System code 929 and a cross-walk of pre-employment transition services definitions to current service definitions. This guidance included a list of current services that would be “allowable” pre-employment

transition services. RSA provided technical assistance regarding the scope of pre-employment transition services summarized in Section E of this focus area.

- ACCES-VR issued new case service codes on July 7, 2017, to be used for students (ages 14-21) participating in select core rehabilitation services. The purpose of these codes was to assist ACCES-VR in quantifying, tracking, and reporting the provision of pre-employment transition services to students with disabilities. The new case service codes have only been available for new service authorizations since July 18, 2017, for those students with disabilities who apply for VR services. RSA provided technical assistance regarding the scope of services listed under the new case service codes as summarized in Section E of this focus area.
- ACCES-VR communicated that pre-employment transition services were reported if the services were:
 - Provided to an individual under the age of 22 (on the date of service), who was identified as a secondary or postsecondary student by reported school status; and received the service in the Federal fiscal year being reported; and
 - One of eleven selected case services codes (community-based assessment; work readiness 1 soft skills training or work readiness 1 soft skills training – deaf service; work readiness for students; work experience development; work-based learning development for students; provider assisted community work experience; coaching supports for employment; work based learning experience for students; work-based coaching supports for students (for employment); and benefits advisement provided). Technical assistance related to the scope of pre-employment transition services is summarized in Section E of this focus area.
- ACCES-VR is developing a CaMS lite system to capture, track, and report the provision of pre-employment transition services by CRPs and ACCES-VR counselors to potentially eligible students (non-applicants), in addition to those potentially eligible (applicants) and eligible students in receipt of such services captured through the current CaMS. ACCES-VR reported that this modification will allow ACCES-VR to collect and report information for each individual in receipt of each pre-employment transition service as required on the RSA-911 Case Service Report (RSA PD-16-04).

Recommendation 3.1: Accurate Reporting of Pre-Employment Transition Services

RSA recommends that ACCES-VR:

- 3.1.1 Analyze and revise existing case service codes and cross walks used to identify and report pre-employment transition services;
- 3.1.2 Modify the current tracking and reporting system in order to ensure ACCES-VR is capturing and reporting each of the five required activities provided to each potentially eligible (non-applicants and applicants) and VR eligible individual in receipt of such service(s), whether provided in-house or purchased (if purchased, must also report expenditures), as required on the RSA-911 Case Service Report;
- 3.1.3 Revise the FY 2015 TEAS Code crosswalk used to track and report the staff time spent directly providing or arranging for the provision of each of the three sets of pre-employment transition services activities (required, authorized, and pre-employment transition coordination activities) to only include those services within the scope of pre-employment transition services; and

3.1.4 Analyze the expenditures reported on the SF-425 as pre-employment transition services expenditures to determine whether those expenditures have been coded and reported for each required activity provided as a direct service to an individual (in-house or purchased) on the RSA-911; or if the expenditures are for staff time spent providing the required service(s), or engaging in pre-employment transition coordination activities and authorized activities.

Agency Response: ACCES-VR has taken several actions to accurately report Pre-Employment Transition Services (Pre-ETS), including the development of new Time and Effort Allocation System (TEAS) Codes for required, authorized and coordination activities (e.g., 931-Required, 933-Authorized, and 935-Coordination) implemented in June 2018. The TEAS codes allow ACCES-VR to track and report staff time spent directly providing or arranging for the provision of Pre-ETS.

Staff were advised of the new codes through a memo distributed to District Offices explaining the new requirement, and staff training was provided through a webinar. A senior counselor was also identified in each district office to provide technical assistance as needed.

The new Core Rehabilitation Services (CRS) contracts (effective January 1, 2019), include separate and distinct Case Service Codes to be used to authorize Pre-ETS for students with disabilities. The Case Service Codes are as follows:

- Post-Secondary Education Counseling (121X);
- Job Exploration Counseling (122X);
- Self-Advocacy (124X);
- Workplace Readiness (127X); and
- Work-based Learning Experiences (557X) and (963X).

Since the on-site review, ACCES-VR also developed an updated crosswalk to identify and report Pre-ETS that are provided directly by ACCES-VR staff and other public institutions. The crosswalk and agency-wide memo will be issued to all staff in October 2018.

ACCES-VR is currently conducting an analysis of Pre-ETS expenditures reported on the SF-425. The analysis includes a review of expenditures previously reported as required, authorized and coordination activities. A revised SF-425 will be submitted to RSA by December 1, 2018.

RSA Response: RSA appreciates the additional information provided by ACCES-VR specific to this observation; and acknowledges the actions taken to ensure that ACCES-VR is capturing, reporting and tracking each of the five required activities to each student in receipt of such services; and staff time spent directly providing or arranging for the provision of each of the three sets of pre-employment transition services.

Request for Technical Assistance: ACCES-VR is not requesting technical assistance in this area. However, we are requesting that the actions already taken to accurately report Pre-ETS be considered and that this finding be modified to focus only on areas that still need improvement.

D. Findings and Corrective Actions

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

3.1 Statewide Availability and Scope of Pre-Employment Transition Services

Issue: Did ACCES-VR make available pre-employment transition services statewide for students with disabilities who are eligible or potentially eligible for VR services in New York.

Requirement: Pursuant to 34 C.F.R. § 361.48(a), each State must ensure that the DSU, in collaboration with the LEAs involved, provide, or arrange for the provision of, pre-employment transition services for all students with disabilities, as defined in 34 C.F.R. § 361.5(c)(51), in need of such services, without regard to the type of disability, from Federal funds reserved in accordance with 34 C.F.R. § 361.65, and any funds made available from State, local, or private funding sources. Funds reserved and made available may be used for the required, authorized, and pre-employment transition coordination activities under paragraphs (2), (3) and (4) of this section. In accordance with 34 C.F.R. § 361.48(a)(1), pre-employment transition services must be made available statewide to all students with disabilities, regardless of whether the student has applied or been determined eligible for VR services.

Analysis: Prior to the VR regulations issued on August 19, 2016, ACCES-VR implemented fee-for-service CRS contracts (effective from FY 2014 through FY 2018) that provide YES, a service group that combines existing CRS services (e.g., pre-employment, employment and related services), to transition-age youth below the age of 25 under an approved IPE. Transition-age youth include students with IEPs; students with 504 plans; other VR-eligible youth; drop-outs; and individuals participating in vocational training or college programs. Of the services available through the YES service group, ACCES-VR identified the following services as pre-employment transition services when provided under an IPE to VR eligible students enrolled in secondary or postsecondary education and under the age of 22: community-based workplace assessments; work readiness 1 - soft skills training; work-readiness 1 – soft skills training – deaf services; work readiness for students; work experience development; work-based learning development for students; provider assisted community work experience; coaching supports for employment; work-based learning experience for students; work-based coaching supports for students (for employment); and benefits advisement. Pre-employment transition services are available only to students with disabilities, not youth (34 C.F.R. § 361.48(a)), and are limited in nature and scope to only the five required activities in 34 C.F.R. § 361.48(a)(2), authorized activities in 34 C.F.R. § 361.48(a)(3), and pre-employment transition coordination activities in 34 C.F.R. § 361.48(a)(4). Any individualized VR service (34 C.F.R. § 361.48(b)) beyond the scope of pre-employment transition services (i.e., provider assisted and coaching supports for employment) must be provided under an approved IPE using VR funds that have not been reserved for the provision of pre-employment transition services.

In addition to the YES service group available under the current CRS fee-for-service contracts, limited pre-employment transition services are also provided directly by VR counselors to students who have applied for or been determined eligible for VR services. Specifically, VR counselors reported providing job exploration counseling and counseling on opportunities for

enrollment in postsecondary education at institutions of higher education, while some VR counselors also reported providing instruction in self-advocacy. At the time of the onsite review, pre-employment transition services were not yet available to potentially eligible students who had not applied for VR services (non-applicants); and workplace readiness training and work-based learning experiences are only available to students determined eligible for VR services under an approved IPE. As such, not all required activities are available statewide to all students with disabilities who are potentially eligible or eligible for VR services.

ACCES-VR has developed CRS 2.0 fee-for-service contracts (effective July 1, 2018 through June 30, 2023) that will provide all five required activities to students with disabilities who have applied or been determined eligible for VR services. While onsite RSA recommended these contracts also serve potentially eligible students who have not applied for VR services. ACCES-VR reported it is developing fee-for-service contracts to provide required activities to potentially eligible students who have not applied for VR services by October 2018.

Conclusion: Pursuant to 34 C.F.R. § 361.48(a)(1), ACCES-VR must make pre-employment transition services available statewide to all students with disabilities, regardless of whether the student has applied or been determined eligible for VR services. As a result of the analysis, RSA determined that ACCES-VR was not making pre-employment transition services available statewide to all students with disabilities in need of such services who are potentially eligible and have not applied for VR services or are not eligible for VR services in accordance with 34 C.F.R. § 361.48(a)(1).

Corrective Action Steps:

RSA requires that ACCES-VR:

- 3.1.1 Make pre-employment transition services available to all students with disabilities, including those potentially eligible students with disabilities who have not applied for VR services, and for whom services are not available through existing CRS contracts or by using other mechanisms, such as fee-for-service contracts and/or direct provision of services by ACCES-VR staff in collaboration with the LEAs;
- 3.1.2 Track and report each required activity provided to each individual in receipt of such services (in-house or purchased); and
- 3.1.3 Track and report to RSA, VR counselor staff time spent providing or arranging for the provision of pre-employment transition services for each individual in receipt of pre-employment transition services, as well as time spent engaging in authorized activities and pre-employment transition coordination activities.

Agency Response: Students with disabilities who are ACCES-VR participants can currently receive Pre-ETS in-house from VR counselors. Pre-ETS provided by VR counselors will be tracked and reported with the use of an updated crosswalk (effective October 2018) and new TEAS codes (effective June 2018). The crosswalk will be used to ensure that Pre-ETS services are correctly reported into CaMS which will ensure accurate RSA-911 reporting. The new TEAS codes will be used to ensure accurate reporting of Pre-ETS provided by staff. Pre-ETS will be available to students with disabilities as part of CRS contracts that start in January 2019. Potentially eligible students with disabilities will be able to receive Pre-

ETS starting in August 2019, as part of a separate fee-for-service contract and collaboration with local educational agencies. Vendors awarded contracts to provide Pre-ETS to potentially eligible students with disabilities will be required to track and report required activities provided to each student.

RSA Response: RSA maintains the finding and acknowledges ACCES-VR's efforts; the strategies implemented and under development to ensure pre-employment transition services are available statewide not only to students who have applied or been determined eligible for the VR program, but also those students with disabilities who have not yet applied for VR services. RSA has provided technical assistance to ACCES-VR, and is available to provide technical assistance as needed.

Request for Technical Assistance: No Request for Technical Assistance

E. Technical Assistance

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

Planning for the Provision of Pre-Employment Transition Services

RSA reviewed and provided technical assistance to ACCES-VR on the development of its fiscal forecasting model and inclusion of the number of potentially eligible and eligible students with disabilities (currently served and projected to be served) in need of the required activities under pre-employment transition services, as well as the current and projected costs for required and pre-employment transition coordination activities, in order for ACCES-VR to reasonably identify the funds available and remaining to engage in authorized activities (34 C.F.R. § 361.48(a)(3)).

Formal Interagency Agreement between the State Educational Agency (SEA) and ACCES-VR

While onsite, RSA and ACCES-VR discussed the regulatory requirements (finalized on August 19, 2016), specific to the formal interagency agreement as described in 34 C.F.R. § 361.22(b) and the need for ACCES-VR to incorporate the following requirements into the next formal interagency agreement, including:

- Procedures for outreach to and identification of students not only in need of transition services, but also pre-employment transition services, who are between the ages of 14-21, and a process for referring potentially eligible students starting at the age of 14, not two years prior to exit, since New York has elected to make pre-employment transition services available to students with disabilities at age 14 (34 C.F.R. § 361.22(b)(4));
- Data elements and supporting documentation OSE/LEAs must provide to ACCES-VR with a pre-employment transition services referral (i.e., unique identifier or social security number, date of birth, race, ethnicity, disability) (RSA-PD-16-04); and

- Description of the process and timelines that will be used to ensure that the LEAs will provide Section 511 documentation of completion of the required actions to ACCES-VR (34 C.F.R. § 361.22(b)(5)).

RSA clarified that the draft SEA agreement needs additional detail describing how the LEA will transmit the required documentation to ACCES-VR when it becomes aware that a student is seeking subminimum wage employment, and within the required timeframes (34 C.F.R. § 361.22(b)(5) and §397.30).

RSA further clarified that the LEA must transmit the required documentation described in 34 C.F.R. §397.30 to ACCES-VR, as requirements under Section 511 of the Rehabilitation Act and 34 C.F.R. Part 397 must be satisfied before an entity holding a 14(c) certificate may hire or continue to employ an individual with a disability at subminimum wage.

RSA also requested that ACCES-VR include in the formal interagency agreement that IPEs for students will be developed within 90 days from the date of eligibility determination, and prior to exit, pursuant to 34 C.F.R. § 361.22(a)(2).

Provision of Pre-Employment Transition Services

- RSA provided technical assistance related to the nature and scope of pre-employment transition services (34 C.F.R. § 361.48(a)(2) and provided examples of such services from the preamble to the final regulations (81 FR 55629, 55694-55695 (August 19, 2016)).
- RSA clarified that these services are to be used as early job exploration activities, and not as assessments to determine eligibility for the VR program, if additional VR services are necessary, or whether a student will be successful in employment (81 FR 55629, 55695 (August 19, 2016)).
- RSA also clarified that required activities may be provided concurrently. Specifically, workplace readiness training may be provided at an employment site while a student is participating in a work-based learning experience. However, individualized VR services under Section 103(a) of the Act and 34 C.F.R. § 361.48(b), such as transportation, job retention services (i.e., job coaching and supports), must be provided to eligible individuals under an approved IPE using non-reserved Title I VR funds.
- RSA provided technical assistance related to the mechanisms (fee-for-service contracts and VR counselor staff) through which ACCES-VR is currently making required activities available to students with disabilities who have applied for VR services; those eligible and receiving services under an IPE; and discussed how ACCES-VR will ensure pre-employment transition services are available statewide to students who are potentially eligible (non-applicants and applicants) for VR services (34 C.F.R. § 361.48(a)(1)).
- RSA reviewed and provided feedback on a draft request for proposals developed to contract the provision of pre-employment transition services to potentially eligible students who have not applied for VR services. This proposal included funding projects proposed by entities (i.e. not-for-profit organizations; CRPs; independent living centers; institutions of higher education; and BOCES), and included budgets with line items for

provider staff, space, and equipment, in order to provide pre-employment transition services.

- RSA provided technical assistance on the establishment authority (34 C.F.R. § 361.49(a)(1)) and the regulatory definitions specific to establishment (34 C.F.R. §§ 361.5(c)(16) and (17)) should ACCES-VR determine through pre-planning activities that it is necessary to establish, develop, or improve a community rehabilitation program's capacity, including staffing, to provide VR services to individuals who are applicants of or have been determined eligible for the VR program.
- RSA also provided guidance related to interagency transfers and third party cooperative arrangements (34 C.F.R. § 361.28) should ACCES-VR determine it is necessary to use such mechanisms to coordinate the provision of pre-employment transition services with LEAs while receiving other sources of match.
- RSA clarified that pre-employment transition services do not include administrative costs.
- RSA recommended that other mechanisms be developed to provide pre-employment transition services to all students with disabilities who are potentially eligible (applicants or non-applicants), or eligible for VR services, such as fee-for-service contracts or direct provision of services by VR counselors.
- RSA reviewed and provided feedback on a request for proposals (RFP # GC 18-004) which will update and replace the existing CRS contracts with CRS 2.0 on July 1, 2018.
- RSA and ACCES-VR discussed the nature and scope of services developed for students with disabilities, and the need to include specific case services and codes within the scope of the five required activities under pre-employment transition services, so that a cross walk from existing VR services to pre-employment transition services is not necessary.
- RSA clarified that the proposed required activities for students in the CRS 2.0 contracts should not reference case services and codes listed for individualized VR services, as such references broaden the allowable scope of pre-employment transition services.

Policies and Procedures

RSA reviewed ACCES-VR's draft policies (421.00) and procedures (421.00P) specific to the provision of pre-employment transition services and transition services. Technical assistance was provided with respect to:

- Outreach to and referral of potentially eligible and eligible students (34 C.F.R. §§ 361.22(b) and 361.41(a));
- The nature and scope of services available only to students with disabilities (34 C.F.R. § 361.48(a));
- Group and individualized transition services for students and youth (34 C.F.R. §§ 361.49(a)(7) and 361.48(b)(18));
- Continuation of services that have been initiated prior to an individual being assigned to a closed order of selection priority category (34 C.F.R. § 361.36(e)(3)(i) and (ii));
- Tracking and reporting the provision of each required activity provided to each student in receipt of such services (RSA-PD-16-04), whether provided in-house or purchased by ACCES-VR;

- Tracking staff time spent on required, authorized, and pre-employment transition coordination activities (34 C.F.R. § 361.48(a)(2)(3) and (4));
- Inclusion of timelines for eligibility determination (34 C.F.R. § 361.41(b)) and IPE development (34 C.F.R. §§ 361.22(a)(2) and 361.45(e));
- Aligning the process for school district collaboration on student referrals in its draft policies with the referral process described in the formal interagency agreement with OSE;
- Data elements required to be submitted with student referrals for the provision of pre-employment transition services;
- Pre-employment transition services are an early start at job exploration and should enrich, not delay the transition planning process, application to VR, and the continuum of VR services (81 FR 55629, 55692 (August 19, 2016)); and
- Authorized activities are to support the arrangement and provision of required activities under pre-employment transition services.

RSA reviewed the existing FY 2015 Time and Effort Allocation System (TEAS) Chart used as a crosswalk from pre-employment transition services (i.e., required, authorized and pre-employment transition coordination activities) to existing CRS services for which ACCES-VR staff used TEAS code 929 to charge as time spent on the provision of pre-employment transition services.

- RSA clarified the scope of pre-employment transition services and that pre-employment transition services are only available to students with disabilities enrolled in an educational program;
- RSA clarified that aptitude, psychological and neuropsychological testing; development of an IPE; supported employment services; individualized VR services, such as transportation and job coaching services; services for youth with disabilities, and some pre-college preparation services are not pre-employment transition services; and
- Staff time spent on such activities cannot be charged to the funds reserved for the provision of pre-employment transition services.

RSA reviewed and provided technical assistance on the case service codes ACCES-VR identified as pre-employment transition services in a July 1, 2017, memo to staff.

- RSA clarified that provider-assisted community work experience (958X), coaching supports for employment (959X), and work-based coaching supports for students for employment (964X) are all individualized VR services to be provided under an IPE using non-reserved funds.
- RSA further clarified that these services and codes should not be reported as pre-employment transition services, or charged as expenditures to the funds reserved for the provision of pre-employment transition services.

SECTION 4: FOCUS AREA – STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM

A. Purpose

WIOA made several significant changes to Title VI of the Rehabilitation Act that governs the Supported Employment program. The amendments to Title VI are consistent with those made throughout the Rehabilitation Act to maximize the potential of individuals with disabilities, especially those individuals with the most significant disabilities, to achieve competitive integrated employment and to expand services for youth with the most significant disabilities. Through this focus area, RSA assessed the VR agency performance and technical assistance needs related to the provision of supported employment services to individuals with the most significant disabilities and extended services for youth with the most significant disabilities; and the employment outcomes achieved by these individuals.

B. Overview of Service Delivery and Performance of the Supported Employment Program

Delivery of Supported Employment Services

ACCES-VR continues to serve as a member of the Chapter 515 Interagency Implementation Team (established in October 2006) with representatives from the Office of Persons with Developmental Disabilities (OPWDD), Office of Mental Health (OMH), and NYSCB, to facilitate cross-system coordination and implementation of supported employment and extended services in the State of New York.

ACCES-VR administers the intensive services component of supported employment programs in the State of New York, with the exception of those intensive supported employment services provided by the OPWDD (since July 2015) and OMH.

ACCES-VR utilizes an individual placement model and reported that supported employment services consist of ongoing support services and other appropriate services necessary for an individual with a most significant disability to obtain and maintain competitive integrated employment. Specifically, ACCES-VR provides the following supported employment services authorized under an IPE: assessment; vocational guidance and counseling; job planning, development and placement; intensive job-coaching and retention services; and extended services.

ACCES-VR receives NYSED Extended Services Funding (a State appropriation) of approximately \$10 million to provide extended services to individuals with most significant disabilities. Such services are provided after an individual has made the transition from intensive supported employment services from ACCES-VR to an extended services provider. ACCES-VR reported it will use Federal funding (Titles I and VI) to provide extended services to youth with most significant disabilities and the NYSED Extended Services Funding to provide extended services to individuals with disabilities age 25 and older.

Since January 2014, ACCES-VR has provided supported employment services and extended services to individuals with most significant disabilities through a performance-based milestone contracting system with approximately 197 supported employment providers. ACCES-VR replaced its hourly fee-for-service supported employment contracts with the core rehabilitation services contracts under which payments are based on the attainment of specific milestones and supported employment outcomes. Specifically, supported employment providers are paid an established flat fee for conducting a supported employment intake; providing supported employment pre-employment assessment and job development services; the 5th and 45th day after job placement (retention); supported employment retention (on-going supports beyond the 45th day after job placement); and quality employment outcomes in which individuals are working 30 or more hours per week; and earning at least \$9.50 per hour (upstate) and \$10.50 per hour (downstate).

ACCES-VR revised its supported employment policies (Section 1310) in November 2017, to include the Federal requirements related to: extending the duration of supported employment services from 18 to 24 months (Section 7(39) of the Rehabilitation Act); competitive integrated employment and integrated employment on a short-term basis (Section 7(38) of the Rehabilitation Act); customized employment (Sections 7(7) and 7(39) of the Rehabilitation Act); extended services for youth with most significant disabilities for up to four years, or until the youth reaches the age of 25, whichever occurs first (Section 604(b) of the Rehabilitation Act); achieving an employment outcome in supported employment and closing a supported employment service record. At the time of this review, ACCES-VR reported its draft supported employment policies would be finalized by May 2018; and the supported employment guidelines would be finalized in October 2018, after the July 2018 issuance of the revised CRS 2.0 contracts, which will include supported employment services and extended services.

In January 2018, ACCES-VR procured a CSNA update to the FY 2017 Needs Assessment. This update reported that six to 10 percent of ACCES-VR participants received supported employment services; and highlighted that the, “service duration at which the highest probability of outcomes were achieved with supported employment services, ranged from 20 to 24 months.” The data reported by the CSNA supports the expansion of supported employment services to youth with most significant disabilities, and the time during which supported employment services may be provided under the Rehabilitation Act. The CSNA update also included recommended action strategies to support movement of individuals from subminimum wage employment to supported employment, and the expansion of supported employment services. Specifically, it was recommended that ACCES-VR conduct a robust cost/benefit analysis of the expansion of seamless supported employment programming across State agencies offering supported employment services.

Performance of the Supported Employment Program

A summary analysis of the performance of the Supported Employment program (Appendix C: Supported Employment Program Profile) revealed the following information:

- The percentage of individuals who achieved a supported employment outcome decreased from 26.6 percent, or 3,016 individuals, in FFY 2015 to 25.5 percent, or 2,079 individuals, in FFY 2017; and the percentage of competitive employment outcomes fluctuated from 99.6 percent in FFY 2015 to 98.0 percent in FFY 2017;

- In FFYs 2015 and 2017, over 98 percent of supported employment outcomes were competitive employment outcomes. However, in FFY 2016, 5 percent, or 42 individuals, who achieved supported employment outcomes were not working in competitive employment;
- The top five services provided to individuals in competitive supported employment in 2017 included: job search assistance (84.9 percent); on the job supports (72.5 percent); assessment (45.3 percent); transportation (26.5 percent); and maintenance (19.9 percent); and
- In FY 2017, the average hours worked per week for competitive employment outcomes were 23.8 hours per week, and the median hourly earnings for competitive employment outcomes were \$10.00 per hour for individuals served whose service records were closed after obtaining employment.

C. Observations and Recommendations

RSA's review of the ACCES-VR's performance in this focus area did not result in the identification of observations and recommendations to improve performance.

D. Findings and Corrective Actions

RSA's review of the ACCES-VR's performance in this focus area did not result in the identification of a finding.

E. Technical Assistance

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

Policies and Procedures

RSA reviewed and provided technical assistance specific to ACCES-VR's draft supported employment policies (Section 1310.00, revised November 2017), Supported Employment Guidelines (effective January 2014) and CRS contracts. At the time of the review, supported employment policies (Section 1310.00) defined supported employment services as ongoing support services and other appropriate services that are necessary to obtain and maintain an individual with a most significant disability in supported employment and included the goal of supported employment to be job placement in a competitive integrated setting. In addition, the Supported Employment Guidelines (effective January 2014) and current CRS contracts include the following services as supported employment services: supported employment intake; supported employment assessment and development; supported employment job placement day 5; supported employment job placement day 45; supported employment retention; supported employment retention hours per week; supported employment retention hourly wage; and extended services. Furthermore, CRS 2.0 Contracts (effective July 1, 2018) define supported employment as job placement, onsite assistive technology training, specialized job training, job coaching and individually tailored supervision as supported employment services. The milestones listed in the current CRS contracts above are also reflected in the CRS 2.0 contracts,

including the supported employment quality bonus for hours per week (average 22 hours per week (CRS 2.0 contracts), rather than 30 hours per week (CRS contracts)).

While on-site, RSA provided the following technical assistance to ACCES-VR:

- RSA clarified that job search and placement services are not supported employment services, but rather are VR services that may be provided using Title I funds (not Title VI funds), prior to the provision of supported employment services, which include on-going support services, in order to support and maintain an individual with a most significant disability in a competitive integrated supported employment outcome (see 34 C.F.R. §§ 363.1(a), 363.54, and 363.55). RSA also clarified that ongoing support services may be initiated under an IPE (after job placement), until the individual transitions to extended services (34 C.F.R. § 361.5(c)(37)(iii)).
- RSA further clarified that supported employment program funds (Title VI) may only be used after placing an individual in competitive integrated employment (preamble to the final VR regulations (81 FR 55629, 55706 (August 19, 2016))).
- RSA recommended including in ACCES-VR’s policy definition of “supported employment”, the new provision that supported employment services may be provided for a period of up to 24 months, unless under special circumstances, the eligible individual and rehabilitation counselor jointly agree to extend the time to achieve the employment outcome identified in the IPE.
- RSA provided technical assistance related to the definitions of short-term basis (34 C.F.R. § 361.5(c)(53)(ii)(A) and (B) and § 363.1(c)(1) and (2)); on-going supports (34 C.F.R. § 361.5(c)(37)); extended services (34 C.F.R. § 361.5(c)(19))
- RSA clarified that ACCES-VR should have procedures that include the following new requirements: 1.) Fifty (50) percent of Title VI funds be used for the provision of supported employment and extended services to youth with most significant disabilities to assist those youth in achieving employment in supported employment (Section 603(d) of the Rehabilitation Act and 34 C.F.R. § 363.22); and 2.) Procedures to limit expenditures on administrative costs to 2.5 percent of the State’s supported employment award (Section 603(c) of the Rehabilitation Act and 34 C.F.R. § 363.51).
- RSA provided guidance related to customized employment as defined in 34 C.F.R. § 361.5(c)(11) and the preamble to the final VR regulations (81 FR 55629, 55645-55646, (August 19, 2016)). RSA also provided ACCES-VR with the link to the “Essential Elements of Customized Employment” resource developed by the WINTAC, YTAC and Virginia Commonwealth University.

Supported Employment Contracts and Quality Employment Incentives

Incentive payments were built into the current CRS contracts (effective 2014 through 2018) to improve the quality of employment outcomes achieved by individuals served.

- Established rates of payment (\$400 flat fee) were paid to providers when individuals achieved and maintained supported employment at 30 or more hours per week; and earned \$9.50 (upstate)/\$10.50 (downstate) per hour.
- ACCES-VR’s performance related to median hourly earnings increased from \$8.80 per hour in FFY 2015 to \$10.00 per hour in FFY 2017, and the consistency of average hours

worked for competitive employment outcomes increased slightly from 23.5 hours in FFY 2015 to 23.8 hours in FFY 2017. However, ACCES-VR has removed the median hourly earnings or wage incentive from and lowered the average hours worked per week in the draft CRS 2.0 contract implemented in July 2018.

- The draft CRS 2.0 contract includes a provider bonus when a provider assists an individual with achieving and maintaining employment working 22 or more hours per week.
- While onsite RSA recommended ACCES-VR review its performance data before removing the wage incentive; and lowering the 30 or more hours per week threshold for incentive payments based on average hours worked per week, as the FFY 2015 to FFY 2017 performance related to average hours worked per week (23 hours per week) is above the proposed 22 hour threshold, and median hourly earnings have increased over the three-year period under review.

SECTION 5: FOCUS AREA – ALLOCATION AND EXPENDITURE OF STATE VOCATIONAL REHABILITATION SERVICES AND STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM FUNDS

A. Purpose

Through this focus area RSA assessed the fiscal accountability of the VR and Supported Employment programs to ensure that: funds are being used only for intended purposes; programs have sound internal controls and reliable reporting systems; available resources are maximized for program needs; and funds support the achievement of employment outcomes for individuals with disabilities, including youth with disabilities and individuals with the most significant disabilities.

B. Overview and Analysis

During the onsite visit, ACCES-VR demonstrated the ability of its financial management system to record obligation and payment dates of VR and Supported Employment program expenditures and to track those expenditures to specific periods of funding availability by award to ensure assignment of expenditures to the correct FFY for costs other than those reported as pre-employment transition services.

ACCES-VR's CaMS was developed in-house and is used to track all VR services, except for pre-employment transition services to potentially eligible students. ACCES-VR reported that it is currently in the process of developing a "CaMS-Lite" system to track services to potentially eligible students. ACCES-VR has initiated a procurement process to purchase a new case management system to replace CaMS; however, agency staff estimate they are three years away from completing the acquisition.

ACCES-VR summarized its consumer services accounting processes through a flowchart titled *Individual Consumer Services from Authorization to Payment*. ACCES-VR provided this flowchart to field staff and service providers during trainings to help clarify the authorization process. It begins with a written authorization, and identifies the electronic records ACCES-VR uses to identify units of authorized vendor services, units of vendor services used, reports reviewed, and units approved for payment. Once a unit is approved for payment, the flowchart leads through the steps from voucher generation through scoop transmittals for fiscal processing, batching, issuing payments, and updating the transaction record in the State Financial System. Another flowchart titled *Voucher Processing* shows the central office nightly cycle of database updates, printouts, GAAP and scoop file processing through Oracle Financials, merchandise invoice received reports, and voucher payments.

Many of ACCES-VR's financial management policies and internal controls are located within the *New York State Education Department Adult Career and Continuing Education Services– Vocational Rehabilitation Business Manual*. ACCES-VR developed the manual to assist Business Office Managers (BOMs) with their key responsibilities, which include procuring goods and services to maintain the operation of district offices and to provide goods and services

for consumers as requested by rehabilitation counseling professionals to meet the needs of ACCES-VR consumers. BOMs oversee management at 15 District Offices with 10 satellite offices, located across New York State. The manual defines different processes for managers to use, including case service procurement, district office operation standards for inventory, records disposition, maintenance, consumer equipment repossession, utility bill payment, virtual conferencing, record retention, supervision, staff training, and travel, among others. The procurement processes detail how VR-specific purchasing requirements interface with statewide procurement and acquisition laws and policies. New York has a robust acquisition and procurement system, through which ACCES-VR must process all procurements. During the onsite visit, two BOMs from field district offices described their financial management responsibilities and took questions from RSA staff.

ACCES-VR engages technical support from its designated State agency and New York State's Bureau of Fiscal Management to assist in oversight of VR and Supported Employment financial management requirements that integrate with the New York State Financial System of accounting, particularly regarding match, maintenance of effort (MOE), reallotment, assignment of funds, periods of performance, liquidation, and program income.

C. Findings and Corrective Actions

RSA's review of the ACCES-VR's performance in this focus area resulted in the identification of the following findings and the corresponding corrective action(s) to improve performance.

5.1 Prior Approval Not Obtained

Issue: Did ACCES-VR obtain prior written approval from RSA before purchasing items requiring prior approval? This area of review is included on page 53 of the Federal FY 2018 Monitoring and Technical Assistance Guide (MTAG).

Requirements: 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 in order 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 in 2 C.F.R. § 200.62(a) and 2 C.F.R. § 200.303(a) also requires that the agency have a process, and establish and maintain effective internal control over the Federal award, which 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.

On November 2, 2015, the Department of Education adopted the final regulations found in 2 C.F.R. § 200 (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 grant award notifications for FFY 2015 awards necessitating implementation of these requirements in FFY

2016. The special clause Stated, in pertinent part, “that the prior approval requirements listed in the Uniform Administrative Requirements, Cost 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. Part 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.

Analysis: RSA requested ACCES-VR’s written processes that ensure the agency meets the prior approval requirements. During the onsite review, ACCES-VR informed RSA that no such processes have been developed. To determine whether the lack of processes resulted in noncompliance with the prior approval requirements, RSA reviewed the supporting documentation for recent equipment purchases directly charged to the VR award. RSA found several instances where equipment purchases, which exceeded the State’s threshold for classification of equipment, were charged directly to the award without prior approval.

Conclusion: Based on the analysis, RSA has determined that ACCES-VR was not in compliance with the prior approval requirements pursuant to the Uniform Guidance (2 C.F.R. § 200.407).

Corrective Action Steps:

RSA requires that ACCES-VR:

- 5.1.1 Develop and implement a written internal control process, including a monitoring component, to ensure ongoing compliance with prior approval requirements.

Agency Response: ACCES-VR sent the FFY 2018- 2019 Prior Approval Request Spreadsheet to RSA in September 2018. ACCES-VR is currently developing a written internal control process, including a monitoring component, to ensure ongoing compliance with prior approval requirements. The prior approval internal control process will be finalized by December 1, 2018.

RSA Response: RSA maintains the finding and appreciates ACCES-VR’s commitment to ensuring compliance with prior approval requirements.

Request for Technical Assistance: No Request for Technical Assistance.

5.2 Internal Control Deficiencies

Issue: Did ACCES-VR maintain effective internal control over the Federal award to provide reasonable assurance that it is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the award? This area of review is included on pages 52 and 53 of the MTAG.

Requirement: A State VR agency must assure, in the VR services portion of the Unified or Combined State Plan, that it will employ methods of administration that ensure the proper and efficient administration of the VR program. These methods of administration (i.e., the agency’s

internal controls) must include procedures to ensure accurate data collection and financial accountability (34 C.F.R. § 361.12).

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

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

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

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

In accordance with the Uniform Guidance (2 C.F.R. § 200.302(a)), a State’s financial management systems, including records documenting compliance with Federal statutes, regulations, and the terms and conditions of the award, must be sufficient to permit the:

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

In its guidance “The Role of Internal Control, Documenting Internal Control, and Determining Allowability & Use of Funds,” the 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 non-compliance with Federal and State requirements.

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

A. Inadequate Documentation of Reported Expenditures

- i. **Inadequate Documentation of Pre-employment Transition Services Expenditures** – ACCES-VR reported \$21,366,007 total in Federal VR funds expended on pre-employment transition services in FFY 2017 (reflective of the combined total reported on line 12b of its SF-425 Federal financial report on 9/30 of the year of appropriation of the FFY 2017 award, and on 9/30 of the carryover year of the FFY 2016 award, less the amount reported on line 12b at the end of the year of appropriation of the FFY 2016 award). While onsite, RSA staff asked ACCES-VR to demonstrate how the agency was able to identify the expenditures from its State Financial System reported to RSA as meeting the pre-employment transition services reservation and expenditure of Federal funds requirement. ACCES-VR responded that the amount the agency reports as meeting the reserve is based on its analysis of agency expenditures; however the description provided was limited to a personnel activity report code agency staff use to track time spent on reserve activities in general, and expenditures for case services, identified by case service codes, for the provision of reserve activities. ACCES-VR did not provide documentation of the expenditures it reported as meeting the reserve for authorized or coordination activities, nor did it have a way to differentiate costs to the agency for staff time spent providing required, authorized, and coordination activities.

Because 34 C.F.R. § 361.48(a)(3) States that funds available and remaining after the provision of the required activities may be used for authorized activities, the grantee must have the ability to determine the amount of funds it has expended at any given time on those required and authorized activities to ensure that, consistent with its fiscal forecast, enough funds remain to carry out the provision of required activities statewide through the end of the period of performance of the grant award.

Following the site visit, ACCES-VR staff reported to RSA via email that “the State Financial System does not separate out payments for pre-employment transition services or Supported Employment for youth with the most significant disabilities.” Instead of describing how ACCES-VR is able to identify which expenditures recorded in its State Financial System were reported as meeting the reserve, the agency provided a “data snapshot” of case service authorization counts, amounts authorized, encumbered, and vouchered for FFY 2017 in aggregate. As noted above, the total amount of expenditures ACCES-VR reported as meeting the reserve for this time period was \$21,366,007, yet the amount authorized for the case services provided by ACCES-VR in its breakdown of pre-employment transition case services for the same time period was \$10,761,768. Based on the documentation provided, it is unclear how the agency is able to account for the \$10,604,239 difference. In addition, the agency identified costs for services other than pre-employment transition services as meeting the reserve when it included case service codes for *Coaching Supports for Employment* and *Work-Based Coaching Supports for Students (for employment)* as meeting the reserve. Hence, for FFY 2017, the agency provided supporting documentation for significantly less than half of the costs it reported as meeting the reserve.

Additionally, ACCES-VR indicated that components of some contracts included pre-employment transition services, but staff were unable to identify the actual amount of costs from those contracts assignable to the reserve. The lack of internal control processes to adequately track and account for pre-employment transition service expenditures and Supported Employment service expenditures for youth with most significant disabilities prohibited ACCES-VR from providing supporting documentation demonstrating that it is in compliance with the required reservation and expenditure of funds requirements for the VR and Supported Employment programs.

- ii. **Inadequate Documentation of Obligation Dates** – In response to RSA’s request for a list of Federal expenditures, including obligation and liquidation dates, incurred under its FFY 2016 VR award, ACCES-VR provided RSA a spreadsheet report from its State Financial System. The spreadsheet included a column header titled “Obligation Date” that was generated from the State Financial System; however, the definition of “obligation date” in the State Financial System is different from the definition required by the Education Department General Administrative Regulations (EDGAR) in 34 C.F.R. §76.707.

The *State of New York Comptroller Guide to Financial Operations* provides the following chart to illustrate how the State defines “obligation date” in various situations. This can be found in *Section XII, Expenditures > 5. Agency Payment Preparation and Submittal > G. Entering the Appropriate Obligation and Accounting Dates on Vouchers* (<https://www.osc.State.ny.us/agencies/guide/MyWebHelp/>).

Table 5.2A. New York State Guidelines for Obligation Determination by Types of Payment

If the payment is for:	Then the obligation date is the:
Merchandise (Non Contract)	Date merchandise is received.
Services (Non Contract)	Date services are completed.
Contract payments	Payment dates specified in contract; if none specified, then date(s) goods are delivered or services are completed.
Prepaid Services (i.e., Rents, Subscriptions, Maintenance Contracts)	Date the service begins. If period is not open, end date of current open period.
Inter-agency Vouchers	Obligation date of the bill. Generally this is the Billing Date.

In contrast, EDGAR provides the chart below to illustrate the way obligation dates must be recorded to meet U.S. Department of Education requirements.

Table 5.2B. Obligation Illustration Pursuant To EDGAR 34 C.F.R. §76.707

If the obligation is for -	The obligation is made -
(a) Acquisition of real or personal property	On the date the State or subgrantee makes a binding written commitment to acquire the property.
(b) Personal services by an employee of the State or subgrantee	When the services are performed.
(c) Personal services by a contractor who is not an employee of the State or subgrantee	On the date on which the State or subgrantee makes a binding written commitment to obtain the services.
(d) Performance of work other than personal services	On the date on which the State or subgrantee makes a binding written commitment to obtain the work.
(e) Public utility services	When the State or subgrantee receives the services.
(f) Travel	When the travel is taken.
(g) Rental of real or personal property	When the State or subgrantee uses the property.
(h) A pre-agreement cost that was properly approved by the Secretary under the cost principles in 2 C.F.R. Part 200, Subpart E - Cost Principles	On the first day of the grant or subgrant performance period.

A comparison of these two charts reveals several differences in the way the New York State Financial System records obligation dates versus the way EDGAR requires grantees to track them for grant reporting purposes. For example, the New York State Financial System records the obligation date for equipment purchases on the date the item is delivered, whereas EDGAR requires obligation dates for these purchases to be recorded as the date on which the State makes a binding written commitment to acquire the property. In another example, the information provided by ACCES-VR in its case services “data snapshot” (noted above) identified case service codes by the start date of service, and not by the date on which the State made a binding written commitment to obtain the service, as required by 34 C.F.R. §76.707.

Additional detail concerning the New York State Financial System definition of obligation date can be found in *Section XIV, Special Procedures > 2. Obligation, Accounting and Budget Dates of the State of New York Comptroller Guide to Financial Operation*. This section references the accounting date, which controls the accounting period, and fiscal year in which the transaction will be recorded in the Modified Accrual Ledger and Commitment Control Ledger(s). However, the guide lacks information on how State agencies can use the State Financial System to record obligation dates in a manner consistent with the EDGAR definition for Federal reporting.

The information ACCES-VR provided demonstrated that it is unable to trace funds reported as obligations or as meeting the reserve 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. ACCES-VR provided no evidence that the amounts reported as obligations or as meeting the reserve were assigned to the Federal award within the periods of availability for the obligation and expenditure as required by 2 C.F.R. § 200.302(a), or that the expenditures reported as meeting the reserve were reported based on the date that the funds were obligated, as required by 34 C.F.R. §76.707.

The inability of ACCES-VR to track Federal and non-Federal expenditures to the correct FFY affects RSA's ability to adequately determine ACCES-VR's compliance with Federal matching and maintenance of effort requirements.

B. Late Dispersal of Program Income – ACCES-VR SF-425 Federal financial reports show that program income is not being disbursed prior to the drawdown of additional Federal award funds, as required by 34 C.F.R. §80.21(f)(1). ACCES-VR reported the following amounts of unexpended program income on line 10o of its fourth quarter SF-425 reports for FFYs 2014-2017:

- i. FFY 2014 VR: \$2,180,085
- ii. FFY 2015 VR: \$613,311
- iii. FFY 2016 VR: \$1,994,213
- iv. FFY 2017 VR: \$1,849,285

ACCES-VR has a pattern of drawing down Federal award funds on the same day or next day after it reports unexpended program income. For example, ACCES-VR submitted its FFY 2017 fourth quarter report on October 31, 2017 in which it reported unexpended program income of \$1,849,285, but on the same day it drew down \$2,203,517.18. Similarly, ACCES-VR submitted its FFY 2016 fourth quarter report on November 14, 2017, in which it reported unexpended program income of \$1,994,213, but on the next day it drew down \$149,066.02. In accordance with Federal regulations, ACCES-VR was required to disburse the unexpended program income prior to drawing down additional Federal award funds. ACCES-VR's internal controls must provide for the proper tracking and disbursement of program income in accordance with the Federal requirements.

C. Undocumented, Incomplete or Inaccurate Internal Controls – ACCES-VR's designated State agency, the State Department of Education, provides financial management support to ACCES-VR through its Accounting and Budget Office (ABO) to ensure ongoing compliance with Federal grant and New York State budget requirements related to Federal financial reporting, MOE and match. During the onsite visit, a representative from the ABO provided a verbal overview of the processes behind developing work papers that ACCES-VR uses to populate SF-425 reports. While the representative described business processes and monitoring activities to track MOE, non-Federal share, and carryover balances, and prevent late or inaccurate reporting, none of

the control activities verbally described were documented or otherwise written into ACCES-VR policy.

Given the lack of documented policy, ACCES-VR management and staff have become dependent on the representative to be knowledgeable of, and to carry out, the undocumented business processes and continuous monitoring activities. Not having those processes documented in such a way that ACCES-VR staff could carry them out with the same effectiveness as the ABO representative poses a risk to ACCES-VR's 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). It is important for grantees to maintain up-to-date, clearly written financial management policies and procedures to prevent missteps that may occur as the result of unexpected departures by personnel who ordinarily carry out those procedures. As noted in 2 C.F.R. § 200.302, each State's financial management system must be sufficient to permit the preparation of reports required by the terms and conditions of the award, and the tracing of funds to a level of expenditure adequate to establish that such funds have been used according to Federal requirements.

In addition to undocumented fiscal policies, several key agency policy manuals contain instances of incomplete or inaccurate information, including *FIS-04-04 Cost Effective Strategies* (which is missing 2 C.F.R. part 200 and WIOA updates), *FIS-04-03 Process for Purchasing Transportation Services* (which is missing a description on the limitations for pre-employment transition services), and the *New York State Education Department Adult Career and Continuing Education Services—Vocational Rehabilitation Business Manual* (of which several versions appear to be circulating, the latest of which appeared to have been updated in 2013, and needs 2 C.F.R. part 200 and WIOA updates, including detailed policy for identifying, tracking and reporting pre-employment transition services expenditures).

Conclusion: In the areas noted above, ACCES-VR did not maintain effective internal controls over the Federal award that provide reasonable assurances that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the award, as required by 34 C.F.R. § 361.12 and 2 C.F.R. § 200.303. Specific internal control areas of deficiency, noted above, include documentation of the obligation and liquidation dates of reported expenditures and documentation of control activities to ensure management oversight of MOE, match, and the accurate Federal financial reporting.

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

Corrective Action Steps:

RSA requires that ACCES-VR:

- 5.2.A.i.1 Review pre-employment transition services expenditures reported as meeting the reservation and expenditure of funds requirement for the FFY 2017 and 2018 VR awards to determine a) which costs are identifiable with a recorded obligation and liquidation date, and b) which costs for case service codes for *Coaching Supports for Employment* and *Work-Based Coaching Supports for Students (for employment)* were improperly reported as meeting the reserve, and revise fourth quarter and Final SF-425 reports to ensure only those costs for pre-employment transition services that are allowable and supported by documentation of obligation and liquidation dates are reported on line 12b.
- 5.2.A.i.2 Develop and implement internal control procedures that permit ACCES-VR management the ability to track and account for the amount of funds it has expended on required and authorized pre-employment transition services activities to ensure that, consistent with its fiscal forecast, enough funds remain to carry out the provision of required activities statewide through the end of the period of performance of the grant award.
- 5.2.A.i.3 Develop and implement written internal control procedures to ensure pre-employment transition service contracts identify the specific activities that constitute allowable pre-employment transition services and the specific reporting requirements to permit the required tracking and reporting of pre-employment transition service expenditures.
- 5.2.A.ii Develop and implement written internal controls, including a monitoring component, that enable ACCES-VR to track and report obligation dates in a manner consistent with EDGAR requirements at 34 C.F.R. §76.707.
- 5.2.B Develop and implement a written internal control process, including a monitoring component, to ensure additional Federal funds cannot be drawn down until available program income has been expended.
- 5.2.C.1 Develop written internal control processes and activities for ACCES-VR staff use to ensure the accuracy of Federal financial reports.
- 5.2.C.2 Develop or revise, as necessary, agency policies/procedures to ensure compliance with WIOA and 2 C.F.R. part 200 requirements, together with an ongoing monitoring component to ensure policies comply with changes to Federal law and regulations.

Agency Response: As part of the review and analysis of Pre-ETS expenditures reported on the SF-425, there will be a review of expenditures reported as meeting the 15 percent reserve for FFY 2017 and FFY 2018. Corrections will be made to ensure that fourth quarter and final SF-425 reports contain only allowable costs that can be supported with documentation of obligation and liquidation dates. Costs for “coaching” services that are not Pre-ETS will not be included.

ACCES-VR is currently working to modify its Case Management System (CaMS), VR database and voucher scoop process to categorize case service codes for the purpose of identifying charges which can be made against the Pre-ETS reserve. Concurrently, ACCES fiscal staff are setting up a cost center reserve for Pre-ETS. The cost center will enable ACCES-VR management to monitor funds expended on Pre-ETS to ensure consistency with the fiscal forecast and ensure that funds are available through the end of the grant award period. These changes will be in place by November 2018.

In preparation for the January 1, 2019 start of new CRS contracts, ACCES-VR will be providing training to vendors. Trainings will start in November 2018 and will be available in-person and via webinar. The trainings will cover requirements related to the type of activities that constitute allowable Pre-ETS and specific reporting requirements (including data) that ACCES-VR will incorporate into the SF-425 and RSA-911 submissions.

ACCES-VR has created a procedure to ensure additional Federal funds are not drawn down until available program income has been expended. Fiscal staff will check the Statewide Financial System (SFS) 428 Report on a bi-weekly basis. This report tracks revenue from Social Security. Fiscal staff will expend program income in a timely manner taking into consideration expenses that need to be vouchered to revenue.

ACCES-VR utilizes SFS to report financial transactions and obligations to vendors. SFS and EDGAR define obligation dates differently. Reconciling the differences between SFS and EDGAR require consultation with the State Education Department Financial Management Office.

RSA Response: RSA maintains the finding and appreciates ACCES-VR's willingness to address internal control deficiencies. RSA is available to provide technical assistance, as requested.

Request for Technical Assistance: ACCES-VR staff will request technical assistance as differences between SFS and EDGAR are resolved.

D. Technical Assistance

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

During the onsite review, ACCES-VR requested an explanation of the prior approval topics listed at 2 C.F.R. § 200.407. RSA staff provided the agency informal guidance concerning the applicability to ACCES-VR of each of the prior approval topics. ACCES-VR staff noted that New York State has a robust and tightly-controlled system of contracting and procurement, and that it might benefit both RSA and ACCES-VR for RSA to take this into consideration when processing prior approval requests for costs that must be vetted through the State's procurement process.

To assist ACCES-VR in developing internal controls in response to finding 5.2, RSA recommends that management review the document *The Role of Internal Control, Documenting Internal Control, and Determining Allowability & Use of Funds*, which is available at ed.gov at <https://www2.ed.gov/policy/fund/guid/uniform-guidance/fundsguidance.pdf>. RSA recently published *TAC-18-02, Submission Procedures for Prior Written Approval Requests under the State Vocational Rehabilitation (VR) Services Program*, which describes alternative prior approval submission procedures for certain items of cost. This is available at rsa.ed.gov here: <https://www2.ed.gov/policy/speced/guid/rsa/subregulatory/tac-18-02.pdf>. Additional resources concerning prior approval for RSA grants are available at the National Clearinghouse of Rehabilitation Training Materials website at the following address: <https://ncrtm.ed.gov/SearchResults.aspx?st=RSA+Technical+Assistance+on+Prior+Approval>

RSA referred the agency to an FAQ resource published on the RSA website that covers a number of questions concerning Federal requirements for VR awards in relation to the period of performance and availability of Federal funds under a given FFY. This resource, titled “Period of Performance for Formula Grant Awards FAQs” is available at the following internet address:
<https://www2.ed.gov/print/about/offices/list/osers/rsa/formula-period-of-performance-faqs.html>

SECTION 6: FOCUS AREA – JOINT WORKFORCE INNOVATION AND OPPORTUNITY ACT FINAL RULE IMPLEMENTATION

A. Purpose

The Departments of Education and Labor issued the Workforce Innovation and Opportunity Act (WIOA) Joint Rule for Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions; Final Rule (Joint WIOA Final Rule) to implement Title I of WIOA. These joint regulations apply to all core programs of the workforce development system established by Title I of WIOA, and the joint regulations are incorporated into the VR program regulations through Subparts D, E, and F of 34 C.F.R. part 361.

WIOA strengthens the alignment of the public workforce development system's six core programs through unified strategic planning requirements, common performance accountability measures, and requirements governing the one-stop delivery system. WIOA places heightened emphasis on coordination and collaboration at the Federal, State, local, and tribal levels to ensure a streamlined and coordinated service delivery system for job seekers, including those with disabilities, and employers.

In FFY 2018, the Employment and Training Administration in the U.S. Department of Labor, the Office of Career, Technical, and Adult Education in the U.S. Department of Education, and RSA developed the "WIOA Shared Monitoring Guide." RSA incorporated its content into the FFY 2018 monitoring of the VR program in this focus area. RSA assessed the VR agency's progress and compliance in the implementation of the Joint WIOA Final Rule through this focus area.

B. Implementation of WIOA Joint Final Rule

This focus area consists of the following topical areas: WIOA Partnership; Governance; One-Stop Operations; and Performance Accountability. To gather information pertinent to these topics, RSA staff reviewed a variety of documents including the PY 2016 Unified State Plan; Memoranda of Understanding (MOUs) including the One-Stop Center Operating Budget and Infrastructure Funding Agreement (IFA) related to the one-stop service delivery system; and other supporting documentation related to the four topical areas.

WIOA Partnership

WIOA requires States and local areas to enhance coordination and partnerships with local entities and supportive service agencies for strengthened service delivery, including through Unified/Combined State Plans. Beyond the partnerships reflected in the Governance and One-Stop Operations sections of this focus area, Federal partners thought it was important for Federal agencies to inquire about the broader partnership activities occurring to implement many of the approaches called for within WIOA, such as career pathways and sector strategies. These require robust relationships across programs and with businesses, economic development, education, and training institutions, including community colleges and career and technical education local entities and supportive service agencies. Exploring how these activities are led and sustained may be useful in assessing how these initiatives are progressing within a State.

State partners have made progress in their efforts to engage with businesses and other stakeholders in partnerships for the purposes of unified planning, career pathway development and apprenticeships, sector strategies, and other related workforce development activities.

The partners established an interagency Business Workgroup, which includes the NYSDOL Business Services Unit and representatives from both ACCES-VR and the NYSCB, the VR agencies in the State. As discussed in greater detail later in this report, the partners are using the One-Stop Operating System (OSOS) to track and analyze their efforts in engaging business. In terms of sector strategies, the State partners have partnered with the State's Regional Economic Development Councils to begin to ensure that the education and training services, provided in the workforce development system, align with the in-demand occupations and careers in differing regions of the State. ACCES-VR reported that it is also training its VR personnel, in partnership with the University of Buffalo, around 21st Century Knowledge including how to interpret labor market information. Finally, the partners established an interagency Training and Assistance Workgroup to enhance awareness of each workforce development program in the State. For example, the Adult Education program recently provided training for ACCES-VR's transition-age youth VR counselors and Community Employment Specialists.

To support and maintain these partnerships, the State partners have not established a memorandum of understanding or formal agreement. Rather, the partners established the WIOA Interagency Team in 2014, following the passage of WIOA, which serves as the coordinating group for a variety of interagency workgroups:

- Accessibility Workgroup;
- Business Engagement Workgroup;
- Customer Outreach Workgroup;
- Training Workgroup;
- MOU Workgroup;
- Data Integration Workgroup;
- Referral and Release Workgroup; and
- Youth Workgroup.

NYSDOL has historically served as the convener of the WIOA Interagency Team and the workgroups. ACCES-VR reported that it has staff on each of these workgroups with the Youth Workgroup being the most recent to form.

Governance

State Workforce Development Boards (SWDBs) and Local Workforce Development Boards (LWDBs), which should include representation from all six core programs, including the VR program, set strategy and policies for an aligned workforce development system that partners with the education continuum, economic development, human services, and businesses. The VR representative on the SWDB must be an individual who has optimum policy making authority for the VR program. Further, each LWDB is required to have at least one representative from programs carried out under Title I of the Rehabilitation Act of 1973 (other than Section 112 or part C of that Title).

SWDB

The SWDB, which is titled the State Workforce Investment Board in New York, plays a key role in leading the State's implementation of WIOA. The Commissioner of the New York State Education Department, who also serves as the President of the University of the State of New York, represents the State VR program on the SWDB. The New York State Department of Labor administers funding for the SWDB and provides staff resources for it.

LWDB

There are 33 LWDBs established to represent each local workforce area in the State of New York. ACCES-VR's regional coordinators and district office managers represent the VR program on each of these 33 Local Boards. During the onsite monitoring review, ACCES-VR indicated having a productive working relationship with the LWDBs that assists in meeting the requirements set forth in WIOA.

One-Stop Operations

The one-stop delivery system brings together workforce development, educational, and other human resource services in a seamless customer-focused service delivery network that enhances access to services and improves long-term employment outcomes for individuals receiving assistance. One-stop partners administer separately funded programs as a set of integrated streamlined services to customers.

In documents ACCES-VR submitted prior to the onsite monitoring review and in discussions onsite with its State partners, ACCES-VR demonstrated that it has made progress in implementing the requirements related to the one-stop service delivery under WIOA, but ACCES-VR and its partners also acknowledged that there is room for growth.

Under the Workforce Investment Act (WIA), some ACCES-VR staff were co-located with NYSDOL-funded staff under Titles I and III of WIOA in one-stop centers. Under WIOA, ACCES-VR is building upon those relationships and expanding the delivery of VR services across the comprehensive one-stop centers in the State. While some ACCES-VR staff are physically present in comprehensive centers, other staff, including VR counselors, may visit the centers on a weekly basis or are assigned to centers as liaisons. This accounts for a variety of ways in which ACCES-VR provides the applicable career services, under the VR program, to job-seekers and workers in comprehensive centers. Similar to VR services coordinated by ACCES-VR outside the context of the one-stop service delivery system, ACCES-VR may work with applicants or eligible individuals with disabilities to coordinate the wide array of VR services necessary to assist the individual in meeting his or her career goal in one-stop centers if the individual accesses the VR program there. However, ACCES-VR shared that many of the VR services it provides often take place elsewhere, such as CRPs, schools, work sites, and other locations in the community. ACCES-VR said it remains committed to the model of delivering VR services in the most-integrated setting possible with providers and entities who specialize in working with individuals with significant or most significant disabilities.

To provide an example of how ACCES-VR collaborates with State partners, ACCES-VR provided RSA with MOUs from four of the 33 local workforce areas:

- Finger Lakes Workforce Development Area;
- Genesee, Livingston, Orleans, Wyoming Workforce Development Board;
- New York City Workforce Development Area; and
- Oswego County Workforce Development System.

ACCES-VR reported that it was typically a district office manager or regional coordinator who negotiated with the LWDB in developing MOUs for the one-stop service delivery system. Because ACCES-VR is a component of the NYSED, the Executive deputy commissioner of NYSED served as the signatory for ACCES-VR on the MOUs.

During the onsite monitoring review, a representative from ACCES-VR's Rochester district office discussed with RSA how State partners in the Finger Lakes Workforce Development Area, where the ACCES-VR office is co-located in the Geneva Career Center, have begun to develop integrated service delivery strategies. For example, this area has developed an interagency referral form which partners use to refer individuals across workforce programs, which has led to some instances of co-enrollment.

ACCES-VR and its partners reported that while they strived to meet the July 1, 2017, deadline set by the U.S. Departments of Education and Labor for having WIOA-compliant MOUs in place, the State had only fully executed 17 of 33 MOUs at the time of the onsite monitoring review. State partners explained that the 16 outstanding MOUs were operational, but that the chief elected officials (e.g., county executives) in those particular local workforce areas had yet to sign the MOUs.

Furthermore, at the time of the onsite monitoring review, State partners reported that they had not finalized IFAs, a component of the one-stop operating budget, for any of the 33 local workforce areas in New York. While they acknowledged the January 1, 2018 deadline set by the U.S. Departments of Education and Labor, the partners discussed the extensive amount of time and resources they had dedicated to developing guidance for local workforce areas to follow and the effort they have invested to ensure that State partners are contributing to these costs equitably. State partners said they established a deadline of March 30, 2018, for each local workforce area to have WIOA-compliant IFAs in place. The partners also said they intend to negotiate each IFA using the local funding mechanism, and they have no reason to believe any local workforce area will trigger the State funding mechanism as a result of an impasse in the negotiation.

Before RSA met with ACCES-VR onsite, ACCES-VR provided RSA with draft guidance and a template document, titled "New York State Local Workforce Development Area Infrastructure Funding Memorandum of Understanding," dated December 22, 2017. During the onsite monitoring review, State partners provided RSA with a draft of Technical Advisory #18-3 titled, "Local Workforce Development Area (LWDA) Memorandum of Understanding (MOU)," (undated), and explained that this joint guidance would soon be issued to the stakeholders in the State. ACCES-VR informed RSA then that it anticipated publishing the guidance on February

23, 2018; however, the partners did not publish it until March 16, 2018. The guidance details the State partners' expectations for what they have termed the "Service Delivery MOU Component" and the "Infrastructure Funding MOU Component." In completing these components, the guidance refers local workforce areas to the previously mentioned template, which is no longer in draft and dated January 24, 2018. For the IFA, the State partners established the deadline of March 30, 2018, and set forth steps they will follow if a local workforce area fails to meet this deadline.

Performance Accountability

Section 116 of WIOA establishes performance accountability indicators and performance reporting requirements to assess the effectiveness of States and local areas in achieving positive outcomes for individuals served in the workforce development system. WIOA requires that these requirements apply across all six core programs, with a few exceptions. RSA reviewed the VR agency's progress and implementation of performance accountability measures and data sharing and matching requirements.

In New York, State partners hold regular meetings to discuss performance accountability topics. The partners have identified several concerns related to performance accountability that each workforce agency needs to address internally as well as general concerns related to the joint reporting that need to be resolved by the State partners collectively. ACCES-VR reported that a key concern is actually gathering the data to report. ACCES-VR indicated that, even with time provided by RSA to obtain baseline information, it has been difficult to get agreements signed to access certain data. In particular, the VR agencies in New York have never reported on those individuals who have exited the VR program, and collecting information after exit is a challenging concept for the agencies. Further, ACCES-VR indicated that it will also be necessary to analyze and use the results when available. For NYSDOL, ACCES-VR reported that the changes to the wage data numerator and denominator definitions have been significant.

ACCES-VR also reported that they are challenged with the data received through UI wage sharing agreements because it is on a two-quarter lag. For the VR program, ACCES-VR said it will be necessary to acquire some foundational data before it is able to clearly identify trends that could be used to determine need for change.

Effectiveness in Serving Employers

The State partners selected the Repeat Business and Business Penetration approaches in collecting data on the "Effectiveness in Serving Employers" measure; the partners have not added a State-specific approach. In New York, the core programs came to agreement on which Federal approaches to use and how to establish the expected level of performance. The partners discussed each approach and, through consensus, they decided that "retention," though extremely important, did not seem to tie as directly to what State agencies could specifically do for business. ACCES-VR reported that the partners felt that there are simply too many variables involved in why an individual might not continue at a particular job. Specifically, ACCES-VR communicated that some of those reasons could be positive, such as the individual received a job promotion, or neutral, such as the individual needed to move due to family issues, or hospitalization or incarceration. ACCES-VR explained that the fact that an employer did not

retain an individual may not have been because the employer had not been well served by the workforce development system. The partners designated NYSDOL to be the lead agency for collection and reporting of the data for this shared outcome because NYSDOL already had a robust system in place for collecting business engagement data. NYSDOL provided management of ACCES-VR and NYSCB with a demo of their business engagement system, and the VR agencies decided that they would enter their business data into the existing system. ACCES-VR explained that NYSDOL modified their system to incorporate details needed by the VR agencies and added fields for VR data entry. At the time of the onsite visit, ACCES-VR said that both VR agencies expect to be entering the business data into the system by March or April, 2018.

Unique Identifier, Co-Enrollment, and Additional Measures

The State partners are discussing options for establishing a unique identification number to be retained by the same individual across multiple programs; however, given the number and complexity of their current systems, ACCES-VR reported that this has not yet been operationalized.

ACCES-VR reported that the State partners do not currently have a mechanism to track co-enrollment across programs, in accordance with 34 C.F.R. §677.160, except for when participants provide a self-report.

The State partners decided not to establish additional performance indicators for the six core programs; however, each partner is tracking additional information as necessary for their own agency purposes.

Data Matching and Sharing

NYSDOL uses quarterly wage information to obtain wage information for the primary indicators of performance. ACCES-VR and NYSDOL recently executed a data sharing agreement for unemployment insurance data. However, there are still some issues to be resolved as per NYSDOL. Namely, according to ACCES-VR, NYSDOL determined that ACCES-VR cannot re-disclose the disaggregated data to RSA unless there is a confidentiality agreement executed between RSA and NYSDOL. ACCES-VR and its partners acknowledged that there is still work to be completed around data sharing to meet the regulatory provisions in WIOA. RSA has identified this as technical assistance for both NYSDOL and ACCES-VR.

In New York, the Governor has not designated a State agency to assist the core agencies in carrying out performance reporting related to facilitating data matches, data quality reliability, and protection against disaggregation that would violate privacy provisions. Rather, this work is being coordinated by the WIOA interagency team of State workforce programs. NYSDOL is currently participating in the Wage Record Interchange System (WRIS) data sharing agreement, and the partner agencies plan to establish data sharing agreements with NYSDOL to receive this data as well.

While the Federal agencies plan for the new State Wage Interchange System (SWIS) to facilitate the interstate exchange of wage data between and among participating States for the purpose of assessing and reporting on State and local performance for the programs authorized under WIOA, the State partners indicated that preliminary information leads them to believe that they

would require a modification to participate in the SWIS as they understand their State laws to be more restrictive.

The State is allowing the use of supplemental wage data for verifying performance outcomes; however, not all core programs have decided how they will implement these procedures. The New York State Department of Labor and NYSCB use supplemental wage data for performance outcomes, but ACCES-VR has not yet made a determination on this issue.

To access and integrate supplemental wage data into its performance calculations, NYSDOL's case management system, the OSOS, allows staff to document the supplemental wages within the case management system and requires verification documentation. Given that data is documented in the case management system, the partners said that it is automatically included when the PIRL file is generated. ACCES-VR, however, has not modified its case management system to collect this documentation.

In terms of progress the State has made toward the creation of information technology solutions such as data system interfaces, the WIOA Interagency Data Integration Workgroup has been tasked with fulfilling the joint reporting requirements under WIOA, but is also discussing other performance accountability issues. The State partners reported that there are several concerns and barriers the group has with regard to performance accountability. The first barrier remains changing reporting requirements and ensuring their systems undergo consistent changes to align with reporting requirements. The second barrier, which the State partners reported, is the inconsistent guidance they have determined they received from their cognizant Federal agencies. Additionally, the State partner's preliminary exploration of a single case management system led to concerns about the data each system collects that is not part of the joint reporting requirements, the costs of such a system, and confidentiality issues. The Data Integration Workgroup meets monthly to discuss progress and opportunities to develop a data sharing agreement.

As it relates to State mechanisms to monitor performance across core partners to identify performance issues that may affect the State's ability to meet its performance targets, the State partners reported that this remains a challenging task for the State where several case management systems are used. The State partners reported that they are working toward data sharing agreements to strengthen their abilities in this area and they have committed to use one system for reporting on business engagement. NYSDOL has modified the OSOS to include ACCES-VR and NYSCB services, and staff have been provided with the required confidentiality training. NYSCB signed its agreement, while at the time of the onsite visit ACCES-VR expected to sign its agreement with NYDSOL in the near future.

C. Observations and Recommendations

RSA's review of the ACCES-VR's performance in this focus area did not result in the identification of any observations and recommendations to improve performance.

D. Findings and Corrective Actions

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

Finding 6.1: Memoranda of Understanding and Infrastructure Funding Agreements

Issue: Has ACCES-VR executed MOUs, including IFAs, with each of the LWDBs and the one-stop partners satisfying 34 C.F.R. § 361.420 and 34 C.F.R. § 361.500 and policy guidance issued jointly by the U.S. Departments of Education and Labor.

Requirement: The DSU has sole responsibility for the VR program's participation as a partner in the one-stop service delivery system (34 C.F.R. §§ 361.13(c)(1)(v) and 361.13(c)(2)).

As a required one-stop partner pursuant to 34 C.F.R. § 361.420, the DSU must:

- Provide access to the VR program through the one-stop delivery system, in addition to any other appropriate locations;
- Use a portion of its funds, consistent with the Rehabilitation Act and with Federal cost principles in 2 C.F.R. parts 200 and 3474 (requiring, among other things, that costs are allowable, reasonable, necessary, and allocable), to
 - Provide applicable career services; and
 - Work collaboratively with the State Board and LWDBs to establish and maintain the one-stop delivery system. This includes jointly funding the one-stop infrastructure through partner contributions that are based upon:
 - A reasonable cost allocation methodology by which infrastructure costs are charged to each partner based on proportionate use and relative benefit received;
 - Federal cost principles; and
 - Any local administrative cost requirements in the Federal law authorizing the partner's program. (This is further described in 34 C.F.R. § 361.700.)
- Enter into an MOU with the LWDBs relating to the operation of the one-stop delivery system that meets the requirements of 34 C.F.R. § 361.500(b);
- Participate in the operation of the one-stop delivery system consistent with the terms of the MOU, requirements of authorizing laws, the Federal cost principles, and all other applicable legal requirements; and
- Provide representation on the State Board and LWDBs as required and participate in Board committees as needed.

Pursuant to 34 C.F.R. § 361.500(a), the MOU is the product of local discussion and negotiation. It is an agreement developed and executed between the LWDB and the one-stop partners, with the agreement of the chief elected official and the one-stop partners, relating to the operation of the one-stop delivery system in the local area. In accordance with 34 C.F.R. § 361.500(b), each MOU must contain:

- A description of services to be provided through the one-stop delivery system, including the manner in which the services will be coordinated and delivered through the system;
- Agreement on funding the costs of the services and the operating costs of the system, including:
 - Funding of infrastructure costs of one-stop centers in accordance with 34 C.F.R. §§ 361.700 through 361.755; and

- Funding of the shared services and operating costs of the one-stop delivery system described in 34 C.F.R. § 361.760;
- Methods for referring individuals between the one-stop operators and partners for appropriate services and activities;
- Methods to ensure that the needs of workers, youth, and individuals with barriers to employment, including individuals with disabilities, are addressed in providing access to services, including access to technology and materials that are available through the one-stop delivery system;
- The duration of the MOU and procedures for amending it; and
- Assurances that each MOU will be reviewed, and if substantial changes have occurred, renewed, not less than once every 3-year period to ensure appropriate funding and delivery of services.

The MOU may contain any other provisions agreed to by the parties that are consistent with Title I of WIOA, the authorizing statutes and regulations of one-stop partner programs, and the implementing regulations of WIOA (34 C.F.R. § 361.500(c)). When fully executed, the MOU must contain the signatures of the LWDB, one-stop partners, the chief elected official(s), and the time period in which the agreement is effective. The MOU must be updated not less than every 3 years to reflect any changes in the signatory official of the Board, one-stop partners, and chief elected officials, or one-stop infrastructure funding (34 C.F.R. § 361.500(d)). If a one-stop partner appeal to the State regarding infrastructure costs, using the process described in § 361.750, results in a change to the one-stop partner's infrastructure cost contributions, the MOU must be updated to reflect the final one-stop partner infrastructure cost contributions (34 C.F.R. § 361.500(e)).

The U.S. Departments of Education and Labor (the Departments) provided extensive guidance regarding the operation of the one-stop service delivery system and the funding of its infrastructure costs in the joint regulations ([Federal Register notice 81 FR 55791](#)), published August 19, 2016. On December 27, 2016, the Departments published a set of frequently asked questions related to the one-stop service delivery system. In this guidance, the Departments indicated that in order to have MOUs in place for Program Year (PY) 2017, which began on July 1, 2017, LWDBs and one-stop partners must enter into MOUs that align with the requirements of WIOA, except for the final IFA, by June 30, 2017. The Departments also indicated that DOL used its transition authority in Section 503(b) of WIOA to extend the implementation date of the final IFAs for PY 2017. With this extension, final IFAs were to be in place no later than January 1, 2018. However, the Departments explained that Governors had the discretion to require local areas to enter into final IFAs at any time between July 1, 2017 and January 1, 2018. During the extension period, local areas were allowed to use existing funding agreements in place for PY 2016, with any such modifications as the partners may have agreed to, to fund infrastructure costs in the local area. On January 18, 2017, the Departments issued formal policy guidance, which RSA published as technical assistance circulars: RSA-TAC-17-02 and RSA-TAC-17-03. In RSA-TAC-17-02, the Departments reiterated the extended IFA deadline of January 1, 2018.

Analysis: New York has established 33 local workforce areas across the State. During the monitoring review, RSA requested four MOUs from local workforce areas to assess ACCES-

VR's progress in implementing the joint one-stop requirements for purposes of the VR program, including those regarding funding the one-stop system's infrastructure costs.

Prior to the onsite monitoring review, ACCES-VR provided RSA the following MOUs:

- Finger Lakes Workforce Development Area
- Genesee, Livingston, Orleans, Wyoming Workforce Development Board
- New York City Workforce Development Area
- Oswego County Workforce Development System

Each of the four MOUs satisfied most of the one-stop MOU requirements identified in 34 C.F.R. § 361.500, and they were fully executed by July 1, 2017. Each MOU contained a "Career Services System Operating Budget;" however, none of the MOUs contained a final IFA as required by 34 C.F.R. §§ 361.700 through 361.755.

During onsite discussions with ACCES-VR and its State workforce partners – the New York State Department of Labor (NYSDOL) administering Titles I and III of WIOA and AEPP administering Title II of WIOA – the State workforce partners acknowledged that they had fully executed MOUs in 16 of the 33 local workforce areas. In those 17 local workforce areas where a MOU was not fully executed, NYSDOL explained that this is due to a lack of some or all of the required signatures on the MOU. NYSDOL further explained that these MOUs are, in effect, operational while the signatures are collected. ACCES-VR and its partners did not provide a date as to when these 17 MOUs would be fully executed, but they explained that they were actively trying to remedy the situation. As of April 11, 2018, during the development of this report, RSA confirmed that 12 of these 17 local areas still do not have fully executed MOUs in place. NYSDOL requested technical assistance related to how other States have secured the required signatories; RSA responded that it would inform its Federal partners of this request.

While onsite, ACCES-VR and its partners informed RSA that they have not finalized IFAs in any of the 33 local workforce areas. The State partners indicated that they plan to issue joint guidance on the development of IFAs including a template for local workforce areas to use. ACCES-VR provided a copy of this guidance to RSA during the onsite visit and Stated that it would be issuing it as soon as possible. The State partners said they plan to finalize IFAs in all of the local workforce areas by April 1, 2018. In following up on this issue, RSA confirmed that as of April 11, 2018, none of the 33 local areas have final IFAs in place, as required by Title I of WIOA and its implementing regulations. State partners reported that 23 of the 33 local workforce areas submitted IFAs for review; however, the State partners had not yet approved any of them. Finally, State partners indicated some local workforce areas requested extensions beyond their April 1, 2018 deadline.

Conclusion: As explained in this analysis, at the time of the onsite monitoring review, ACCES-VR did not meet the joint one-stop requirements regarding the development and implementation of MOUs and final IFAs with each local workforce area in the State, as required by 34 C.F.R. §§ 361.420 and 361.500. At the time of the onsite visit, the State had failed to fully execute 17 of the 33 required MOUs and had failed to develop and implement final IFAs in all 33 local areas. Since that time, the State executed an additional five MOUs and did not finalize IFAs in any of the local workforce areas.

Corrective Action Steps:

RSA requires that ACCES-VR:

- 6.1.1 Finalize MOUs with those local workforce areas that do not have fully executed MOUs in accordance with 34 C.F.R. § 361.500; and
- 6.1.2 Finalize IFAs for each of the State’s local workforce areas in accordance with 34 C.F.R. §§ 361.700 through 361.755.

Agency Response: At this time, 27 out of 33 MOUs have been fully executed. In addition, 33 IFAs are being reviewed by the WIOA partners.

RSA Response: RSA maintains the finding specific to joint one-stop requirements regarding the development and implementation of MOUs and final IFAs with each local workforce area in the State, and is available to provide technical assistance, as requested.

Request for Technical Assistance: Given the joint roles of the U.S. Department of Labor and RSA as it relates to implementation of the WIOA Joint Final Rule, the WIOA partners in NYS would benefit from technical assistance in this area.

E. Technical Assistance

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

ACCES-VR and the NYSCB, which administer the VR program – one of the core workforce development programs that are authorized under the Rehabilitation Act, as amended by Title IV of WIOA, are housed in the NYSED and the New York State Office of Children and Family Services, respectively. NYSED also houses the AEPP – another core workforce development program authorized under Title II of WIOA. NYSED is overseen by a Commissioner who also serves as the President of the University of the State of New York. Programs housed within NYSED are administered by a Deputy Commissioner or Assistant Commissioner specific to that program.

During RSA’s onsite monitoring of the VR program, RSA learned that ACCES-VR and NYSCB are both represented on the State Workforce Development Board (State Board) by the Commissioner of NYSED, who also represents AEPP – the Adult Education and Family Literacy Act (AEFLA) program authorized under Title II of WIOA.

Section 101(b)(1)(C)(iii)(I)(aa) of WIOA requires that the State Board be comprised of, among others, representatives from “the lead State officials with primary responsibility for the core programs” (see also 20 C.F.R. §679.110(b)(3)(iii)(A)(1)). The preamble to the final regulations explains further that 20 C.F.R. §679.110(b)(3)(iii)(A)(1)(i) through (iii) were modified for purposes of the final regulations to make clear that the Title II AEFLA and the Title IV VR programs must each be represented by a single, unique representative (see 81 FR 56072, 56074

(Aug. 19, 2016)). In other words, one representative cannot represent both core programs, as is done in New York.

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

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

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

Therefore, the State Board has failed to comply with Section 101(b) of WIOA and 20 C.F.R. §679.110(b)(3)(iii)(A)(1)(iii) of its implementing regulations by having the Commissioner of NYSED represent both the Adult Education and VR programs on the State Board. After consultation with DOL and the U.S. Department of Education’s Office of Career, Technical, and Adult Education on this matter, RSA recommends that New York revise its State Board composition by appointing either the ACCES-VR or NYSCB director to the State Board to represent the VR program. Enforcement of this matter falls under the jurisdiction of DOL.

APPENDIX A: PROGRAM AND FISCAL PERFORMANCE DATA TABLES

This appendix contains the program and fiscal performance data tables used throughout the review. Data were drawn from the RSA-113 (Quarterly Cumulative Caseload Report), the RSA-911 (Case Service Report), and SF-425 (Federal Financial Report). The RSA-113 report is a quarterly submission that provides cumulative information at the end of the Federal fiscal year. The data from the RSA-113 cover both open and closed cases as reported to RSA at the end of the Federal fiscal year. The RSA-911 contains information on cases closed during the Federal fiscal year covered by the report and does not include information related to those cases remaining open in the next Federal fiscal year.

Program Performance Tables for Focus Area III

Vocational Rehabilitation Program Federal Fiscal Year (FFY) 2017 Monitoring and Technical Assistance Guide

Table 1. ACCES-VR Summary Statistics from RSA 113: FFYs 2015-2017

Row	Performance category	2015	2016	2017
1	Number of total applicants	40,336	45,715	44,642
2	Number of total eligible individuals	37,818	41,103	39,229
3	Agency implementing order of selection (Yes/No)	No	No	No
4	Number of individuals on order of selection waiting list at year-end	0	0	0
5	Percent eligible of individuals had IPE who received no services	21.2%	21.1%	22.5%
6	Number of individuals in plan receiving services	57,259	61,049	61,478

Data source: RSA-113

Table 2a. ACCES-VR Case Status Information, Exit Status, and Employment Outcomes for All Individuals at Closure-FFYs 2015-2017

Row	Performance category	2015 Number	2015 Percent	2016 Number	2016 Percent	2017* Number	2017 Percent
1	Exited as applicants	6,114	18.1%	7,996	21.8%	6,567	20.3%
2	Exited from trial work experience	630	1.9%	477	1.3%	307	0.9%
3	Exited with employment	11,284	33.4%	11,272	30.7%	7,995	24.8%
4	Exited without employment	7,713	22.8%	8,322	22.6%	10,908	33.8%
5	Exited without employment outcomes, after eligibility, before an IPE was signed or before receiving services	8,033	23.8%	8,685	23.6%	6,514	20.2%
6	Employment rate*		59.4%		57.5%		42.3%
7	Competitive employment outcomes	11,018	97.6%	10,626	94.3%	7,793	97.5%
8	Average hourly earnings for competitive employment outcomes**	\$11.47		\$12.10		\$12.64	
9	Average hours worked for competitive employment outcomes	29.3		29.5		29.2	
10	Median hourly earnings for competitive employment outcomes	\$10.00		\$10.00		\$11.00	
11	Median hours worked for competitive employment outcomes	30.0		30.0		30.0	
12	Quarterly median earnings for competitive employment outcomes***	\$3,900.00		\$4,251.00		\$4,368.00	
13	Competitive employment outcomes meeting SGA	6,584	59.8%	6,598	62.1%	4,757	61.0%
14	Competitive employment outcomes with employer-provided medical insurance	1,837	16.7%	1,519	14.3%	1,116	14.3%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*Using RSA-911: Total number of individuals who exited with employment divided by total number of individuals who received services multiplied by 100.

**Using RSA-911: Sum of the Weekly Wage at Closure / sum of the Hours Worked in a Week at Closure for individuals achieving a competitive employment outcome.

***Using RSA-911: Weekly earnings at closure (Data Element 197) multiplied by hours worked in a week at closure (Data Element 198) for individuals who achieved a competitive employment outcome multiplied by 13. Then the values are listed in order, from the lowest to the highest value. The value in the middle of this list is the median quarterly earnings, so there is the same quantity of numbers above the median number as there is below the median number.

Table 2b. ACCES-VR Case Status Information, Exit Status, and Employment Outcomes for Individuals below Age 25 at Closure -FFYs 2015-2017

Row	Performance category	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
1	Exited as applicants	2,437	18.3%	2,844	19.5%	2,361	18.7%
2	Exited from trial work experience	223	1.7%	185	1.3%	113	.9%
3	Exited with employment	4,428	33.2%	4,461	30.5%	3,191	25.2%
4	Exited without employment	2,742	20.6%	3,120	21.4%	4,168	33.0%
5	Exited without employment outcomes, after eligibility, before an IPE was signed or before receiving services	3,495	26.2%	3,998	27.4%	2,811	22.2%
6	Employment rate*		61.8%		58.8%		43.4%
7	Competitive employment outcomes	4,411	99.6%	4,263	95.6%	3,118	97.7%
8	Average hourly earnings for competitive employment outcomes**	\$10.34		\$11.04		\$11.38	
9	Average hours worked for competitive employment outcomes	29.0		29.4		29.2	
10	Median hourly earnings for competitive employment outcomes	\$9.00		\$10.00		\$10.00	
11	Median hours worked for competitive employment outcomes	30.0		30.0		30.0	
12	Quarterly median earnings for competitive employment outcomes***	\$3575.00		\$3,900.00		\$3,900.00	
13	Competitive employment outcomes meeting SGA	2,479	56.2%	2,530	59.3%	1,805	57.9%
14	Competitive employment outcomes with employer-provided medical insurance	638	14.5%	506	11.9%	390	12.5%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*Using RSA-911: Total number of individuals who exited with employment divided by total number of individuals who received services multiplied by 100.

**Using RSA-911: Sum of the Weekly Wage at Closure / sum of the Hours Worked in a Week at Closure for individuals achieving a competitive employment outcome.

***Using RSA-911: Weekly earnings at closure (Data Element 197) multiplied by hours worked in a week at closure (Data Element 198) for individuals who achieved a competitive employment outcome multiplied by 13. Then the values are listed in order, from the lowest to the highest value. The value in the middle of this list is the median quarterly earnings, so there is the same quantity of numbers above the median number as there is below the median number.

Table 2c. ACCES-VR Case Status Information, Exit Status, and Employment Outcomes for Individuals Age 25 and Older at Closure -FFYs 2015-2017

Row	Performance category	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
1	Exited as applicants	3,675	18.0%	5,150	23.3%	4,206	21.4%
2	Exited from trial work experience	407	2.0%	292	1.3%	194	1.0%
3	Exited with employment	6,856	33.5%	6,811	30.8%	4,804	24.5%
4	Exited without employment	4,971	24.3%	5,202	23.5%	6,740	34.3%
5	Exited without employment outcomes, after eligibility, before an IPE was signed or before receiving services	4,538	22.2%	4,687	21.2%	3,703	18.8%
6	Employment rate*		58.0%		56.7%		41.6%
7	Competitive employment outcomes	6,607	96.4%	6,363	93.4%	4,675	97.3%
8	Average hourly earnings for competitive employment outcomes**	\$12.23		\$12.81		\$13.48	
9	Average hours worked for competitive employment outcomes	29.4		29.5		29.2	
10	Median hourly earnings for competitive employment outcomes	\$10.00		\$11.00		\$11.44	
11	Median hours worked for competitive employment outcomes	30.0		30.0		30.0	
12	Quarterly median earnings for competitive employment outcomes***	\$4,225.00		\$4,550.00		\$4,680.00	
13	Competitive employment outcomes meeting SGA	4,105	62.1%	4,068	63.9%	2,952	63.1%
14	Competitive employment outcomes with employer-provided medical insurance	1,199	18.1%	1,013	15.9%	726	15.5%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*Using RSA-911: Total number of individuals who exited with employment divided by total number of individuals who received services multiplied by 100.

**Using RSA-911: Sum of the Weekly Wage at Closure / sum of the Hours Worked in a Week at Closure for individuals achieving a competitive employment outcome.

***Using RSA-911: Weekly earnings at closure (Data Element 197) multiplied by hours worked in a week at closure (Data Element 198) for individuals who achieved a competitive employment outcome multiplied by 13. Then the values are listed in order, from the lowest to the highest value. The value in the middle of this list is the median quarterly earnings, so there is the same quantity of numbers above the median number as there is below the median number.

Table 3a. ACCES-VR Source of Referral for All Individuals at Closure-FFYs 2015-2017

Row	Source of Referral	2015 Percent	2016 Percent	2017* Percent
1	Educational Institutions (elementary/secondary)	33.3%	35.1%	27.8%
2	Educational Institutions (post-secondary)	3.0%	3.8%	1.3%
3	Medical Health Provider (Public or Private)	1.4%	1.3%	1.3%
4	Welfare Agency (State or local government)	.3%	0.4%	0.5%
5	Community Rehabilitation Programs	1.5%	2.2%	2.6%
6	Social Security Administration (Disability Determination Service or District office)	.2%	0.2%	0.2%
7	One-stop Employment/Training Centers	.8%	0.9%	0.9%
8	Self-referral	22.9%	23.2%	24.5%
9	Other Sources	31.8%	26.8%	23.8%
10	American Indian VR Services Program	0	0	0
11	Centers for Independent Living	0	0	0.2%
12	Child Protective Services	0	0	0
13	Consumer Organizations or Advocacy Groups	0	0	0.6%
14	Employers	0	0	0.1%
15	Faith Based Organizations	0	0	0.1%
16	Family/Friends	0	0	2.2%
17	Intellectual and Developmental Disabilities Providers	0	0	0.8%
18	Mental Health Provider (Public or Private)	0	0	4.2%
19	Public Housing Authority	0	0	0
20	State Department of Correction/Juvenile Justice	0	0	0.3%
21	State Employment Service Agency	0	0	0.2%
22	Veteran's Administration	0	0	0.2%
23	Worker's Compensation	0	0	1.6%
24	Other State Agencies	0	0	0.6%
25	Other VR State Agencies	0	0	0.1%
26	Total Identified Referral Sources	95.2%	93.9%	94.1%
27	Other Referral Sources (unknown)	4.8%	6.1%	6.1%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 3b. ACCES-VR Source of Referral for Individuals below Age 25 at Closure -FFYs 2015-2017

Row	Source of Referral	2015 Percent	2016 Percent	2017 Percent
1	Educational Institutions (elementary/secondary)	69.4%	70.3%	67.2%
2	Educational Institutions (post-secondary)	1.5%	1.8%	1.9%
3	Medical Health Provider (Public or Private)	0.2%	.3%	0.3%
4	Welfare Agency (State or local government)	0.1%	.1%	0.1%
5	Community Rehabilitation Programs	1.0%	1.2%	1.4%
6	Social Security Administration (Disability Determination Service or District office)	0.0%	0.0%	0.0%
7	One-stop Employment/Training Centers	0.2%	0.2%	0.2%
8	Self-referral	10.6%	10.4%	10.1%
9	Other Sources	12.8%	10.7%	8.8%
10	American Indian VR Services Program	0	0	0.0%
11	Centers for Independent Living	0	0	0.1%
12	Child Protective Services	0	0	0.0%
13	Consumer Organizations or Advocacy Groups	0	0	0.3%
14	Employers	0	0	0.1%
15	Faith Based Organizations	0	0	0.0%
16	Family/Friends	0	0	1.7%
17	Intellectual and Developmental Disabilities Providers	0	0	0.4%
18	Mental Health Provider (Public or Private)	0	0	1.6%
19	Public Housing Authority	0	0	0.0%
20	State Department of Correction/Juvenile Justice	0	0	0.2%
21	State Employment Service Agency	0	0	0.1%
22	Veteran's Administration	0	0	0.0%
23	Worker's Compensation	0	0	0.0%
24	Other State Agencies	0	0	0.4%
25	Other VR State Agencies	0	0	0.0%
26	Total Identified Referral Sources	95.8%	95.0%	95.1%
27	Other Referral Sources	4.2%	5.0%	4.9%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 3c. ACCES-VR Source of Referral for Individuals Age 25 and Older at Closure - FFYs 2015-2017

Row	Source of Referral	2015 Percent	2016 Percent	2017 Percent
1	Educational Institutions (elementary/secondary)	9.8%	11.8%	2.4%
2	Educational Institutions (post-secondary)	4.1%	5.1%	0.8%
3	Medical Health Provider (Public or Private)	2.2%	2.0%	1.9%
4	Welfare Agency (State or local government)	0.4%	0.6%	0.8%
5	Community Rehabilitation Programs	1.8%	2.9%	3.5%
6	Social Security Administration (Disability Determination Service or District office)	0.2%	0.3%	0.3%
7	One-stop Employment/Training Centers	1.1%	1.3%	1.3%
8	Self-referral	30.9%	31.7%	33.8%
9	Other Sources	44.2%	37.4%	33.5%
10	American Indian VR Services Program	0	0	0.0%
11	Centers for Independent Living	0	0	0.3%
12	Child Protective Services	0	0	0.0%
13	Consumer Organizations or Advocacy Groups	0	0	0.7%
14	Employers	0	0	0.1%
15	Faith Based Organizations	0	0	0.1%
16	Family/Friends	0	0	2.5%
17	Intellectual and Developmental Disabilities Providers	0	0	1.0%
18	Mental Health Provider (Public or Private)	0	0	5.9%
19	Public Housing Authority	0	0	0.0%
20	State Department of Correction/Juvenile Justice	0	0	0.4%
21	State Employment Service Agency	0	0	0.2%
22	Veteran's Administration	0	0	0.4%
23	Worker's Compensation	0	0	2.6%
24	Other State Agencies	0	0	0.8%
25	Other VR State Agencies	0	0	0.1%
26	Total Identified Referral Sources	94.9%	93.1%	93.1%
27	Other Referral Sources	5.1%	6.9%	6.9%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 4a. ACCES-VR Outcomes by Disability Type for All Individuals at Closure who had received services - FFYs 2015-2017

Row	Disability Type	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
1	Visual - Individuals served	81	0.4%	81	0.4%	83	0.4%
2	Visual - Employment rate		70.4%		54.3%		41.0%
3	Auditory and Communicative - Individuals served	1,015	5.3%	1,114	5.7%	1,046	5.5%
4	Auditory and Communicative - Employment rate		76.5%		76.4%		56.0%
5	Physical - Individuals served	3,213	16.9%	3,136	16.0%	3,015	15.9%
6	Physical - Employment rate		52.2%		51.5%		39.2%
7	Intellectual and Learning disability - Individuals served	7,680	40.4%	7,925	40.4%	7,752	41.0%
8	Intellectual and Learning disability - Employment rate		64.4%		61.6%		45.3%
9	Psychosocial and psychological- Individuals served	7,006	36.9%	7,338	37.5%	7,007	37.1%
10	Psychosocial and psychological- Employment rate		54.7%		52.9%		38.3%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 4b. ACCES-VR Outcomes by Disability Type for Individuals below Age 25 at Closure who had received services - FFYs 2015-2017

Row	Disability Type	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
1	Visual - Individuals served	22	0.3%	19	0.3%	26	0.4%
2	Visual - Employment rate		68.2%		47.4%		46.2%
3	Auditory and Communicative - Individuals served	310	4.3%	340	4.5%	367	5.0%
4	Auditory and Communicative - Employment rate		67.1%		63.8%		44.7%
5	Physical - Individuals served	331	4.6%	339	4.5%	351	4.8%
6	Physical - Employment rate		52.6%		54.0%		39.9%
7	Intellectual and Learning disability - Individuals served	5,130	71.5%	5,438	71.7%	5,321	72.3%
8	Intellectual and Learning disability - Employment rate		63.8%		60.1%		43.8%
9	Psychosocial and psychological- Individuals served	1,375	19.2%	1,445	19.1%	1,294	17.6%
10	Psychosocial and psychological- Employment rate		55.1%		54.1%		41.9%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 4c. ACCES-VR Outcomes by Disability Type for Individuals Age 25 and Older at Closure who had received services - FFYs 2015-2017

Row	Disability Type	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
1	Visual - Individuals served	59	0.5%	62	0.5%	57	0.5%
2	Visual - Employment rate		71.2%		56.5%		38.6%
3	Auditory and Communicative - Individuals served	705	6.0%	774	6.4%	679	5.9%
4	Auditory and Communicative - Employment rate		80.6%		81.9%		62.2%
5	Physical - Individuals served	2,882	24.4%	2,797	23.3%	2,664	23.1%
6	Physical - Employment rate		52.2%		51.2%		39.1%
7	Intellectual and Learning disability - Individuals served	2,550	21.6%	2,487	20.7%	2,431	21.1%
8	Intellectual and Learning disability - Employment rate		65.5%		64.8%		48.4%
9	Psychosocial and psychological- Individuals served	5,631	47.6%	5,893	49.1%	5,713	49.5%
10	Psychosocial and psychological- Employment rate		54.5%		52.6%		37.5%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 5a. ACCES-VR Number of Days from Application to Eligibility Determination for All Individuals at Closure for individuals for whom an eligibility determination was made - FFYs 2015-2017

Number of Days	2015 Number	2015 Percent	2016 Number	2016 Percent	2017* Number	2017* Percent
0 – 60 days	21,492	79.5%	22,344	79.0%	19,914	78.3%
More than 60 days	5,538	20.5%	5,935	21.0%	5,503	21.7%
Total eligible	27,030	100.0%	28,279	100.0%	25,417	100.0%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 5b. ACCES-VR Number of Days from Application to Eligibility Determination for Individuals below Age 25 at Closure for individuals for whom an eligibility determination was made - FFYs 2015-2017

Number of Days	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
0 – 60 days	8,326	78.1%	9,168	79.2%	8,012	78.8%
More than 60 days	2,339	21.9%	2,411	20.8%	2,158	21.2%
Total eligible	10,665	100.0%	11,579	100.0%	10,170	100.0%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 5c. ACCES-VR Number of Days from Application to Eligibility Determination for Individuals Age 25 and Older at Closure for individuals for whom an eligibility determination was made - FFYs 2015-2017

Number of Days	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
0 – 60 days	13,166	80.5%	13,176	78.9%	11,902	78.1%
More than 60 days	3,199	19.5%	3,524	21.1%	3,345	21.9%
Total eligible	16,365	100.0%	16,700	100.0%	15,247	100.0%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 6a. ACCES-VR Number of Days from Eligibility* Determination to IPE for All Individuals Served at Closure- FFYs 2015-2017

Number of Days	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
0 – 90 days	2,773	87.0%	7,744	73.2%	8,543	66.4%
More than 90 days	416	13.0%	2,836	26.8%	4,314	33.6%
Total served	3,189	100.0%	10,580	100%	12,857	100%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*Eligibility occurred on or after July 22, 2014

Table 6b. ACCES-VR Number of Days from Eligibility* Determination to IPE for Individuals Served below Age 25 at Closure- FFYs 2015-2017

Number of Days	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
0 – 90 days	790	85.7%	2,881	72.3%	3,302	63.9%
More than 90 days	132	14.3%	1,103	27.7%	1,864	36.1%
Total served	922	100.0%	3,984	100.0%	5,166	100.0%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*Eligibility occurred on or after July 22, 2014

Table 6c. ACCES-VR Number of Days from Eligibility* Determination to IPE for Individuals Served Age 25 and Older at Closure- FFYs 2015-2017

Number of Days	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
0 – 90 days	1,983	87.5%	4,863	73.7%	5,241	68.1%
More than 90 days	284	12.5%	1,733	26.3%	2,450	31.9%
Total served	2,267	100.0%	6,596	100.0%	7,691	100%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*Eligibility occurred on or after July 22, 2014

Table 7a. ACCES-VR Vocational Rehabilitation Services Provided for All Individuals Served* at Closure – FFYs 2015-2017

Row	Services Provided**	2015 Percent	2016 Percent	2017 Percent
1	Training- Graduate degree training	0.3%	0.3%	0.3%
2	Training- Bachelor degree training	4.4%	4.2%	4.1%
3	Training- Junior or community college training	6.2%	6.4%	6.2%
4	Training- Occupational or vocational training	18.0%	19.2%	18.8%
5	Training- On-the-job training	0.3%	0.9%	1.9%
6	Training- Apprenticeship training	0.0%	0.0%	0.0%
7	Training- Basic academic remedial or literacy training	0.0%	0.0%	0.0%
8	Training- Job readiness training	5.7%	7.0%	8.4%
9	Training- Disability-related skills training	0.1%	0.2%	0.1%
10	Training- Miscellaneous training	9.6%	9.4%	8.7%
11	Career- Assessment	54.4%	52.8%	50.7%
12	Career- Diagnosis and treatment of impairment	0.3%	0.2%	0.2%
13	Career- Vocational rehab counseling and guidance	0.0%	0.0%	0.0%
14	Career- Job search assistance	42.4%	43.2%	39.0%
15	Career- Job placement assistance	20.2%	19.8%	17.2%
16	Career- On-the-job supports-short term	9.4%	11.1%	10.6%
17	Career- On-the-job supports-SE	21.8%	18.8%	15.7%
18	Career- Information and referral services	0.0%	0.0%	0.0%
19	Career- Benefits counseling	3.4%	5.8%	6.9%
20	Career- Customized employment services	0.0%	0.0%	0.0%
21	Other services- Transportation	34.9%	35.9%	37.5%
22	Other services- Maintenance	21.0%	21.3%	20.9%
23	Other services- Rehabilitation technology	6.5%	6.8%	5.8%
24	Other services- Reader services	0.0%	0.0%	0.0%
25	Other services- Interpreter services	1.5%	1.5%	1.6%
26	Other services- Personal attendant services	0.1%	0.1%	0.1%
27	Other services- Technical assistance services	0.1%	0.1%	0.1%
28	Other services- Other services	29.7%	31.3%	30.2%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*For individuals who were determined eligible, placed on an IPE, and received a service under the IPE.

**VR Services include both those provided and purchased by the VR agency as well as those provided by comparable service providers

Table 7b. ACCES-VR Vocational Rehabilitation Services Provided for Individuals Served* below Age 25 at Closure- FFYs 2015-2017

Row	Services Provided**	2015 Percent	2016 Percent	2017 Percent
1	Training- Graduate degree training	0.1%	0.1%	0.1%
2	Training- Bachelor degree training	5.1%	4.6%	4.5%
3	Training- Junior or community college training	8.3%	8.5%	8.7%
4	Training- Occupational or vocational training	15.3%	16.0%	14.5%
5	Training- On-the-job training	0.4%	1.7%	4.0%
6	Training- Apprenticeship training	0.0%	0.0%	0.0%
7	Training- Basic academic remedial or literacy training	0.0%	0.0%	0.0%
8	Training- Job readiness training	5.0%	6.8%	10.6%
9	Training- Disability-related skills training	0.2%	0.3%	0.2%
10	Training- Miscellaneous training	10.7%	11.2%	10.1%
11	Career- Assessment	45.2%	41.1%	38.3%
12	Career- Diagnosis and treatment of impairment	0.2%	0.1%	0.0%
13	Career- Vocational rehab counseling and guidance	0.0%	0.0%	0.0%
14	Career- Job search assistance	36.5%	35.9%	30.8%
15	Career- Job placement assistance	14.6%	13.3%	11.1%
16	Career- On-the-job supports-short term	7.7%	9.2%	9.4%
17	Career- On-the-job supports-SE	23.8%	20.3%	16.0%
18	Career- Information and referral services	0.0%	0.0%	0.0%
19	Career- Benefits counseling	2.2%	3.3%	3.7%
20	Career- Customized employment services	0.0%	0.0%	0.0%
21	Other services- Transportation	22.2%	22.5%	23.3%
22	Other services- Maintenance	17.0%	16.8%	16.3%
23	Other services- Rehabilitation technology	6.4%	6.6%	6.6%
24	Other services- Reader services	0.0%	0.0%	0.0%
25	Other services- Interpreter services	0.9%	0.8%	0.9%
26	Other services- Personal attendant services	0.1%	0.1%	0.1%
27	Other services- Technical assistance services	0.0%	0.0%	0.0%
28	Other services- Other services	27.3%	29.2%	26.8%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*For individuals who were determined eligible, placed on an IPE, and received a service under the IPE.

**VR Services include those provided and purchased by the VR agency.

**Table 7c. ACCES-VR Vocational Rehabilitation Services Provided for Individuals Served*
Age 25 and Older at Closure - FFYs 2015-2017**

Row	Services Provided**	2015 Percent	2016 Percent	2017 Percent
1	Training- Graduate degree training	0.5%	0.4%	0.5%
2	Training- Bachelor degree training	4.0%	4.0%	3.9%
3	Training- Junior or community college training	4.9%	5.1%	4.7%
4	Training- Occupational or vocational training	19.6%	21.2%	21.6%
5	Training- On-the-job training	0.2%	0.4%	0.5%
6	Training- Apprenticeship training	0.0%	0.0%	0.0%
7	Training- Basic academic remedial or literacy training	0.0%	0.0%	0.0%
8	Training- Job readiness training	6.1%	7.1%	7.0%
9	Training- Disability-related skills training	0.1%	0.1%	0.0%
10	Training- Miscellaneous training	8.9%	8.3%	7.9%
11	Career- Assessment	60.0%	60.2%	58.6%
12	Career- Diagnosis and treatment of impairment	0.4%	0.3%	0.3%
13	Career- Vocational rehab counseling and guidance	0.0%	0.0%	0.0%
14	Career- Job search assistance	46.0%	47.9%	44.2%
15	Career- Job placement assistance	23.5%	23.9%	21.1%
16	Career- On-the-job supports-short term	10.3%	12.3%	11.4%
17	Career- On-the-job supports-SE	20.7%	17.8%	15.5%
18	Career- Information and referral services	0.0%	0.0%	0.0%
19	Career- Benefits counseling	4.2%	7.4%	8.9%
20	Career- Customized employment services	0.0%	0.0%	0.0%
21	Other services- Transportation	42.6%	44.3%	46.5%
22	Other services- Maintenance	23.4%	24.2%	23.8%
23	Other services- Rehabilitation technology	6.6%	6.9%	5.4%
24	Other services- Reader services	0.0%	0.0%	0.0%
25	Other services- Interpreter services	1.9%	1.9%	2.0%
26	Other services- Personal attendant services	0.1%	0.1%	0.1%
27	Other services- Technical assistance services	0.2%	0.2%	0.2%
28	Other services- Other services	31.2%	32.7%	32.4%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*For individuals who were determined eligible, placed on an IPE, and received a service under the IPE.

**VR Services include those provided and purchased by the VR agency.

Table 8a. ACCES-VR Standard Occupational Classification (SOC) Codes Percentages of Employment Outcomes and Median Hourly Earnings for All Individuals Who Achieved Competitive Employment Outcomes at Closure - FFYs 2015-2017

Row	SOC for Competitive Integrated Employment Outcomes	2015 Percent	2015 Median Hourly Wage	2016 Percent	2016 Median Hourly Wage	2017 Percent	2017 Median Hourly Wage
1	Architecture and Engineering Occupations	0.5%	\$16.00	0.5%	\$15.75	0.6%	\$15.00
2	Arts, Design, Entertainment, Sports, and Media	1.2%	\$12.00	1.3%	\$12.86	1.2%	\$12.88
3	Building and Grounds Cleaning and Maintenance	13.5%	\$9.00	13.3%	\$10.00	12.2%	\$10.00
4	Business and Financial Operations Occupations	1.4%	\$14.00	1.4%	\$14.00	1.4%	\$13.00
5	Community and Social Services Occupations	4.8%	\$12.13	5.0%	\$13.00	5.3%	\$14.25
6	Computer and Mathematical Occupations	1.5%	\$13.50	1.7%	\$15.00	1.4%	\$13.50
7	Constructive and Extraction Occupations	2.6%	\$12.00	3.3%	\$13.00	2.9%	\$12.50
8	Education, Training, and Library Occupations	3.0%	\$10.87	2.9%	\$11.51	3.5%	\$12.31
9	Farming, Fishing, and Forestry Occupations	0.6%	\$10.00	0.6%	\$10.00	0.5%	\$10.00
10	Food Preparation and Serving Related Occupations	11.9%	\$9.00	11.7%	\$9.75	12.5%	\$10.00
11	Healthcare Practitioners and Technical Occupations	2.1%	\$16.00	1.9%	\$16.25	2.1%	\$17.50
12	Healthcare Support Occupations	4.9%	\$11.00	5.1%	\$11.50	5.0%	\$11.74
13	Installation, Maintenance, and Repair Occupations	3.8%	\$11.43	4.5%	\$12.00	4.2%	\$12.00
14	Legal Occupations	0.2%	\$18.93	0.2%	\$15.97	0.2%	\$13.75
15	Life, Physical, and Social Science Occupations	0.2%	\$15.00	0.3%	\$14.00	0.4%	\$17.50
16	Management Occupations	1.5%	\$12.00	1.4%	\$15.04	1.3%	\$15.00
17	Military Specific Occupations	0.1%	\$10.25	0.1%	\$9.67	0.1%	\$10.94
18	Office and Administrative Support Occupations	16.3%	\$9.54	15.5%	\$10.00	16.6%	\$10.76
19	Personal Care and Service Occupations	5.9%	\$10.00	5.7%	\$10.00	5.8%	\$10.00
20	Production Occupations	5.2%	\$9.56	5.3%	\$10.00	4.6%	\$10.50
21	Protective Service Occupations	1.8%	\$10.00	2.0%	\$10.50	2.0%	\$11.55
22	Randolph-Sheppard vending facility clerk*	0	0	0	0	0	0
23	Randolph-Sheppard vending facility operator*	0	0	0	0	0	0
24	Sales and Related Occupations	10.2%	\$8.80	9.9%	\$9.33	9.8%	\$10.00
25	Transportation and Material Moving Occupations	6.7%	\$10.70	6.5%	\$11.00	6.4%	\$11.75
26	Total competitive employment outcomes	100.0%	\$10.00	100.0%	\$10.00	100.0%	\$10.00

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*RSA specific occupational classifications

Table 8b. ACCES-VR Standard Occupational Classification (SOC) Codes Percentages of Employment Outcomes and Median Hourly Earnings for Individuals below Age 25 Who Achieved Competitive Employment Outcomes at Closure - FFYs 2015-2017

Row	SOC for Competitive Integrated Employment Outcomes	2015 Percent	2015 Median Hourly Wage	2016 Percent	2016 Median Hourly Wage	2017 Percent	2017 Median Hourly Wage
1	Architecture and Engineering Occupations	0.4%	\$12.50	0.3%	\$15.00	0.6%	\$15.00
2	Arts, Design, Entertainment, Sports, and Media	1.1%	\$10.00	1.3%	\$12.25	1.0%	\$12.64
3	Building and Grounds Cleaning and Maintenance	10.9%	\$9.00	10.5%	\$9.50	10.1%	\$10.00
4	Business and Financial Operations Occupations	1.2%	\$12.35	1.2%	\$12.75	1.2%	\$12.00
5	Community and Social Services Occupations	1.8%	\$10.45	1.3%	\$11.43	1.5%	\$11.46
6	Computer and Mathematical Occupations	0.9%	\$11.25	1.5%	\$12.42	1.1%	\$10.00
7	Constructive and Extraction Occupations	3.3%	\$11.25	3.9%	\$12.00	3.7%	\$12.00
8	Education, Training, and Library Occupations	2.9%	\$10.00	2.9%	\$10.00	2.9%	\$11.00
9	Farming, Fishing, and Forestry Occupations	1.1%	\$9.51	1.1%	\$10.00	0.9%	\$10.00
10	Food Preparation and Serving Related Occupations	15.9%	\$8.77	16.0%	\$9.50	16.7%	\$10.00
11	Healthcare Practitioners and Technical Occupations	1.3%	\$11.20	1.1%	\$14.00	1.6%	\$13.00
12	Healthcare Support Occupations	4.4%	\$10.50	4.6%	\$11.50	4.4%	\$11.25
13	Installation, Maintenance, and Repair Occupations	5.3%	\$10.50	6.4%	\$10.00	6.1%	\$11.51
14	Legal Occupations	0.0%	\$10.00	0.1%	\$12.73	0.0%	\$11.00
15	Life, Physical, and Social Science Occupations	0.1%	\$9.60	0.2%	\$12.00	0.4%	\$12.49
16	Management Occupations	1.2%	\$10.00	0.9%	\$12.36	0.9%	\$11.10
17	Military Specific Occupations	0.3%	\$10.25	0.2%	\$9.67	0.2%	\$10.94
18	Office and Administrative Support Occupations	14.7%	\$9.00	13.7%	\$9.74	13.5%	\$10.00
19	Personal Care and Service Occupations	7.3%	\$9.14	6.9%	\$10.00	7.7%	\$10.00
20	Production Occupations	5.6%	\$9.55	5.7%	\$9.90	5.0%	\$10.50
21	Protective Service Occupations	1.9%	\$10.00	1.9%	\$11.00	2.2%	\$12.00
22	Randolph-Sheppard vending facility clerk*	0	0	0	0	0	0
23	Randolph-Sheppard vending facility operator*	0	0	0	0	0	0
24	Sales and Related Occupations	13.7%	\$8.77	14.0%	\$9.24	13.9%	\$10.00
25	Transportation and Material Moving Occupations	4.6%	\$9.50	4.4%	\$10.00	4.6%	\$10.00
26	Total competitive employment outcomes	100.0%	\$9.00	100.0%	\$10.00	100.0%	\$10.00

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*RSA specific occupational classifications

Table 8c. ACCES-VR Standard Occupational Classification (SOC) Codes Percentages of Employment Outcomes and Median Hourly Earnings for Individuals Age 25 and Older Who Achieved Competitive Employment Outcomes at Closure- FFYs 2015-2017

Row	SOC for Competitive Integrated Employment Outcomes	2015 Percent	2015 Median Hourly Wage	2016 Percent	2016 Median Hourly Wage	2017 Percent	2017 Median Hourly Wage
1	Architecture and Engineering Occupations	0.6%	\$17.10	0.6%	\$16.13	0.6%	\$15.00
2	Arts, Design, Entertainment, Sports, and Media	1.2%	\$13.00	1.3%	\$12.93	1.4%	\$13.00
3	Building and Grounds Cleaning and Maintenance	15.2%	\$9.00	15.2%	\$10.00	13.6%	\$10.33
4	Business and Financial Operations Occupations	1.5%	\$15.00	1.5%	\$15.00	1.6%	\$14.25
5	Community and Social Services Occupations	6.8%	\$12.73	7.4%	\$13.50	7.9%	\$14.43
6	Computer and Mathematical Occupations	1.8%	\$13.65	1.9%	\$15.00	1.6%	\$15.00
7	Constructive and Extraction Occupations	2.1%	\$12.83	2.9%	\$14.00	2.4%	\$14.00
8	Education, Training, and Library Occupations	3.0%	\$12.00	2.9%	\$12.86	4.0%	\$13.37
9	Farming, Fishing, and Forestry Occupations	0.4%	\$12.50	0.3%	\$10.00	0.3%	\$11.50
10	Food Preparation and Serving Related Occupations	9.2%	\$9.00	8.8%	\$10.00	9.7%	\$10.00
11	Healthcare Practitioners and Technical Occupations	2.6%	\$17.16	2.5%	\$17.50	2.4%	\$20.00
12	Healthcare Support Occupations	5.3%	\$11.00	5.4%	\$11.50	5.3%	\$12.00
13	Installation, Maintenance, and Repair Occupations	2.9%	\$12.50	3.2%	\$12.68	3.0%	\$13.00
14	Legal Occupations	0.3%	\$20.00	0.3%	\$17.87	0.3%	\$14.38
15	Life, Physical, and Social Science Occupations	0.3%	\$16.00	0.3%	\$14.98	0.4%	\$22.75
16	Management Occupations	1.7%	\$14.33	1.7%	\$16.33	1.5%	\$18.00
17	Military Specific Occupations	0	0	0	0	0	0
18	Office and Administrative Support Occupations	17.4%	\$10.00	16.8%	\$10.00	18.7%	\$11.00
19	Personal Care and Service Occupations	4.9%	\$10.00	4.9%	\$10.00	4.5%	\$10.45
20	Production Occupations	4.9%	\$9.56	5.1%	\$10.00	4.3%	\$10.50
21	Protective Service Occupations	1.7%	\$10.00	2.0%	\$10.00	1.8%	\$11.35
22	Randolph-Sheppard vending facility clerk*	0	0	0	0	0	0
23	Randolph-Sheppard vending facility operator*	0	0	0	0	0	0
24	Sales and Related Occupations	7.9%	\$9.00	7.2%	\$9.52	7.1%	\$10.00
25	Transportation and Material Moving Occupations	8.0%	\$11.77	7.8%	\$12.50	7.6%	\$12.50
26	Total competitive employment outcomes	100.0%	\$10.00	100.0%	\$11.00	100.0%	\$11.44

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

*RSA specific occupational classifications

Table 9a. ACCES-VR Reason for Exit for All Individuals Who Did Not Achieve an Employment Outcome at Closure- FFYs 2015-2017

Row	Reason for Closure	2015 number	2015 Percent	2016 number	2016 Percent	2017*number	2017* Percent
1	Unable to locate or contact	6,995	31.1%	7,688	30.2%	8,297	34.1%
2	Disability too significant to benefit from VR services - ineligible	478	2.1%	526	2.1%	367	1.5%
3	No longer interested in receiving services or further services	9,771	43.4%	11,390	44.7%	10,561	43.5%
4	Death	106	0.5%	108	0.4%	96	0.4%
5	Transferred to another agency	611	2.7%	658	2.6%	514	2.1%
6	No disabling condition – ineligible	32	0.1%	28	0.1%	34	0.1%
7	No impediment to employment - ineligible	64	0.3%	59	0.2%	39	0.2%
8	Transportation not feasible or available	36	0.2%	42	0.2%	37	0.2%
9	Does not require VR services - ineligible	69	0.3%	50	0.2%	36	0.1%
10	All other reasons	4,083	18.2%	4,655	18.3%	4,095	16.9%
11	Extended employment	0		2	0.0%	2	0.0%
12	Individual in institution other than a prison or jail	82	0.4%	75	0.3%	68	0.3%
13	Individual is incarcerated in a prison or jail	161	0.7%	195	0.8%	148	0.6%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 9b. ACCES-VR Reason for Exit for Individuals below Age 25 Who Did Not Achieve an Employment Outcome at Closure - FFYs 2015-2017

Row	Reason for Closure	2015 number	2015 Percent	2016 number	2016 Percent	2017 number	2017 Percent
1	Unable to locate or contact	2,893	32.5%	3,148	31.0%	3,316	35.1%
2	Disability too significant to benefit from VR services - ineligible	130	1.5%	123	1.2%	106	1.1%
3	No longer interested in receiving services or further services	4,053	45.6%	4,830	47.6%	4,199	44.4%
4	Death	19	0.2%	15	0.1%	13	0.1%
5	Transferred to another agency	305	3.4%	347	3.4%	272	2.9%
6	No disabling condition - ineligible	24	0.3%	17	0.2%	23	0.2%
7	No impediment to employment - ineligible	29	0.3%	29	0.3%	19	0.2%
8	Transportation not feasible or available	13	0.1%	22	0.2%	19	0.2%
9	Does not require VR services - ineligible	22	0.2%	14	0.1%	9	0.1%
10	All other reasons	1,342	15.1%	1,545	15.2%	1,423	15.1%
11	Extended employment						
12	Individual in institution other than a prison or jail	26	0.3%	18	0.2%	22	0.2%
13	Individual is incarcerated in a prison or jail	41	0.5%	38	0.4%	32	0.3%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 9c. ACCES-VR Reason for Exit for Individuals Age 25 and Older Who Did Not Achieve an Employment Outcome at Closure - FFYs 2015-2017

Row	Reason for Closure	2015 number	2015 Percent	2016 number	2016 Percent	2017 number	2017 Percent
1	Unable to locate or contact	4,100	30.2%	4,539	29.6%	4,981	33.6%
2	Disability too significant to benefit from VR services - ineligible	348	2.6%	403	2.6%	261	1.8%
3	No longer interested in receiving services or further services	5,718	42.1%	6,559	42.8%	6,362	42.9%
4	Death	87	0.6%	93	0.6%	83	0.6%
5	Transferred to another agency	306	2.3%	311	2.0%	242	1.6%
6	No disabling condition - ineligible	8	0.1%	11	0.1%	11	0.1%
7	No impediment to employment - ineligible	35	0.3%	30	0.2%	20	0.1%
8	Transportation not feasible or available	23	0.2%	20	0.1%	18	0.1%
9	Does not require VR services - ineligible	47	0.3%	36	0.2%	27	0.2%
10	All other reasons	2,741	20.2%	3,110	20.3%	2,672	18.0%
11	Extended employment	0		2	0.0%	2	0.0%
12	Individual in institution other than a prison or jail	56	0.4%	57	0.4%	46	0.3%
13	Individual is incarcerated in a prison or jail	120	0.9%	157	1.0%	116	0.8%

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Table 10a. Provision of Pre-Employment Transition Services PY 2017 Quarter 1 (PY17Q1)

Agency	Individuals Who Have Received a Pre-ETS Service	Potentially Eligible Who Have Received a Pre-ETS Service	Number of Individuals Receiving Services by Type in PY17Q1				
			JEC	WBLE	CEO	WRT	ISA
NY-G	45	3	0	0	0	0	0

Table 10b. Provision of Pre-Employment Transition Services PY 2017 Quarter 2 (PY17Q2)

Agency	Individuals Who Have Received a Pre-ETS Service	Potentially Eligible Who Have Received a Pre-ETS Service	Number of Individuals Receiving Services by Type in PY17Q2				
			JEC	WBLE	CEO	WRT	ISA
NY-G	221	7	0	28	0	19	0

Table 10c. Pre-Employment Transition Services Final FFY 2016 SF-425

State	Total Federal Funds Authorized at End of Year of Appropriation (2016)	Amount Required to be Expended on Pre-Employment Transition Services	Amount Expended on Pre-employment Transition Services	Amount Expended on Pre-employment Transition Services as a Percent	Amount of Pre-employment Transition Service Expenditures Required	G5 Post-liquidation Balance
New York-G	\$122,950,430	\$18,442,565	\$18,443,565	15.00%	\$ (1,001)	\$419

Table 10d. New York General Agency Number of Days from Job Placement to Close for Supported Employment - FFYs 2015-2017

Time	2015 Number	2015 Percent	2016 Number	2016 Percent	2017* Number	2017* Percent
0 – 90 days	317	10.5	258	8.4	197	9.5
91 – 100 days	1501	49.8	1617	52.6	1038	49.9
101 – 110 days	348	11.5	358	11.6	243	11.7
111 – 120 days	202	6.7	214	7.0	142	6.8
121 – 130 days	153	5.1	132	4.3	103	5.0
131 – 140 days	73	2.4	94	3.1	61	2.9
141 – 150 days	77	2.6	65	2.1	32	1.5
151 – 160 days	53	1.8	50	1.6	40	1.9
161 – 170 days	49	1.6	34	1.1	24	1.2
171 – 180 days	32	1.1	33	1.1	20	1.0
6 months – 1 year	185	6.1	155	5.0	130	6.3
1 year – 18 months	15	0.5	35	1.1	26	1.3
18 months – 24 months	6	0.2	15	0.5	6	0.3
More than 24 months	5	0.2	17	0.6	17	0.8
Total	3016		3077		2079	

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

Fiscal Data Tables for Focus Area VI
State Vocational Rehabilitation Services Program
Federal Fiscal Year (FFY) 2018
Monitoring and Technical Assistance Guide

Table 6.1 ACCES-VR Resources and Expenditures—FFYs 2015–2017*

VR Resources and Expenditures	2015	2016	2017*
Total program expenditures	\$177,086,134	\$181,505,581	\$157,877,390
Federal expenditures	\$118,848,972	\$122,950,011	\$82,471,894
State agency expenditures (4 th quarter)	\$74,524,112	\$96,499,580	\$75,405,496
State agency expenditures (latest/final)	\$58,237,162	\$58,555,570	\$75,405,496
Federal formula award amount	\$118,851,132	\$122,950,430	\$122,622,790
MOE penalty from prior year	-	-	-
Federal award amount relinquished during reallocation	-	-	-
Federal award amount received during reallocation	-	-	-
Federal funds transferred from State VR agency	-	-	-
Federal funds transferred to State VR agency	-	-	-
Federal award amount (net)	\$118,851,132	\$122,950,430	\$122,622,790
Federal award funds deobligated	\$2,160	-	-
Federal award funds used	\$118,848,972	\$122,950,430	\$122,622,790
Percent of formula award amount used	100.00%	100.00%	100.00%
Federal award funds matched but not used	\$2,160	-	-

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

Table 6.1 ACCES-VR Resources and Expenditures—Descriptions, Sources and Formulas

VR Resources and Expenditures	Source/Formula
Total program expenditures	The sum of the Federal and non-Federal expenditures. Source/Formula: Table 6.1: Federal expenditures plus State expenditures (latest/final)
Federal expenditures	The cumulative amount of disbursements from Federal funds. Source/Formula: SF-425 line 10e from latest/final report
State expenditures (4 th quarter)	The cumulative amount of disbursements and unliquidated obligations from State funds through September 30 th of the award period. Source/Formula: SF-425 line 10j from 4 th quarter report
State expenditures (latest/final)	The cumulative amount of disbursements and unliquidated obligations from State funds as reported on the agency’s latest or final SF-425 report. Final reports do not include unliquidated obligations. Source/Formula: SF-425 line 10j from latest/final report
Federal formula award amount	The amount of the Federal funds available to the agency based on the formula mandated in the Rehabilitation Act. Formula/Source: Federal formula award calculation
MOE penalty from prior year	The amount of the Maintenance of Effort (MOE) deficit from the previous FFY which resulted in a MOE penalty against the current FFY. Source/Formula: Table 6.2: MOE difference from prior year
Federal award amount relinquished during reallocation	Amount of Federal award voluntarily relinquished through the reallocation process. Formula/Source: RSA-692
Federal award received during reallocation	Amount of funds received through the reallocation process. Source/Formula: RSA-692
Federal funds transferred from State VR agency	Amount of award funds transferred from State VR agencies (Blind to General or General to Blind). Formula/Source: Agency transfer request documentation
Federal funds transferred to State VR agency	Amount of award funds transferred to State VR agencies (Blind to General or General to Blind). Formula/Source: Agency transfer request documentation
Federal award amount (net)	Federal award amount available after accounting for adjustments to award (e.g., MOE penalties, relinquishment, reallocation and transfers). Formula/Source: Federal formula award calculation, RSA-692, agency documentation, SF-425 : Federal formula calculation minus MOE penalty minus funds relinquished in reallocation plus funds received in reallocation plus funds transferred from agency minus funds transferred to agency
Federal award funds deobligated	Federal award funds deobligated at the request of the agency or as part of the award closeout process. These funds may include matched

VR Resources and Expenditures	Source/Formula
	or unmatched Federal funds. Source/Formula: Agency deobligation request documentation, G5 closeout reports
Federal award funds used	Amount of Federal award funds expended. Source/Formula: Federal formula calculation, RSA-692, agency documentation, SF-425 lesser of the 4 th quarter or latest/final: Federal award amount (net) (calculation above) minus Federal award funds deobligated
Percent Federal formula award used	Percent of Federal formula award funds used. Source/Formula: Federal award funds used (calculation above) divided by Federal formula award amount
Federal award funds matched but not used	This represents unused Federal award funds for which the agency provided match. I. Source/Formula: Table 6.2 Federal award funds matched (actual) minus Table 6.1 Federal award funds used

Table 6.2 ACCES-VR Non-Federal Share and Maintenance of Effort—FFYs 2015–2017*

Non-Federal Share (Match) and Maintenance of Effort (MOE)	2015	2016	2017*
Match required per net award amount	\$32,166,825	\$33,276,292	\$33,187,617
Match provided (actual)	\$58,237,162	\$58,555,570	\$75,405,496
Match difference**	-\$26,070,337	-\$25,279,278	-\$42,217,879
Federal funds matched (actual)	\$118,851,132	\$122,950,430	\$122,622,790
Percent Federal funds matched	100.00%	100.00%	100.00%
Match from State appropriation			
Percent match from State appropriation	0.00%	0.00%	0.00%
Match from Third-Party Cooperative Arrangements (TPCA)			
Percent match from TPCAs	0.00%	0.00%	0.00%
Match from Randolph-Sheppard program			
Percent match from Randolph-Sheppard Program	0.00%	0.00%	0.00%
Match from interagency transfers			
Percent match from interagency transfers	0.00%	0.00%	0.00%
Match from other sources			
Percent match from other sources	-	-	-
MOE required	-	\$58,198,986	\$58,237,162
MOE: Establishment/construction expenditures	-	-	-
MOE actual	\$58,237,162	\$58,555,570	\$75,405,496
MOE difference**	-\$58,237,162	-\$356,584	-\$17,168,334

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

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

Table 6.2 ACCES-VR Non-Federal Share and Maintenance of Effort—Descriptions, Sources and Formulas

Non-Federal Share (Match) and Maintenance of Effort (MOE)	Source/Formula
Match required per net award amount	Non-Federal funds required based upon the net amount of the Federal award. Source/Formula: (Table 6.1 Federal award amount net divided by 0.787) multiplied by 0.213
Match provided (actual)	Amount of match (non-Federal share) provided, by the agency. Source/Formula: SF-425 line 10j lesser of the 4 th quarter or latest/final
Match difference**	The difference between match required to access the net Federal award funds and the actual amount of match provided by agency. Source/Formula: SF-425 lesser of the 4 th quarter or latest/final: ((Federal formula award amount divided by 0.787) multiplied by 0.213) minus SF-425 line 10j
Federal funds matched (actual)	Total amount of Federal funds the agency was able to match based upon the non-Federal share reported. The maximum amount of Federal funds the agency can access is limited to the Federal grant award amount. Source/Formula: (Match provided actual divided by .213) multiplied by .787
Percent of Federal funds matched	Percent of Federal funds matched. Source/Formula: Federal funds matched divided by Federal award amount net
Match from State appropriation	Match amount from State appropriation. Source/Formula: Data provided by State
Percent match from State appropriation	Match amount from State appropriation expressed as a percentage of total match provided. Source/Formula: Match from State appropriation divided by SF-425 line 10j
Match from TPCAs	Match amount from Third-Party Cooperative Arrangements (TPCAs). Source/Formula: Data provided by State
Percent match from TPCAs	Match amount from Third-Party Cooperative Arrangements (TPCAs) expressed as a percentage of total match provided. Source/Formula: Match from TPCAs divided by SF-425 line 10j
Match from Randolph-Sheppard program	Match amount from Randolph-Sheppard program. Source/Formula: Data provided by State

Non-Federal Share (Match) and Maintenance of Effort (MOE)	Source/Formula
Percent match from Randolph-Sheppard Program	Match amount from Randolph-Sheppard program expressed as a percentage of total match provided. Source/Formula: Match from Randolph-Sheppard Program divided by SF-425 line 10j
Match from interagency transfers	Match amount from interagency transfers. Source/Formula: Data provided by State
Percent match from interagency transfers	Match amount from interagency transfers expressed as a percentage of total match provided. Source/Formula: Match from interagency transfers divided by SF-425 line 10j
Match from other sources	Match amount from all sources of match not previously listed. Source/Formula: Data provided by State
Percent match from other sources	Match amount from all other sources expressed as a percentage of total match provided. Source/Formula: Match from other sources divided by SF-425 line 10j
Maintenance of Effort (MOE) required	Maintenance of effort (MOE) is the level of non-Federal expenditures, minus establishment/construction expenditures for CRPs, established by the State's non-Federal expenditures two years prior, i.e. Recipient Share of Expenditures. Source/Formula: (For FFY two year prior) SF-425 4 th quarter or latest/final report: line 10j minus line 12a. If non-Federal share is added in the prior carryover year, the additional amount is added to the MOE required. If an agency increases their Establishment/Construction expenditures in the prior carryover year, the increase is deducted from the FFY's total non-Federal share for MOE purposes.
MOE: Establishment / construction expenditures	Non-Federal share of expenditures for construction of facilities for community rehabilitation program (CRP) purposes and the establishment of facilities for community rehabilitation purposes. Source/Formula: SF-425 latest/final report: line 12a
MOE actual	Non-Federal share provided by agency minus establishment/construction expenditures for CRPs. Source/Formula: SF-425: Match provided actual minus establishment/construction expenditures. NOTE: If non-Federal share is added in the prior carryover year, the additional amount is added to the MOE actual. If an agency increases their Establishment/Construction expenditures in the prior carryover year, the increase is deducted from the FFY's total non-Federal share for MOE purposes.

Non-Federal Share (Match) and Maintenance of Effort (MOE)	Source/Formula
MOE difference**	The difference between MOE required and the actual MOE provided. Source/Formula: MOE required minus MOE actual

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

Table 6.3 ACCES-VR Program Income and Carryover—FFYs 2015–2017*

Program Income and Carryover	2015	2016	2017*
Program income received	\$665,109	\$2,038,744	\$2,183,554
Program income disbursed	\$665,109	\$2,038,744	\$334,269
Program income transferred	-	-	-
Program income used for VR program	\$665,109	\$2,038,744	\$334,269
Federal grant amount matched	\$118,851,132	\$122,950,430	\$122,622,790
Federal expenditures and unobligated funds 9/30	\$53,548,254	\$44,301,769	\$82,471,894
Carryover amount	\$55,786,147	\$63,305,173	\$30,776,045
Carryover as percent of award	46.94%	51.49%	25.10%

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

Table 6.3 ACCES-VR Program Income and Carryover—Descriptions, Sources and Formulas

Program Income and Carryover	Source/Formula
Program income received	Total amount of Federal program income received by the grantee. Source/Formula: SF-425 latest/final line 10l
Program income disbursed	Amount of Federal program income disbursed, including transfers. Source/Formula: SF-425 latest/final: line 10m plus line 10n
Program income transferred	Amount of Federal program income transferred to other allowable programs. Source/Formula: SF-425 latest/final: line 12e plus line 12f plus line 12g plus line 12h
Program income used for VR program	Amount of Federal program income utilized for the VR program. Source/Formula: SF-425 latest/final: Program income expended minus program income transferred
Federal grant amount matched	Federal funds an agency is able to draw down based upon on reported non-Federal share not to exceed net award amount. Source/Formula: Table 6.2 Federal funds matched actual
Federal expenditures and unobligated funds 9/30	Federal funds expended by 9/30 of the FFY of appropriation. This does not include unliquidated obligations. Source/Formula: SF-425 4 th quarter: line 10e
Carryover amount	The amount of Federal funds matched that the grantee did not liquidate, by 9/30 of the FFY of appropriation. This includes any unliquidated Federal obligations as of 9/30. Source/Formula: G5 Reports run as of 9/30 of the FFY of appropriation.
Carryover as percent of award	Amount of carryover expressed as a percentage of total Federal funds available. Source//Formula: G5, SF-425 latest/final: Carryover amount divided by Federal net award amount.

Table 6.4 ACCES-VR RSA-2 Expenditures—FFYs 2015–2017*

RSA-2 Expenditures	2015	2016	2017
Total expenditures	\$451,435,714	\$522,875,392	\$251,910,385
Administrative costs	\$26,311,548	\$27,405,002	\$10,258,827
Administration as Percent expenditures	5.83%	5.24%	4.07%
Purchased services expenditures	\$317,302,920	\$372,664,360	\$185,278,035
Purchased services as a Percent expenditures	70.29%	71.27%	73.55%
Services to groups	\$624,518	\$6,007,148	-
Services to groups percentage	0.14%	1.15%	0.00%

*Expenditures for RSA-2 data represent current FFY expenditures and carryover from prior FFY. Therefore, these figures may differ from the expenditures in Tables 6.1, 6.2, and 6.3 which are from SF-425 reports.

Table 6.4 ACCES-VR- RSA-2 Expenditures—Descriptions, Sources and Formulas*

RSA-2 Expenditures	Sources/Formula
Total expenditures	All expenditures from Federal, State and other rehabilitation funds (including VR, supported employment, program income, and carryover from previous FFY). This includes unliquidated obligations. Source: RSA-2: Schedule 1.4
Administrative costs	Total amount expended on administrative costs under the VR program. Source/Formula: RSA-2: Schedule 1.1
Administration as percent of expenditures	Administrative costs expressed as a percentage of all expenditures. Source/Formula: Administrative costs divided by total expenditures
Purchased services expenditures	Expenditures made for services purchased by the agency. Source/Formula: RSA-2: Schedule 1.2.B
Purchased services as a percent of expenditures	Purchased services expressed as a percentage of total expenditures. Source/Formula: Purchased services expenditures divided by total expenditures
Services to groups	Expenditures made by the agency for the provision of VR services for the benefit of groups of individuals with disabilities. Source/Formula: RSA-2: Schedule 1.3
Services to groups percentage	Services to groups expressed as a percentage of total expenditures. Source/Formula: Services to groups divided by total expenditures

*Expenditures for RSA-2 data represent current FFY expenditures and carryover from prior FFY. Therefore, these figures may differ from the expenditures in Tables 6.1, 6.2, and 6.3 which are from SF-425 reports.

APPENDIX B: DOCUMENTATION REVIEW RESULTS

Data Element	Number with required documentation	Number without required documentation	Percent with required documentation	Percent without required documentation
Date of Application	17	13	56.7%	43.3%
Date of Eligibility Determination	20	10	66.7%	23.3%
Date of IPE	2	28	6.7%	93.3%
Start Date of Employment in Primary Occupation at Exit or Closure	15	2	88.2%	11.8%
Hourly Wage at Exit or Closure	8	10	44.4%	55.6%
Employment Status at Exit or Closure	11	7	61.1%	38.9%
Type of Exit or Closure	28	2	93.3%	6.7%
Date of Exit or Closure	30	0	100%	0%

Summary	Number (of 30)	Percent (of 30)
Files with all required documentation	0	0%
Files with documentation for four or more data elements	23	76.7%
Files with no required documentation	0	0%

APPENDIX C: SUPPORTED EMPLOYMENT PROGRAM PROFILE

2017 ACCES-VR Supported Employment Program Profile

Summary Statistics – Supported Employment Outcomes						
Performance category	2015 Number	2015 Percent	2016 Number	2016 Percent	2017 Number	2017 Percent
Supported employment (SE) outcomes	3,016	26.6%	3,077	26.0%	2,079	25.5%
Competitive employment outcomes	3,005	99.6%	2,926	95.1%	2,037	98.0%
Median hourly earnings for competitive employment outcomes	\$8.80		\$9.28		\$10.00	
Average hours worked for competitive employment outcomes	23.5		23.8		23.8	

Data source: RSA-911

Note: FFY 2017 data is not comparable with other FFY data. FFY 2017 shows Oct. – June data. FFY 15-16 show Oct. – Sept. data.

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

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

Top Five Services Provided to Individuals in Competitive Supported Employment	
Services Provided	2017 Percent
Job search assistance	84.9%
On-the-job supports-SE	72.5%
Assessment	45.3%
Transportation	26.5%
Maintenance	19.9%

Data source: RSA-911

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

Top Five Occupations by Percentages of Employment Outcomes with Median Hourly Earnings for All Individuals Who Achieved Competitive Supported Employment Outcomes at Closure for FFY17		
SOC Code	2017 Percent	2017 Median Hourly Wage
Office and Administrative Support Occupations	22.0%	\$10.00
Building and Grounds Cleaning and Maintenance	19.5%	\$9.94
Food Preparation and Serving Related Occupations	16.0%	\$9.75
Sales and Related Occupations	12.8%	\$9.75
Production Occupations	6.3%	\$9.71

Data source: RSA-911

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