

**FISCAL YEAR 2017
MONITORING REPORT
ON THE
GEORGIA VOCATIONAL
REHABILITATION AGENCY
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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Table of Contents

	Page
Section 1: Executive Summary	4
Section 2: Focus Area – Performance of the Vocational Rehabilitation Program	9
Section 3: Focus Area – Transition Services, Including Pre-Employment Transition Services for Students and Youth with Disabilities	24
Section 4: Focus Area – State Supported Employment Services Program.....	39
Section 5: Focus Area – Allocation and Expenditure of State Vocational Rehabilitation Services and State Supported Employment Services Program Funds	44
Section 6: Focus Area – Joint Workforce Innovation and Opportunity Act Final Rule Implementation.....	64
Appendix A: Program and Fiscal Performance Data Tables	72
Appendix B: Documentation Review Results	121
Appendix C: Agency Response	122
Appendix D: GVRA Market Survey.....	138

SECTION 1: EXECUTIVE SUMMARY

A. Background

Section 107 of the Rehabilitation Act of 1973 (Act), as amended by Title IV of the Workforce Innovation and Opportunity Act (WIOA), requires the Commissioner of the Rehabilitation Services Administration (RSA) to conduct annual reviews and periodic on-site monitoring of programs authorized under Title I of the Act to determine whether a vocational rehabilitation (VR) agency is complying substantially with the provisions of its State Plan under section 101 of the Act and with the evaluation standards and performance indicators established under section 106 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 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 Georgia Vocational Rehabilitation Agency (GVRA) in Federal fiscal year (FFY) 2017, 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 and those with the most significant disabilities, including students and youth with disabilities; and
- 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 Program 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 Case Service Report (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 on-site visit August 21 through August 24, 2017, is described in detail in the [FFY 2017 Vocational Rehabilitation Program Monitoring and Technical Assistance Guide](#).

B. Summary of Observations and Findings

RSA's review of GVRA resulted in the observations and findings summarized below. The entire observations and findings, along with the recommendations and corrective actions that the agency can undertake to improve its performance are contained within the sections of this report covering the focus areas to which they pertain.

Observations

RSA observed that:

- Individuals with disabilities, particularly 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;
- Although the employment rate increased slightly from FFY 2014 to FFY 2016, the quality of these employment outcomes showed less positive trends over the three-year period;
- Although the percentage of individuals under the age of 25 who exited the VR system with employment outcomes increased from 21.63 percent in FFY 2014 to 38.62 percent in FFY 2016, the percentage of individuals under the age of 25 who exited the VR system without employment also increased over the three-year period; and the quality of employment outcomes declined; and
- GVRA cross-referenced specific examples of pre-employment transition services under multiple required activities and provided, documented, tracked, and reported some VR services beyond the nature and scope of pre-employment transition services.

Findings

RSA found that:

- GVRA did not determine the eligibility of each applicant for VR services within the required 60-day Federal time frame from the date of application pursuant to 34 CFR §361.41(b)(1);
- GVRA did not develop IPEs within 90 days from the date of eligibility determination for each individual in accordance with 34 CFR §361.45(a)(1) and 34 CFR §361.45(e);
- GVRA did not satisfy the service record closure requirements in 34 CFR §361.56, nor the service record documentation requirements in 34 CFR §361.47;
- GVRA is not in compliance with the prior approval requirements pursuant to the Uniform Guidance (2 CFR §200.407); and
- GVRA does not maintain effective internal control over the Federal award to provide reasonable assurance that GVRA is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the award.
 - GVRA is paying unallowable and unreasonable rental costs at its office locations that it shares with the Georgia Department of Labor (GDOL), which are funded in

part through State municipal bonds that GDOL and the State Property Commission compels the VR agency to pay. This is in violation of the non-delegable functions requirement at 34 CFR §361.13(c)(2) and Uniform Guidance rental costs of real property and equipment standards at 2 CFR §200.465.

- GVRA was unable to produce several of its current Inclusive Postsecondary Education (IPSE) Collaborative Agreements, and of the agreements GVRA did produce, none were fully valid. Therefore, GVRA is not in compliance with Uniform Guidance requirements at 2 CFR §200.333, §200.336, and §200.318.
- GVRA failed to monitor the activities performed under its IPSE Collaborative Agreements as it is required to do pursuant to 2 CFR §200.303 and 34 CFR §361.12.
- GVRA used VR funds to provide services to individuals through its IPSE programs who may not have applied for or been determined eligible for VR services, thus the agency did not satisfy Standards for Documentation of Personnel Expenses requirements at 2 CFR §200.430.
- Due to variability in the number of students served by GVRA staff across six IPSEs and GVRA's admission that it did not determine reasonableness of the cost for the staff, GVRA is not in compliance with the Uniform Guidance reasonable cost requirements in 2 CFR §200.404.

C. Summary of Technical Assistance

During the review process, RSA provided the following technical assistance to GVRA:

- Reviewed and provided technical assistance on the formal interagency agreement between GVRA and the Georgia Department of Education (GaDOE) and clarified formal interagency agreement requirements under section 101(a)(11)(D) of the Act and 34 CFR §361.22(b);
- Clarified the requirements for the provision of pre-employment transition services in section 113 of the Act and 34 CFR §361.48(a); and coordination of responsibilities under section 511 of the Act and 34 CFR part 397;
- Discussed necessary transition-related revisions to GVRA's Client Services Policy Manual pursuant to the statutory requirements in the Act, as amended by WIOA and the regulatory requirements in 34 CFR parts 361, 363 and 397;
- Provided technical assistance regarding the provision of generalized group transition services under the services to groups authority in 34 CFR §361.49(a)(7); clarified the distinction between such services and pre-employment transition services provided to students with disabilities in group settings pursuant to 34 CFR §361.48(a)(2);
- Provided guidance related to the provision of individualized services (section 103(a) of the Act and 34 CFR §361.48(b)) to eligible individuals under an approved individualized plan for employment (IPE); and the use of projected post-school employment outcomes (34 CFR §361.46(a)(2)(ii));
- Provided technical assistance regarding the continuation of pre-employment transition services for students with disabilities and generalized group transition services for

students and youth with disabilities should GVRA need to implement an order of selection due to an inability to provide VR services to all eligible individuals in the State of Georgia in accordance with 34 CFR §361.36(e);

- Provided technical assistance regarding the tracking and reporting of not only VR counselor time spent providing required activities, but also staff time spent engaging in pre-employment transition coordination activities (34 CFR §361.48(a)(2) and (4));
- Clarified the cost-allocation requirements and need for cost allocation should GVRA continue to provide required activities under pre-employment transition services to students with disabilities in group settings with students without disabilities (e.g., general education classrooms);
- Provided technical assistance regarding tracking and reporting requirements for the provision of pre-employment transition services and the need for proper internal controls in accordance with RSA Technical Assistance Circular (TAC) 16-04, 34 CFR §361.12 and 2 CFR §200.302;
- Clarified that authorized activities, as defined in section 113(c) of the Act, and 34 CFR §361.48(a)(3), must support the provision or arrangement of the provision of the required activities under section 113(b) of the Act;
- Provided technical assistance regarding GVRA's Policy Manual including its policies on postsecondary education, advancement in employment, entry-level employment, and competitive integrated employment;
- Explored the reasons for the possible inaccuracies in the categorization of VR services, particularly in miscellaneous or other categories, and the discrepancies GVRA cited in the reported data with the actual provision of services based upon the possibility that VR counselors may not have coded these services if they were not purchased services, but rather provided internally by GVRA staff;
- Clarified requirements of the Supported Employment program under 34 CFR part 363 related to the provision of supported employment services, competitive integrated employment, customized employment, short-term basis, and extended services for youth with the most significant disabilities, and that transitional employment represents a VR service, not a supported employment service;
- Clarified the 50 percent reserve and 10 percent match requirements for title VI supported employment funds allotted for the provision of supported employment services;
- Provided technical assistance related to the need to set the scope and requirements for financial systems contractors (rather than relying on contractors to set the requirements) with regard to the manner in which financial systems track and assign payment process dates;
- Discussed with GVRA the relevant State laws pertaining to GVRA's request to use State municipal bonds to help fund capital improvement projects at the Roosevelt Warm Springs facility;
- Provided technical assistance regarding GVRA's Memoranda of Understanding and Infrastructure Funding Agreements related to the one-stop service delivery system in accordance with 34 CFR §§361.500 and 361.755; and

- Provided technical assistance related to co-enrollment, supplemental wage information, and the WIOA Annual Report in accordance with policy guidance issued jointly with the U.S. Department of Labor.

As a result of the monitoring process, GVRA and RSA identified the need for additional technical assistance related to:

- Period of performance with regard to the current buildout of a new case management system; correcting data reported in financial status reports; and the use of bonds, under certain circumstances, to fund portions of a project covered under the establishment authority; and
- GVRA's policies and procedures for pre-employment transition services to support GVRA in meeting the requirement for the reservation and expenditure of pre-employment transition services funds.

D. Review Team Participants

Members of the RSA review team included Jessica Davis and Tonya Stellar (Vocational Rehabilitation Program Unit); Marisa Liuzzi and Terrence Martin (Technical Assistance Unit); Melinda Giancola (Data Collection and Analysis Unit); David Miller (Fiscal Unit); Christopher Pope (Office of the Director). 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.

E. Acknowledgements

RSA wishes to express appreciation to the leadership and management of GVRA for their cooperation and assistance extended throughout the monitoring process. RSA also appreciates the participation of the Client Assistance Program (CAP) and the GVRA Board. RSA acknowledges those GVRA staff who presented on the following topics during a discussion on some of GVRA's initiatives: GVRA's Ticket-to-Work program; the e3 program (GVRA's Career Pathways for Individuals with Disabilities Model Demonstration project); GVRA's business process mapping; GVRA's implementation of section 511 of the Act; and GVRA's approach to industry-recognized certifications at its comprehensive rehabilitation center, Roosevelt Warm Springs. Finally, RSA acknowledges the three GVRA staff who assisted RSA with the case service record review.

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

A. Nature and Scope

Through implementation of this focus area, RSA assessed the achievement of quality employment 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 represents a broad overview of the VR program administered by GVRA and included employment outcomes in competitive integrated employment and supported employment. It should not be construed as a definitive or exhaustive review of all available VR program data. The data generally measure performance based on individuals who exited the VR program during the most recently completed three-year period for which data are available. Consequently, the tables do not provide complete information that could otherwise be derived from examining open service records. The analysis includes the number of individuals participating in the various stages of the VR process; the number and quality of employment outcomes; the services provided to eligible individuals; the types of disabilities experienced by individuals receiving services; and the amount of time individuals are engaged in the various stages of the VR process, including eligibility determination, development of the IPE, and the provision of services. RSA also reviewed policies and procedures related to internal controls necessary for the verification of data and compared the performance of GVRA with that of all VR agencies of similar type (i.e., combined) as appropriate.

In addition to data tables, the review team used a variety of other resources to better understand the performance trends indicated by the outcomes measured. Other resources included, but were not limited to:

- Agency policies and procedures related to the provision of transition and pre-employment transition services, competitive integrated employment, and supported employment services; and
- Descriptions in the VR services portion of the program year 2016 Unified State Plan describing goals and priorities pertaining to the performance of the VR program.

The review team shared the data with the VR agency prior to the on-site monitoring review and solicited information throughout the review process explaining the performance trends demonstrated by the data. Specifically, the review team met with:

- The VR agency director;
- VR agency managers and supervisors;
- VR counselors;
- VR agency personnel; and
- Representatives of the Client Assistance Program (CAP).

In addition to a review of the RSA-911 and Quarterly Cumulative Caseload Report (RSA-113) data provided by the VR agency, RSA conducted a review of individual service records. RSA provided guidelines to the VR agency prior to the on-site visit. The review team discussed the selection of service records with GVRA and the method it uses to maintain records. RSA used the information obtained through the review of service records to assess GVRA's internal controls for the accuracy and validity of RSA-911 data.

The review team provided technical assistance on the joint performance accountability measures established in section 116(b) of WIOA. RSA did not issue compliance findings on these measures. However, the review team and VR agency used these measures to discuss the potential effect of the joint performance accountability measures on the State and agency level performance.

RSA provided additional technical assistance to the VR agency during the course of monitoring to enable it to improve programmatic performance.

B. Overview of Performance Data and Internal Controls

RSA reviewed GVRA's performance for FFYs 2014, 2015, and 2016, 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 GVRA to RSA on the RSA-113 and the RSA-911.

The VR Process

From FFY 2014 through FFY 2016, the total number of applicants increased from 9,605 individuals to 16,041 individuals; and the total number of individuals with disabilities eligible for VR services increased from 12,357 to 15,373 individuals. Similarly, the number of individuals with an IPE who received services increased from 12,293 individuals in FFY 2014 to 20,472 individuals in FFY 2016.

During FFY 2014, GVRA implemented an order of selection (OOS) and closed priority categories. In the same year, 1,498 individuals exited the VR system from the OOS waiting list. Of these individuals, 791 individuals or 52 percent were under the age of 25. GVRA served individuals in all priority categories in FFY 2015 and FFY 2016.

During FFY 2014 through FFY 2016, of all individuals whose service records were closed, the total number of individuals who exited from the VR system as applicants increased from 1,272 individuals or 15.5 percent in FFY 2014, to 1,948 individuals or 21.5 percent in FFY 2015, and subsequently decreased to 1,844, individuals or 17.1 percent in FFY 2016 in comparison to the national performance of 12.3 percent in FFY 2016 for combined agencies. Over the three-year period, of the 5,064 individuals who exited as applicants, 2,088 of these individuals or 41 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 services were received, decreased from 2,889 individuals or 35.5 percent of all individuals whose service records were closed in FFY 2014, to 2,704 individuals or 25 percent in FFY 2016, compared to the national performance of 23.4 percent for combined agencies in FFY 2016. Over the three-year period, of the 8,277 individuals who exited at this stage of the VR process, 3,751 individuals or 45 percent were under the age of 25. In FFY 2016, 24 percent of individuals under the age of 25 exited after they were determined eligible for VR services and before receiving services compared to the national performance of 4.5 percent in FFY 2016 for combined agencies.

During FFY 2014 through FFY 2016, the percentage of individuals who were accepted for VR services, but received no services decreased from 35.5 percent in FFY 2014, to 17.6 percent in FFY 2016, compared to the national performance for combined agencies of 23.2 percent in FFY 2016.

Employment Outcomes

The number and percentage of individuals served whose service records were closed after achieving employment increased from 1,618 individuals or 19.8 percent in FFY 2014, to 4,056 individuals or 37.5 percent in FFY 2016. At the same time, the number and percentage of individuals who did not achieve employment and whose service records were closed increased from 881 individuals or 10.8 percent in FFY 2014, to 2,183 individuals or 20.2 percent in FFY 2016. The employment rate remained relatively constant over the three-year period, ranging from 64.6 percent in FFY 2014, to 66.2 percent in FFY 2015, to 65 percent in FFY 2016, which is approximately ten percentage points higher than the national performance for combined agencies. Furthermore, the number and percentage of individuals who achieved supported employment outcomes increased from 188 individuals or 11.6 percent of all individuals whose service records were closed in FFY 2014, to 495 individuals or 12.2 percent in FFY 2016.

From FFY 2014 through FFY 2016, the average hourly earnings for individuals who achieved competitive employment outcomes decreased from \$10.36 per hour to \$10.08 per hour, which was lower than the national average hourly earnings of individuals in FFY 2016 of \$11.84 for combined agencies. For individuals who achieved competitive employment outcomes, the average hours worked per week was 32.02 hours per week in FFY 2016 compared to the national performance of 30.3 average hours worked per week for combined agencies in FFY 2016.

Over the three-year period, of the 8,600 individuals who exited with employment, 8,297 individuals or 96.4 percent exited the VR system with competitive employment outcomes. Eighty (26.4 percent) of the 303 individuals who exited with non-competitive employment outcomes were under the age of 25.

VR Services Provided

From FFY 2014 through FFY 2016, the number of individuals served by GVRA increased from 2,499 to 6,239 individuals. Of the individuals whose service records were closed in FFY 2016, 942 individuals or 15 percent received postsecondary education training (e.g., college or university training, four-year or university training, and junior or community college training), a substantial increase from the 59 individuals who received postsecondary education training in FFY 2014.

In FFY 2016, 18.4 percent of individuals served by GVRA received miscellaneous training compared to the national performance of 7.8 percent of individuals served by combined agencies. The percentage of individuals served who received occupational/vocational training in FFY 2016 was 9.6 percent compared to the national performance in FFY 2016 of 10.1 percent for combined agencies. Over the three-year period, GVRA provided minimal on-the-job training, apprenticeship training, and disability-related skills training. In FFY 2014, GVRA did not provide any basic academic remedial or literacy training whereas in FFY 2016, GVRA provided this training service to 456 individuals or 7.3 percent, compared to the national performance of 1.6 percent for combined agencies. Additionally, 639 individuals or 25.6 percent received job readiness training in FFY 2014 compared to 3,318 individuals or 53.2 percent in FFY 2016, significantly higher than the national performance for combined agencies.

Of the individuals who received career services, whose service records were closed in FFY 2016, 42.5 percent received vocational rehabilitation counseling and guidance compared to the national performance of 64.4 percent for combined agencies. This contrasts with FFY 2014 and FFY 2015, during which only 0.5 percent and 1.1 percent of individuals respectively were reported as receiving this service. In FFY 2016, 18.3 percent of individuals received assessment services, compared to the national performance for combined agencies of 57.2 percent. The percentage of individuals receiving on-the-job supports short-term reported by GVRA was 0.4 percent, significantly lower than the national performance of 13.8 percent for combined agencies. In Georgia, 11.6 percent of individuals served received job search assistance compared to the national performance of 33.2 percent for combined agencies. From FFY 2014 through FFY 2016, the percentage of individuals who received job placement assistance increased dramatically from 0.3 percent to 60.3 percent. During the same period, very few individuals received information and referral services (0 percent in FFY 2016 compared to the national performance of 22.5 percent for combined agencies), and similarly, few individuals received benefits counseling (0.1 percent in FFY 2016 compared to the national performance of 5.9 percent for combined agencies).

Of the individuals who received other services and whose service records were closed in FFY 2016, 26.6 percent received transportation services compared to the national performance of 34.5 percent for combined agencies, and 23.2 percent of individuals received maintenance compared to the national performance of 21.7 percent for combined agencies. From FFY 2014 through FFY 2016, there was a significant increase in the percentage of individuals who received rehabilitation technology (0.1 to 14.8 percent).

Select Measures for All Individuals Served by Disability

Of the individuals served who exited from the VR system in FFY 2016 who achieved employment, 42.6 percent were individuals with intellectual and learning disabilities. The percentage of those achieving employment who exited with psychosocial and psychological disabilities was 28 percent, comparable to the national performance for combined agencies.

From FFY 2014 through FFY 2016, there was a decrease in the percentage of individuals with visual disabilities served by GVRA whose service records were closed (7.3 percent to 4.7 percent) and those with intellectual and learning disabilities (48 percent to 40.8 percent), while there was an increase in the percentage of individuals served with psychosocial and psychological disabilities (21.2 percent to 29.6 percent).

In FFY 2016, the employment rates for individuals with each type of impairment were higher than the national performance for combined agencies. From FFY 2014 through FFY 2016, the employment rate for individuals with visual disabilities increased from 49.2 percent to 65.8 and the employment rate for individuals with auditory and communicative disabilities represented the highest employment rate, increasing from 72 percent to 77 percent.

Length of Time in Stages of the VR Process

The percentage of individuals served who were determined eligible within 60 days from the date of application decreased from 66.4 percent for all individuals whose service records were closed in FFY 2014, to 65 percent in FFY 2016, less than the national performance of 82.6 percent for combined agencies in FFY 2016.

From FFY 2014 through FFY 2016, the percentage of individuals for whom an IPE was developed within 90 days increased from 52.7 percent to 60.4 percent for all individuals whose service records were closed, below the national performance of 75.1 percent for combined agencies.

Standard Occupational Codes for Individuals Who Achieved Employment Outcomes

Of the individuals served who achieved employment and whose service records were closed in FFY 2016, 22.4 percent were employed in office and administrative support occupations with an average hourly wage of \$9 per hour, 14.3 percent were employed in food preparation and serving related occupations with an average hourly wage of \$7.50 per hour, and 10.5 percent were employed in transportation and material moving occupations with an average hourly wage of \$8.75 per hour. Compared to other combined agencies in FFY 2016, the percentages of individuals in GVRA's top three occupations for employment outcomes are higher than the percentages reflected in the national performance and all three corresponding average hourly wages are less than the national average hourly wages.

From FFY 2014 to FFY 2016, GVRA closed the service records of 139 individuals employed as

homemakers and seven individuals employed as unpaid family workers.

C. Internal Controls

During the on-site monitoring review, RSA conducted a review of 31 service records comprised of individuals who did and did not achieve employment whose service records were closed on September 30, 2016. 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, the date of eligibility determination, date of IPE, start date of employment in primary occupation at exit or closure, hourly wage at exit or closure, employment status at exit or closure, type of exit or closure, and date of exit or closure.

Of the 31 service records reviewed, 36 percent did not include a signed application or the date of the individual's signed application was different from the date entered in GVRA's case management system. In addition, 55 percent of all service records reviewed did not have documentation that GVRA notified individuals of their eligibility determination and 58 percent did not include a signed copy of the IPE.

Of the service records reviewed, 44 percent did not include verification of the start date for employment, while 56 percent did not include verification of the individual's employment status at closure. Also, 67 percent of all service records reviewed did not include weekly earnings at employment, while 16 percent did not include the type of closure. Furthermore, 45 percent of the service records reviewed did not include the date of closure or the date of closure in GVRA's case management system differed from the date of closure GVRA used to notify individuals that their service record was closed.

Due to the lack of supporting documentation required by 34 CFR §361.47, RSA was unable to verify that the requirements for closing the record of services of an individual who achieved employment in 34 CFR §361.56 were met. Specifically, RSA was unable to verify that GVRA counselors contacted individuals directly to verify that they maintained employment for at least 90 days, were stable in their current employment, and that they were satisfied with the employment outcome prior to closing their service records as having achieved an employment outcome. Furthermore, RSA was unable to verify whether individuals were in agreement with the decision to close their service records.

At the time of the on-site review, GVRA did not have policies and procedures requiring VR counselors to maintain documentation (either hardcopy or electronic documents) in the case management system to corroborate each participant's date of application, employment start date, weekly earnings at closure, and hours worked per week at closure. The employment dates in the service records reviewed were unverifiable without supporting documentation and, therefore, unreliable for use when determining whether all case service record closures for individuals who achieved an employment outcome were accurate and reliable.

D. Analysis of Performance and Observations

RSA's review and analysis of the performance of GVRA in this focus area resulted in the following observations. See section B above for data referenced in the observations below. The recommendations to improve GVRA's performance related to the observations are in section D of this focus area.

2.1. Attrition

Observation: Individuals with disabilities, particularly 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:

- In FFY 2014, 13 percent or 1,272 individuals exited as applicants. In FFY 2015, 14 percent or 1,948 individuals exited as applicants. In FFY 2016, 11 percent or 1,844 individuals exited as applicants; and
- Over the three-year period, this accounts for 5,064 individuals who exited as applicants without eligibility determinations, which is higher than the national performance for combined VR agencies in FFY 2016. Furthermore, over the three-year period, 41 percent or 2,088 of these individuals were individuals under the age of 25.

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:

- 35.3 percent or 2,889 individuals exited in FFY 2014; 29.6 percent or 2,684 individuals exited in FFY 2015; and 25 percent or 2,704 individuals exited in FFY 2016; and
- Over the three-year period, this totals 8,277 individuals of which 45 percent or 3,751 individuals were under the age of 25.

2.2. Employment Outcomes

Observation: Although the employment rate for all individuals increased slightly from 64.7 percent in FFY 2014, to 65 percent in FFY 2016, which was above the national performance of 55.9 percent for combined agencies, measures of the quality of employment outcomes showed less positive trends over the three-year period, despite increases in the provision of postsecondary education and other services that support the achievement of improved quality of employment outcomes.

From FFY 2014 through FFY 2016, the number and percentage of individuals whose service records were closed without achieving an employment outcome rose each year:

- In FFY 2014, 881 individuals or 10.8 percent exited without employment outcomes; 1,494 individuals or 16.5 percent in FFY 2015 and 2,183 individuals or 20.2 percent in

FFY 2016 exited without employment outcomes; and

- While this remains below the national average of 27.3 percent for combined VR agencies in FFY 2016, the increase over the three-year period represents an area for VR program improvement.

In terms of the earnings of individuals who achieved employment outcomes:

- The average hourly earnings worked for competitive employment outcomes decreased from \$10.36 per hour in FFY 2014 to \$10.08 per hour in FFY 2016, below the national performance of \$11.84 per hour for combined VR agencies;
- The quarterly median earnings also decreased slightly from \$3,783 in FFY 2014 to \$3,770 in FFY 2016, which is below the national performance of median earnings of \$3,900 in FFY 2016;
- The average hours worked for competitive employment outcomes decreased from 32.94 hours per week in FFY 2014 to 32.02 hours per week in FFY 2016; and
- Similarly, the median hours worked for competitive employment outcomes also decreased from 38 hours per week in FFY 2014 to 35 hours per week in FFY 2016.

Related to the specific occupations these individuals with disabilities achieved:

- In FFY 2016, GVRA reported its highest percentage of individuals who achieved employment outcomes to be employed in Office and Administrative Support Occupations (22.4 percent) followed by Food Preparation and Serving Related Occupations (14.3 percent) followed by Transportation and Material Moving Occupations (10.5 percent); and
- In each of these occupations, the median hourly earnings were less than the median hourly earnings for combined VR agencies in FFY 2016. For instance, in FFY 2016, all individuals earned a median hourly wage of \$9 compared to the national median hourly wage of \$10 per hour for combined VR agencies in Office and Administrative Support Occupations.

From FFY 2014 through FFY 2016, for individuals whose cases were closed:

- The percentage of those attending postsecondary education increased as follows: college or university training (0.2 percent to 3.6 percent); four-year or university training (1.7 percent to 9.4 percent); and junior or community college training (0.4 percent to 2.1 percent);
- As described in section B of this focus area, from FFY 2014 through FFY 2016, the percentage of individuals whose cases were closed and received the following services increased: vocational rehabilitation counseling and guidance (0.5 percent to 42.5 percent), job search assistance (0.4 percent to 11.6 percent), and job placement assistance (0.3 percent to 60.3 percent); and
- Over the same period, there were also large increases in the percentage of individuals who received rehabilitation technology (0.1 percent to 14.8 percent), basic academic

remedial or literacy training (0 percent to 7.3 percent), and job readiness training (25.6 percent to 53.2 percent).

While on-site, RSA and GVRA discussed the upward trend in individuals receiving postsecondary education services along with the increase in the provision of various job-related services; the increase in the number and percentage of individuals exiting without employment outcomes; hourly and median earnings; and the specific occupations individuals with disabilities are entering as a result of receiving VR services. GVRA acknowledged a new focus on improving the quality, rather than the quantity, of employment outcomes for individuals served by the VR agency. GVRA also indicated that its partnerships with other State workforce development agencies are expected to improve the quality of employment outcomes.

E. Recommendations

RSA's review of the performance of the VR program in this focus area resulted in the following recommendations. Appendix C of this report indicates whether or not the agency has requested technical assistance to enable it to implement any of the below recommendations.

RSA recommends that GVRA:

2.1 Attrition

- 2.1.1 Conduct surveys of individuals, particularly those under the age of 25, who exit the VR program as applicants before eligibility is determined and after eligibility is determined but before IPEs are developed 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.

2.2 Employment Outcomes

- 2.2.1 Develop measurable goals and strategies to improve the agency's performance in terms of maximizing and improving the quality of employment outcomes;
- 2.2.2 Assess the effect of postsecondary education (e.g., junior or community college training) on the quality of employment outcomes achieved by individuals who attended various levels of postsecondary education; and
- 2.2.3 Assess the effect of various job-related services (e.g., job placement assistance) on the quality of an individual's employment outcome.

F. Findings and Corrective Actions to Improve Performance

RSA's review of the performance of the VR program in this focus area resulted in the

identification of the following findings and corrective actions to improve performance. Appendix C of this report indicates whether or not the agency has requested technical assistance to enable it to implement any of the below corrective actions.

2.1 Untimely Eligibility Determination

Issue: Is GVRA determining the eligibility of applicants for VR services within the required 60-day Federal time frame from the date of application.

Requirement: Under 34 CFR §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 CFR §361.42(e).

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

- Of all individuals served whose service records were closed in FFY 2016, 65 percent had an eligibility determination made within the required 60-day period, compared to the national performance of 82.6 percent for combined agencies;
- GVRA made eligibility determinations for 14.7 percent of all individuals served whose service records were closed in FFY 2016 within a 61- to 90-day period, compared to the national performance of 8.3 percent for combined agencies;
- Of the total individuals served, only 60.64 percent of individuals under age 25 at exit whose service records were closed in FFY 2016 had an eligibility determination made within the required 60-day period, compared to the national performance of 81.70 percent for combined agencies;
- GVRA made eligibility determinations for 16.65 percent of all individuals under age 25 at exit whose service records were closed in FFY 2016 within a 61- to 90-day period, compared to the national performance of 8.51 percent for combined agencies;
- Of the total individuals served who achieved supported employment and whose service records were closed in FFY 2016, 72.32 percent had an eligibility determination made within the required 60-day period, compared to the national performance of 85.57 percent for combined agencies; and
- GVRA made eligibility determinations for 12.12 percent of the individuals who achieved supported employment and whose service records were closed in FFY 2016 within a 61- to 90-day period, compared to the national performance of 6.54 percent for combined agencies.

During the on-site monitoring visit, GVRA reported that it had identified untimely eligibility determinations as a performance issue and its plans to implement a new case management model using a team approach to improve its performance in determining eligibility within the required 60-day period.

Conclusion: As demonstrated by performance data, GVRA 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 CFR §361.41(b)(1).

Corrective Action Steps:

RSA requires that GVRA:

- 2.1.1. Comply with 34 CFR §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 timeliness of eligibility determinations.

2.2 Untimely Development of the IPE

Issue: Is GVRA developing IPEs within 90 days from the date of eligibility determination for each individual.

Requirement: In accordance with 34 CFR §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 CFR §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 CFR §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 CFR §361.45(e), the IPE must be developed as soon as possible, but not later than 90 days after the date of determination of eligibility, 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 GVRA to develop IPEs for individuals determined eligible for VR services. In particular, FFY 2016 data reported by GVRA on the RSA-911 show that:

- Of all individuals served whose service records were closed in FFY 2016, 60.4 percent had an IPE developed within the required 90-day period, compared to the national performance of 75.1 percent for combined agencies;

- For individuals served under the age of 25 whose cases were closed in FFY 2016, 62.05 percent had an IPE developed within the required 90-day period, compared to the national performance of 75.79 percent for combined agencies; and
- Of the total individuals served who achieved supported employment and whose service records were closed in FFY 2016, 71.11 percent had an IPE developed within the required 90-day period, compared to the national performance of 79.06 percent for combined agencies.

During the on-site visit, GVRA management informed RSA that it had identified the untimely development of IPEs as a performance issue and reported its plans to implement a new case management model using a team approach to improve its performance in developing IPEs within the required 90-day time frame.

Conclusion: As the FFY 2016 performance data demonstrate, GVRA did not develop IPEs for each eligible individual whose service record was closed within 90 days following the date of eligibility determination pursuant to 34 CFR §361.45(a)(1) and within the required 90-day period pursuant to 34 CFR §361.45(e).

Corrective Action Steps:

RSA requires that GVRA:

- 2.2.1 Comply with 34 CFR §361.45(a)(1) and (e) to ensure IPEs are developed within the 90-day Federal time frame from date of application;
- 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.

2.3 Service Record Closure

Issue: Does GVRA close the service records of individuals who achieved an employment outcome without documenting that the employment outcome was maintained for at least 90 days, that the employment outcome was stable, and that the individual no longer needed VR services in accordance with 34 CFR §361.56(b). In addition, do GVRA service records include supporting documentation that the employment outcome was considered to be satisfactory by the individual employed and the VR counselor, that the individual was performing well in his or her employment, and that the individual was informed of the availability of post-employment services pursuant to 34 CFR §361.56(c) and (d).

Requirement: Pursuant to 34 CFR §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 CFR §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 CFR §361.47(a)(15), prior to closing a service record, VR agencies must maintain documentation verifying that the provisions of 34 CFR §361.56 have been satisfied. More specifically, under 34 CFR §361.47(a)(9), GVRA must maintain documentation verifying that an individual who obtains competitive 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. Under 34 CFR §361.45(d)(6), the VR agency must ensure that the IPE is amended, as necessary, by the individual, or as appropriate, the individual's representative, if there are substantive changes in the employment goal, the VR services to be provided, or the providers of the VR services. In accordance with 34 CFR §361.45(d)(7), amendments to the IPE do not take effect until agreed to and signed by the eligible individual, or as appropriate, the individual's representative, and by a qualified VR counselor employed by the DSU.

Analysis: While on-site, RSA reviewed 31 service records closed on September 30, 2016, which included service records of individuals who did, and did not, achieve employment. Of the service records reviewed, 8 records or 44 percent of all service records reviewed with employment outcomes did not include verification of the start date for employment, while 10 records or 56 percent of all service records reviewed did not include verification of employment status at closure. Also, 12 service records or 67 percent of all service records reviewed did not include documentation of weekly earnings at employment, while 5 service records or 16 percent of all service records reviewed did not include documentation of the type of closure. Finally, 14 service records or 45 percent of all service records reviewed did not have a copy of the closure letter or the date in the closure letter did not match the date the case was closed in GVRA's case management system.

According to the information obtained during the on-site service record review and interviews with GVRA management and VR counselors, GVRA reported that it routinely closes service records for those individuals who achieve an employment outcome 90 days after job placement. RSA observed that the service records reviewed lacked documentation to support that GVRA's 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 CFR §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 CFR §361.56(c). Due to lack of supporting documentation, RSA was not able to verify whether the individual was informed of the availability of post-employment services as required by 34 CFR §361.56(d).

GVRA must maintain documentation (either hardcopy or electronic documents) in the electronic service records within its case management system to verify the accuracy of reporting of Federal requirements, including the individual's date of application, employment start date, weekly earnings at closure, and hours worked per week at service record closure. For some of the service records reviewed, the employment dates at service record closure were not substantiated with documentation verifying that the individual maintained stable and satisfactory employment for at least 90 days after placement. Therefore, without documentation that the data elements were valid, RSA was unable to verify the accuracy of employment outcomes reported.

Conclusion: As a result of the analysis and lack of supporting documentation, RSA determined that GVRA did not satisfy the service record closure requirements in 34 CFR §361.56.

Corrective Action Steps:

RSA requires that GVRA:

- 2.3.1 Develop procedures to ensure and document that the provisions of 34 CFR §361.56 have been met and verified through service record documentation in accordance with 34 CFR §361.47(a), including verified documentation that individuals have sustained satisfactory competitive integrated employment earning at least the minimum wage, prior to determining that they have achieved and maintained stable competitive employment for at least 90 days;
- 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 review processes and use the results to inform the design and evaluation of training of staff.

G. Technical Assistance

RSA provided technical assistance on internal controls to GVRA. RSA reviewed 2 CFR §200.303 outlining the requirements GVRA must follow regarding internal controls as a non-Federal entity receiving Federal funds.

In regards to data collection, internal controls would help GVRA ensure the accuracy and validity of the data being reported to RSA. Data from the RSA-911 are used to create the VR programs performance indicators, which are 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.

Prior to the on-site monitoring visit, GVRA provided RSA with its internal controls procedures, which only included running the RSA-provided individual record edit checks on the RSA-911 prior to submission to RSA. RSA explained that GVRA 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 the individual record edit checks. For example, GVRA leadership indicated that they were surprised to learn that the agency's performance data indicated that very few individuals received information and referral services or benefits counseling. 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 GVRA implement case service record reviews as part of its internal control procedures. Case service record reviews serve as a mechanism to ensure that staff are adequately trained and are following procedures; they also serve as a mechanism for the agency to identify policies and procedures that may need to be developed or improved if already in place.

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

A. Nature and Scope

Through the implementation of this focus area, RSA assessed the VR agency performance and technical assistance needs related to the provision of pre-employment transition services for students with disabilities, and transition services for students and youth with disabilities and the employment outcomes achieved by these individuals. For purposes of the VR program, “transition services” are defined as a coordinated set of activities for a student or youth with a disability, designed within an outcome-oriented process that promotes movement from school to post-school activities, including postsecondary education, vocational training, competitive integrated employment, supported employment, continuing and adult education, adult services, independent living, or community participation.

The Act places heightened emphasis on the provision of services, including pre-employment transition services, to students and youth with disabilities to ensure they have meaningful opportunities to receive training and other 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.

“Pre-employment transition services,” defined in section 7(30) of the Act and 34 CFR §361.5(c)(42), include both required activities and authorized activities specified in section 113 of the Act and in 34 CFR §361.48(a). Pre-employment transition services also include pre-employment transition coordination activities. Section 113(a) of the Act requires that VR agencies provide, or arrange for the provision of, pre-employment transition services to students with disabilities who are eligible or potentially eligible for VR services. The term “potentially eligible” is specific to the provision of pre-employment transition services but is not defined in the Act. A “student with a disability,” as defined in section 7(37) of the Act and 34 CFR §361.5(c)(51), includes the minimum age for the receipt of pre-employment transition services, the minimum age for the provision of transition services under the Individuals with Disabilities Education Act (IDEA), and the maximum age for the receipt of services under IDEA; thus, the implementing definition of “student with a disability” may vary from State to State.

“Youth with a disability” is defined in section 7(42) of the Act and in 34 CFR §361.5(c)(58) as an individual with a disability who is age 14 through 24. The distinction between the definitions of “student with a disability” and “youth with a disability” is critical for purposes of the various authorities for providing transition-related services, including pre-employment transition services.

During the monitoring process, RSA and GVRA jointly reviewed applicable data and documentation related to transition and pre-employment transition services, which included:

- State educational agency (SEA) agreement;
- Policies related to the provision of transition services, including pre-employment transition services;
- Assurance 4(c) and descriptions (j), (m), and (o), and any other relevant information from the most recently submitted VR services portion of the Unified or Combined State Plan;
- Federal Financial Report (SF-425) reporting procedures, especially as those procedures relate to the proper accounting and reporting of expenditures with funds reserved under section 110(d)(1) of the Act for the provision of pre-employment transition services for students with disabilities;
- Supporting documentation for expenditures incurred with funds reserved for the provision of pre-employment transition services and reported in line 12b of the SF-425; and
- Updated policies or procedures for tracking expenditures for the provision of pre-employment transition services for: 1) purchased services and services provided by VR agency personnel; and 2) related procedures to exclude administrative costs from expenditures paid with funds reserved under section 110(d)(1) for the provision of pre-employment transition services (section 110(d)(2) of the Act prohibits such costs from being paid for with funds reserved under section 110(d)(1)).

In gathering information related to the provision of transition services, including pre-employment transition services, RSA consulted:

- GVRA's Chief Client Management Officer;
- GVRA's Director of Transition Services;
- GVRA's Director of WIOA Compliance and Policy Unit;
- GVRA fiscal officers and staff;
- GVRA VR counselors; and
- Representatives of the State Educational Agency (SEA).

B. Overview

GVRA provides a continuum of VR services to students and youth with disabilities through approximately 75 transition VR counselors who are dispersed across the West, Metro, East, and South quadrants of the State and are housed in the 41 VR local offices covering the State's 159 counties. To facilitate the provision of transition services and pre-employment transition services, transition VR counselors have been assigned as liaisons to each of the 619 public high schools in 208 school districts. GVRA has assigned additional general VR counselors to support the transition planning process and provision of transition services, as needed.

Students with disabilities may self-refer or be referred to GVRA by school personnel in local educational agencies (LEAs), including teachers, school counselors, nurses, social workers and individualized education program (IEP) teams. VR counselors attend transition planning, IEP meetings, senior student exit meetings, parent information nights, and high school career fairs when invited by the LEAs. GVRA reported that VR counselors do not provide group transition services, however, they conduct outreach to students with disabilities and coordinate the provision of VR services, including individualized transition services under an IPE for students determined eligible for the VR program and in need of individualized services in addition to any of the five required activities under pre-employment transition services.

GVRA reported that it provides the five required activities under pre-employment transition services statewide to all students with disabilities ages 14 through 21 in educational programs who are potentially eligible and eligible for VR services, through its VR counselors and fee-for-service contracts with providers. VR counselors provide pre-employment transition services including job exploration counseling, work-based learning experiences, counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education, workplace readiness training, and instruction in self-advocacy to students with disabilities who may or may not have applied for VR services. GVRA also provides pre-employment transition services to students with disabilities through the High School High Tech program available in over 50 high schools in collaboration with the Georgia Committee on Employment of People with Disabilities, Inc., local school systems; and nine Project SEARCH sites covering 14 cities, including medical centers, hospitals and a credit card service company. At the time of the on-site review, GVRA reported that it was not providing any of the nine authorized activities.

Throughout FFY 2016, GVRA worked to revise the formal interagency agreement with GaDOE, to align with the requirements in the Act, as amended by WIOA, and VR program regulations. GVRA and GaDOE revised the formal interagency agreement to ensure it included the minimum statutory requirements of a formal interagency agreement pursuant to section 101(a)(11)(D) of the Act and 34 CFR §361.22(b). The formal interagency agreement was approved on August 24, 2016, and is effective through June 30, 2018. GVRA and GaDOE included criteria in the current formal interagency agreement to assist LEAs and VR offices with determining which entity is responsible for providing and funding services that are similar under the Act and IDEA.

During July 2017, GVRA revised the Georgia Client Services Policy Manual to include the nature and scope of pre-employment transition services, as required in 34 CFR §361.50(a); and to reflect the transition-related revisions to the statutory requirements in the Act, as amended by WIOA, and the regulatory requirements in 34 CFR part 361. At the time of the on-site visit, GVRA planned to hold public hearings in order to make additional revisions to the current policy manual. GVRA reported that while developing policy, it provided transition-related guidance and training on the implementation of new policies to VR and LEA staff through focused trainings; webinars; FAQs; the Georgia Learning Resource System (GLRS) comprised of special education, transition, VR, and GLRS directors and field staff; conferences; and leadership academies. Furthermore, GVRA reported piloting referral and parental permission forms in a few regions, and will expand the statewide use of standardized referral and permission forms in order

to ensure consistency; and provide and arrange for the provision of pre-employment transition services with all LEAs in Georgia.

C. Analysis of Performance and Observations

RSA's review and analysis of the performance of GVRA in this focus area resulted in the following observations. Recommendations to the observations are in section D of this focus area.

3.1 Employment Outcomes

Observation: Although the percentage of individuals under the age of 25 who exited the VR system with employment outcomes increased from 21.63 percent in FFY 2014 to 38.62 percent in FFY 2016, the percentage of individuals under the age of 25 who exited the VR system without employment also increased over the three-year period from 10.6 percent to 20.41 percent. Consequently, the employment rate for this population decreased from 67.11 percent in FFY 2014 to 65.43 percent in FFY 2016. Notably, however, the percentage of those individuals under the age of 25 at exit who achieved competitive employment outcomes increased from 93.67 percent to 98.97 percent, which is higher than the national performance of 97.55 percent for combined agencies. Nevertheless, during the three-year period, there was also an overall decline in the quality measures for those individuals under 25 who achieved employment. With respect to the quality of employment outcomes for individuals under the age of 25 at exit who achieved employment from FFY 2014 to FFY 2016:

- The average hourly earnings decreased from \$9.86 to \$9.45, which remains below the national average of \$10.12 for combined agencies in FFY 2016;
- The average hours worked per week for individuals under the age of 25 at exit who achieved employment decreased from 32.67 hours per week to 31.31 hours per week;
- The percentage of competitive employment outcomes at 35 or more hours per week decreased from 45.96 percent to 36.5 percent;
- The percentage of competitive employment outcomes meeting substantial gainful activity also decreased from 55.13 percent to 52.89 percent; and
- The percentage of competitive employment outcomes with employer-provided medical insurance decreased from 25 percent to 21.66 percent; however, it is important to note that the percentage of individuals under the age of 25 at exit was significantly higher than the national performance of 13.15 percent for combined agencies.

In FFY 2016, similar to all individuals served, GVRA reported its highest percentage of individuals under the age of 25 at exit who achieved employment outcomes to be employed in the following relatively low-wage occupations:

- Office and Administrative Support Occupations (19.04 percent);
- Food Preparation and Serving Related Occupations (17.83 percent); and
- Transportation and Material Moving Occupations (9.98 percent).

In each of these occupations, the median hourly earnings of this population in the State were less than the median hourly earnings for combined VR agencies in FFY 2016. For instance:

- In FFY 2016, individuals under the age of 25 at exit earned a median hourly wage of \$8.50 in Office and Administrative Support Occupations compared to the national performance of \$9 per hour for combined VR agencies; and
- In FFY 2016, for all occupations, individuals under the age of 25 at exit in the State earned 50 cents less than this population did at exit when compared with the national performance of combined agencies.

Over the three-year period, GVRA reported closing the service records of eight individuals under the age of 25 at exit as “homemakers” and four individuals under the age of 25 at exit as “unpaid family workers.” During the on-site monitoring review, GVRA stated that it recognizes that these outcomes will no longer constitute employment outcomes under the VR program.

3.2 Scope of Pre-Employment Transition Services

Observation: GVRA has cross-referenced specific examples of pre-employment transition services under more than one of the required activities and is providing, documenting, tracking and reporting services that are beyond the nature and scope of pre-employment transition services.

In May 2017, GVRA issued a client management guidance document that described the five required activities to be provided to students with disabilities, ages 14 through 21, eligible or potentially eligible for VR services, and provided examples, some of which are unallowable, of VR services to be identified and reported as pre-employment transition services.

GVRA provided specific required activity examples across multiple required activities. Job sampling and related vocational instruction were included as examples of job exploration counseling, rather than examples of work-based learning experiences and workplace readiness training, respectively; community work adjustment was identified as a work-based learning experience, rather than workplace readiness training; vocational evaluations and vocational profiles (i.e., job exploration counseling), and related vocational instruction (workplace readiness training) were listed under counseling on postsecondary opportunities; and orientation and mobility, personal and social adjustment, self-care and home management, and job readiness training were included under instruction in self-advocacy, rather than workplace readiness training.

GVRA provided guidance to staff to identify and provide as pre-employment transition services the following services: person-centered planning services such as discovery and programming through the Georgia Career Information System (GCIS), including workplace employability skills assessments; a learning styles survey; course planner (a four-year Individual Graduation Plan used to complete the eighth grade Bridge Law requirement); a combined report of assessments; and two career cluster inventories.

High School High Tech (HSHT) programming is provided and reported as counseling on postsecondary education opportunities, and includes school-based preparatory experiences, career preparation and work-based learning, connecting activities, youth leadership and development, and family involvement and supports.

D. Recommendations

RSA's review of the performance of the VR program in this focus area resulted in the following recommendations. Appendix C of this report indicates whether or not the agency has requested technical assistance to enable it to implement any of the below recommendations.

RSA recommends that GVRA:

3.1 Employment Outcomes

- 3.1.1 Analyze the reasons individuals under the age of 25 at exit without employment and develop strategies to address these and engage individuals in the VR process in a manner that will lead to successful employment outcomes;
- 3.1.2 Analyze the types and patterns of services provided to individuals under the age of 25 to determine if the appropriate VR services are being provided that support the choice of, and maximize, the employment goal of each individual with a disability, align with labor market demands in the State of Georgia, and lead to career-focused employment outcomes;
- 3.1.3 Identify career pathways and work-based learning experience available for students and youth under the age of 25; and
- 3.1.4 Provide opportunities for individuals to participate in education and training programs, including those programs leading to recognized credentials, advanced postsecondary degrees, and career advancement.

3.2 Scope of Pre-Employment Transition Services

- 3.2.1 Analyze services provided by GVRA, and arranged for through other providers and entities, to ensure each meets the nature and scope of pre-employment transition services in accordance with section 113(a)(2) of the Act and 34 CFR §361.48(a)(2);
- 3.2.2 Provide examples of specific required activities only under the most appropriate required activity in order to identify, provide, report, track and monitor each required activity provided to each student with a disability in receipt of such service on the RSA-911 pursuant to RSA Policy Directive (PD)-16-04;
- 3.2.3 Review assessment services provided to ensure that only vocational interest inventories are being used to identify career pathways of interest to students for the participation in pre-employment transition services, rather than comprehensive assessments to determine eligibility, need for additional services and employment success. The preamble to the final rule included examples of pre-employment transition services and clarified that DSUs are not to use required activities as assessment services for the purpose of determining whether additional VR services are needed, or if the individual will be successful in employment (81 FR 55629, 55695 (August 19, 2016));
- 3.2.4 Assess activities provided under counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education, to determine if such services are appropriate under this required activity. Appropriate activities may include information on course offerings, career options, types of academic and occupational training needed to succeed in the workplace; advising students and parents on academic curricula, college application and admissions processes; and completing the Free Application for Federal Student Aid (FAFSA); and resources such as disability support services; and
- 3.2.5 Assess and evaluate HSHT programming to ensure each activity is provided and reported as the most appropriate required activity under pre-employment transition services. For example, career preparation may include soft-skills and/or job seeking skills trainings (i.e., workplace readiness training), whereas HSHT work-based learning may include job shadowing, informational interviews or summer work experiences, which would equate

to the work-based learning required activity under pre-employment transition services. In addition, youth leadership and development under the HSHT program may provide instruction in self-advocacy and peer mentoring opportunities.

E. Findings and Corrective Actions to Improve Performance

RSA's review of the performance of the VR program in this focus area did not result in the identification of any findings and corrective actions to improve performance.

F. Technical Assistance

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

State Educational Agency (SEA) Agreement

While on-site, RSA and GVRA discussed the regulatory requirements (finalized on August 19, 2016), specific to the formal interagency agreement as described in 34 CFR §361.22(b) and the need for GVRA to incorporate the following requirements into the next formal interagency agreement, including:

- Transition planning by GVRA and GaDOE personnel for students with disabilities that facilitates the development and implementation of their individualized education programs (IEPs) under section 614(d) of the Individuals with Disabilities Education Act (IDEA) (34 CFR §361.22(b)(2));
- Procedures that provide for the development and approval of an IPE in accordance with 34 CFR §361.45, within 90 days from the date of eligibility determination, and as early as possible during the transition planning process, but not later than the time a student with a disability is determined to be eligible for VR services and leaves the school setting (34 CFR §361.22(a)(2));
- Procedures for outreach to and identification of students not only in need of pre-employment transition services, but also transition services (34 CFR §361.22(b)(4)); and
- Developing one GVRA referral form and one parent permission form to streamline various forms used by GVRA local offices and LEAs to outreach to VR eligible and potentially eligible students in need of pre-employment transition services and other VR services, including transition services; and to collect the required data elements for students with disabilities who are potentially eligible for VR services.

Pursuant to the formal interagency agreement, GVRA and GaDOE committed to developing training and communication tools for LEA staff regarding WIOA and its effect on schools and IDEA requirements; outreach to students with disabilities, their parents and/ or representatives, school personnel and other community agencies related to VR services leading to competitive integrated employment; and providing LEAs the required processes and forms to document the required actions specified under section 511 of the Act and 34 CFR part 397 for all students with disabilities who are seeking subminimum wage.

Policies Regarding Pre-Employment Transition Services, Transition Services and other VR Services

Effective July 1, 2017, GVRA implemented policy section 449, to include the definitions of “student with a disability,” “youth with a disability,” a list of the five required activities; and clarification that potentially eligible students may only receive the five required activities under pre-employment transition services. RSA recommended that GVRA also include in section 449, either a definition for “potentially eligible” or clarification of the population that is “potentially eligible;” clarification that pre-employment transition services are to be made available statewide; and examples of pre-employment transition services contained in the preamble to the final regulations (81 FR 55629, and 55694 through 55695 (August 19, 2016)) as the agency revises the written policies governing the nature and scope of pre-employment transition services and allowable “required” activities pursuant to section 113(b) of the Act and 34 CFR §361.48(a)(2).

RSA and GVRA also discussed the need to develop policies specific to the provision of authorized activities in accordance with section 113(c) of the Act and 34 CFR §361.48(a)(3); and pre-employment transition coordination activities pursuant to section 113(d) of the Act and 34 CFR §361.48(a)(4), including the tracking and assignment of costs for required, authorized, and pre-employment transition coordination activities. Additionally, RSA and GVRA discussed the need for GVRA to develop a fiscal forecasting model and procedures to determine whether the funds reserved for the provision of the required activities under pre-employment transition services are sufficient to meet the pre-employment transition services needs for all students, prior to using reserved funds for “authorized” activities. RSA clarified that if funds are available and remaining after GVRA has determined the funds necessary to provide “required” activities to all students identified as needing such services, then GVRA may begin to engage in “authorized” activities.

In addition, RSA and GVRA discussed changes to transition-related requirements as a result of the WIOA amendments to the Act, including: the availability and purpose of the CAP to assist VR eligible and potentially eligible students with disabilities receiving pre-employment transition services (sections 20 and 112(a) of the Act); group transition services available to students and youth who may not have applied for VR services under section 103(b) of the Act and 34 CFR §361.49(a)(7); the use of projected post-school employment outcome on an IPE for a student or youth with a disability pursuant to section 102(b)(4)(A) of the Act and 34 CFR §361.46(a)(2)(ii); and individualized transition services available to students and youth who have applied and been determined eligible for VR services under an approved IPE in accordance with section 103(a) of the Act and 34 CFR §361.48(b).

Specifically, RSA provided guidance to GVRA with respect to revising its policy sections 104 (Due Process) and 116 (CAP), to provide assistance to recipients of VR services under sections 113 and 511 of the Act. Although GVRA had not implemented group transition services at the time of the on-site review, it revised section 450 to include the provision of transition services to groups of students prior to any or all of the students becoming applicants for VR services.

GVRA and RSA discussed the inclusion of the examples of group transition services (34 CFR §361.49(a)(7)) in policy section 450.2.01, as individualized VR services, including transition services, cannot be provided as service to groups. RSA also clarified the distinction between group transition services and pre-employment transition services described in 34 CFR §361.48(a)(2). RSA further clarified that pre-employment transition services provided to individuals in a group setting, are to be reported on the RSA-911 for each individual in receipt of such services and these services can be charged to the funds reserved under section 110(d); whereas, group transition services under the services to groups authority, are not reported for each individual in receipt of such services, and cannot be charged to the reserved funds.

Prior to WIOA amendments to the Act, GVRA provided work readiness training and pre-employment services to the individuals it served. RSA recommended revising policy section 452 (Work Readiness Training) to differentiate between these services and workplace readiness training under pre-employment transition services for students with disabilities.

RSA and GVRA also discussed the provision of individualized VR services (section 103(a) of the Act and 34 CFR §361.48(b)) to eligible students and youth under an approved IPE. Specifically, GVRA and RSA discussed the provision of individualized services, including tuition, fees, books and supplies, and the requirement that these services be provided under an approved IPE. RSA recommended that GVRA revise policy section 451 (Certified Comprehensive Transition Programs) to ensure postsecondary education services are provided under an approved IPE. RSA also clarified that only counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education would constitute pre-employment transition services (34 CFR §361.48(a)(2)(iii)).

Although GVRA had not implemented an order of selection (OOS) at the time of the on-site monitoring review, RSA recommended revising its OOS policies at section 216 to include the requirement that students with disabilities in receipt of pre-employment transition services, prior to eligibility determination and placement in a closed order of selection priority category, may continue to receive any of the five required activities under pre-employment transition services (34 CFR §361.36(e)). RSA also clarified that students and youth with disabilities may continue to receive group transition services (34 CFR §361.49(a)(7)), while assigned to a closed order of selection priority category.

Finally, RSA clarified that extended evaluations for determining eligibility for VR services are no longer permitted by the Act, as amended by WIOA, and communicated that GVRA will need to revise its Case Services Policy Manual to align with the requirements of the Act, as amended by WIOA, and the implementing VR regulations in 34 CFR part 361.

Reporting and Tracking Direct Provision of Pre-Employment Transition Services by GVRA VR Counselors

GVRA VR counselors directly provide most of the required activities under pre-employment transition services, including: job exploration counseling; counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of

higher education; workplace readiness training, and instruction in self-advocacy in group settings for those students who have not applied for VR services and on an individual basis for those students who have applied for VR services. GVRA counselors also work closely with Project SEARCH and High School High Tech programs, and providers to deliver pre-employment transition services.

RSA and GVRA discussed required data that need to be tracked and reported for each student in receipt of pre-employment transition services who is potentially eligible or eligible for VR services in accordance with RSA PD-16-04 and the RSA Case Services Manual. GVRA reported that it is tracking the provision of pre-employment transition services for each student in receipt of pre-employment transition services directly provided by GVRA's VR counselors, as well as VR counselor time to provide these services. GVRA VR counselors use a pre-employment transition services form to track services provided in-house or directly by VR counselors.

Although GVRA's VR counselors were participating in pre-employment transition coordination activities described in section 113(d) of the Act and 34 CFR §361.48(a)(4), GVRA was not using funds reserved to carry out any of the responsibilities described under pre-employment transition coordination activities at the time of the on-site review. RSA clarified that pre-employment transition coordination activities are necessary for the provision of required activities to students with disabilities. RSA further clarified that GVRA should also be tracking VR counselor time spent on pre-employment transition coordination activities listed in section 113(d) of the Act and 34 CFR §361.48(a)(4).

Contracting Pre-Employment Transition Services and Internal Controls

While on-site, GVRA management staff and VR counselors communicated that pre-employment transition services are also provided to students with and without disabilities in general education classrooms. RSA clarified that GVRA is permitted to provide pre-employment transition services in integrated general education classrooms; however, GVRA is only permitted to fund the cost of pre-employment transition services for students with disabilities. GVRA, its staff providing direct services, and its providers will need to determine the cost of programming per student to ensure that GVRA has implemented cost allocation measures. As such, the LEA must fund the cost for any student without a disability participating in pre-employment transition services in general education classroom settings.

RSA provided technical assistance regarding tracking and reporting requirements for the provision of pre-employment transition services and the need for proper internal controls in accordance with RSA Technical Assistance Circular (TAC) 16-04, 34 CFR §361.12 and 2 CFR §200.302.

Authorized Activities under Pre-Employment Transition Services

At the time of the on-site review, GVRA reported that its efforts have been focused on making the five required activities under pre-employment transition services available to students with

disabilities who are eligible or potentially eligible for VR services. As such, GVRA had not begun to engage in authorized activities.

RSA and GVRA reviewed the statutory and regulatory requirements related to the provision of the nine authorized activities described in section 113(c) of the Act and 34 CFR §361.48(a)(3) in which GVRA can engage once it has determined that funds are available and remaining after the necessary required activities have been provided to students with disabilities identified as needing such services.

RSA clarified that authorized activities may be provided to improve the transition of students with disabilities from school to postsecondary education or an employment outcome. The authorized activities must support the provision or arrangement of the required activities under section 113(b) of the Act and may be provided only if funds reserved under section 110(d)(1) of the Act remain after the provision of required activities described in section 113(b) of the Act.

RSA further clarified that authorized activities may be provided concurrently with required activities and pre-employment transition coordination activities so long as funds reserved for the provision of pre-employment transition services under section 110(d)(1) of the Act remain beyond the targeted amount necessary for the required activities as identified in the comprehensive statewide needs assessment, fiscal forecasting, or other planning activities.

Additional Pre-Employment Transition Services Technical Assistance

RSA clarified that:

- Third-party cooperative arrangements and other contracts can be used to provide pre-employment transition services to students with disabilities who are potentially eligible for VR services (non-applicants), as recipients of VR services, or applicants of VR services;
- The method an agency uses to provide pre-employment transition services to non-applicants and applicants may differ (e.g., direct services by a VR counselor, third-party cooperative arrangement with a LEA, or contract with a community rehabilitation program (CRP), including fee-for-service or performance-based), so long as the State makes the “required” activities available to both non-applicants and applicants statewide, even if through different agreements; and
- Personal devices and services do not meet the definition of auxiliary aids and services under the ADA or section 504 of the Act. Personal devices, services and individually prescribed assistive technology can only be provided to eligible individuals under an IPE and those services may not be paid with funds reserved under section 110(d)(1) for the provision of pre-employment transition services. Rather, these additional services must be paid with non-reserved funds.

Policies on Postsecondary Education

During the on-site review, RSA and GVRA reviewed the agency’s policies on postsecondary education including undergraduate and graduate-level degrees, which are outlined in GVRA’s

Policy Manual in section 446 titled Postsecondary Academic and Vocational Training and section 448 titled Post Graduate Training. GVRA last updated these policies on October 1, 2002 and October 1, 1999 respectively.

Specifically, RSA provided technical assistance on sections 446.1.01 and 448.1.01. Section 446.1.01 indicates that GVRA “may authorize and assist with postsecondary academic or vocational training for a qualified individual sufficient to meet the entry level requirements of a specific occupation...” For graduate-level degrees, section 448.1.01 states that GVRA “may provide post graduate training when such training is necessary to obtain entry level work in the client’s agreed to specific occupation. Care must be taken in the joint development of the work plan not to plan services that surpass those required for entry level into the agreed upon occupation as indicated by the work goal on the work plan.”

GVRA reported that a “qualified individual,” in section 446.1.01, means an individual who is eligible for VR services and appropriate for college-level training and that “entry level” in both policies means having a basic level of occupational readiness. RSA suggested that GVRA revise this policy to explain, in more detail, what “qualified individual” means in practical terms. RSA also discussed with the agency that its inclusion of entry level limits GVRA in the individuals with disabilities it may support and does not align with the new requirements under WIOA. In particular, RSA discussed section 102(a)(1)(B) of the Act, as amended by WIOA, which allows for an individual with a disability, whose physical or mental impairment constitutes a substantial impediment to employment, to be determined eligible for vocational rehabilitation services if he or she requires services to prepare for, secure, retain, advance in, or regain employment. RSA explained that adding the phrase “advance in” in section 102(a)(1)(B) of the Act, as amended by WIOA, reinforces the RSA’s long-standing commitment that the VR program must provide comprehensive services to assist individuals with disabilities to achieve their maximum vocational potential. RSA reiterated that the VR program is not intended solely to place individuals with disabilities in entry-level jobs but rather to assist them to obtain appropriate employment, given their unique strengths, resources, priorities, concerns, abilities, capabilities, and informed choice. Further, RSA discussed how the VR program's purpose is the same regardless of whether an individual wants to advance in employment or obtain employment and that the provision of vocational rehabilitation services to assist an individual to advance in employment should not be limited to disability needs rather than other needs or desires. RSA explained that the extent to which GVRA should assist eligible individuals to advance in their careers by providing vocational rehabilitation services depends upon whether the individual has achieved employment that is consistent with this standard. RSA stated that GVRA’s assistance could include, as appropriate for the individual, graduate-level postsecondary education, if necessary to achieve the advancement in employment specified in the vocational goal on the individual's IPE. GVRA informed RSA that the agency would revisit this section of the policy and consider making revisions to it to align with WIOA.

RSA also provided technical assistance on section 446.1.02B, which states, “There must be evidence in the case file to support the vocational rehabilitation counselor’s rationale that the client has the ability to complete the training selected. Such evidence may include the Scholastic

Aptitude Test (SAT), psychological examination, vocational evaluation, and prior college transcripts.” RSA suggested amending this policy to indicate that, for some individuals, acceptance to a college or university would suffice as sufficient evidence. GVRA agreed that this may be appropriate in cases where the VR counselor and the agency agree that the college or university, who accepted the individual, did so with good faith. GVRA indicated that it will update this policy.

RSA and GVRA also discussed section 446.1.02C, which states, “If the client has a substantial work history and training is being considered, a vocational evaluation should be considered in addition to the vocational needs assessment to determine transferable work skills and an appropriate work goal.” RSA provided technical assistance that “a substantial work history” or an individual’s transferable work skills should not preclude GVRA from sponsoring that individual in a postsecondary education program. GVRA indicated that it will amend this policy.

RSA and GVRA reviewed section 446.1.09, which establishes a radius of 35 miles from the individual’s home or residence as the distance that an individual must live outside of in order for GVRA to fund housing (room and board) in support of postsecondary education. GVRA also established exceptions to this policy, which are included in section 446.1.09 A through E. GVRA indicated that it reduced the radius from 50 miles to 35 miles to be fiscally responsible and avoid implementing an order of selection due to limitations in resources. GVRA also stated that this policy is in accordance with research that suggests students perform better in their first years of college if they reside at home.

Section 446.1.12 limits an individual from taking “less than a full course load for more than two semesters/quarters during his/her training program. Blanket approval for taking less than a full load based solely on the disability cannot be given.” RSA and GVRA discussed a circumstance where an individual’s disability prohibits the individual from attending full-time and how GVRA would address this. GVRA stated that this policy is in place because colleges and universities will withhold granting degrees of study if the individual takes too long to matriculate and that some courses become irrelevant over time if not completed within the required time frames set by postsecondary institutions.

RSA provided technical assistance that section 446.1.19, which states that GVRA will not fund “tutors for the purpose of individualized instruction to supplement that instruction which is already being provided to the individual,” should be revised. GVRA indicated that this prohibition has already been lifted in a draft of the new policy. Similarly, GVRA has also amended section 446.1.24(C) to indicate that the full price of books may be paid by GVRA.

GVRA indicated that it will consider amending section 446.1.27, which details the requirements for the “Work Plan Attachment for Post- Secondary Academic and Vocational Training.” RSA provided technical assistance related to the contents of the IPE, in accordance with 34 CFR §361.46, in sharing with GVRA that this attachment may be included directly in the individual’s IPE or subsequent amendments to reduce the amount of paperwork required on behalf of the agency and individual.

Additional Technical Assistance

While on-site, GVRA acknowledged that some of the data on VR services provided may be inaccurate due to a lack of understanding on the part of VR counselors of the definitions and coding of the VR services resulting in categorizing them, for example, as miscellaneous training and other services. GVRA staff indicated that there are certainly more individuals who received information and referral services and benefits counseling than were reported. RSA explored the reasons for the possible inaccuracies in the categorization of VR services, particularly in miscellaneous or other categories, and the discrepancies GVRA cited in the reported data with the actual provision of services based upon the possibility that VR counselors may not have coded these services if they were not purchased services, but rather provided internally by GVRA staff.

RSA also provided technical assistance related to policy development and changes recommending that GVRA:

- Include reference to competitive integrated employment in section 306 of its Policy Manual related to work goals. GVRA indicated that it would revise this policy, which it last updated on October 1, 1999;
- Remove section 488 titled Extended Employment Transitional Service from its Policy Manual considering GVRA no longer provides these services; and
- Include competitive integrated employment in the types of employment outcomes an individual may obtain in section 510.1.05 of its Policy Manual.

SECTION 4: FOCUS AREA – STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM

A. Nature and Scope

Through this focus area, RSA assessed the Supported Employment program, authorized under title VI of the Act and regulations in 34 CFR part 363. The Supported Employment program provides grants to assist States in developing and implementing collaborative programs with appropriate entities to provide programs of supported employment services for individuals with the most significant disabilities, including youth with the most significant disabilities, to enable them to achieve a supported employment outcome in competitive integrated employment. Grants made under the Supported Employment program supplement grants issued to States under the VR program.

WIOA made several significant changes to title VI of the Act that governs the Supported Employment program. The amendments to title VI are consistent with those made throughout the 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.

The changes to the Supported Employment program made in the Act covered in this focus area included:

- The extension of the time frame for the provision of supported employment services from 18 to 24 months (section 7(39)(C) of the Act, 34 CFR §361.5(c)(54)(iii), and 34 CFR §363.50(b)(1));
- The requirement that supported employment must be in competitive integrated employment or, if not in competitive integrated employment, in an integrated setting in which the individual is working toward competitive integrated employment on a short-term basis (section 7(38) of the Act, and 34 CFR §363.1);
- The requirement that supported employment funds and/or VR program funds be available for providing extended services to youth with the most significant disabilities for a period of time not to exceed four years, or until such time that a youth reaches the age of 25 and no longer meets the definition of “youth with a disability,” whichever occurs first (section 604(b) of the Act and 34 CFR §363.4(a)(2)); and
- The reduction of the amount of funds that may be spent on administrative costs (section 606(b)(7)(H) of the Act and 34 CFR §363.51).

To facilitate the provision of monitoring and technical assistance activities, and in preparation for the on-site visit, RSA and GVRA reviewed applicable documentation and resources related to the Supported Employment program, including, but not limited to:

- VR agency policies and procedures related to the provision of supported employment and extended services;
- Cooperative agreements with supported employment vendors and associated CRPs;
- Supported employment assurances 5, 6, and 7 and descriptions e, j.1.A, k.2.B, l.2, n, o, p, and q and any additional information from the VR services portion of the most recently approved Unified or Combined State Plan; and
- Performance data related to the number and percentage of individuals with the most significant disabilities receiving supported employment services and achieving supported employment outcomes.

In gathering information related to this focus area, the review team consulted with GVRA senior managers and VR Counselors who provide supported employment services.

B. Overview and Analysis of Performance

GVRA provides supported employment services to individuals with the most significant disabilities for whom competitive employment has not traditionally occurred, or for whom competitive employment has been interrupted or intermittent as a result of the significance of the disability, and who require supported employment services. GVRA purchases supported employment services for individuals with most significant disabilities with the funds received under section 603 of the Rehabilitation Act as well as title I funds.

Across Georgia, individuals seeking supported employment outcomes are served through three models: traditional supported employment, customized supported employment, and individualized placement and supports. The process is similar for each model and includes movement through the following stages: identification of services, job development, training and supports, stabilization, and on-going support. GVRA has been committed to individuals achieving competitive integrated employment through supported employment and the agency has worked closely with community rehabilitation programs and other providers on securing employment outcomes in competitive integrated settings.

GVRA has agreements with each provider of services and payment is authorized and invoiced as each individual attains a milestone along the continuum of services. The last payment represents the completion of the case and transition to ongoing extended services, agreed to by all parties and funded in accordance with the supported employment fee schedule. Extended services are funded by other agencies in the State. Approximately 150 GVRA counselors are available throughout Georgia to provide supported employment services under the traditional model.

The customized supported employment services model is designed primarily for individuals connected with the Department of Behavioral Health and Developmental Disabilities (DBHDD). Seventeen GVRA counselors are assigned to provide customized supported employment services to individuals with intellectual disabilities. GVRA has worked closely with CRPs and LEAs to develop capacity in providing customized supported employment services throughout Georgia.

The individualized placement and supports model is closely integrated with mental health treatment. Fourteen GVRA counselors are assigned to work with mental health providers through a separate agreement with DBHDD's Division of Mental Health. Through this agreement, individuals continue to receive extended support services from providers after exiting the VR program.

From FFY 2014 to FFY 2016, the percentage of individuals who achieved supported employment outcomes increased from 11.62 percent to 12.2 percent. These percentages are similar to the national performance in FFY 2016 for all combined agencies, which was 11.67 percent. GVRA also served more individuals under the age of 25 at exit in supported employment each year from FFY 2014 to FFY 2016; however, GVRA's percentage of 12.44 percent in FFY 2016 is slightly less than the national performance of 13.39 percent for combined agencies during the same year.

Across several of the quality measures of supported employment outcomes for all individuals and individuals under the age of 25 at exit, GVRA demonstrated better performance when compared to other combined agencies in FFY 2016:

- The average hourly wage for supported employment outcomes for all individuals was \$9.11 compared to the national performance of \$9.07 in FFY 2016;
- In FFY 2016, the average hours worked per week for individuals with supported employment outcomes was 27.91 hours, compared to the national average of 22.48 hours for all individuals with supported employment outcomes in combined agencies;
- The percentage of competitive supported employment outcomes for all individuals was higher than the national averages for combined agencies in FFY 2016;
- The average hours worked per week for individuals with competitive supported employment outcomes was 28.03 in the State in FFY 2016 compared to the national average of 22.23 for combined agencies;
- The percentage of competitive supported employment outcomes at 35 or more hours per week was 31.31 percent, well above the national performance of 13.8 percent for combined agencies in FFY 2016;
- The percentage of supported employment outcomes meeting SGA was 38.38 percent in FFY 2016 compared to the national performance of 23.53 percent in FFY 2016; and
- Finally, GVRA outperformed other combined agencies in FFY 2016 as it related to the percentage of competitive supported employment outcomes with employer-provided medical insurance. For all individuals, this was 15.15 percent in the State compared to 3.49 percent nationally.

C. Observations and Recommendations

RSA's review of the performance of GVRA in this focus area did not result in observations and recommendations.

D. Findings and Corrective Actions to Improve Performance

RSA's review of the performance of the GVRA in this focus area did not result in the identification of findings and corrective actions.

E. Technical Assistance

While on-site, RSA provided technical assistance related to the significant changes to the Supported Employment program resulting from the WIOA amendments to the Act. RSA reviewed GVRA's policies and procedures for supported employment to determine necessary revisions to address the new requirements under the Act and to ensure the incorporation and implementation of all supported employment requirements. During the course of monitoring activities, RSA provided technical assistance to GVRA as described below.

RSA provided technical assistance related to the revised definition of "supported employment services" consistent with section 7(39) of the Act and 34 CFR §361.5(c)(54), including the extension of the allowable time frame for the provision of these services from 18 months to 24 months. RSA clarified that this time frame may be extended under special circumstances if the individual and VR counselor jointly agree to extend it in order to achieve the employment outcome identified in the IPE.

RSA provided technical assistance to GVRA regarding issuance of policies and procedures for tracking individuals working toward competitive wages in supported employment on a short-term basis, and revisions to its supported employment contracts to incorporate competitive integrated employment and the use of the short-term basis period into the provision of supported employment services.

RSA clarified that despite the payment of competitive wages, employment in a non-integrated work setting does not meet the requirement under the Act for an employment outcome in supported employment.

RSA clarified extended services requirements in sections 7(42) and 604(b)(2) of the Act. RSA also clarified that once an individual reaches the age of 25, he or she no longer meets the definition of a "youth with a disability" pursuant to 34 CFR §361.5(c)(58) and is no longer eligible to receive extended services provided by the VR agency with title I or VI funds under the Act. In addition, RSA clarified that GVRA may not provide extended services to a youth with the most significant disability who has not received services from GVRA through an IPE simply because he or she meets the definition of a "youth with a disability," and is in need of extended services. RSA further clarified that in order to be eligible for supported employment services, including extended services, a youth must meet the requirements of section 605 of the Act and 34 CFR §363.3, which include being determined eligible for VR services.

RSA provided clarification as to when the service record of an individual who has achieved a supported employment outcome may be closed in accordance with title VI of the Act and 34 CFR §363.55, as well as the requirements under title I of the Act and 34 CFR §361.56.

GVRA did not express any further training and/or technical assistance needs regarding the Supported Employment program.

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

A. Nature and Scope

Through this focus area RSA assessed the fiscal accountability of the VR and Supported Employment programs to ensure funds are being used only for intended purposes; programs have sound internal controls and reliable reporting systems; GVRA is maximizing resources available 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. RSA reviewed GVRA's adherence to Federal fiscal accountability requirements, which include both general administrative and program-specific requirements.

General administrative requirements refer to:

- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) located in 2 CFR part 200. These regulations establish the foundation of Federal cost principles and standards for determining costs for Federal awards while reducing the administrative burden on award recipients and guarding against the risk of waste and misuse of Federal funds;
- Education Department General Administrative Regulations (EDGAR) in 34 CFR part 76. These regulations are applicable to Department of Education (Department) grantees and establish uniform administrative rules for the Department's Federal grants to State administered programs; and
- Departmental and RSA guidance, including Policy Directives (PDs), Technical Assistance Circulars (TACs), Grant Bulletins, Frequently Asked Questions (FAQ), etc.

Program-specific requirements refer to the Act and VR and Supported Employment program implementing regulations in 34 CFR part 361 and 34 CFR part 363, respectively. These requirements establish the specific provisions related to the administration and operation of the VR and Supported Employment programs.

In addition to the fiscal accountability requirements covered in this focus area, RSA reviewed fiscal requirements pertaining to the VR program funds reserved for the provision of pre-employment transition services (i.e., the prohibition against the use of these funds for administrative costs) and Supported Employment program funds (i.e., the limit on the use of these funds for administrative costs to 2.5 percent of the award to youth with the most significant disabilities). The nature and scope of this focus area did not include a review of the extent to which States have satisfied the requirements to reserve at least 15 percent of the Federal VR program award for expenditures on pre-employment transition services, to reserve 50 percent of Supported Employment program funds for services to youth with the most significant

disabilities, and to provide a 10 percent match for this amount, or to track expenditures toward these reserves. Instead, beginning in FFY 2017, RSA will be providing technical assistance to, and reviewing the progress of, each State toward satisfying these requirements through other processes established by the State Monitoring and Program Improvement Division's (SMPID) Fiscal unit.

In the review, RSA used a variety of resources and documents from the period covering FFY 2014 through FFY 2016. If issues identified included Federal fiscal years prior to 2014, RSA requested additional information within the statute of limitations. Resources and documentation included data maintained on RSA's Management Information System (MIS) generated from reports submitted by GVRA (e.g., Federal Financial Reports (SF-425), Annual VR Program/Cost Report (RSA-2), and the VR services portion of the program year 2016 Unified State Plan). These data were organized into a fiscal profile for GVRA and shared with the VR agency and served as a reference for discussions regarding the areas covered within this focus area.

The review team reviewed the following documents, as needed, to ensure adherence to accountability requirements (list is not exhaustive):

- A-133 audit findings and corrective actions;
- State/agency allocation/budget documents and annual fiscal reports;
- Agency policies, procedures, and forms (e.g., monitoring, personnel cost allocation, procurement, etc.);
- Documentation of obligations and expenditures, including contracts, purchase orders, invoices, etc.; and
- Grant award notifications, documentation of non-Federal share/match (e.g., interagency transfers, third-party cooperative arrangements (TPCAs), establishment projects, private donations, maintenance of effort (MOE), and program income documentation.

Prior to conducting the review, RSA provided GVRA with a documentation request that included a list of the documentation that the agency needed to provide before the start of the review in a manner that enabled RSA to analyze the documents prior to the on-site visit.

The degree to which the review team addressed each accountability requirement was dependent upon the individual circumstances of the agency. The review team analyzed the information obtained prior to the on-site visit by reviewing the documentation requested, conducting teleconferences, and examining RSA-MIS data to determine the level of review required for each component.

B. Overview and Analysis of Performance

During the on-site visit, GVRA 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.

GVRA illustrated its daily drawdown process through two flowcharts, one titled Revenue-Draws for Accounts Payable, and one titled Case Management Processing for Accounts Receivable. The Revenue-Draws flowchart identified three types of payable need: 1) accounts payable processed in PeopleSoft, 2) Case Management System vendor and client payment batch uploads to PeopleSoft, and 3) payroll. Each payment type follows a unique succession of internal control procedures resulting in a forecast for the next day's expenditures, prior day validated payment data, and properly taxed Automated Clearing House (ACH) payroll wires. GVRA's Revenue Unit (Revenue) then uses this information to summarize a draw worksheet broken down by method, date, fund source, and amount. Revenue validates the chart field data before merging data into one file for processing a draw of funds. Checks that are subject to the Cash Management Improvement Act (CMIA) check-clearing pattern are drawn according to the allowable daily percentage, while checks not subject to the clearing pattern, ACHs, and wires are drawn in their totality. Both the GVRA Revenue Manager and Accounting Director verify and sign off on the draw worksheet before a draw can occur. True-up reconciliation is performed monthly and is reviewed by the Accounting Director.

The Case Management Processing flowchart identified two receivable accounts: 1) Disability Adjudication Services (DAS) and VR. Both follow the same process as batches sent to the case management system and PeopleSoft, discussed above. Checks and ACH payments are generated nightly through the State Accounting Office. The data file is reviewed by the GVRA Accounts Payable Manager before corrections are processed the next morning and the case manager analyzes the batches. GVRA Disbursement Unit staff retrieve the checks the next morning and validate the payment register against the PeopleSoft system generated register. Variances are identified and corrected by manually entering missing data into the system or providing the backup for the data to the correct department, and Case Management performs a monthly reconciliation. Prior day DAS/VR daily payments are validated by the Case Management Unit and the Disbursement Unit before the data is given to Revenue. Monthly reconciliations are reviewed and signed off by the Accounts Payable Manager and the Accounting Director.

GVRA reported that it is approaching the end of a multi-year process of transitioning from its legacy claims management system to a new claims management system. The Office of Procurement and Contracts oversees the procurement process for all GVRA contracts.

GVRA noted that the last year the agency implemented TPCAs was 2016. Since then, GVRA has provided VR resources to schools by making its VR Counselors available to schools through paid service agreements with the schools. GVRA also noted that it uses VR funding under the establishment authority to pay for a portion of construction costs at its Roosevelt Warm Springs Rehabilitation Center (RWS) facility.

Fiscal Data Analysis Overview

According to the data reported in table 6.1 (see Appendix A) GVRA fell short of matching its total Federal formula award during FFYs 2014 through 2016. However each year the agency generated an increasing non-Federal share and, as a result, was able to drawdown more of its Federal formula allocation than in the prior year. For each of these years, GVRA relinquished

un-matched Federal funds during the reallocation period, ranging from a high of \$42,581,367 in FFY 2014 to a low of \$19,000,000 in FFY 2016, increasing its net Federal resources significantly in each consecutive FFY.

In Table 6.2, GVRA identified the percentage of its non-Federal share used for match that was appropriated to the agency by the State of Georgia as \$14,516,254 in FFY 2014 and \$16,667,089 in FFY 2015. The data for FFY 2016 is not final as the final SF-425 report was not due until December 30, 2017 and, therefore, the final data was not available at the time of the review. Table 6.2 data indicates an increase in match from interagency transfers, and a decrease in match from the Randolph-Sheppard program in FFY 2016. The table indicates that GVRA had a MOE penalty in FFY 2014 of \$3,499,381, with no MOE penalties in either FFYs 2015 or 2016.

Table 6.3 indicates that program income received has increased yearly from \$3,739,352 in FFY 2014 to \$6,461,799 in FFY 2016. Program income was used primarily in the VR program; however, an increasing amount of Social Security Administration program income was transferred to other programs under the Rehabilitation Act in each succeeding year of the review period. GVRA's carryover, as a percentage of its award, has increased considerably, from 13.53 percent in FFY 2014 to 24.8 percent in FFY 2016.

GVRA reported a significant increase in the amount of total expenditures, close to doubling, from \$66,316,166 in FFY 2014 to \$103,030,621 in FFY 2016 (table 6.4). Notably, the percentage of total expenditures used for purchased services increased from 21.06 percent in FFY 2014 to 35.77 percent in FFY 2016, indicating the agency shifted resources away from agency staff-provided services increasing its use of vendor-provided services during the period under review.

While on-site, GVRA reported total costs for the Roosevelt Warm Springs Rehabilitation Center facility for FFY 2016 as \$17,000,181. GVRA also reported that of these total costs, the portion paid out of VR Federal and non-Federal share funds totaled \$14,478,637. During FFY 2016, GVRA reported serving 135 boarding clients and 298 non-boarding clients at Roosevelt Warm Springs.

C. Observations and Recommendations

RSA's review of the performance of GVRA in this focus area did not result in observations and recommendations.

D. Findings and Corrective Actions to Improve Performance

RSA's review of the performance of the VR program in this focus area resulted in the identification of the following findings and corrective actions to improve performance. Appendix C of this report indicates whether or not the agency has requested technical assistance to enable it to implement any of the below corrective actions.

5.1 Prior Approval Not Obtained

Issue: Does GVRA obtain prior written approval from RSA before purchasing items requiring prior approval. This area of review is included on page 53 of the MTAG.

Requirements: The Uniform Guidance at 2 CFR §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 CFR §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 CFR §200.62(a) and 2 CFR §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 CFR part 200 (Federal Register notice 80 FR 67261). The Department issued notifications to grantees regarding the new requirements and made training and technical assistance documents available to grantees to assist in implementation of the new requirements. To ensure that RSA grantees were aware of the applicability of the prior approval requirements, RSA included a special clause on 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, Costs Principles, and Audit Requirements for Federal Awards (Uniform Guidance) (2 CFR 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 CFR part 200 subpart E).” In addition, information regarding the requirements in 2 CFR part 200 was communicated to grantees via RSA’s listserv on September 23, 2015.

Analysis: RSA requested GVRA’s written processes that ensure the agency meets the prior approval requirements. During the on-site review, GVRA 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 \$500.00, the State’s threshold for classification of equipment, were charged directly to the award without prior approval. The agency requires individuals, who receive VR services, to sign a statement, upon receipt of VR purchased equipment, clarifying the equipment remains the property of the VR agency until the individual achieves a successful outcome. As such, GVRA retains title to the equipment and it must request prior approval before directly charging such expenditures.

Conclusion: Based on the analysis, RSA has determined that GVRA is not in compliance with the prior approval requirements pursuant to the Uniform Guidance (2 CFR §200.407).

Corrective Action Step:

RSA requires that GVRA:

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

5.2 Internal Control Deficiencies

Issue: Does GVRA maintain effective internal control over the Federal award to provide reasonable assurance that GVRA 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 CFR §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 CFR §200.61).

Additionally, 2 CFR §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 CFR §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 U.S. Department of Education (Department) made clear to grantees that internal controls represent those processes by which an organization assures operational objectives are achieved efficiently, effectively, and with reliable, compliant reporting.

Therefore, an internal control deficiency would exist when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or correct processes that might lead to non-compliance with Federal and State requirements.

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

A. Unallowable and Unreasonable Rental Costs

Prior to the on-site review, GVRA indicated that it planned to move six of its field offices out of facilities it shares with the Georgia Department of Labor (GDOL) due to unreasonable and disproportional rental costs for GVRA at these locations. GVRA staff noted that when GVRA expressed its intent to GDOL to relocate these shared locations to more reasonably priced facilities in locations better suited for GVRA consumers, the Georgia State Property Commission (SPC) notified GVRA that such a move was not possible due to the potential negative impact on the State's overall bond rating. GVRA indicated that each of the six locations were either renovated or built using local development bonds, and that GDOL initially intended GVRA to share office space at these locations prior to 2012, when GVRA was under the purview of GDOL (State law has since made GVRA an independent agency administratively connected to the Georgia Department of Human Services). It is important to note that none of the bonds identify GVRA as a partner at the six locations: Athens, College Park, Gainesville, Norcross, Thomasville, and Valdosta.

On July 26, 2016, GVRA's executive director provided RSA with a document titled Rental Rate Analysis that details both GVRA's and GDOL's rental costs at each of the six shared locations. The analysis also provides a projection of comparable market rates for similar facility space. The Rental Rate Analysis identifies the projected market rate per square foot of rented office space ranging from \$6.50 to \$19.58 depending on the site, resulting in an average of \$10.97 per square foot. In SFY 2016 alone, based on these projections, the cost for GVRA to rent the space

prescribed by GDOL's local development bond engagements (in which the SPC indicated GVRA was required to participate) was \$610,068.30 more than GVRA predicted the rent would have cost had GVRA been able to rent the space independently, outside of GDOL's local development bond engagements. In addition, the time remaining on each of the GDOL bond-backed leases is noteworthy. According to the Rental Rate Analysis, the amount of time remaining on these leases spans eight to 15 years, except for the College Park location where three years remain.

The Uniform Guidance in 2 CFR §200.465, Rental Costs of Real Property and Equipment, states that rental costs are allowable to the extent that the rates are reasonable in light of such factors as: rental costs of comparable property, if any; market conditions in the area; alternatives available; and the type, life expectancy, condition, and value of the property leased. The Uniform Guidance also states that rental arrangements should be reviewed periodically to determine if circumstances have changed and other options are available.

Both during the on-site monitoring review and through separate previous communications with RSA, GVRA indicated that since becoming an independent agency in 2012, it intended to move the GVRA field offices out of the facilities it shares with GDOL. According to GVRA, the only barrier to relocation has been SPC's concern related to the State's overall bond rating.

In accordance with 34 CFR §361.13(c)(1)(iv), GVRA is solely responsible for the allocation and expenditure of VR funds and cannot delegate this responsibility to any other entity (34 CFR §361.13(c)(2)). RSA clarified these regulations in RSA-TAC-12-03, Organizational Structure and Non-Delegable Responsibilities of the Designated State Unit for the Vocational Rehabilitation Program, explaining that the DSU (i.e., GVRA) must maintain the responsibility for the approval of expenditures, the development and approval of contracts, budgeting for the program, development of the cost allocation plan, and the procurement process. As the head of the DSU, the entity solely responsible for the expenditure and allocation of VR funds pursuant to 34 CFR §361.13(c)(1)(iv), the DSU director must be privy to all financial information about the VR program, not just informed of such information by the DSA, and should be in direct control of the decisions affecting the VR program. Decisions regarding staffing levels, priority setting, and the awarding of contracts fall within the scope of the expenditure and allocation of VR funds. Therefore, decisions related to these matters require the DSU to determine where to spend its resources for the benefit of the program and to meet the needs of individuals with disabilities within the State. As such, GVRA must ultimately make these decisions.

Therefore, the SPC may not require GVRA to spend Federal VR funds to lease property in a manner that is inconsistent with Federal requirements. It is important to note that lease expenditures in excess of the allowable amount represent questioned VR program costs.

B. IPSE Collaborative Agreement Development and Oversight

Inclusive Postsecondary Education Program Background

In Georgia, eight institutions of higher education (IHE) have established inclusive postsecondary education programs (IPSEs) that provide opportunities for individuals with intellectual disabilities to enroll in college courses, participate in college activities, and, in some instances, live in college housing while receiving vocational and independent living skills training, work-based learning experiences, and other educational services intended to prepare individuals for employment. According to these IHE's marketing materials and the Georgia consortium of IPSEs to which they belong, IPSEs are typically geared towards individuals for whom college has historically been unavailable based upon limitations or barriers resulting from disabilities. Three of the IPSEs in Georgia are considered certified Comprehensive Transition Programs (CTPs) approved by the U.S. Department of Education and students, who attend these programs, are eligible for Federal student financial aid.

GVRA Funding of Academic Transition Teachers

In response to RSA's information request, GVRA reported as non-Federal share for the FFY 2016 VR award an inter-agency transfer (IAT) of \$1,369,213 from GaDOE - Special Education. According to discussions with GVRA during the on-site monitoring review and in follow-up documentation submitted by GVRA, GaDOE-Special Education directed GVRA to use \$559,213 of this IAT to support IPSEs in Georgia. In FFY 2016, GVRA used \$176,463.23 of this IAT to fund salaries and benefits of three Academic Transition Teacher (ATT) positions at two IPSEs:

- One ATT position at East Georgia State University's IPSE in the amount of \$46,555.33; and
- Two ATT positions at Kennesaw State University's IPSE in the amount of \$129,907.90.

With the remaining IAT funds intended for IPSE and with the agreement of GaDOE-Special Education, for which GVRA did not provide supporting documentation, GVRA reported that it funded the salaries and benefits of VR teachers at its comprehensive rehabilitation center, Roosevelt Warm Springs (RWS), in the amount of \$382,750.00 in FFY 2016.

In FFY 2017, GVRA received an IAT of \$729,607 from GaDOE-Special Education, which the VR agency included as non-Federal share on its FFY 2017 SF-425. GVRA used \$612,847.15 of this IAT to fund salaries and benefits of seven ATT positions at six IPSEs:

- One ATT position at East Georgia State University's IPSE in the amount of \$93,894.33;
- Two ATT positions at Kennesaw State University's IPSE in the amount of \$207,843.16;
- One ATT position at Albany Technical College's IPSE in the amount \$82,510.72;
- One ATT position at Columbus State University's IPSE in the amount of \$55,014.55;
- One ATT position at University of Georgia's IPSE in the amount of \$94,527.39; and
- One ATT position at Georgia Institute of Technology's IPSE in the amount of \$79,057.

With the remaining IAT funds intended for IPSE and the agreement of GaDOE-Special Education, for which GVRA did not provide supporting documentation, GVRA funded the salaries and benefits of VR teachers at RWS in the amount of \$116,760 in FFY 2017.

Table 6.1a: GVRA Funding of Academic Transition Teachers

IPSE	Number of ATT Positions FFY 2016	ATT Costs FFY 2016	Number of ATT Positions FFY 2017	ATT Costs FFY 2017
East Georgia State University	1	\$46,555.33	1	\$93,894.33
Kennesaw State University	2	\$129,907.90	2	\$207,843.16
Albany Technical College	N/A	N/A	1	\$82,510.72
Columbus State University	N/A	N/A	1	\$55,014.55
University of Georgia	N/A	N/A	1	\$94,527.39
Georgia Institute of Technology	N/A	N/A	1	\$79,057.00
Total	3	\$176,463.23	7	\$612,847.15

ATT Job Description and Supervision

Following the on-site monitoring review, GVRA provided the ATT job description to RSA. According to this description, ATTs “provide quality education to students in IPSE programs. Major responsibilities include creating, modifying, and adapting university-level course content for individual students; working with peer mentors to ensure curricular access; assisting students to understand and master skills required to meet workplace expectations; and working with students, their families, and IPSE program staff to support student success.” In FFYs 2016 and 2017, GVRA stated that all ATT positions were considered full-time staff of GVRA. In other words, they were not considered employees of the IHE where the IPSE was located. GVRA reported that it does not employ ATTs in any other programs across the State. The salaries of ATTs were based on the Georgia Teacher Pay Scale, according to the ATT job description.

In terms of supervision, the job description indicates that the ATTs “will report to the IPSE program director for day-to-day activities and to GVRA or its designee for evaluation and supervision, and must be available to participate in IPSE program activities both in campus and beyond.” Among the key responsibilities listed on the job description, ATTs are to “perform other duties as assigned by the IPSE program director and GVRA.” Following the on-site monitoring review, GVRA reported that one GVRA staff person, the VR special projects coordinator, supervised all three ATTs in FFY 2016 and all seven ATTs in FFY 2017. GVRA stated that the coordinator maintained documentation of bi-monthly phone calls with each ATT and held quarterly meetings with each ATT. GVRA further explained that the coordinator evaluated each ATT twice annually and approved the time, travel and other administrative duties

of each ATT. GVRA did not submit documentation substantiating these supervision activities despite RSA's request for such documentation.

IPSE Collaborative Agreements

East Georgia State University

For GVRA's funding of one ATT position in FFY 2016, GVRA did not submit documentation of a collaborative agreement with East Georgia State University. For the FFY 2017 funding of one ATT position at this IHE, GVRA signed a collaborative agreement on August 21, 2017. Because FFY 2017 ended on September 30, 2017, this collaborative agreement between GVRA and the IHE was only in place for six weeks of FFY 2017.

Kennesaw State University

For the FFY 2016 funding of its two ATT positions at Kennesaw State University, GVRA signed a collaborative agreement with the IHE on January 30, 2015, which expired on June 30, 2015. GVRA renewed this agreement on August 11, 2015, which expired on June 30, 2016. GVRA did not submit documentation of an agreement covering the remainder of FFY 2016: July 1, 2016 to September 30, 2016. For FFY 2017, GVRA did not provide documentation of an agreement for the funding of its two ATT positions at this IHE.

Albany Technical College

GVRA provided a copy of a collaborative agreement with Albany Technical College that does not detail the duration of the agreement and does not include the signatures of any parties. As a result, GVRA did not execute a collaborative agreement for the FFY 2017 funding of its ATT position at this IHE.

Columbus State University

GVRA signed a collaborative with Columbus State University on January 13, 2015, which indicates the agreement is "annual in nature," but it does not include the duration of the collaborative agreement or any reference to FFY 2017. As a result, GVRA did not execute a collaborative agreement with Columbus State University for the FFY 2017 funding of its ATT position at this IHE.

University of Georgia

For the FFY 2017 funding of its ATT position at this IPSE, GVRA did not execute a collaborative agreement with the University of Georgia.

Georgia Institute of Technology

For the FFY 2017 funding of its ATT position at this IPSE, GVRA did not execute a collaborative agreement with Georgia Institute of Technology.

Table 6.1b: GVRA/IPSE Collaborative Agreements

IPSE	FFY 2016 Collaborative Agreement	FFY 2017 Collaborative Agreement
East Georgia State University	None in place	Partially in place
Kennesaw State University	Partially in place	None in place
Albany Technical College	N/A	None in place
Columbus State University	N/A	None in place
University of Georgia	N/A	None in place
Georgia Institute of Technology	N/A	None in place

Individuals Served in IPSEs Funded by GVRA

In FFY 2016, the ATT position at East Georgia State University’s IPSE program provided education services to 14 eligible individuals with IPEs and one individual who had only applied for VR services. In the same year, the two ATT positions at Kennesaw’s IPSE program provided education services to 41 eligible individuals with IPEs and one individual who was referred to the VR program, but had not applied for VR services, and one individual who had not been referred to the VR program. In total, these GVRA staff provided education services to three individuals who were not determined eligible for VR services and who did not have approved IPEs in FFY 2016.

In FFY 2017, the ATT at East Georgia State University’s IPSE program provided education services to 14 eligible individuals with IPEs and one individual who had only applied for VR services. The ATTs at Kennesaw’s IPSE program provided education services to 41 eligible individuals with IPEs and one individual who was referred to the VR program, but had not applied for VR services, and one individual who had not been referred to the VR program. The ATT at Albany Technical College’s IPSE provided VR services to five eligible individuals with IPEs. The ATT at Columbus State’s IPSE provided education services to one eligible individual with an IPE and two individuals who had only applied for VR services. At the University of Georgia’s IPSE program, the ATT provided education services to five eligible individuals with IPEs. Finally, the ATT at Georgia Tech’s IPSE provided VR services to 27 eligible individuals with IPEs and one individual who had only applied for VR services. In total, these GVRA staff

provided VR services to six individuals who were not determined eligible for VR services and who did not have approved IPEs in FFY 2017.

Table 6.1c: Individuals Served in IPSEs Funded by GVRA

IPSE	Total Individuals Enrolled FFY 2016	Individuals Determined Eligible for VR Services/IPE FFY 2016	Total Individuals Enrolled FFY 2017	Individuals Determined Eligible for VR Services/IPE FFY 2017
East Georgia State University	15	14	15	14
Kennesaw State University	43	41	43	41
Albany Technical College	N/A	N/A	5	5
Columbus State University	N/A	N/A	3	1
University of Georgia	N/A	N/A	5	5
Georgia Institute of Technology	N/A	N/A	28	27

GVRA Funding of Tuition and Fees Paid to IHEs

During the on-site monitoring review and in follow-up discussions with RSA, GVRA reported that if an IPSE is a certified CTP, GVRA may provide tuition, fees, room and board, and other expenses, after applying any available comparable benefits (e.g., Federal student financial aid), to support eligible individuals with IPEs in attending these programs. Three of the IPSEs where GVRA funded ATT positions in FFYs 2016 and 2017 are considered CTPs: East Georgia State University’s IPSE; Kennesaw State University’s IPSE; and Georgia Institute of Technology’s IPSE.

In documentation GVRA provided to RSA following the on-site monitoring review, GVRA reported that it made payments of tuition and fees directly to IHEs on behalf of eligible individuals with IPEs to fund their enrollment in CTP-certified programs. Furthermore, GVRA’s documentation showed the majority of individuals’ IPEs included tuition and fees paid directly to the following IHEs in FFYs 2016 and 2017:

- East Georgia State University’s IPSE: 13 of the 14 eligible individuals with IPEs;
- Kennesaw State University’s IPSE: 33 of the 41 eligible individuals with IPEs; and
- Georgia Technical Institute’s IPSE: 17 of the 27 eligible individuals with IPEs.

Table 6.1d: Tuition and Fees Paid to IHEs under IPEs

IHE	Total Individuals with IPEs FFY 2016	IPEs with Tuition and Fees Paid to IHE FFY 2016	Total Individuals with IPEs FFY 2017	IPEs with Tuition and Fees Paid to IHE FFY 2017
East Georgia State University	14	13	14	13
Kennesaw State University	41	33	41	33
Georgia Institute of Technology	N/A	N/A	27	17

In documentation submitted to RSA following the on-site monitoring review, GVRA reported that it funded tuition, fees, and other expenses at IPSEs, in addition to funding the ATT’s salary and benefits, because GVRA considered these services “completely separate” from the services ATTs provide. GVRA further reported that it is updating its policies and procedures to ensure that the services provided by ATTs are also included on the IPEs of individuals enrolled in IPSEs, as these services are necessary for these individuals to achieve their vocational goals.

Inclusive Postsecondary Education Program Compliance Findings

Missing or Invalid IPSE Collaborative Agreements

During FFY 2016 and 2017, GVRA funded a total of eight collaborative agreements with six State university partners; however, GVRA could provide only four agreements to RSA for review, and of these four, none were fully valid. As described above, the four agreements RSA reviewed included many inconsistencies related to agreement execution, including incorrect start and end dates and missing authorizing signatures. According to GVRA staff, the four agreements GVRA could not provide were missing and could not be found. These missing and invalid agreements violate multiple Federal requirements under the Uniform Guidance at 2 CFR part 200. Retention requirements for records, 2 CFR §200.333, states that Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three years. Access to records, 2 CFR §200.336, requires that the Federal awarding agency, Inspectors General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives, must have the right of access to any documents, papers, or other records of the non-Federal entity which are pertinent to the Federal award, in order to make audits, examinations, excerpts, and transcripts. Due to the missing agreements, GVRA is also in violation of general procurement standards at 2 CFR §200.318, notably part (a), which states that non-Federal entities must maintain oversight to ensure that contractors adhere to the terms, conditions, and specifications of their contracts or purchase orders.

Because of the missing agreements, GVRA had no way to legally monitor its partners in carrying out the requirements of the Federal award, to determine if services rendered or milestones achieved met the terms and conditions of the agreements, or to hold its own staff, being paid through the agreements, legally accountable for what was expected to occur as the result of the agreements. With respect to internal controls, the lack of and invalidity of these collaborative agreements represents an absolute lack of control—not just an internal control deficiency—because, without the agreements, it is impossible for GVRA management or its staff to prevent or correct processes that might lead to non-compliance with Federal and State requirements.

Insufficient Internal Controls over Collaborative Agreement Development to Ensure Accountability

The Uniform Guidance at 2 CFR §200.303(c) requires grantees to have internal controls sufficient to ensure the grantee evaluates and monitors the agency's activities to ensure compliance with Federal requirements. In addition, 2 CFR §200.328(a) requires GVRA to be responsible for the operations of all grant-supported activities. As such, GVRA must monitor and evaluate grant-supported activities to ensure compliance of all activities performed under the VR program. During the on-site monitoring review, RSA reviewed four of GVRA's six IPSE collaborative agreements with university partners. Each of the four available collaborative agreements included the statement "GVRA will provide administrative and consultative supervision of the ATT staff assigned to [the program]." However, the agreements did not include specific information identifying to who in GVRA the ATT was to report, or the manner in which GVRA was to supervise and verify the work performed by the ATT.

Following the on-site monitoring review, RSA requested documentation to support GVRA's claim that GVRA staff monitored the activities of its ATTs; however, GVRA did not submit any documentation. Instead, GVRA provided a written email description of the following activities conducted by one GVRA manager for all of the IPSE program sites:

- Bi-monthly phone calls to provide GVRA updates on recruitment;
- Quarterly meetings with IPSE teachers to update them on GVRA business and to provide programmatic guidance and clarification;
- Mid-point and year end evaluations;
- On-site visitation; and
- Approval of time, travel, and administrative duties.

Because GVRA did not provide documentation to RSA of the above activities, and because GVRA provided no evidence that these supervisory activities were a component of the collaborative agreements or a condition of employment for the ATTs, GVRA lacked sufficient internal controls to ensure the effectiveness and efficiency of operations or to provide 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. As such, GVRA is unable to substantiate its claim that it is exercising its responsibility to evaluate and monitor the activities of ATT staff paid with VR funds, thereby creating an unnecessary risk to Federal funds. Because GVRA did not monitor the activities performed under the IPSE collaborative

agreements, GVRA has not satisfied 2 CFR §200.303, which requires the grantee to have internal controls that ensure the grantee complies with Federal requirements and evaluates and monitors grant-supported activities. In so doing, GVRA cannot assure, as it is required to do pursuant to 34 CFR §361.12, that it is administering the VR program properly and efficiently, and ensuring financial accountability.

Costs for Teaching Students Who Have Not Been Determined Eligible

In accordance with Uniform Guidance in 2 CFR §200.430, Standards for Documentation of Personnel Expenses, charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed, and must be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated. In reviewing documentation of personnel costs and students served under each of the six IPSE programs, RSA identified several situations in which students, who were not eligible to receive VR services, were provided services by ATTs, but where the costs for serving these ineligible students were not excluded from the amount paid by the VR program. Table 6.1c includes a breakdown, by collaborating partner, of the numbers of students served by VR-funded ATT staff in FFY 2017 who were eligible to receive VR services versus those who were not.

GVRA stated that the costs of providing services to the students who had not been determined eligible for the VR program, and thus, had no IPE, were not removed from the salary costs paid by VR for the ATTs at those sites where these students were served. As illustrated, at four of the six collaborating sites, GVRA used VR funds to provide services to individuals who may not have applied for or been determined eligible for VR services. Therefore, GVRA did not satisfy the requirement at 2 CFR §200.430 that the grantee base salary and wages on records that accurately reflect the work performed and that are based on a system of internal controls that provides reasonable assurance that the charges are accurate, allowable, and properly allocated.

Reasonableness of Staffing Costs

According to the Uniform Guidance at 2 CFR §200.404, a cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. The numbers of students served per ATT varied significantly, from one ATT position per three students, to one ATT position per 28 students. When RSA asked how GVRA determined that a salary of \$82,511 was reasonable for the ATT who worked with five students at Albany Tech, GVRA staff responded that they “have not determined what is reasonable.” Similarly, when RSA asked how GVRA determined that 100 percent of the ATT at GA Tech was allocable to the VR program, GVRA responded again that they “have not determined what is reasonable.” Because of the extreme variability in the number of students served per ATT across the six IPSEs, together with GVRA’s admission that it had not determined reasonableness of the cost for the ATTs, GVRA is not in compliance with the Uniform Guidance reasonable cost requirements in 2 CFR §200.404.

In addition to concerns about the reasonableness of costs in relation to the number of students being served per ATT, RSA is also concerned about the reasonableness of the VR program

paying the cost of tuition for eligible individuals who attend classes that are staffed by ATTs who are also funded by GVRA. This is effectively paying for the ATT twice—once by VR directly paying the ATT’s salary, and again by VR making tuition payments on behalf of the eligible individual to enroll in the IPSE. If the cost of tuition at an IHE ordinarily includes the salary of instructors and other staff, then it is imperative that GVRA negotiate a fair pricing structure (as a component of the collaborative agreement) that prevents the possibility of VR funds being used to pay both the ATT’s salary while at the same time paying the cost of tuition.

Conclusion: As described above, GVRA does 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 CFR §361.12 and 2 CFR §200.303. Specific internal control areas of deficiency include unreasonable and disproportionate One-Stop rental costs, missing and invalid vendor agreements, insufficient collaborative agreement development and oversight, improper allocation of non-grant supported activities, reasonableness of staffing costs, and overall accountability with regard to IPSE collaborative agreements.

Collectively, these material deficiencies suggest generalized, systemic deficiencies within the agency’s control environment. The corrective action steps listed below will support GVRA in developing its ability to correct processes that have led to the non-compliance findings noted above.

Corrective Action Steps:

RSA requires that GVRA:

- 5.2.1A Cease paying lease or rental costs, with Federal VR funds or State funds used as match, that are not paid in accordance with requirements in 2 CFR 200;
- 5.2.2A Develop and implement internal control procedures to ensure that lease and rental costs are allowable and reviewed periodically pursuant to 2 CFR §200.465;
- 5.2.3A Determine the total amount of unallowable costs charged to the Federal award that is associated with Finding 5.2;
- 5.2.1B Develop and implement written policies or procedures governing oversight of grant-supported activities, particularly with respect to activities performed under GVRA’s collaborative agreements, as required by 2 CFR §200.328(a);
- 5.2.2B Amend collaborative agreements with IPSEs to correct the issues identified in the above finding; and
- 5.2.3B Develop and implement internal controls to correct IPSE-related internal control deficiencies, to ensure:
 - a) All actionable agreements are maintained and are available for review in accordance with 2 CFR §200.333;
 - b) Collaborative agreements identify the specific, detailed components of supervision and monitoring that GVRA will use to directly oversee the work duties, time, and attendance of its staff providing IPSE services;
 - c) Collaborative agreement development policy identifies:

- i. Guidelines for pre-agreement analyses of reasonable cost expectations, including minimum and maximum client to instructor ratios, and guidelines for negotiating a fair pricing structure that prevents duplicating the payments from VR funds for the instructor’s salary and instructor costs embedded in the full cost of tuition;
- ii. Procedures, from start to finish, for managing collaborative agreement development and execution including realistic timelines for development and partner review of collaborative agreement draft and final language, timelines for signatures, and clear time frames identifying each agreement’s begin and end dates;
- iii. Guidelines for supervisory review and monitoring of agreement activities, and the manner in which GVRA will train staff delivering VR services through the agreements to ensure only VR services are being provided through funded activities; and
- iv. Assurances that agreements are complete, properly signed, and fully executable prior to work being performed;
- d) Ensure that only costs that are allowable, reasonable, and allocable to the VR program are paid using VR funds, particularly with regard to costs for participants and reasonableness of staffing costs; and
- e) Develop and implement specific written policy for GVRA staff to follow when it is learned that an IPSE instructor who’s salary is paid 100 percent with VR funds has instructed one or more students who are not VR eligible. Identify in the policy that only costs allocable to VR may be paid with VR funds, and any portion of costs not allocable to VR must be paid from other sources.

E. Technical Assistance

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

During conversations held on-site, GVRA requested technical assistance in the areas of: period of performance with regard to the current buildout of a new case management system; correcting data reported in financial status reports; and the use of bonds to, under certain circumstances, fund portions of a project covered under the establishment authority. GVRA also noted ongoing difficulty drawing down the full amount of its Federal VR award from year to year due to a lack of available match from State appropriations and other allowable sources.

RSA reminded GVRA of the need to set the scope and requirements for financial systems contractors (rather than relying on contractors to set the requirements) with regard to the manner in which financial systems track and assign payment process dates, including clearly defined parameters for what constitutes the date of obligation for each expenditure, how each system records payments of those obligations, and how each system adheres to Federal requirements in irregular situations, such as when a service must be backdated—including procedures to follow for complications that may arise from backdating obligations. For example, one GVRA staff member indicated the understanding that a case must remain in “open” status until all invoices

have been paid under a particular case file. RSA staff clarified that case file closure should follow agency policy, but should not remain open solely due to an outstanding unpaid bill. RSA also noted that it is important for the agency to have detailed documented processes that allow for staff, when necessary, to back out canceled sub-authorizations when they exist under a parent authorization, and to understand—and document—how these processes affect initially recorded obligation dates. Through all of these processes, each component of the system must maintain standards of accountability for the accurate tracking of obligations and expenditures to the correct Federal fiscal year in all situations.

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>

GVRA requested that RSA review State laws pertaining to GVRA’s request to use State municipal bonds to help fund capital improvement projects at the Roosevelt Warm Springs facility. Based on RSA’s review, RSA confirms that State law does appear to secure the VR program from administrative and other costs and possible losses that may result from the proposed establishment project bonds. Therefore, these specific bonds, backed by the guarantee that the VR program is protected from any fees or losses, may be used as match pending approval of specific purchases.

GVRA noted that it uses Randolph-Sheppard set-aside funds as match; however, the agency did not have policies or procedures for identifying which Randolph-Sheppard funds are allowable as match. Therefore, GVRA should develop policy delineating what, if any, Randolph-Sheppard set-aside funding GVRA is legally entitled to report as match for the VR program to ensure the amount reported includes only allowable funds consistent with RSA Program Assistance Circular 89-02, Guidelines for the Use of Federal Financial Participation and Set-Aside Funds in the Randolph-Sheppard Vending Facilities Program. Randolph-Sheppard Vending Facility Program regulations in 34 CFR 395.9(b) state that set-aside funds may be used only for the purposes of:

1. Maintenance and replacement of equipment;
2. The purchase of new equipment;
3. Management services;
4. Assuring a fair minimum of return to vendors; or
5. The establishment and maintenance of retirement or pension funds, health insurance contributions, and provision for paid sick leave and vacation time.

Randolph-Sheppard set-aside funds counted as match for the VR program are subject to the same rules of allowability as any other VR program funds, including proper justification for conference expenses and prior approval obtained for certain items of cost. Set-aside funds used for numbers (4) and (5) above may not be used as match for the VR program.

Subsequent to the on-site review, RSA agreed to provide technical assistance to GVRA related to its policies and procedures for pre-employment transition services to support GVRA in meeting the requirement for the reservation and expenditure of pre-employment transition services funds.

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

A. Nature and Scope

The U.S. Department of Education and the U.S. Department of Labor (collectively, the Departments) issued the 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 jointly administered activities authorized by title I of WIOA. These jointly-administered regulations apply to all core programs of the workforce development system established by title I of WIOA and are incorporated into the VR program regulations through subparts D, E, and F of 34 CFR part 361.

WIOA strengthens the alignment of the public workforce development system's six core programs by compelling unified strategic planning requirements, common performance accountability measures, and requirements governing the one-stop delivery system. In so doing, 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.

Under WIOA, the workforce development system consists of the following six core programs:

- Adult, Dislocated Worker, and Youth programs, authorized under title I;
- Adult Education and Family Literacy Act (AEFLA) program, authorized under title II;
- Employment Service program authorized under the Wagner-Peyser Act, as amended by title III; and
- VR program authorized under title I of the Rehabilitation Act of 1973, as amended by title IV.

Through this focus area, RSA:

- Assessed GVRA's progress toward fulfilling its role as one of the core programs in the workforce development system;
- Identified areas where GVRA's partnership and collaboration with other core programs should be strengthened; and
- Provided technical assistance to GVRA to assist in implementing the Joint WIOA Final Rule.

This focus area consists of the following topical areas: Governance, Unified or Combined State Plans, One-Stop Operations, and Performance Accountability. To gather information pertinent to these topics, RSA reviewed the Program Year (PY) 2016 Unified State Plan and a sample Memorandum of Understanding (MOU) and Infrastructure Funding Agreement (IFA) related to the one-stop service delivery system and met with GVRA staff during the monitoring review.

B. Overview

RSA reviewed GVRA's progress and status in meeting its role as a WIOA core program and required partner under the Joint WIOA Final Rule at 20 CFR part 678 (subpart F of 34 CFR 361). RSA found that GVRA is meeting substantially the intent and spirit of the requirements outlined by WIOA in terms of ensuring that VR is participating and collaborating within the process. GVRA also participates in deliberation and development of policies regarding workforce development activities for the State of Georgia through the State and local workforce development boards as well as participation and involvement with State plan development and implementation.

Governance

State Workforce Development Board (SWDB)

Georgia's SWDB plays a key role in leading the State's implementation of WIOA, which requires aligning investments in job training, integrating service delivery across programs, and ensuring that workforce investments are job-driven and match employers with skilled workers. In Georgia, the GVRA executive director represents the State VR program, in accordance with 34 CFR §679.110. The SWDB is also comprised of business owners, members of the Georgia General Assembly, other statewide agency leadership, local elected officials, and representatives from other workforce organizations.

WIOA requires the Governor to develop strategies for effectively serving individuals with barriers to employment, including individuals with disabilities, and for coordinating programs and services among one-stop partner programs for these individuals. Georgia's Unified State Plan outlines several strategies for the State, including increasing service integration among partner agencies within the one stop delivery system and sharing data between partner agencies.

Local Workforce Development Board (LWDB)

There are 19 LWDBs established to represent each workforce investment area in the State of Georgia. GVRA's district office managers or supervisors represent the VR program on these boards. While on-site, GVRA staff indicated having a productive working relationship with the LWDBs that assists in meeting the requirements set forth in the Act. GVRA indicated its local staff have not been asked by the LWDBs to assist with the certification process of one-stop centers. GVRA also indicated that its local staff were involved in the development of Georgia's twelve regional plans.

State Plan Development and Implementation

At the time of the on-site review, Georgia had not formalized a policy for the development of its Unified State Plan. Led by the Georgia Department of Economic Development's Workforce Division, the process for the PY 2016 Unified State Plan was based on strong collaboration between the State workforce development agencies to formulate the strategic and operational elements of the State Plan. Georgia's SWDB was also involved in its development. GVRA

provided comments on the strategic and operational planning elements of the Unified State Plan. GVRA provided opportunities for public comment on the Unified State Plan in accordance with subpart D of 34 CFR part 361 and the opportunity for public review of the State Plan on the GVRA website. In addition, GVRA considered comments from the GVRA Board, GVRA's State Rehabilitation Council, and Georgia's Client Assistance Program during the development of the Unified State Plan and the VR Services Portion.

At the time of the on-site visit, GVRA was in the process of identifying components of the VR Services Portion to be modified in the two-year modification process in PY 2018. GVRA indicated that as it completes its business mapping process, GVRA may need to revise the VR Services Portion to reflect organizational changes in how the VR agency is operating and conducting business. Georgia's Workforce Division organizes regular meetings with all WIOA core partners in which GVRA participates. GVRA has also begun to provide disability awareness training and VR cross-training to other State workforce development agencies and one-stop operators.

One-Stop Delivery System

Access to VR Services in One-Stop Centers

In accordance with 34 CFR §361.420, and 34 CFR §463.420, each required one-stop partner program must provide access to its programs or activities. The one-stop delivery system should bring 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 with disabilities.

Georgia has 19 local areas each with a corresponding comprehensive one-stop center, referred to as WorkSource Georgia centers. Georgia also has established affiliated sites across the State. GVRA provides access to the VR program in each comprehensive one-stop center through a variety of ways. In four of the comprehensive one-stop centers, GVRA was already physically co-located and sharing space with its State workforce development partner. In about half of the remaining 15 centers, GVRA staff are physically present on a part-time basis. In others, GVRA has trained other State workforce development programs in providing access to the VR program on GVRA's behalf. Finally, in some comprehensive one-stop centers, GVRA is providing access to the VR program through a direct linkage.

Memoranda of Understanding

In accordance with 34 CFR §361.420, each required one-stop partner program must enter into a MOU with the LWDB that meets the requirements of 34 CFR §361.500(b) relating to the operation of the one-stop delivery system. At the time of the on-site review, GVRA had entered into MOUs with 18 of the 19 LWDBs in Georgia. The outstanding MOU pertains to a LWDB in the Atlanta metro area. GVRA reported that partner programs were actively engaged with this

LWDB to finalize an MOU, including an IFA, so as to avoid the State Funding Mechanism (SFM).

Infrastructure Costs

GVRA staff from its central office negotiated one-stop infrastructure costs in the process of developing MOUs with each of the 19 local areas in the spring of 2017. On May 12, 2017, GVRA submitted an assurance to the Governor that, for all 19 comprehensive one-stop centers, the VR program had reached enough of an agreement to avoid the SFM even though not all MOUs and IFAs had been finalized. At the time of the on-site review, the Governor's office had not provided guidance to State workforce programs on how partners must determine their contributions to infrastructure costs under WIOA, nor had it published guidance on the SFM.

Prior to WIOA, GVRA contributed towards the infrastructure costs of the four one-stop centers in which GVRA staff were permanently co-located with Georgia's Department of Labor.

One-Stop Center Accessibility

While GVRA reported that individuals with disabilities may be reluctant to access services in the one-stop service delivery centers out of concerns related to accessibility, Georgia's PY 2016 Unified State Plan elaborates on the physical and programmatic accessibility for individuals with disabilities across the system. The State Plan states that Georgia "is focused on ensuring universal access across its workforce system." The State Plan also indicates that "local partners maintain compliance with the provisions of WIOA section 188 which require programmatic and physical accessibility." State workforce partners ensure that one-stop centers are not only compliant with section 188 of WIOA, but also with the Americans with Disabilities Act. In addition, Georgia maintains Methods of Administration procedures which detail how compliance with section 188 of WIOA is maintained. Specifically, GVRA ensures physical accessibility across the one-stop service delivery system through its ADA Checklist for Readily Achievable Barrier Removal and the Checklist for Existing Facilities. Georgia has also established the One-Stop Integration Working Group to identify criteria which will be assessed during the one-stop certification process. This workgroup also provided guidance and technical assistance to LWDBs prior to the completion of LWDB certification.

Performance Accountability

Data Collection and Reporting

The State performance report required by section 116(d)(2) of WIOA and 34 CFR §361.160 must be submitted annually using the template developed by the U.S. Department of Labor and the U.S. Department of Education. For VR specific standards, RSA recently updated the RSA-911 to include the primary indicators of performance identified in 34 CFR §361.155, to include Effectiveness in Serving Employers. In accordance with RSA Technical Assistance Circular (TAC) 17-01, Performance Accountability Guidance for Workforce Innovation and Opportunity Act Title I, Title II, Title III and Title IV Core Programs, States must select two of three

approaches while participating in a pilot program to measure the effectiveness in serving employers. There was some confusion among the GVRA staff as to which indicators the State had selected to report. GVRA initially indicated that Georgia chose to monitor the effectiveness of serving employers by employer penetration rate, which addresses the program's efforts to provide quality engagement and services to employers and sectors within a State and local economy. Georgia also chose to monitor effectiveness in serving employers by measuring the employee retention rate. This measure calculates the percentage of individuals who are employed by the same employer in the second and fourth quarter after exiting the program. The data sharing agreement that the GVRA signed included provisions to share data for the employee retention measure and the repeat business customers measure, which calculates the number of business establishments that have received a service from the State Workforce Development System in the current program year as well as one of the three previous program years. In addition to concerns related to the confusion around the effectiveness in serving employers measures, RSA also had some concerns about the data flow and structure of the data sharing agreement and discussed these with GVRA.

In accordance with WIOA section 116(b)(3)(A)(ii) and 34 CFR §361.160(a)(1)(ii) annual reporting should include the total number of participants who are co-enrolled in any of the WIOA programs. GVRA indicated that it remains in discussions with its partner programs to develop a method for tracking individuals who are co-enrolled in multiple programs. GVRA also indicated that it was working with workforce partners to identify services that the other programs can provide to individuals with disabilities, and that VR staff had benefitted from the exchange of information through training with some local partner programs.

In accordance with RSA Policy Directive (PD)-16-04, Revision of PD 14-01 instructions for the completion of the Case Service Report (RSA-911) for the State Vocational Rehabilitation Services Program and the State Supported Employment Services Program, GVRA began collecting open case RSA-911 data on July 1, 2017. At the time of the on-site review, GVRA acknowledged that it was aware that November 15, 2017, was the due date for the first quarter report. The agency indicated working on developing the file that will be sent to RSA, but it was not in a position to begin using the RSA system to test the file. GVRA reported that it is transitioning to a new case management system, which is expected to be completed in April 2018.

C. Analysis of Performance and Observations

RSA's review of the performance of GVRA in this focus area did not result in the identification of any observations or recommendations.

D. Findings and Corrective Actions to Improve Performance

RSA's review of the performance of GVRA in this focus area did not result in the identification of findings and corrective actions.

E. Technical Assistance

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

Memorandum of Understanding (MOU)

RSA reminded GVRA of the Departments' guidance that the LWDBs and one-stop partners should have entered into MOUs for PY 2017 by June 30, 2017 that align with the requirements of WIOA, except for IFAs, which must be in place no later than January 1, 2018. However, Governors have the discretion to require local areas to enter into final IFAs at any time between July 1, 2017, and January 1, 2018. RSA explained that, during the extension period, local areas may use the funding agreement they used for PY 2016, with any such modifications as the partners may agree to, to fund infrastructure costs in the local area.

While on-site, RSA reviewed the MOU State workforce development partners created for the Thomson comprehensive one-stop center in the East Central Georgia Workforce Development Board. RSA and GVRA compared this MOU to the requirements in 34 CFR §361.500. In part four of the MOU, the partners included a brief 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. In Exhibit E-1, an attachment to the MOU, the partners detailed their agreement on funding the costs of the services and the operating costs of the system, which includes funding of infrastructure costs of one-stop centers and preliminary estimates of the funding of the shared services and operating costs of the one-stop delivery system. Under the MOU, the one-stop operator will develop methods for referring individuals between the partners for appropriate services and activities. Through Assurance D, the MOU contained some reference to 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 MOU did not contain assurances that it 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 outlined the duration (July 1, 2017 to June 30, 2020), but it did not include procedures for amending it. The MOU also contained a clause specific to GVRA and its need to sign a three-year agreement.

The MOU did not contain the signatures of the Local WDB Director, authorized representatives of each one-stop partner, and chief elected official(s); GVRA indicated that copies were still being signed at the time of the on-site review.

Infrastructure Funding Agreement (IFA)

RSA provided technical assistance related to the requirements in 34 CFR §361.755 for IFAs to include the following:

- The period of time in which the IFA is effective (which may be a different time period than the duration of the MOU);
- Identification of the infrastructure costs budget, which is a component of the overall one-stop operating budget;
- Identification of all one-stop partners, chief elected officials (CEOs), and the LWDB participating in the IFA;
- A description of the periodic modification and review process to ensure equitable benefit among one-stop partners;
- Information on the steps the LWDB, CEOs, and one-stop partners used to reach consensus or the assurance that the local area followed the SFM process; and
- A description of the process to be used among partners to resolve issues related to infrastructure funding during the MOU duration period when consensus cannot be reached.

RSA provided technical assistance on infrastructure costs and discussed how these are non-personnel costs that are necessary for the general operation of the one-stop center, which may include: rental of the facilities; utilities and maintenance; equipment (including assessment-related and assistive technology for individuals with disabilities); and technology to facilitate access to the one-stop center, including technology used for the center’s planning and outreach activities. Further, this may also include the costs associated with the development and use of the common identifier (i.e., American Job Center signage) and supplies, as defined in the Uniform Guidance at 2 CFR §200.94, to support the general operation of the one-stop center (34 CFR §361.700(a)). Non-personnel costs are all costs that are not compensation for personnel costs. For example, technology-related services performed by vendors or contractors are non-personnel costs and may be identified as infrastructure costs if they are necessary for the general operation of the one-stop center. Such costs would include service contracts with vendors or contractors, equipment, and supplies. Personnel services include salaries, wages, and fringe benefits of the employees of partner programs or their sub-recipients, as described in 2 CFR §§200.430 through 200.431 of the Uniform Guidance. RSA explained that the cost of a shared welcome desk or greeter, for example, directing employers and customers to the services or staff that are available in that one-stop center is a personnel expense. These costs, therefore, could not be included as infrastructure costs, but are included as “additional costs.”

Supplemental Wage Information

RSA staff provided an overview of the joint guidance issued under TAC 17-04, Guidance on the Use of Supplemental Wage Information to Implement the Performance Accountability Requirements under the Workforce Innovation and Opportunity Act.

Four performance accountability measures require that the agency verify employment or wage information prior to submitting data to RSA. These indicators are: Employment Second and Fourth Quarter after Exit, Median Earnings Second Quarter after Exit, and the employment-related portion of the Credential Attainment indicator.

Section 116 of WIOA requires the programs to use wage records to verify the employment and wage information to the extent possible. If the individual does not have a wage record, the programs are then to use supplemental information to verify the employment and wages for the individual. If employment or wages cannot be verified, then this information cannot be entered into the participant's case service record or reported through the RSA-911.

RSA provided an overview of TAC 17-04, Guidance on the Use of Supplemental Wage Information to Implement the Performance Accountability Requirements under the Workforce Innovation and Opportunity Act. RSA also suggested practices to the agency to assist in the collection and verification of employment and wage information. For example, consistency can be established through development and dissemination of uniform policies or procedures; and accuracy in reporting can be enhanced through staff training in effective information collection techniques, timing; and follow-up and tracking strategies, particularly for individuals who do not or will not appear on a wage record.

WIOA Annual Report

RSA provided an overview of the information in TAC 17-05, WIOA Annual Performance Report Submission and shared that VR agencies will not be providing Annual Reports for PY 2016, but will provide their WIOA Annual Report to RSA for PY 2017, which is due on October 1, 2018. RSA explained that sanctions may be imposed in accordance with section 116(f)(1)(B) of WIOA for any State that fails to report by the due date, meaning the Governor's reserve authorized under section 128 of WIOA shall be reduced by five percent.

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, the RSA-911, and SF-425. 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 service records as reported to RSA at the end of the Federal fiscal year. The RSA-911 contains only information on service records closed during the Federal fiscal year covered by the report and does not include information related to those service records remaining open in the next Federal fiscal year.

Table 3.1 GA-C Case Status Information, Exit Status, and Employment Outcomes for All Individuals - FFYs 2014-2016

Performance category	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total applicants	9,605		13,674		16,041		263,064	
Total eligible individuals	12,357		13,098		15,373		247,467	
Agency implementing order of selection	Yes		Yes		Yes		-	
Individuals on order of selection waiting list at year-end	1		0		2		11,437	
Individuals in plan receiving services	12,293		16,340		20,472		454,801	
Percent accepted for services who received no services		35.5%		20.5%		17.6%		23.2%
Exited as applicants	1,272	15.5%	1,948	21.5%	1,844	17.1%	29,456	12.3%
Exited trial experience/extended evaluation	26	.3%	29	.3%	22	.2%	1,956	.8%
Exited with employment	1,618	19.8%	2,926	32.2%	4,056	37.5%	82,808	34.6%
Exited without employment	881	10.8%	1,494	16.5%	2,183	20.2%	65,276	27.3%
Exited from OOS waiting list	1,498	18.3%					3,516	1.5%

Performance category	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Exited without employment outcomes, after eligibility, before an IPE was signed or before receiving services	2,889	35.3%	2,684	29.6%	2,704	25.0%	56,055	23.4%
Total received services	2,499	30.5%	4,420	48.7%	6,239	57.7%	148,084	61.9%
Employment rate		64.7%		66.2%		65.0%		55.9%
Competitive employment outcomes	1,493	92.3%	2,856	97.6%	3,948	97.3%	78,859	95.2%
Supported employment outcomes	188	11.6%	296	10.1%	495	12.2%	9,673	11.7%
Average hourly earnings for competitive employment outcomes	\$10.36		\$10.27		\$10.08		\$11.84	
Average hours worked for competitive employment outcomes	32.94		32.45		32.02		30.3	
Median hourly earnings for competitive employment outcomes	\$8.50		\$8.32		\$8.75		\$10.00	
Median hours worked for competitive employment outcomes	38.00		35.00		35.00		30.0	
Quarterly median earnings	\$3,783.00		\$3,770.00		\$3,770.00		\$3,900.00	

Data sources: RSA-911, RSA 113

Table 3.2.a GA-C VR Training Services Provided for Individuals Served - FFYs 2014-2016

Training Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of individuals served	2,499		4,420		6,239		148,084	
College or university training	6	0.2%	56	1.3%	223	3.6%	1,951	1.3%
Four-year or university training	42	1.7%	623	14.1%	587	9.4%	13,025	8.8%
Junior or community college training	11	0.4%	136	3.1%	132	2.1%	9,790	6.6%
Occupational or vocational training	197	7.9%	259	5.9%	600	9.6%	14,961	10.1%
On-the-job training	11	0.4%	16	0.4%	13	0.2%	2,840	1.9%
Apprenticeship training	1	0.0%	1	0.0%	1	0.0%	83	0.1%
Basic academic remedial or literacy training	0	0.0%	8	0.2%	456	7.3%	2,357	1.6%
Job readiness training	639	25.6%	1,250	28.3%	3,318	53.2%	30,291	20.5%
Disability-related skills training	2	0.1%	48	1.1%	66	1.1%	4,642	3.1%
Miscellaneous training	196	7.8%	481	10.9%	1,145	18.4%	11,595	7.8%

Data source: RSA-911

Table 3.2.b GA-C VR Career Services Provided for Individuals Served - FFYs 2014-2016

Career Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of individuals served	2,499		4,420		6,239		148,084	
Assessment	12	0.5%	387	8.8%	1,142	18.3%	84,756	57.2%
Diagnosis and treatment of impairment	1,717	68.7%	2,862	64.8%	4,381	70.2%	43,641	29.5%
Vocational rehab counseling and guidance	12	0.5%	48	1.1%	2,653	42.5%	95,439	64.4%
Job search assistance	9	0.4%	29	0.7%	721	11.6%	49,182	33.2%
Job placement assistance	7	0.3%	203	4.6%	3,763	60.3%	44,189	29.8%

Career Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
On-the-job supports-short term	2	0.1%	20	0.5%	25	0.4%	20,412	13.8%
On-the-job supports-SE	52	2.1%	257	5.8%	494	7.9%	11,615	7.8%
Information and referral services	0	0.0%	0	0.0%	1	0.0%	33,306	22.5%
Benefits counseling	3	0.1%	3	0.1%	7	0.1%	8,715	5.9%
Customized employment services	0	0.0%	0	0.0%	0	0.0%	928	0.6%

Data source: RSA-911

Table 3.2.c GA-C VR Other Services Provided for Individuals Served - FFYs 2014-2016

Other Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of individuals served	2,499		4,420		6,239		148,084	
Transportation	510	20.4%	909	20.6%	1,660	26.6%	51,017	34.5%
Maintenance	367	14.7%	741	16.8%	1,446	23.2%	32,145	21.7%
Rehabilitation technology	3	0.1%	276	6.2%	922	14.8%	24,372	16.5%
Reader services	2	0.1%	1	0.0%	1	0.0%	151	0.1%
Interpreter services	60	2.4%	96	2.2%	137	2.2%	2,590	1.7%
Personal attendant services	4	0.2%	3	0.1%	4	0.1%	247	0.2%
Technical assistance services	2	0.1%	4	0.1%	3	0.0%	1,437	1.0%
Other services	1,082	43.3%	1,807	40.9%	1,892	30.3%	32,136	21.7%

Data source: RSA-911

Table 3.3.a GA-C Outcomes by Type of Impairment - FFYs 2014-2016

Type of Impairment	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Visual - Employment outcomes	90	5.6%	147	5.0%	192	4.7%	5,241	6.3%
Visual - Without employment outcomes	93	10.6%	83	5.6%	100	4.6%	2,861	4.4%
Auditory and Communicative - Employment outcomes	118	7.3%	291	9.9%	421	10.4%	11,490	13.9%
Auditory and Communicative - Without employment outcomes	46	5.2%	114	7.6%	126	5.8%	3,490	5.4%
Physical - Employment outcomes	247	15.3%	418	14.3%	578	14.3%	14,906	18.0%
Physical - Without employment outcomes	175	19.9%	271	18.1%	430	19.7%	14,128	21.7%
Intellectual and Learning disability - Employment outcomes	836	51.7%	1,364	46.6%	1,728	42.6%	28,084	34.0%
Intellectual and Learning disability - Without employment outcomes	363	41.2%	632	42.3%	817	37.4%	21,270	32.7%
Psychosocial and psychological - Employment outcomes	327	20.2%	706	24.1%	1,137	28.0%	22,897	27.7%
Psychosocial and psychological - Without employment outcomes	204	23.2%	394	26.4%	710	32.5%	23,281	35.8%
Total served - Employment outcomes	1,618	100.0%	2,926	100.0%	4,056	100.0%	82,618	100.0%
Total served - Without employment outcomes	881	100.0%	1,494	100.0%	2,183	100.0%	65,030	100.0%

Data source: RSA-911

Table 3.3.b GA-C All Individuals Served by Type of Impairment FFYs 2014-2016

Type of Impairment	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Visual - Individuals served	183	7.3%	230	5.2%	292	4.7%	8,102	5.5%
Auditory and Communicative - Individuals served	164	6.6%	405	9.2%	547	8.8%	14,980	10.1%
Physical - Individuals served	422	16.9%	689	15.6%	1,008	16.2%	29,034	19.7%
Intellectual and Learning disability - Individuals served	1,199	48.0%	1,996	45.2%	2,545	40.8%	49,354	33.4%
Psychosocial and psychological	531	21.2%	1,100	24.9%	1,847	29.6%	46,178	31.3%
Total individuals served	2,499	100.0%	4,420	100.0%	6,239	100.0%	147,648	100.0

Data source: RSA-911

Table 3.3.c GA-C Employment Rate by Type of Impairment - FFYs 2014-2016

Type of Impairment	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Visual - Employment rate		49.2%		63.9%		65.8%		64.7%
Auditory and Communicative - Employment rate		72.0%		71.9%		77.0%		76.7%
Physical - Employment rate		58.5%		60.7%		57.3%		51.3%
Intellectual and Learning disability - Employment rate		69.7%		68.3%		67.9%		56.9%
Psychosocial and psychological – Employment rate		61.6%		64.2%		61.6%		49.6%
Total served - Employment rate		64.7%		66.2%		65.0%		56.0%

Data source: RSA-911

Table 3.4.a GA-C Elapsed Time from Application to Eligibility for All Individuals Served - FFYs 2014-2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 60 days	4,575	66.4%	4,681	65.9%	5,813	65.0%	171,607	82.6%
61 – 90 days	978	14.2%	982	13.8%	1,311	14.7%	17,315	8.3%
91 – 120 days	489	7.1%	527	7.4%	681	7.6%	8,398	4.0%
121 – 180 days	458	6.7%	525	7.4%	642	7.2%	6,202	3.0%
181 – 365 days	336	4.9%	322	4.5%	432	4.8%	3,473	1.7%
More than 1 year	50	.7%	67	.9%	64	.7%	660	.3%
Total eligible	6,886	100.0%	7,104	100.0%	8,943	100.0%	207,655	100.0%

Data source: RSA-911

Table 3.4.b GA-C Elapsed Time from Eligibility to IPE for All Individuals Served - FFYs 2014-2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 90 days	1,316	52.7%	2,347	53.1%	3,769	60.4%	111,220	75.1%
More than 90 days	1,183	47.3%	2,073	46.9%	2,470	39.6%	36,864	24.9%
Total served	2,499	100.0%	4,420	100.0%	6,239	100.0%	148,084	100.0%

Data source: RSA-911

Table 3.4.c GA-C Elapsed Time from IPE to Closure for All Individuals Served - FFYs 2014-2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months	77	3.1%	158	3.6%	308	4.9%	4,867	3.3%
4 – 6 months	271	10.8%	681	15.4%	1,146	18.4%	18,624	12.6%
7 – 9 months	160	6.4%	554	12.5%	861	13.8%	18,240	12.3%
10 – 12 months	39	1.6%	458	10.4%	649	10.4%	15,762	10.6%
13 - 24 months	576	23.0%	813	18.4%	1,617	25.9%	37,939	25.6%
25 – 36 months	576	23.0%	395	8.9%	438	7.0%	18,934	12.8%
37 – 60 months	484	19.4%	848	19.2%	674	10.8%	19,177	13.0%
More than 5 years	316	12.6%	513	11.6%	546	8.8%	14,541	9.8%
Total served	2,499	100.0%	4,420	100.0%	6,239	100.0%	148,084	100.0%

Data source: RSA-911

Table 3.5.a GA-C Standard Occupational Classification (SOC) Codes for All Individuals Served with Employment Outcomes - FFYs 2014-2016

SOC	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Architecture and Engineering Occupations (17-0000)	14	.9%	25	.9%	20	.5%	577	.7%
Arts, Design, Entertainment, Sports, and Media (27-0000)	12	.7%	26	.9%	40	1.0%	885	1.1%
Building and Grounds Cleaning and Maintenance (37-0000)	148	9.1%	275	9.4%	360	8.9%	6,923	8.4%
Business and Financial Operations Occupations (13-0000)	23	1.4%	46	1.6%	46	1.1%	1,248	1.5%
Community and Social Services Occupations (21-0000)	39	2.4%	38	1.3%	61	1.5%	2,300	2.8%
Computer and Mathematical Occupations (15-0000)	19	1.2%	39	1.3%	48	1.2%	874	1.1%
Constructive and Extraction Occupations (47-0000)	53	3.3%	116	4.0%	145	3.6%	1,722	2.1%
Education, Training, and Library Occupations (25-0000)	63	3.9%	104	3.6%	102	2.5%	2,434	2.9%
Farming, Fishing, and Forestry Occupations(45-0000)	10	.6%	20	.7%	18	.4%	425	.5%
Food Preparation and Serving Related Occupations (35-0000)	213	13.2%	408	13.9%	581	14.3%	9,434	11.4%
Healthcare Practitioners and Technical Occupations (29-0000)	42	2.6%	52	1.8%	62	1.5%	2,238	2.7%
Healthcare Support Occupations (31-0000)	59	3.6%	82	2.8%	112	2.8%	2,722	3.3%
Homemaker*	28	1.7%	55	1.9%	56	1.4%	1,803	2.2%
Installation, Maintenance, and Repair Occupations (49-0000)	51	3.2%	69	2.4%	134	3.3%	4,981	6.0%
Legal Occupations (23-0000)	4	.2%	5	.2%	9	.2%	191	.2%

SOC	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Life, Physical, and Social Science Occupations (19-0000)	5	.3%	15	.5%	26	.6%	374	.5%
Management Occupations (11-0000)	35	2.2%	63	2.2%	76	1.9%	2,050	2.5%
Military Specific Occupations (55-0000)	6	.4%	2	.1%	3	.1%	92	.1%
Office and Administrative Support Occupations (19-0000)	250	15.5%	536	18.3%	910	22.4%	15,218	18.4%
Personal Care and Service Occupations (39-0000)	56	3.5%	85	2.9%	137	3.4%	4,073	4.9%
Production Occupations (51-0000)	144	8.9%	252	8.6%	298	7.3%	6,888	8.3%
Protective Service Occupations (33-0000)	17	1.1%	37	1.3%	47	1.2%	1,376	1.7%
Randolph-Sheppard vending facility clerk*					1	.0%	8	.0%
Randolph-Sheppard vending facility operator*	1	.1%	3	.1%	7	.2%	76	.1%
Sales and Related Occupations (41-0000)	150	9.3%	259	8.9%	325	8.0%	6,552	7.9%
Transportation and Material Moving Occupations (53-0000)	174	10.8%	312	10.7%	427	10.5%	7,284	8.8%
Unpaid Family Worker*	1	.1%	2	.1%	4	.1%	18	.0%
Total employment outcomes	1,617	100.0%	2,926	100.0%	4,055	100.0%	82,766	100.0%

Data source: RSA-911

Table 3.5.b GA-C Standard Occupational Classification (SOC) Codes Median Hourly Earnings for All Individuals Served with Employment Outcomes - FFYs 2014-2016

SOC	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Architecture and Engineering Occupations (17-0000)	\$16.31		\$20.00		\$17.25		\$19.00	
Arts, Design, Entertainment, Sports, and Media (27-0000)	\$10.48		\$12.52		\$10.00		\$12.03	
Building and Grounds Cleaning and Maintenance (37-0000)	\$7.75		\$8.00		\$8.25		\$9.00	
Business and Financial Operations Occupations (13-0000)	\$17.70		\$16.43		\$14.75		\$15.34	
Community and Social Services Occupations (21-0000)	\$12.98		\$13.49		\$13.10		\$13.50	
Computer and Mathematical Occupations (15-0000)	\$11.00		\$16.35		\$15.15		\$16.00	
Constructive and Extraction Occupations (47-0000)	\$9.00		\$8.25		\$8.50		\$12.70	
Education, Training, and Library Occupations (25-0000)	\$13.30		\$11.40		\$11.25		\$13.00	
Farming, Fishing, and Forestry Occupations(45-0000)	\$7.75		\$9.30		\$9.25		\$10.00	
Food Preparation and Serving Related Occupations (35-0000)	\$7.27		\$7.33		\$7.50		\$8.36	
Healthcare Practitioners and Technical Occupations (29-0000)	\$15.31		\$16.98		\$15.00		\$16.12	
Healthcare Support Occupations (31-0000)	\$8.51		\$9.50		\$9.15		\$10.43	
Homemaker*								
Installation, Maintenance, and Repair Occupations (49-0000)	\$11.00		\$10.00		\$9.00		\$9.80	
Legal Occupations (23-0000)	\$26.73		\$14.43		\$17.50		\$17.00	

SOC	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Life, Physical, and Social Science Occupations (19-0000)	\$15.00		\$12.00		\$13.46		\$15.00	
Management Occupations (11-0000)	\$13.45		\$13.20		\$12.38		\$15.00	
Military Specific Occupations (55-0000)	\$10.21		\$13.73		\$8.17		\$13.17	
Office and Administrative Support Occupations (19-0000)	\$8.00		\$8.50		\$9.00		\$10.00	
Personal Care and Service Occupations (39-0000)	\$8.00		\$8.27		\$8.00		\$9.00	
Production Occupations (51-0000)	\$8.00		\$8.50		\$9.00		\$10.00	
Protective Service Occupations (33-0000)	\$11.00		\$9.50		\$10.00		\$10.25	
Randolph-Sheppard vending facility clerk*					\$17.71		\$10.91	
Randolph-Sheppard vending facility operator*	\$24.00		\$51.00		\$12.00		\$12.68	
Sales and Related Occupations (41-0000)	\$8.00		\$8.00		\$8.33		\$9.00	
Transportation and Material Moving Occupations (53-0000)	\$8.00		\$8.00		\$8.75		\$10.00	
Unpaid Family Worker*								
Total employment outcomes	\$8.25		\$8.30		\$8.65		\$10.00	

Data source: RSA-911

Table 4.1 GA-C Case Status Information, Outcomes, and Quality Employment Measures for Individuals with Disabilities under Age 25 at Exit—FFYs 2014–2016

Individuals with Disabilities under Age 25 at Exit	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total cases closed	4,234		4,123		4,518		86,272	
Exited as an applicant	582	13.75%	776	18.82%	730	16.16%	10,776	12.49%
Exited during or after trial work experience/extended evaluation	12	0.28%	15	0.36%	10	0.22%	687	0.80%
Exited without employment after IPE, before services	11	0.26%	36	0.87%	28	0.62%	16,390	19.00%
Exited from order of selection waiting list	791	18.68%		0.00%		0.00%	972	1.13%
Exited without employment after eligibility, before IPE	1,473	34.79%	1,195	28.98%	1,083	23.97%	3,865	4.48%
Exited with employment	916	21.63%	1,412	34.25%	1,745	38.62%	29,391	34.07%
Exited without employment	449	10.60%	689	16.71%	922	20.41%	24,191	28.04%
Employment rate	67.11%		67.21%		65.43%		54.85%	
Supported employment outcomes	121	13.21%	157	11.12%	217	12.44%	3,965	13.49%
Competitive employment outcomes	858	93.67%	1,408	99.72%	1,727	98.97%	28,670	97.55%
Average hourly earnings for competitive employment outcomes	\$ 9.86		\$ 9.64		\$ 9.45		\$ 10.12	

Individuals with Disabilities under Age 25 at Exit	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Average hours worked per week for competitive employment outcomes	32.67		31.93		31.31		29.12	
Competitive employment outcomes at 35 or more hours per week	421	45.96%	620	43.91%	637	36.50%	10,346	35.20%
Competitive employment outcomes meeting SGA	505	55.13%	820	58.07%	923	52.89%	14,616	49.73%
Competitive employment outcomes with employer-provided medical insurance	229	25.00%	373	26.42%	378	21.66%	3,866	13.15%

Table 4.2.a GA-C Select VR Services Provided for Individuals with Disabilities under Age 25 at Exit- FFYs 2014-2016

Training Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of individuals served	1,365		2,101		2,667		53,582	
College or university training	5	0.40%	21	1.00%	127	4.80%	852	1.60%
Four-year or university training	31	2.30%	394	18.80%	334	12.50%	5,289	9.90%
Junior or community college training	9	0.70%	91	4.30%	80	3.00%	4,482	8.40%
Occupational or vocational training	131	9.60%	159	7.60%	283	10.60%	5,067	9.50%

Training Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
On-the-job training	9	0.70%	12	0.60%	9	0.30%	1,329	2.50%
Apprenticeship training	0	0.00%	1	0.00%	1	0.00%	42	0.10%
Basic academic remedial or literacy training	0	0.00%	4	0.20%	239	9.00%	1,198	2.20%
Job readiness training	374	27.40%	654	31.10%	1,490	55.90%	16,251	30.30%
Disability-related skills training	1	0.10%	6	0.30%	26	1.00%	1,272	2.40%
Miscellaneous training	118	8.60%	237	11.30%	543	20.40%	4,918	9.20%
Assessment	8	0.60%	210	10.00%	510	19.10%	29,430	54.90%
Diagnosis and treatment of impairment	876	64.20%	1,178	56.10%	1,670	62.60%	10,630	19.80%
Vocational rehab counseling and guidance	7	0.50%	34	1.60%	1,181	44.30%	36,168	67.50%
Job search assistance	5	0.40%	14	0.70%	281	10.50%	19,183	35.80%
Job placement assistance	5	0.40%	88	4.20%	1,605	60.20%	16,389	30.60%
On-the-job supports-short term	0	0.00%	18	0.90%	25	0.90%	7,651	14.30%
On-the-job supports-SE	31	2.30%	131	6.20%	198	7.40%	4,547	8.50%
Information and referral services	0	0.00%	0	0.00%	1	0.00%	14,113	26.30%
Benefits counseling	1	0.10%	0	0.00%	3	0.10%	1,974	3.70%
Customized employment services	0	0.00%	0	0.00%	0	0.00%	449	0.80%
Transportation	240	17.60%	326	15.50%	585	21.90%	15,830	29.50%
Maintenance	276	20.20%	379	18.00%	476	17.80%	10,436	19.50%
Rehabilitation technology	1	0.10%	23	1.10%	231	8.70%	3,781	7.10%
Reader services	0	0.00%	1	0.00%	0	0.00%	30	0.10%
Interpreter services	10	0.70%	19	0.90%	35	1.30%	607	1.10%
Personal attendant services	3	0.20%	1	0.00%	2	0.10%	84	0.20%

Training Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Technical assistance services	1	0.10%	3	0.10%	1	0.00%	254	0.50%
Other services	493	36.10%	676	32.20%	1,006	37.70%	9,840	18.40%

Table 4.3.a GA-C Outcomes by Type of Impairment for Individuals with Disabilities under Age 25 at Exit- FFYs 2014-2016

Type of Impairment	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Visual - Employment outcomes	14	1.50%	17	1.20%	28	1.60%	524	1.78%
Visual - Without employment outcomes	19	4.20%	19	2.80%	21	2.30%	535	2.21%
Auditory and Communicative - Employment outcomes	37	4.00%	46	3.30%	72	4.10%	1618	5.51%
Auditory and Communicative - Without employment outcomes	10	2.20%	30	4.40%	38	4.10%	1176	4.86%
Physical - Employment outcomes	76	8.30%	93	6.60%	104	6.00%	2339	7.96%
Physical - Without employment outcomes	57	12.70%	57	8.30%	68	7.40%	2054	8.49%
Intellectual and Learning disability - Employment outcomes	671	73.30%	1027	72.70%	1,230	70.50%	18636	63.45%
Intellectual and Learning disability - Without employment outcomes	293	65.30%	479	69.50%	597	64.80%	14463	59.81%
Psychosocial and psychological - Employment	118	12.90%	229	16.20%	311	17.80%	6254	21.29%

Type of Impairment	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
outcomes								
Psychosocial and psychological - Without employment outcomes	70	15.60%	104	15.10%	198	21.50%	5954	24.62%
Total served - Employment outcomes	916	100.00%	1412	100.00%	1,745	100.00%	29,371	100.00%
Total served - Without employment outcomes	449	100.00%	689	100.00%	922	100.00%	24,182	100.00%

Table 4.3.b GA-C All Individuals Served by Type of Impairment for Individuals with Disabilities under Age 25 at Exit- FFYs 2014-2016

Type of Impairment	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Visual - Individuals served	33	2.40%	36	1.70%	49	1.80%	1059	1.98%
Auditory and Communicative - Individuals served	47	3.40%	76	3.60%	110	4.10%	2,794	5.22%
Physical - Individuals served	133	9.70%	150	7.10%	172	6.40%	4,393	8.20%
Intellectual and Learning disability - Individuals served	964	70.60%	1,506	71.70%	1,827	68.50%	33,099	61.81%
Psychosocial and psychological	188	13.80%	333	15.80%	509	19.10%	12,208	22.80%
Total individuals served	1,365	100.00%	2,101	100.00%	2,667	100.00%	53,553	100.00%

Table 4.3.c GA-C Employment Rate by Type of Impairment for Individuals with Disabilities under Age 25 at Exit- FFYs 2014-2016

Type of Impairment	2014	2015	2016	2016 National Agency Type Percent
Visual - Employment rate	42.40%	47.20%	57.10%	49.48%
Auditory and Communicative - Employment rate	78.70%	60.50%	65.50%	57.91%
Physical - Employment rate	57.10%	62%	60.50%	53.24%
Intellectual and Learning disability - Employment rate	69.60%	68.20%	67.30%	56.30%
Psychosocial and psychological – Employment rate	62.80%	68.80%	61.10%	51.23%
Total served - Employment rate	67.10%	67.20%	65.40%	54.84%

Table 4.4.a GA-C Elapsed Time from Application to Eligibility for Individuals with Disabilities under Age 25 at Exit—FFYs 2014–2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 60 days	2,349	64.53%	2,157	64.74%	2,291	60.64%	61,119	81.70%
61 – 90 days	541	14.86%	487	14.62%	629	16.65%	6,367	8.51%
91 – 120 days	299	8.21%	259	7.77%	328	8.68%	3,214	4.30%
121 – 180 days	247	6.79%	245	7.35%	300	7.94%	2,441	3.26%
181 – 365 days	185	5.08%	152	4.56%	203	5.37%	1,410	1.88%
More than 1 year	19	0.52%	32	0.96%	27	0.71%	258	0.34%

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total eligible	3,640		3,332		3,778		74,809	

Table 4.4.b GA-C Elapsed Time from Eligibility to IPE for Individuals with Disabilities under Age 25 at Exit Served—FFYs 2014–2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months	773	56.63%	1,134	53.97%	1,655	62.05%	40,612	75.79%
4-6 months	288	21.10%	387	18.42%	418	15.67%	7,589	14.16%
7-9 months	127	9.30%	164	7.81%	185	6.94%	2,473	4.62%
10-12 months	86	6.30%	147	7.00%	133	4.99%	1,107	2.07%
More than 12 months	91	6.67%	269	12.80%	276	10.35%	1,801	3.36%
Total served	1,365		2,101		2,667		53,582	

Table 4.4.c GA-C Elapsed Time from IPE to Closure for Individuals with Disabilities under Age 25 at Exit Served—FFYs 2014–2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months	20	1.47%	57	2.71%	107	4.01%	1,319	2.46%
4 – 6 months	89	6.52%	201	9.57%	278	10.42%	4,769	8.90%
7 – 9 months	79	5.79%	209	9.95%	298	11.17%	5,556	10.37%
10 – 12 months	14	1.03%	216	10.28%	287	10.76%	5,217	9.74%
13 - 24 months	295	21.61%	464	22.08%	825	30.93%	14,948	27.90%
25 – 36 months	348	25.49%	217	10.33%	247	9.26%	8,479	15.82%
37 – 60 months	337	24.69%	489	23.27%	393	14.74%	8,846	16.51%
More than 5 years	183	13.41%	248	11.80%	232	8.70%	4,448	8.30%
Total served	1,365		2,101		2,667		53,582	

Table 4.5.a GA-C Standard Occupational Classification (SOC) Codes for Individuals with Disabilities under Age 25 at Exit Served with Employment Outcomes—FFYs 2014–2016

SOC	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Architecture and Engineering Occupations (17-0000)	5	0.55%	14	0.99%	12	0.69%	172	0.59%
Arts, Design, Entertainment, Sports, and Media (27-0000)	9	0.98%	14	0.99%	22	1.26%	287	0.98%

SOC	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Building and Grounds Cleaning and Maintenance (37-0000)	69	7.53%	116	8.22%	120	6.88%	2,125	7.23%
Business and Financial Operations Occupations (13-0000)	7	0.76%	15	1.06%	10	0.57%	275	0.94%
Community and Social Services Occupations (21-0000)	10	1.09%	13	0.92%	9	0.52%	293	1.00%
Computer and Mathematical Occupations (15-0000)	7	0.76%	13	0.92%	18	1.03%	235	0.80%
Constructive and Extraction Occupations (47-0000)	22	2.40%	41	2.90%	42	2.41%	518	1.76%
Education, Training, and Library Occupations (25-0000)	38	4.15%	41	2.90%	43	2.47%	562	1.91%
Farming, Fishing, and Forestry Occupations (45-0000)	7	0.76%	12	0.85%	13	0.75%	172	0.59%
Food Preparation and Serving Related Occupations (35-0000)	145	15.83%	245	17.35%	311	17.83%	4,862	16.55%
Healthcare Practitioners and Technical Occupations (29-0000)	23	2.51%	16	1.13%	25	1.43%	612	2.08%
Healthcare Support Occupations (31-0000)	27	2.95%	34	2.41%	45	2.58%	956	3.25%
Homemaker*	2	0.22%	3	0.21%	3	0.17%	50	0.17%
Installation, Maintenance, and Repair Occupations (49-0000)	28	3.06%	38	2.69%	50	2.87%	2,183	7.43%
Legal Occupations (23-0000)	2	0.22%	1	0.07%		0.00%	22	0.07%
Life, Physical, and Social Science Occupations (19-0000)	4	0.44%	7	0.50%	9	0.52%	115	0.39%
Management Occupations (11-0000)	21	2.29%	33	2.34%	24	1.38%	360	1.23%
Military Specific Occupations (55-0000)	6	0.66%	2	0.14%	3	0.17%	48	0.16%

SOC	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Office and Administrative Support Occupations (43-0000)	141	15.39%	262	18.56%	409	23.45%	5,594	19.04%
Personal Care and Service Occupations (39-0000)	44	4.80%	52	3.68%	71	4.07%	1,665	5.67%
Production Occupations (51-0000)	79	8.62%	121	8.57%	147	8.43%	2,625	8.94%
Protective Service Occupations (33-0000)	13	1.42%	18	1.27%	17	0.97%	420	1.43%
Randolph-Sheppard Vending Facility Clerk*		0.00%		0.00%		0.00%	1	0.00%
Randolph-Sheppard Vending Facility Operator*	1	0.11%		0.00%		0.00%	1	0.00%
Sales and Related Occupations (41-0000)	89	9.72%	144	10.20%	165	9.46%	2,856	9.72%
Transportation and Material Moving Occupations (53-0000)	116	12.66%	156	11.05%	174	9.98%	2,367	8.06%
Unpaid Family Worker*	1	0.11%	1	0.07%	2	0.11%	2	0.01%
Total employment outcomes	916		1,412		1,744		29,378	

Table 4.5.b GA-C Standard Occupational Classification (SOC) Codes Median Hourly Earnings for Individuals with Disabilities under Age 25 at Exit Served with Employment Outcomes—FFYs 2014–2016

SOC	2014	2015	2016	2016 National Agency Type
Architecture and Engineering Occupations (17-0000)	\$18.58	\$20.35	\$16.88	\$16.08
Arts, Design, Entertainment, Sports, and Media (27-0000)	\$10.96	\$11.79	\$10.00	\$11.00
Building and Grounds Cleaning and Maintenance (37-0000)	\$8.00	\$8.00	\$8.00	\$8.60
Business and Financial Operations Occupations (13-0000)	\$16.83	\$15.70	\$12.41	\$12.00
Community and Social Services Occupations (21-0000)	\$12.99	\$15.07	\$10.50	\$12.25
Computer and Mathematical Occupations (15-0000)	\$16.83	\$16.00	\$12.89	\$13.00
Constructive and Extraction Occupations (47-0000)	\$10.00	\$8.30	\$9.35	\$11.00
Education, Training, and Library Occupations (25-0000)	\$14.51	\$10.35	\$11.25	\$11.26
Farming, Fishing, and Forestry Occupations (45-0000)	\$7.50	\$9.30	\$9.00	\$10.00
Food Preparation and Serving Related Occupations (35-0000)	\$7.27	\$7.50	\$7.51	\$8.27
Healthcare Practitioners and Technical Occupations (29-0000)	\$15.00	\$18.58	\$13.00	\$12.00
Healthcare Support Occupations (31-0000)	\$8.45	\$9.50	\$9.13	\$10.00
Homemaker*				
Installation, Maintenance, and Repair Occupations (49-0000)	\$11.01	\$9.20	\$8.50	\$9.00
Legal Occupations (23-0000)	\$17.23	\$15.63		\$13.04
Life, Physical, and Social Science Occupations (19-0000)	\$17.50	\$11.00	\$14.43	\$13.50

SOC	2014	2015	2016	2016 National Agency Type
Management Occupations (11-0000)	\$14.43	\$12.24	\$13.03	\$13.00
Military Specific Occupations (55-0000)	\$10.21	\$13.73	\$8.17	\$12.00
Office and Administrative Support Occupations (43-0000)	\$7.85	\$8.00	\$8.50	\$9.00
Personal Care and Service Occupations (39-0000)	\$7.99	\$8.27	\$7.60	\$8.75
Production Occupations (51-0000)	\$9.00	\$9.00	\$9.50	\$9.76
Protective Service Occupations (33-0000)	\$12.00	\$10.00	\$11.70	\$10.00
Randolph-Sheppard Vending Facility Clerk*				\$8
Randolph-Sheppard Vending Facility Operator*	\$24.00			\$8.25
Sales and Related Occupations (41-0000)	\$7.55	\$7.70	\$8.00	\$9.00
Transportation and Material Moving Occupations (53-0000)	\$7.50	\$8.00	\$8.64	\$9.00
Unpaid Family Worker*				
Total employment outcomes	\$8.00	\$8.16	\$8.50	\$9.00

Table 4.6 GA-C Source of Referral Codes for Individuals with Disabilities under Age 25 at Exit—FFYs 2014–2016

Referral Sources	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
American Indian VR Services Program		0.00%		0.00%		0.00%	41	0.05%
Centers for Independent Living		0.00%		0.00%		0.00%	71	0.08%

Referral Sources	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Child Protective Services		0.00%		0.00%		0.00%	106	0.12%
Community Rehabilitation Programs	108	2.56%	113	2.76%	105	2.33%	3,047	3.54%
Consumer Organizations or Advocacy Groups		0.00%		0.00%		0.00%	178	0.21%
Educational Institutions (elementary/secondary)	2,556	60.47%	2,380	58.06%	2,495	55.36%	45,619	52.96%
Educational Institutions (post-secondary)	209	4.94%	179	4.37%	147	3.26%	3,034	3.52%
Employers		0.00%		0.00%		0.00%	53	0.06%
Faith Based Organizations		0.00%		0.00%		0.00%	64	0.07%
Family/Friends		0.00%		0.00%		0.00%	4,041	4.69%
Intellectual and Developmental Disabilities Providers		0.00%		0.00%		0.00%	1,652	1.92%
Medical Health Provider (Public or Private)	78	1.85%	32	0.78%	8	0.18%	1,896	2.20%
Mental Health Provider (Public or Private)		0.00%		0.00%		0.00%	1,936	2.25%
One-stop Employment/Training Centers	45	1.06%	27	0.66%	10	0.22%	1,054	1.22%
Other Sources	339	8.02%	304	7.42%	201	4.46%	6,099	7.08%
Other State Agencies		0.00%		0.00%		0.00%	636	0.74%
Other VR State Agencies		0.00%	10	0.24%	104	2.31%	261	0.30%
Public Housing Authority		0.00%		0.00%		0.00%	15	0.02%
Self-referral	857	20.27%	1,016	24.79%	1,374	30.49%	14,829	17.21%

Referral Sources	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Social Security Administration (Disability Determination Service or District office)	21	0.50%	13	0.32%	8	0.18%	328	0.38%
State Department of Correction/Juvenile Justice		0.00%		0.00%		0.00%	522	0.61%
State Employment Service Agency		0.00%		0.00%		0.00%	67	0.08%
Veteran's Administration		0.00%		0.00%		0.00%	13	0.02%
Welfare Agency (State or local government)	14	0.33%	25	0.61%	55	1.22%	555	0.64%
Worker's Compensation		0.00%		0.00%		0.00%	28	0.03%

Table 4.7 GA-C Reason for Closure Codes for Individuals with Disabilities under Age 25 at Exit—FFYs 2014–2016

Reason for Closure	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Achieved employment outcome	916	22.07%	1,412	34.99%	1,745	39.48%	29,393	35.55%
Unable to locate or contact	908	21.87%	887	21.98%	1,069	24.19%	18,723	22.65%
Transportation not feasible or available	22	0.53%	11	0.27%	12	0.27%	114	0.14%
Does not require VR services	15	0.36%	5	0.12%	7	0.16%	579	0.70%
Extended services not available		0.00%	1	0.02%		0.00%	87	0.11%
All other reasons	694	16.72%	909	22.52%	796	18.01%	6,857	8.29%
Extended employment	1	0.02%		0.00%		0.00%	62	0.07%
Individual in institution, other than a prison or jail	7	0.17%	5	0.12%	2	0.05%	179	0.22%
Individual is incarcerated in a prison or jail	8	0.19%	28	0.69%	37	0.84%	390	0.47%
Disability too significant to benefit from VR services	20	0.48%	10	0.25%	5	0.11%	501	0.61%
No longer interested in receiving services or further services	1,553	37.41%	768	19.03%	740	16.74%	25,623	30.99%
Death	7	0.17%		0.00%	7	0.16%	168	0.20%

Table 5.1.a GA-C Supported Employment Outcomes for All Individuals with Disabilities—FFYs 2014–2016

All Individuals with Disabilities with Supported Employment Outcomes	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Supported employment outcomes	188	11.62%	296	10.12%	495	12.20%	9,673	11.67%
Average hourly wage for supported employment outcomes	\$ 9.08		\$ 9.07		\$ 9.11		\$ 9.07	
Average hours worked per week for supported employment outcomes	28.18		28.12		27.91		22.48	
Competitive supported employment outcomes	179	95.21%	294	99.32%	487	98.38%	9,099	94.07%
Average hourly earnings for competitive supported employment outcomes	\$ 9.22		\$ 9.10		\$ 9.18		\$ 9.30	
Average hours worked per week for competitive supported employment outcomes	28.52		28.06		28.03		22.23	
Competitive supported employment outcomes at 35 or more hours per week	61	32.45%	95	32.09%	155	31.31%	1,335	13.80%
Competitive supported employment outcomes meeting SGA	72	38.30%	125	42.23%	190	38.38%	2,276	23.53%
Competitive supported employment outcomes with employer-provided	38	20.21%	64	21.62%	75	15.15%	338	3.49%

All Individuals with Disabilities with Supported Employment Outcomes	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
medical insurance								

Table 5.1.b GA-C Supported Employment Outcomes for Individuals with Disabilities under Age 25 at Exit—FFYs 2014–2016

Individuals under Age 25 with Disabilities with Supported Employment Outcomes	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Supported employment outcomes	121	13.21%	157	11.12%	217	12.44%	3965	13.49%
Average hourly wage for supported employment outcomes	\$ 8.55		\$ 8.34		\$ 8.66		\$ 8.77	
Average hours worked per week for supported employment outcomes	26.81		25.33		25.62		21.92	
Competitive supported employment outcomes	117	96.69%	157	100.00%	213	98.16%	3750	94.58%
Average hourly earnings for competitive supported employment outcomes	\$ 8.60		\$ 8.34		\$ 8.72		\$ 8.94	
Average hours worked per week for competitive supported employment outcomes	27.23		25.33		25.73		21.75	
Competitive supported employment outcomes at 35 or more hours per week	32	26.45%	34	21.66%	50	23.04%	489	12.33%
Competitive supported employment outcomes	40	33.06%	50	31.85%	64	29.49%	821	20.71%

Individuals under Age 25 with Disabilities with Supported Employment Outcomes	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
meeting SGA								
Competitive supported employment outcomes with employer-provided medical insurance	19	15.70%	26	16.56%	32	14.75%	215	5.42%

Table 5.2.a GA-C Select VR and Supported Employment Services Provided for Individuals with Disabilities with Supported Employment Outcomes- FFYs 2014-2016

Training Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of individuals served	188		296		495		9673	
College or university training	0	0.00%	2	0.70%	7	1.40%	32	0.30%
Four-year or university training	0	0.00%	15	5.10%	18	3.60%	116	1.20%
Junior or community college training	0	0.00%	2	0.70%	2	0.40%	124	1.30%
Occupational or vocational training	8	4.30%	13	4.40%	33	6.70%	423	4.40%
On-the-job training	3	1.60%	3	1.00%	1	0.20%	239	2.50%
Apprenticeship training	0	0.00%	1	0.30%	0	0.00%	7	0.10%
Basic academic remedial or literacy training	0	0.00%	2	0.70%	7	1.40%	78	0.80%
Job readiness training	54	28.70%	85	28.70%	186	37.60%	1,928	19.90%
Disability-related skills training	0	0.00%	1	0.30%	5	1.00%	153	1.60%
Miscellaneous training	90	47.90%	192	64.90%	346	69.90%	804	8.30%

Training Services	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Assessment	0	0.00%	31	10.50%	81	16.40%	5,992	61.90%
Diagnosis and treatment of impairment	158	84.00%	265	89.50%	448	90.50%	1,987	20.50%
Vocational rehab counseling and guidance	3	1.60%	4	1.40%	188	38.00%	6,718	69.50%
Job search assistance	2	1.10%	2	0.70%	12	2.40%	4,766	49.30%
Job placement assistance	3	1.60%	19	6.40%	244	49.30%	4,358	45.10%
On-the-job supports-short term	1	0.50%	18	6.10%	21	4.20%	2,911	30.10%
On-the-job supports-SE	42	22.30%	186	62.80%	329	66.50%	6,821	70.50%
Information and referral services	0	0.00%	0	0.00%	0	0.00%	2,005	20.70%
Benefits counseling	1	0.50%	0	0.00%	1	0.20%	1,233	12.70%
Customized employment services	0	0.00%	0	0.00%	0	0.00%	98	1.00%
Transportation	39	20.70%	68	23.00%	143	28.90%	2,769	28.60%
Maintenance	16	8.50%	35	11.80%	154	31.10%	2,324	24.00%
Rehabilitation technology	0	0.00%	19	6.40%	76	15.40%	568	5.90%
Reader services	1	0.50%	0	0.00%	0	0.00%	1	0.00%
Interpreter services	10	5.30%	15	5.10%	7	1.40%	89	0.90%
Personal attendant services	0	0.00%	0	0.00%	0	0.00%	11	0.10%
Technical assistance services	0	0.00%	0	0.00%	1	0.20%	28	0.30%
Other services	88	46.80%	120	40.50%	123	24.80%	1,674	17.30%

Table 5.2.b GA-C Select VR and Supported Employment Services Provided for Individuals with Disabilities under Age 25 at Exit with Supported Employment Outcomes- FFYs 2014-2016

Training Services	2014	2014 Percent	2015	2015 Percent	2016	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total number of SE	121		157		217		3,965	
College or university training	0	0.00%	0	0.00%	4	1.80%	15	0.40%
Four-year or university training	0	0.00%	8	5.10%	8	3.70%	51	1.30%
Junior or community college training	0	0.00%	0	0.00%	1	0.50%	69	1.70%
Occupational or vocational training	6	5.00%	9	5.70%	18	8.30%	183	4.60%
On-the-job training	3	2.50%	3	1.90%	1	0.50%	122	3.10%
Apprenticeship training	0	0.00%	1	0.60%	0	0.00%	4	0.10%
Basic academic remedial or literacy training	0	0.00%	1	0.60%	6	2.80%	55	1.40%
Job readiness training	33	27.30%	55	35.00%	113	52.10%	1,154	29.10%
Disability-related skills training	0	0.00%	0	0.00%	4	1.80%	80	2.00%
Miscellaneous training	58	47.90%	93	59.20%	137	63.10%	438	11.00%
Assessment	0	0.00%	23	14.60%	45	20.70%	2,653	66.90%
Diagnosis and treatment of impairment	100	82.60%	135	86.00%	191	88.00%	751	18.90%
Vocational rehab counseling and guidance	2	1.70%	3	1.90%	83	38.20%	2,785	70.20%
Job search assistance	0	0.00%	1	0.60%	7	3.20%	1,857	46.80%
Job placement assistance	2	1.70%	10	6.40%	108	49.80%	1,794	45.20%
On-the-job supports-short term	0	0.00%	17	10.80%	21	9.70%	1,310	33.00%
On-the-job supports-SE	25	20.70%	97	61.80%	135	62.20%	2,742	69.20%
Information and referral services	0	0.00%	0	0.00%	0	0.00%	883	22.30%

Training Services	2014	2014 Percent	2015	2015 Percent	2016	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Benefits counseling	0	0.00%	0	0.00%	1	0.50%	451	11.40%
Customized employment services	0	0.00%	0	0.00%	0	0.00%	40	1.00%
Transportation	20	16.50%	33	21.00%	59	27.20%	1,120	28.20%
Maintenance	10	8.30%	17	10.80%	41	18.90%	834	21.00%
Rehabilitation technology	0	0.00%	0	0.00%	20	9.20%	208	5.20%
Reader services	0	0.00%	0	0.00%	0	0.00%	1	0.00%
Interpreter services	1	0.80%	3	1.90%	3	1.40%	37	0.90%
Personal attendant services	0	0.00%	0	0.00%	0	0.00%	5	0.10%
Technical assistance services	0	0.00%	0	0.00%	1	0.50%	10	0.30%
Other services	56	46.30%	62	39.50%	79	36.40%	715	18.00%

Table 5.3.a GA-C Elapsed Time from Application to Eligibility for All Individuals with Disabilities Who Achieved Supported Employment Outcomes—FFYs 2014–2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 60 days	134	71.28%	216	72.97%	358	72.32%	8,277	85.57%
61 – 90 days	17	9.04%	36	12.16%	60	12.12%	633	6.54%
91 – 120 days	17	9.04%	14	4.73%	31	6.26%	291	3.01%
121 – 180 days	7	3.72%	17	5.74%	29	5.86%	250	2.58%
181 – 365 days	10	5.32%	11	3.72%	17	3.43%	169	1.75%
More than 1 year	3	1.60%	2	0.68%		0.00%	53	0.55%
Total SE	188		296		495		9,673	

Table 5.3.b GA-C Elapsed Time from Application to Eligibility for Individuals with Disabilities under Age 25 at Exit Who Achieved Supported Employment Outcomes—FFYs 2014–2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 60 days	85	70.25%	109	69.43%	143	65.90%	3,284	82.82%
61 – 90 days	13	10.74%	21	13.38%	31	14.29%	292	7.36%
91 – 120 days	13	10.74%	5	3.18%	15	6.91%	149	3.76%
121 – 180 days	3	2.48%	13	8.28%	19	8.76%	125	3.15%

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
181 – 365 days	5	4.13%	8	5.10%	9	4.15%	87	2.19%
More than 1 year	2	1.65%	1	0.64%		0.00%	28	0.71%
Total SE	121		157		217		3,965	

Table 5.4.a GA-C Elapsed Time from Eligibility to IPE for All Individuals with Disabilities Who Achieved Supported Employment Outcomes—FFYs 2014–2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months	99	52.66%	168	56.76%	352	71.11%	7,647	79.06%
4-6 months	48	25.53%	48	16.22%	60	12.12%	1,137	11.75%
7-9 months	16	8.51%	23	7.77%	22	4.44%	406	4.20%
10-12 months	11	5.85%	23	7.77%	17	3.43%	185	1.91%
More than 12 months	14	7.45%	34	11.49%	44	8.89%	298	3.08%
Total SE	188		296		495		9,673	

Table 5.4.b GA-C Elapsed Time from Eligibility to IPE for Individuals with Disabilities under Age 25 at Exit Who Achieved Supported Employment Outcome—FFYs 2014–2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months	56	46.28%	79	50.32%	125	57.60%	3,004	75.76%
4-6 months	35	28.93%	32	20.38%	36	16.59%	556	14.02%
7-9 months	12	9.92%	12	7.64%	14	6.45%	190	4.79%
10-12 months	8	6.61%	15	9.55%	16	7.37%	85	2.14%
More than 12 months	10	8.26%	19	12.10%	26	11.98%	130	3.28%
Total SE	121		157		217		3,965	

Table 5.5.a GA-C Elapsed Time from IPE to Closure for All Individuals with Disabilities Who Achieved Supported Employment Outcomes—FFYs 2014–2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months	2	1.06%	4	1.35%	11	2.22%	246	2.54%
4 – 6 months	19	10.11%	64	21.62%	125	25.25%	1,555	16.08%
7 – 9 months	23	12.23%	51	17.23%	89	17.98%	1,713	17.71%
10 – 12 months	4	2.13%	35	11.82%	65	13.13%	1,251	12.93%
13 - 24 months	46	24.47%	73	24.66%	120	24.24%	2,558	26.44%

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
25 – 36 months	47	25.00%	22	7.43%	35	7.07%	1,024	10.59%
37 – 60 months	34	18.09%	31	10.47%	32	6.46%	911	9.42%
More than 5 years	13	6.91%	16	5.41%	18	3.64%	415	4.29%
Total SE	188		296		495		9,673	

Table 5.5.b GA-C Elapsed Time from IPE to Closure for All Individuals with Disabilities Under age 25 Who Achieved Supported Employment Outcomes—FFYs 2014–2016

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
0 – 3 months		0.00%	1	0.64%	4	1.84%	65	1.64%
4 – 6 months	9	7.44%	27	17.20%	32	14.75%	464	11.70%
7 – 9 months	18	14.88%	23	14.65%	29	13.36%	612	15.44%
10 – 12 months	2	1.65%	16	10.19%	27	12.44%	472	11.90%
13 - 24 months	30	24.79%	47	29.94%	70	32.26%	1,134	28.60%
25 – 36 months	30	24.79%	17	10.83%	28	12.90%	549	13.85%
37 – 60 months	24	19.83%	21	13.38%	20	9.22%	526	13.27%
More than 5 years	8	6.61%	5	3.18%	7	3.23%	143	3.61%

Elapsed Time	2014 Number	2014 Percent	2015 Number	2015 Percent	2016 Number	2016 Percent	2016 National Agency Type Number	2016 National Agency Type Percent
Total SE	121		157		217		3,965	

Fiscal Data Tables for Focus Area VI

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

Table 6.1 Georgia-Combined (GA-C) VR Resources and Expenditures—FFYs 2014–2016

VR Resources and Expenditures	2014	2015	2016*
Total program expenditures	\$78,909,540	\$91,502,219	\$101,491,869
Federal expenditures	\$62,101,808	\$72,012,246	\$77,043,198
State agency expenditures (4 th quarter)	\$17,159,927	\$20,070,010	\$24,448,671
State agency expenditures (latest/final)	\$16,807,732	\$19,489,973	-
Federal formula award amount	\$103,487,366	\$104,461,323	\$109,381,181
MOE penalty from prior year	-	\$3,499,381	-
Federal award amount relinquished during reallocation	\$42,581,367	\$20,000,000	\$19,000,000
Federal award amount received during reallocation	\$1,730,877	-	-
Federal funds transferred from State VR agency	-	-	-
Federal funds transferred to State VR agency	-	-	-
Federal award amount (net)	\$62,636,876	\$80,961,942	\$90,381,181
Federal award funds deobligated	\$535,068	-	-
Federal award funds used	\$62,101,808	\$80,961,942	\$90,381,181
Percent of formula award amount used	60.01%	77.50%	82.63%
Federal award funds matched but not used	-\$1	-\$8,949,694	-\$47,359

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

Table 6.1 Georgia-Combined (GA-C) 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

VR Resources and Expenditures	Source/Formula
	penalties, relinquishment, reallocation and transfers). Formula/Source: Federal formula award calculation, RSA-692, agency documentation, SF-425 : Federal formula calculation minus MOE penalty minus funds relinquished in reallocation plus funds received in reallocation plus funds transferred from agency minus funds transferred to agency
Federal award funds deobligated	Federal award funds deobligated at the request of the agency or as part of the award closeout process. These funds may include matched or unmatched Federal funds. Source/Formula: Agency deobligation request documentation, G5 closeout reports
Federal award funds used	Amount of Federal award funds expended. Source/Formula: Federal formula calculation, RSA-692, agency documentation, SF-425 lesser of the 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. Source/Formula: Table 6.2 Federal award funds matched (actual) minus Table 6.1 Federal award funds used

Table 6.2 Georgia-Combined (GA-C) Non-Federal Share and Maintenance of Effort—FFYs 2014–2016

Non-Federal Share (Match) and Maintenance of Effort (MOE)	2014	2015	2016*
Match required per net award amount	\$16,952,547	\$21,738,777	\$24,461,489
Match provided (actual)	\$16,807,732	\$19,489,973	\$24,448,671
Match difference**	\$144,815	\$2,248,804	\$12,818
Federal funds matched (actual)	\$62,101,808	\$72,012,248	\$90,333,822
Percent Federal funds matched	99.15%	89.66%	99.95%
Match from State appropriation	14,516,254	16,667,089	20,257,321
Percent match from State appropriation	86.37%	85.52%	82.86%
Match from Third-Party Cooperative Arrangements (TPCA)	825,741	825,500	736,485
Percent match from TPCAs	4.91%	4.24%	3.01%
Match from Randolph-Sheppard program	448,570	669,752	0
Percent match from Randolph-Sheppard Program	2.67%	3.43%	0.00%
Match from interagency transfers	756,000	1,111,824	1,887,303
Percent match from interagency transfers	4.50%	5.7%	7.72%
Match from other sources	0	215,807	131,953
Percent match from other sources	0.00%	1.11%	0.54%
MOE required	\$20,307,113	\$19,419,608	\$16,807,732
MOE: Establishment/construction expenditures	-	-	-
MOE actual	\$16,807,732	\$19,489,973	\$24,448,671
MOE difference**	\$3,499,381	-\$70,365	-\$7,640,939

* 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 Georgia-Combined (GA-C) 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

Non-Federal Share (Match) and Maintenance of Effort (MOE)	Source/Formula
Match from Randolph-Sheppard program	Match amount from Randolph-Sheppard program. Source/Formula: Data provided by State
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

Non-Federal Share (Match) and Maintenance of Effort (MOE)	Source/Formula
MOE actual	<p>Non-Federal share provided by agency minus establishment/construction expenditures for CRPs.</p> <p>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.</p>
MOE difference**	<p>The difference between MOE required and the actual MOE provided.</p> <p>Source/Formula: MOE required minus MOE actual</p>

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

Table 6.3 Georgia-Combined (GA-C) Program Income and Carryover—FFYs 2014–2016

Program Income and Carryover	2014	2015	2016*
Program income received	\$3,739,352	\$4,383,177	\$6,461,799
Program income disbursed	\$3,739,352	\$4,383,177	\$6,461,799
Program income transferred	\$8,087	\$57,136	\$60,436
Program income used for VR program	\$3,731,265	\$4,326,041	\$6,401,363
Federal grant amount matched	\$62,101,808	\$72,012,248	\$90,333,822
Federal expenditures and unobligated funds 9/30	\$48,303,998	\$52,750,800	\$63,445,701
Carryover amount	\$8,400,607	\$13,486,505	\$22,400,918
Carryover as percent of award	13.53%	18.73%	24.80%

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

Table 6.3 Georgia-Combined (GA-C) 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 Georgia-Combined (GA-C) RSA-2 Expenditures—FFYs 2014–2016*

RSA-2 Expenditures	2014	2015	2016
Total expenditures	\$66,316,166	\$98,993,347	\$103,030,621
Administrative costs	\$9,389,232	\$11,278,666	\$18,808,433
Administration as Percent expenditures	14.16%	11.39%	18.26%
Purchased services expenditures	\$13,969,287	\$24,825,640	\$36,858,063
Purchased services as a Percent expenditures	21.06%	25.08%	35.77%
Services to groups	\$1,764,987	\$1,600,899	\$2,448,778
Services to groups percentage	2.66%	1.62%	2.38%

*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 Georgia-Combined (GA-C) - 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	20	11	64.5%	35.5%
Date of Eligibility Determination	14	17	45.2%	54.8%
Date of IPE	13	18	41.9%	58.1%
Start Date of Employment in Primary Occupation at Exit or Closure	10	8	55.6%	44.4%
Weekly Earnings at Exit or Closure	6	12	33.3%	66.7%
Employment Status at Exit or Closure	8	10	44.4%	55.6%
Type of Exit or Closure	26	5	83.9%	16.1%
Date of Exit or Closure	17	14	54.8%	45.2%

Summary	Number (of 31)	Percent (of 31)
Files with all required documentation	2	6.5%
Files with documentation for four or more data elements	16	51.6%
Files with no required documentation	0	0%

APPENDIX C: AGENCY RESPONSE

A. Overview

This appendix contains GVRA's responses to recommendations and corrective actions identified in the monitoring, along with GVRA's requests for technical assistance to address them, and RSA's responses, as appropriate.

For corrective actions to improve program and fiscal performance, as well as to improve administration of the VR program, GVRA must develop a corrective action plan for RSA's review and approval that includes specific steps the agency will take to complete each corrective action, the timetable for completing those steps, and the methods the agency will use to evaluate whether the corrective action has been resolved. RSA anticipates that the corrective action plan can be developed and submitted online using the RSA website at rsa.ed.gov within 45 days from the issuance of this report. RSA is available to provide technical assistance to enable GVRA to develop the plan and undertake the corrective actions.

For recommendations to improve program and fiscal performance as well as to improve administration of the VR program, GVRA will report to the review team, on a quarterly basis, progress on the implementation of recommendations.

B. Agency Responses

RECOMMENDATIONS

2.1 Attrition

- 2.1.1 Conduct surveys of individuals, particularly those under the age of 25, who exit the VR program as applicants before eligibility is determined and after eligibility is determined but before IPEs are developed 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: RSA's recommendation was for GVRA to conduct surveys of individuals, particularly those under the age of 25, who exit the VR program as applicants before eligibility is determined and after eligibility is determined but before IPE's are developed, to determine the reasons why these individuals are withdrawing from the VR program. GVRA has conducted client surveys in the past and plans to re-initiate those in FFY19. In the past, the surveys were provided to the client at specific points in the VR process (application, eligibility, IPE development, and closure) in compliance with 34 CFR §361.17(h)(1)(i), (ii) and (iii) and were either handed to the client after an appointment or mailed to the client. The rate of return for these survey cards was very poor. Going forward, surveys will be presented to the client via email and mail as well as through direct contact via phone call. Surveys will be sent at eligibility when priority category is assigned, when a client and counselor develop, amend, or review the IPE, when the client completes services and transitions into a work

ready status, and at case closure in compliance with the previously specified policy found in 34 CFR §361.17 (h)(1)(i), (ii) and (iii). Specific questions targeting the level of customer service received, timeliness of moving through the VR process as well as soliciting suggestions for improvement will also be included. These surveys will be developed in collaboration with the State Rehabilitation Council (SRC) to ensure compliance with the federal regulations. Internally, surveys will be sent by and returned to the Office Assistants, who will maintain and share responses with the Service Area Manager's (SAM). SAM's will then work with the Assistant Directors to utilize this information to develop measurable targets to decrease the number of individuals exiting the VR program at these stages of the process and develop strategies to achieve the goals. This information will be shared with the SRC as well. At the present time, VR is currently reviewing and developing processes and procedures related directly to a Customer Service Satisfaction survey that was done in FFY18. The responses and data from that survey will be used in the development of the practices outlined above going forward. This data encompasses all GVRA clients including those under 25.

2.2 Employment Outcomes

- 2.2.1 Develop measurable goals and strategies to improve the agency's performance in terms of maximizing and improving the quality of employment outcomes;
- 2.2.2 Assess the effect of postsecondary education (e.g., junior or community college training) on the quality of employment outcomes achieved by individuals who attended various levels of postsecondary education; and
- 2.2.3 Assess the effect of various job-related services (e.g., job placement assistance) on the quality of an individual's employment outcome.

Agency Response: GVRA thanks RSA for its recommendations and recognizes the need to increase both the employment rate and the quality of employment outcomes for individuals exiting the VR system. GVRA has implemented numerous strategies to work toward improving the quality and quantity of competitive, integrated employment outcomes, including the strategies outlined below, and will continue to identify additional strategies.

GVRA appreciates RSA's recognition that its employment rate from FFY2014-FFY2016 was approximately 10 percentage points higher than the national performance for combined agencies and that supported employment outcomes increased. While this statistic is significant in that it represents efficacy at the field level, it must be noted that a variance or anomaly exist, due to the reopening in FFY 2014 of categories GVRA Administration closed during the prior year. Due to the capacity for minimal service delivery during FFY 2013, numbers in the subsequent three years may be unrepresentative due to an increased pipeline of clients seeking services that had been temporarily unavailable.

GVRA seeks to continue to improve its employment rate as well as the number of supported employment outcomes. GVRA also seeks to increase the average hourly earnings for individuals who achieve competitive integrated employment outcomes and maintain an average number of hours worked weekly which is higher than the national performance for combined agencies.

The number of individuals served by GVRA increased significantly from FFY2014 to FFY2016 as did the number of individuals served who attended postsecondary training. The number of individuals who received job placement assistance also increased dramatically. Although GVRA's employment rate in FFY2016 was

approximately ten points higher than the national performance for combined agencies, the agency's employment rate was relatively stable for the three years. It is again significant to note the aftereffect of reopening previously closed categories. Additional research will be required to analyze the impact of postsecondary education and job-related services on the quality of employment outcomes. The attainment of a new case management system, which has greater flexibility in data extraction and creation of reports should greatly enhance our ability to assess the effect of these services.

Beginning July 1, 2018, a business data base will be operational and will contain employment information gathered from client hires to include their wages and employers specific details. We will be able to identify businesses and what services they will provide. This information will be shared in staffing's for the client and counselor to use when developing an individualized plan for employment. The data base will also cross reference client skills with potential jobs thus allowing a more precise fit for the client and employer. This will increase GVRA's ability to provide a more thorough approach to informed choice.

The system will also be utilized by our Employment Services unit to identify those companies that show a consistent track record for hiring individuals with disabilities. This system is compatible with the new case management system and will allow an integration of data moving forward to better track all steps in the VR employment process.

As GVRA integrates the data base system, the strategy is to focus on employment, monitor the client's progress toward their goal, and have them placed within 90 days after being job ready. The measureable goals will be shown by how many clients obtained employment in less than 90 days from the first day they sought employment.

3.1 Employment Outcomes

- 3.1.1 Analyze the reasons individuals under the age of 25 at exit without employment and develop strategies to address these and engage individuals in the VR process in a manner that will lead to successful employment outcomes;
- 3.1.2 Analyze the types and patterns of services provided to individuals under the age of 25 to determine if the appropriate VR services are being provided that support the choice of, and maximize, the employment goal of each individual with a disability, align with labor market demands in the State of Georgia, and lead to career-focused employment outcomes;
- 3.1.3 Identify career pathways and work-based learning experience available for students and youth under the age of 25; and
- 3.1.4 Provide opportunities for individuals to participate in education and training programs, including those programs leading to recognized credentials, advanced postsecondary degrees, and career advancement.

Agency Response: GVRA thanks RSA for its recommendations and agrees that analysis is needed as follows:

- 1. To determine the reasons individuals under age 25 exit without employment and to develop strategies to engage them and lead to successful employment;
- 2. To determine whether appropriate services are being provided and that those services support the choice of and maximize the employment goal in a way that aligns with labor market demands and leads to career-focused employment;

3. Identifies career pathways and work-based learning experiences; and
4. Provides opportunities for individuals to participate in education and training programs leading to recognized credentials, advanced degrees, and career advancement.

RSA's recommendation was for GVRA to conduct surveys of individuals, particularly those under the age of 25, who exit the VR program as applicants before eligibility is determined and after eligibility is determined but before IPE's are developed to determine the reasons why these individuals are withdrawing from the VR program. GVRA has conducted client surveys in the past and plans to reinitiate those in FFY 19. In the past, the surveys were provided to the client at specific points in the VR process (application, eligibility, IPE development, and closure) in compliance with 34 CFR §361.17(h)(1)(i), (ii) and (iii), and were either handed to the client after an appointment or mailed to the client. The rate of return for these survey cards was very poor.

Going forward, surveys will be presented to the client via email and mail as well as through direct contact via phone call. Surveys will be sent at eligibility when priority category is assigned, when a client and counselor develop, amend, or review the IPE, when the client completes services and transitions into a work ready status, and at case closure in compliance with the previously specified policy found in 34 CFR §361.17(h)(1)(i), (ii) and (iii). Specific questions targeting the level of customer service received, timeliness of moving through the VR process as well as soliciting suggestions for improvement will also be included.

These surveys will be developed in collaboration with the State Rehabilitation Council (SRC) to ensure compliance with the federal regulations. Internally, surveys will be sent by and returned to the Office Assistants, who will maintain and share responses with the Service Area Manager's (SAM). SAM's will then work with the Assistant Directors to utilize this information to develop measurable targets to decrease the number of individuals exiting the VR program at these stages of the process and develop strategies to achieve the goals. This information will be shared with the SRC as well. At the present time, VR is currently reviewing and developing processes and procedures related directly to a Customer Service Satisfaction survey that was done in FFY18. The responses and data from that survey will be used in the development of the practices outlined above going forward. This data encompasses all GVRA clients including those under 25.

With the implementation of WIOA and the focus on students and youth with disabilities and the shifting of resources to this population, engaging more students and youth with disabilities in activities leading to a career is expected. Delivery of Pre-Employment Transition Services (Pre-ETS) statewide has been set up on the "E3: Explore, Engage, Employ" model developed for the Career Pathways for Individuals with Disabilities demonstration grant awarded to Georgia in 2015. The strategy for E3 is to have it appeal to students and youth and not appear governmental. A marketing campaign and strategy has been developed to attract and engage youth with disabilities. Stakeholders, such as Adult Education, have participated in joint training with GVRA to ensure a consistent referral process of youth under 25 to the VR program. Monthly data will be provided by Business Applications on the top services and expenditures on youth under 25 and a longitudinal study will be conducted to determine essential services leading to successful employment outcomes.

GVRA is in the process of implementing a new case management system. This system is already in use in many other states and should provide significantly better reporting features which can be used to analyze types and patterns of services. This new system is scheduled to "go live" on April 30, 2018. Based on demonstrations, it provides much greater flexibility in pulling data from the system and will enable leadership and managers to better analyze service trends.

Implementation of training to educate VR program professionals working with transition on career pathways has begun in earnest this fiscal year. The collaboration with the Georgia Department of Education and GVRA with the Georgia Career Information System has resulted in access to the Counselor Companion for all VR program staff. The Counselor Companion has data on existing Career Pathways in each high school in Georgia. Training will be ongoing on this resource to assist VR professionals working in transition in guiding students with disabilities towards appropriate pathways. GVRA is developing policies and procedures for work based learning (WBL) opportunities and collaborating with Employment Services to engage employers for students and youth to participate in all types of WBL. An Out of School Youth (OOSY) strategy has been developed within the E3 model and is multi-faceted, engaging local education agencies, social service agencies, VR program providers and CRP's, libraries and targeting underemployed youth in fast food and service-type establishments. An E3 OOSY marketing strategy has been developed as well and will be implemented statewide.

The implementation and delivery of Pre-ETS will increase the knowledge and experience of students with disabilities, resulting in greater participation in postsecondary training leading to credentials, degrees and career advancement. These outcomes will be captured in the WIOA Quarterly Reporting in the new case management system.

Beginning July 1, 2018, a business data base will be operational and will contain employment information gathered from client hires to include their wages and employers specific details. We will be able to identify businesses and what services they will provide. This information will be shared in staffing's for the client and counselor to use when developing an individualized plan for employment. The data base will also cross reference client skills with potential jobs thus allowing a more precise fit for the client and employer. This will increase GVRA's ability to provide a more thorough approach to informed choice.

The system will also be utilized by our Employment Services unit to identify those companies that show a consistent track record for hiring individuals with disabilities. This system is compatible with the new case management system and will allow an integration of data moving forward to better track all steps in the VR employment process.

3.2 Scope of Pre-Employment Transition Services

- 3.2.1 Analyze services provided by GVRA, and arranged for through other providers and entities, to ensure each meets the nature and scope of pre-employment transition services in accordance with section 113(a)(2) of the Act and 34 CFR §361.48(a)(2);
- 3.2.2 Provide examples of specific required activities only under the most appropriate required activity in order to identify, provide, report, track and monitor each required activity provided to each student with a disability in receipt of such service on the RSA-911 pursuant to RSA Policy Directive (PD)-16-04.
- 3.2.3 Review assessment services provided to ensure that only vocational interest inventories are being used to identify career pathways of interest to students for the participation in pre-employment transition services, rather than comprehensive assessments to determine eligibility, need for additional services and employment success. The preamble to the final rule included examples of pre-employment transition services and clarified that DSUs are not to use required activities as assessment services for the purpose of determining whether additional VR services are needed, or if the individual will be successful in employment (81 FR 55629, 55695 (August 19, 2016));

- 3.2.4 Assess activities provided under counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education, to determine if such services are appropriate under this required activity. Appropriate activities may include information on course offerings, career options, types of academic and occupational training needed to succeed in the workplace; advising students and parents on academic curricula, college application and admissions processes; and completing the Free Application for Federal Student Aid (FAFSA), and resources such as disability support services; and
- 3.2.5 Assess and evaluate HSHT programming to ensure each activity is provided and reported as the most appropriate required activity under pre-employment transition services. For example, career preparation may include soft-skills and/or job seeking skills trainings (i.e., workplace readiness training), whereas HSHT work-based learning may include job shadowing, informational interviews or summer work experiences, which would equate to the work-based learning required activity under pre-employment transition services. In addition, youth leadership and development under the HSHT program may provide instruction in self-advocacy and peer mentoring opportunities.

Agency Response: VR Transition Unit staff and Fiscal Services identified all current vocational rehabilitation services that met the requirements of Pre-ETS. A Pre-ETS code was given to each service and categorized under each Pre-ETS category, relying on the WINTAC guidance and preamble Pre-employment Transition Services (§361.48(a)), to correctly identify services for each area. At the time of the site visit, technical assistance was provided to correct services that did not meet the criteria for Pre-ETS. The Pre-ETS code designation was removed from these services and from the case management system. Training for all VR field staff was provided in October 2017, at which time, Transition Services informed staff of the correction of misidentified services. Follow up training for staff was provided in February 2018 and ongoing support is given by the Transition Unit. All new staff are trained in Quarterly VR Training on the Transition Process. Current providers are being notified by the Provider Relations Specialists (PRS) in the field to amend contracts to provide Pre-ETS services for this current fiscal year and beyond. In 2017, an RFP for Pre-ETS was released with many new services for vendors to provide, if selected. That process is nearing its conclusion with contracts anticipated to begin July 1, 2018.

In the GVRA Outsourcing Services – Provider Guidelines (2017) manual, program reviews are conducted annually and performed by the Provider Relations Specialist (PRS) to ensure that the services purchased by the VRP are of the highest quality and that the scope of services outlined in the contract are still accurate. Each quality review may include:

- Verification of employee credentials for each service;
- Proof of insurance;
- Criminal records investigation;
- Accreditation as appropriate; and
- Ensuring appropriate documentation is on file.

Required activities are captured using the designated Pre-ETS codes. Services are assigned to the following categories: Pre-ETS Job Exploration (JE), Pre-ETS Career Exploration (CE), Pre-ETS Work Based Learning (WBL), Pre-ETS Work Readiness (WR), and Pre-ETS Self-Advocacy (SA). GVRA Business Applications utilizes “System 7 Release Notes” to staff regarding 911 data requirements, WIOA Quarterly Reporting and on

Pre-ETS requirements. The Pre-ETS Case Information form captures the required RSA 911 data elements and services provided to Reportable Individuals. Training on the Pre-ETS case information form was provided to all staff in October 2017 with special emphasis on the documentation and reporting of the service in the case management system. Updated training will be developed to incorporate any changes that arise due to the use of the new case management system will be provided to all staff.

GVRA appreciates the guidance given by RSA on the issue of assessing Reportable Individuals for Pre-ETS vs. using Pre-ETS as a means to determine eligibility for VR services. The GVRA Transition Unit recognizes more training and education is needed for field staff to understand the difference in assessing for Pre-ETS rather than for eligibility, needs assessment and plan development. To determine what Pre-ETS are needed for the Reportable Individual, the Transition Unit developed a form titled the “Pre-ETS Consultation Form” to be used by VR staff with Reportable Individuals. The form lists the five Pre-ETS categories and identifies several services under each for the purpose of not duplicating and providing only needed services. All staff were trained on this form and the Transition process for Reportable Individuals in October 2017 with follow up training February 2018 and ongoing quarterly training will be provided. VR staff are encouraged to utilize the interest inventories, job exploration, career counseling and other assessments available in the Georgia Career Information System. Training has been provided and will continue to be provided to staff on this tool. Furthermore, the collaboration with the Georgia Department of Education and GVRA with the Georgia Career Information System has resulted in access to the Counselor Companion for all VR staff. The Counselor Companion has data on existing Career Pathways in each high school in Georgia. Training will be ongoing on this resource to assist VR professionals working in transition in guiding students with disabilities towards appropriate pathways. Groups of VR staff and special education LEA staff participate in a Leadership Academy at the annual IDEAS (Institute Designed for Educating All Students) conference to educate staff on career pathways, dual enrollment for student with disabilities, self-determination inventories, and work hand in hand with LEA’s to support students with disabilities.

Career Exploration and Planning is a service included in the RFP in 2017 with effective contract dates for eligible providers beginning July 1, 2018. An example of appropriate activities for counseling on opportunities for enrollment provided by Georgia, per review of WINTAC resources and the preamble Pre-employment Transition Services (§361.48(a)) are as follows:

Postsecondary enrollment counseling will assist students with disabilities in:

- Understanding on-line resources for enrollment in PST;
- Types of academic and occupational training needed to succeed in the workplace;
- Postsecondary opportunities associated with career fields or pathways;
- Course offerings;
- Career options;
- Attend College Fairs and College Campus Experiences;
- Learn options such as Dual Enrollment;
- Advising students and parents or representative on academic curricula;
- Providing information about college application and admissions processes;
- Completing the Free Application for Federal Student Aid (FAFSA); and

- Providing resources that may be used to support individual student success in education and training (i.e., disability support services, career services).

Currently, High School High Tech provides financial aid/FAFSA workshops, College Fair and Career Days and Postsecondary tours to potentially eligible students, and CRC counselors provide counseling and guidance on enrollment in PST programs. A Pre-ETS Curriculum is being developed to include counseling on opportunities for enrollment in PST programs with modules that follow Georgia Performance Standards and CTAE course-specific standards with an anticipated implementation date of July 1, 2018.

For FY18, Reportable Individuals will be dually enrolled with the HSHT program with a fee for service agreement for job exploration counseling (Pre-ETS Job Exploration (JE)), work place readiness training (Pre-ETS Work Readiness (WR)), counseling on opportunities for enrollment in PST (Pre-ETS Career Exploration (CE)), and instruction in self-advocacy (Pre-ETS Self-Advocacy (SA)).

CORRECTIVE ACTIONS TO IMPROVE PERFORMANCE

2.1 Untimely Eligibility Determination

- 2.1.1. Comply with 34 CFR §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 timeliness of eligibility determinations.

Agency Response: GVRA understands the importance of compliance with regard to timeliness of eligibility determination and has already implemented several strategies in an effort to reach and monitor compliance with 34 CFR §361.41(b)(1).

GVRA's new organizational structure designates responsibility for movement of cases through the rehabilitation process in a timely manner (including eligibility determination) to the Team Lead. This shift in responsibility is designed to ensure both timeliness and consistency in eligibility determination. The Team Lead will routinely assess staff performance related to timely movement through the VR process through the monthly (or more frequent, in situations where on-going issues have been identified) review of reports pulled from the case management system and will provide feedback and coaching to the staff members regarding issues identified.

The Team Lead position reports to the Service Area Manager (SAM) position. One of the duties of individuals in this role is to monitor statistical data for compliance with performance indicators and policy. When areas of non-compliance or other negative trends occur, this individual works with the Team Lead and Assistant Field Services Director (ASFD) to overcome the issues through training and/or consultation. The SAM and Team Lead roles were enacted in Spring 2017 and training was provided to these managers in Summer 2017. In addition, all staff received training which mapped out each step in the VR process in Fall 2017. The SAM's continue to work with the Team Leads to ensure that staff are utilizing the processes and procedures on which

they were trained and this collaboration should improve compliance with regard to timeliness of eligibility determination.

Comprehensive monthly reporting was initiated in the Fall of 2017 to address the timeliness and effectiveness of VR service delivery. This comprehensive monthly report, which is produced at multiple levels (statewide, quadrant, Service Delivery Area and field services team) identifies the number of cases in exceeding status for each case status (including determination of eligibility). Service Delivery Area and Team Lead level reports also include lists of specific cases with data including the length of time each case has been in a status so that cases which are in non-compliance or close to non-compliance can be addressed with specific staff members. These reports are processed as follows:

Team leads pull:

1. An exceeding status report reflecting eligibility determination (showing both exceeding status cases and those within a day or longer of exceeding status); and
2. A report that outlines “cases lacking documentation” within the past 90 days is generated on the 1st and the 16th of each month.

Team Leads are then assigning tasks to the appropriate staff members with specific deadlines to address deficiencies found. Team Leads provide follow-up to ensure that assigned tasks have been completed in a timely manner and document progress. This information is updated on the spreadsheet reports (outlined above) and submitted to the SAM with comments (providing documentation/justification if unable to move a case off of the exceeding status list) by the 10th and the 26th of each month. The SAM's then provide AFSD's with updated spreadsheets by the 12th and the 28th of each month. In addition, SAM's meet with Team Leads monthly to identify potential training needs, discuss patterns of non-compliance and develop strategies to address these (including coaching and corrective action if necessary).

Quality Assurance Case Reviews have been implemented and will continue to occur quarterly at the local and Service Delivery Area levels. These reviews will target to address specific areas within the case management process such as eligibility determination. After managerial review of the cases, a sampling of those cases will be re-reviewed by Policy Unit staff. The results of the reviews and the issues identified will be shared with VR Leadership so that training can be developed to address issues identified. GVRA will also be re-instating the process of peer service record reviews once case management training has been provided and the new client management system is in place with an anticipated initiation during the first quarter of the state fiscal year beginning July 1, 2018 to September 30, 2018.

In addition, GVRA is also piloting a new approach to application and eligibility determination through which these functions are completed by a dedicated team. In 2017, GVRA began an Intake and Outreach unit as a pilot program in the Atlanta area. A team of staff was dedicated to this pilot and focused solely on referral, intake and eligibility. This pilot was designed to increase timeliness in eligibility determination and ensure consistency in the VR process. Although the pilot is still on-going, it has been very successful with regard to timeliness of eligibility determination as demonstrated by recent data showing an average determination being made in 30 days or less.

2.2 Untimely Development of the IPE

- 2.2.1 Comply with 34 CFR §361.45(a)(1) and (e) to ensure IPEs are developed within the 90-day Federal time frame from date of application;
- 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: GVRA understands the importance of compliance with regard to timeliness of development of the Individualized Plan for Employment (IPE) and has already implemented several strategies in an effort to reach and monitor compliance with 34 CFR §361.45(a)(1) and (e).

The new job duties and responsibilities of designated staff (Service Area Managers (SAM), Team Leads, and Assigned Professionals) ensure the movement of cases through the rehabilitation process in a timely manner (including individualized plan for employment development) to the Team Lead. The Team Lead will routinely assess staff performance related to timely movement through the VR process through the monthly (or more frequent, in situations where on-going issues have been identified) review of reports pulled from the Case Management System and will provide feedback and coaching to the staff members regarding issues identified. The Team Lead position reports to the Service Area Manager (SAM) position. One of the duties of individuals in this role is to monitor statistical data for compliance with performance indicators and policy. When areas of non-compliance or other negative trends occur, this individual works with the Team Lead and Assistant Field Services Director (AFSD) to overcome the issues through training and/or consultation. In addition, when high performers are identified, the SAM and Team Lead can work to identify the best practices utilized by the high performers and share these best practices with other staff members and leadership (so that they can be shared statewide). The SAM and Team Lead roles were enacted in the Spring of 2017 and training was provided to these managers in the Summer of 2017. In addition, all staff received training which mapped out each step in the VR process in the Fall of 2017. The SAM's continue to work with the Team Leads to develop goals and strategies to ensure that staff are utilizing the processes and procedures (along with best practices) on which they were trained. This collaboration should improve compliance with regard to timeliness of development of the IPE.

Comprehensive monthly reporting was initiated in the Fall of 2017 to address the timeliness and effectiveness of VR service delivery. This comprehensive monthly report, which is produced at multiple levels (statewide, quadrant, Service Delivery Area and field services team) identifies the number of cases in exceeding status for each case status (including IPE development). Service Delivery Area and Team Lead level reports also include lists of specific cases with data including the length of time each case has been in a status so that cases which are in non-compliance or close to non-compliance can be addressed with specific staff members. These reports are processed as follows:

Team leads pull:

1. An exceeding status report reflecting the movement of the client's case from eligibility to service delivery (showing both exceeding status cases and those within a day or longer of exceeding status); and

2. A report that outlines “cases lacking documentation” within the past 90 days is generated on the 1st and the 16th of each month. A copy of this report and will provide a copy to applicable staff and the Service Area Manager (SAM).

Team Leads are then assigning tasks to the appropriate staff members with specific deadlines to address deficiencies found. Team Leads provide follow-up to ensure that assigned tasks have been completed in a timely manner and document progress. This information is updated on the spreadsheets and submitted to the SAM with comments (providing documentation/justification if unable to move a case off of the exceeding status list) by the 10th and the 26th of each month. The SAM’s then provide AFSD’s with updated spreadsheets by the 12th and the 28th of each month. In addition, SAM’s meet with Team Leads monthly to identify potential training needs, discuss patterns of non-compliance and develop strategies to address these (including coaching and corrective action if necessary).

Quality Assurance Case Reviews have been implemented and will continue to occur quarterly at the local and Service Delivery Area levels. These reviews will target to address specific areas within the case management process such as individualized plan for employment development. After managerial review of the cases, a sampling of those cases will be re-reviewed by Policy Unit staff. The results of the reviews and the issues identified will be shared with VR Leadership so that training can be developed to address issues identified. GVRA will also be re-instating the process of peer service record reviews once case management training has been provided and the new client management system is in place with an anticipated initiation during the first quarter of the state fiscal year beginning July 1, 2018 to September 30, 2018.

GVRA is also piloting a new approach through which specific functions are completed by a dedicated team. In 2017, GVRA began an Intake and Outreach unit as a pilot program. A team of staff was dedicated to this Atlanta area pilot and focused solely on referral, intake and eligibility. This pilot was designed to increase timeliness in eligibility determination and ensure consistency in the VR process. Although the pilot is still ongoing, it has been very successful with regard to timeliness of eligibility determination as demonstrated by recent data showing an average determination being made in 30 days or less. GVRA is currently advertising for a new position, Plan Development Specialist, which will be added to the pilot team. This position will be responsible for completing IPE’s on cases where the individual is determined eligible for services, thereby enabling the pilot team to hand off cases to the field services team with a completed IPE so that services can begin immediately. The addition of this position should both increase compliance to timeliness requirements for the development of the IPE as well as enable the field services to initiate services immediately after receipt of a case from the pilot team.

2.3 Service Record Closure

- 2.3.1 Develop procedures to ensure and document that the provisions of 34 CFR §361.56 have been met and verified through service record documentation in accordance with 34 CFR §361.47(a), including verified documentation that individuals have sustained satisfactory competitive integrated employment earning at least the minimum wage, prior to determining that they have achieved and maintained stable competitive employment for at least 90 days.
- 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 review processes and use the results to inform the design and evaluation of training of staff.

Agency Response: GVRA understands the importance of compliance with regard to 34 CFR §361.56 and 34 CFR §361.47(a) and has initiated several strategies in an effort to increase compliance. The agency has made a change in organizational structure and has developed an Employment Services Unit to which cases will be transferred once the client is ready for employment. The Employment Services Unit has four Certified Rehabilitation Counselors (CRC) whose primary focus will be to provide services to clients who are ready for employment and those that have attained employment. It will be their responsibility to ensure that contact is made with clients in compliance with the Client Services Policy Manual prior to closure and documenting in the case management system as required. In addition, GVRA is seeking the use of an outside provider to assist with obtaining the required documentation and personal contact for all closures. By using this approach, information will be captured in the case management system by the GVRA staff and contracted party and should result in increased consistency and compliance with the verification and documentation of our clients' successful employment outcomes.

Quality Assurance Case Reviews have been implemented and will continue to occur quarterly at the local and Service Delivery Area levels. These reviews will target to address specific areas within the case management process such as eligibility determination. After managerial review of the cases, a sampling of those cases will be re-reviewed by Policy Unit staff. The Policy Unit will collect and aggregate the results of the reviews and will work with agency leadership to ensure that training is developed to address issues identified. GVRA will also be re-instating the process of peer service record reviews once case management training has been provided and the new client management system is in place with an anticipated initiation during the first quarter of the state fiscal year beginning July 1, 2018 to September 30, 2018.

5.1 Prior Approval Not Obtained

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: GVRA agrees with the finding and corrective action identified regarding prior approval requirements and understands the importance of being in compliance pursuant to the Uniform Guidance 2 CFR 200.407 and the recently issued Technical Assistance Circular RSA-TAC-18-02. The agency has begun developing written internal control processes and procedures to include a monitoring component and state-wide training of key agency employees to ensure ongoing compliance with the Uniform Guidance and RSA-TAC-18 02. GVRA anticipates full implementation by October 1, 2018 with ongoing training.

5.2 Internal Control Deficiencies

5.2.1A Cease paying lease or rental costs, with Federal VR funds or State funds used as match, that are not paid in accordance with requirements in 2 CFR 200;

5.2.2A Develop and implement internal control procedures to ensure that lease and rental costs are allowable and reviewed periodically pursuant to 2 CFR §200.465;

- 5.2.3A Determine the total amount of unallowable costs charged to the Federal award that is associated with Finding 5.2;
- 5.2.1B Develop and implement written policies or procedures governing oversight of grant-supported activities, particularly with respect to activities performed under GVRA's collaborative agreements, as required by 2 CFR §200.328(a);
- 5.2.2B Amend collaborative agreements with IPSEs to correct the issues identified in the above finding; and
- 5.2.3B Develop and implement internal controls to correct IPSE-related internal control deficiencies, to ensure:
- a) All actionable agreements are maintained and are available for review in accordance with 2 CFR §200.333;
 - b) Collaborative agreements identify the specific, detailed components of supervision and monitoring that GVRA will use to directly oversee the work duties, time, and attendance of its staff providing IPSE services;
 - c) Collaborative agreement development policy identifies:
 - i. Guidelines for pre-agreement analyses of reasonable cost expectations, including minimum and maximum client to instructor ratios, and guidelines for negotiating a fair pricing structure that prevents duplicating the payments from VR funds for the instructor's salary and instructor costs embedded in the full cost of tuition;
 - ii. Procedures, from start to finish, for managing collaborative agreement development and execution including realistic timelines for development and partner review of collaborative agreement draft and final language, timelines for signatures, and clear time frames identifying each agreement's begin and end dates;
 - iii. Guidelines for supervisory review and monitoring of agreement activities, and the manner in which GVRA will train staff delivering VR services through the agreements to ensure only VR services are being provided through funded activities; and
 - iv. Assurances that agreements are complete, properly signed, and fully executable prior to work being performed;
 - d) Ensure that only costs that are allowable, reasonable, and allocable to the VR program are paid using VR funds, particularly with regard to costs for participants and reasonableness of staffing costs; and
 - e) Develop and implement specific written policy for GVRA staff to follow when it is learned that an IPSE instructor who's salary is paid 100 percent with VR funds has instructed one or more students who are not VR eligible. Identify in the policy that only costs allocable to VR may be paid with VR funds, and any portion of costs not allocable to VR must be paid from other sources.

Agency Response: GVRA appreciates RSA's guidance with the importance of compliance with Part 200 Uniform Guidance for Federal Awards and specifically, with relation to 2 CFR 200.465 Rental Cost of Real Property and Equipment. However, GVRA does not agree with 5.2 Internal Control Deficiencies as described in Section 5: Focus Area – Allocation and Expenditures of State Vocational Rehabilitation Services and State Supported Employment Services Program Funds. Review of the market analysis information GVRA originally submitted to RSA was provided by an internal staff member and cannot be validated or collaborated on as part of the basis for this response. Consequently, the agency requested assistance from State Properties Commission (SPC), the State of Georgia's Real Estate Portfolio Manager and the experts in this field to research and provide market analysis of the six leases RSA identified as unreasonable and disproportionate facility rental costs. Based on the results of this survey, to include relocation options, the current rental cost was determined to be reasonable and within market range.

SPC staff developed a comparative analysis of various market information and industry analytics to determine market rates for full-service office and full-service retail locations for the six rental leases identified. The current rental cost for four of the six leases were within market range and determined to be reasonable. However, two of the six rental lease costs were above the market rate. (See Appendix E: GVRA Market Survey).

SPC Summary Market Information showed the two rental leases, Athens and Norcross, applicable “Not to Exceed Rent” and One-time relocation cost which GVRA would need to consider if these VR Service Delivery Centers relocated to another location in these cities. If relocation is determined SPC would a) prepare a Lease Budget Summary LBS which outline all of the necessary relocation cost, one-time cost and VR Service Delivery Center specific requirements; b) perform a search criteria based on factors critical to square footage, general location, full-service office or retail space, accessibility to public transportation, site security patrol etc. then; c) assess and consider multiple rental option availability within the city. SPC also reviews rental agreements prior to renewal to determine if any circumstances have changed or other options are available.

Based on the outcome of the market analysis, rental cost for Athens and Norcross would actually increase more than the current rate by approximately \$.081 and \$.050 per sq. ft. or \$12,000 and \$3,000 per year respectively. Additionally, the agency would incur one-time relocation cost exceeding \$100,000 for Athens and \$60,000 for Norcross. SPC and GVRA are currently reaching out to the landlord in an attempt re-negotiate and reduce the current rental rates in lieu of relocation and will update RSA on the outcome following this meeting. See attachments: Relocation Cost Information and Search Criteria.

The process described above represents SPC guidance and standard operating procedures followed across the State of Georgia to ensure leasing policy, processes and forms are consistent, competitive, fair, economical, and in the best interest of the agency. The agency will develop and implement internal control procedures to ensure lease and rental costs are allowable and reviewed periodically pursuant to 2 CFR §200.465 in accordance with federal as well as the state guidelines in the attached document.

GVRA is confident in the expertise of SPC staff, the process and steps taken to provide a thorough and concise market analysis to determine the reasonableness of the six rental leases. It is for these reasons, GVRA does not agree with 5.2 Internal Control Deficiencies requiring the agency to cease paying lease or rental cost, with federal VR funds or State funds used as match, that are not paid in accordance with requirements of 2 CFR part 200.

GVRA welcomes and looks forward to RSA’s guidance regarding what is or should be considered reasonable rates according to 2 CFR §200.465 when negotiating rental cost in the future. See attached Total Amounts Charged for Six Rental Leases

GVRA recognizes and appreciates RSA’s guidance on the Inclusive Post-Secondary Education Programs (IPSEs), particularly the technical assistance on IPSE collaborative agreements, instructor to student ratio, and reasonable cost expectations and outcomes for VR funded Academic Transition Teachers (ATT) in IPSE Programs. As a result of these report findings, GVRA Leadership has decided, effective July 1, 2018, to re-

purpose the ATT's to work exclusively with the VR Transition Services Unit and Field Services in transition related activities.

RSA Response: To clarify part A (Unallowable and Unreasonable Rental Costs) of compliance finding 5.2 (Internal Controls Deficiencies) in this report, RSA removed references related to the one-stop service delivery system, established under title I of WIOA. RSA also included additional language specific to the allocation and expenditure of VR program funds as a non-delegable function of the DSU in accordance with 34 CFR §361.13(c).

In accordance with 2 CFR §200.465(a), "rental costs are allowable to the extent that the rates are reasonable in light of such factors as: rental costs of comparable property, if any; market conditions in the area; alternatives available...." RSA appreciates the current market rate survey developed by SPC. However, RSA's review found the following areas of concern related to SPC's analysis:

1. SPC based its "not to exceed rent for relocation" calculations on the *average market rate - retail* versus the *average market rate - office*. Since the GVRA leased space is for office space, SPC should have used the *average market rate - office* in calculating the "not to exceed rent for relocation" cost in order to provide an accurate comparison of comparable property (2 CFR §200.465(a)). The *average market rate - retail* is the higher of the two rates.
2. The GVRA market survey did not include a full accounting of the potential costs associated with the current lease agreements for several of the sites (e.g., Athens, Norcross, Thomasville). In calculating the "Current (2018) Full Service Rental Rate per SF (Annual)" SPC failed to account for the full costs under the agreements. For example, the Memorandum of Agreement for the Norcross site, dated May 25, 2017, states that "In consideration for providing this space, the Tenant agrees to pay the Landlord the sum of Fourteen Thousand, Two Hundred Twenty-Eight Dollars and Ninety-Two Cents (\$14,228.92) per month which includes the Tenant's pro-rata share of the rubbish removal, janitorial services, security monitoring services and utilities at this location... *In addition to the monthly rent, Tenant agrees to reimburse Landlord for the Tenant's pro rata share (17.009%) of any major, unplanned maintenance and repairs to the premises, upon receipt of invoices from Landlord delineating the costs for these services and repairs.*" [italics added] SPC's analysis did not include the potential financial liability associated with the lease agreement requiring GVRA to be responsible for 17 percent of any major, unplanned maintenance and repairs. These are potential financial liabilities that GVRA would not be responsible for under the market rate comparisons. The requirement to reimburse the landlord for a pro rata share of any major, unplanned maintenance and repairs to the premises is also included in other GVRA lease agreements and similarly, those potential liabilities were not incorporated into SPC's market rate analysis.

The current (2018) full service rental rate per square foot (sf) (annual) cost for the Athens and Norcross sites are higher than the average market rate per sf for full service office and retail rates without inclusion of the liability for unplanned maintenance and repair of the facilities. As such, any unplanned maintenance and repair of facilities costs exceeding the comparable market rates for full service office space charged to the Federal award would be considered unnecessary and unreasonable costs. Additionally, such maintenance and repair expenditures would likely be subject to prior approval, see finding 5.1.

3. RSA also questions the inclusion of the tenant improvement, office furniture and moving expenses into the rate analysis. At the time the initial leases were signed by the GDOL, on behalf of Georgia's VR program, OMB Circular A-187 stated "rental costs are allowable to the extent that the rates are reasonable in light of such factors as: rental costs of comparable property, if any; market conditions in the area; alternatives available...." Had the discrepancy with the current market rates been addressed at that time, the inclusion of costs in the current market survey for tenant improvements, office furniture, etc., for new facilities would not be necessary.

As part of the corrective action plan for this finding, RSA recommends that GVRA revise the market survey based upon the feedback provided above and resubmit the market survey for review. Once that is complete, RSA will be able to provide additional guidance regarding potential next steps.

APPENDIX D: GVRA MARKET SURVEY

May 1, 2018

State Properties Commission (SPC) Mission

- To advise, guide and maximize Georgia's real estate portfolio by applying industry best practices in asset, space and transaction management.

SPC Authority

- Acquisition and disposition of State-owned real property and real property interests (Short & long term leases, easements, licenses, certifications, condemnation)
- Leasing services to State entities in State-owned or commercially-owned facilities (Lease search, advertisement, negotiation, selection and execution)
- Asset & Space Management and Inventory of all State-owned and leased real property (BLLIP) ([Link](#) to Georgia Real Properties website)
- Management of Administrative Space: "The Commission is given the authority and charged with the duty of managing the utilization of administrative space by all state entities, except the Board of Regents..." – OCGA 50-16-41(b)
 - Provide consistency in leasing policy, process, and forms
 - Locate and procure lease locations on behalf of the State
 - Authorized to negotiate, prepare, and enter into rental agreements in its own name
 - Assign and reassign spaces based on the needs of the state and the agencies
 - Ensure lease transactions are competitive, fair, economical and in the best interests of the agency and the State.

Scope of Report

The Georgia Vocational Rehabilitation Agency (GVRA) requested SPC research six (6) leases to determine if the lease rate currently paid by GVRA is in line with the market and/or is reasonable. The six (6) leases are in the following Cities: Athens, College Park, Gainesville, Norcross, Thomasville and Valdosta.

Step 1

Summary Market Information: SPC generated a comparative spreadsheet to show all relevant lease and market information. SPC tracks annual market rates for Office and Retail rates for 76 Cities in Georgia. These market rates were produced by SPC's contract broker (Savills Studley) using various sources including CoStar, Loopnet, driving the market, calling local brokers and landlords and consulting local chambers of commerce. These market rates are used by SPC to generate a Lease Budget Summary (LBS).

Step 2

Relocation Cost Information: If the Summary Market Information shows current rents are outside of the Office / Retail average market rates then the potential need for relocation exists. Based on the potential

need for a relocation in Athens and Norcross, SPC generated Lease Budget Summaries (LBS) which outline all costs necessary for GVRA to budget for a potential relocation.

Step 3

Available Options: SPC generated a market survey of available options for Athens and Norcross.

Step 4

Recommendation: SPC provided a narrative analysis and staff recommendation.

Summary Market Information

Lease City	Lease #	Lease Expiration	Total Square Feet (SF)	2018 Rental Rate Per Month	Current (2018) Full Service Rental Rate per SF (Annual)	Average Market Rate per SF - Full Service (Office)	Average Market Rate per SF - Full Service (Retail)	Not to Exceed Rent for a Relocation	One Time Relocation Costs
Athens	7393	6/30/1937	14,700	\$36,761.50	\$30.01	\$20.62	\$24.55	\$30.82	\$101,960
College Park	6553(1)	6/30/2020	24,797	\$41,918.28	\$20.29	\$20.01	\$25.00	\$31.27	
Gainesville	7395	6/30/2027	8,050	\$15,122.23	\$22.54	\$20.54	\$23.13	\$29.40	
Norcross	6572	6/30/2029	6,300	\$14,228.92	\$27.10	\$18.36	\$21.33	\$27.60	\$66,031
Thomasville	7268	6/30/2026	4,900	\$6,837.69	\$16.75	\$14.92	\$18.77	\$25.04	
Valdosta	6582	6/30/2022	9,800	\$12,654.01	\$15.49	\$16.58	\$19.50	\$25.77	

SPC Footnotes:

- For new relocations, SPC includes an additional \$6.27/rsf for tenant improvement allowance based on \$45.00/rsf in tenant improvements, amortized at 7%. The additional \$6.27/rsf has not been included in the average market rates noted in this schedule.
- Full Service market rate determined by adding \$4 estimate for utilities and janitorial expenses to a modified gross rate.
- Average Market Rate reflects the City of East Point

Notes:

- College Park is not a City SPC tracks. A comparable City was chosen for this study (East Point).
- “Not to Exceed Rent for a Relocation” is determined by adding a market Tenant Improvement (TI) allowance to the higher of the Office or Retail Market Rate. SPC estimates an additional \$6.27/sf for TI allowance based on \$45.00/sf in tenant improvements, amortized at 7%
- “Not to Exceed Rent” is the amount SPC instructs agencies to budget for new leases or relocations in a specific City.
- “One Time Relocation Costs” include: Furniture, Data cabling, Security, and Moving Expenses
- Lease Budget Summary (LBS) sheets summarize all cost information and are provided to agencies for budgeting.

Athens Georgia Relocation Cost Information

Lease Budget Summary Sheet
 GVRA: Athens
 Square Feet: 14,700

	Average Market Rate	\$ 20.55	(Retail)		
	Utilities & Janitorial:	\$ 4.00			
	Tenant Improvement Allowance:	\$ 6.27			
	Total:	\$ 30.82			
	Annual Rent:			\$ 453,054	
	New Furniture Budget:		Pricing	Qty	
	Closed (220 sf)	\$ 3,550.00	1	\$ 3,550	*
	Closed (120 sf)	\$ 1,394.00	2	\$ 2,788	*
	Open (64 sf)	\$ 2,197.00	4	\$ 8,788	
	Open (49 sf)	\$ 2,094.00	21	\$ 43,974	*
	Open (20 sf)	\$ 1,123.00	0	\$ -	*
	10% Installation			\$ 5,910	*
	Voice/Data System (Cabling 2 per FTE):		Pricing	Qty	
	CAT 6	\$ 600.00	15	\$ 9,000	*
	10% Installation			\$ 900	*
	Audio Visual:			\$ -	
	Security/Access Cameras (interior/exterior):			\$ 5,000.00	*
	Moving Cost:	\$ 1.50		\$ 22,050	*
	Total (Capital Expenses/Non- Construction):			\$ 555,014	
	Note: * indicates one-time costs				

Athens Georgia Search Criteria - Available Options

- SPC searched the market using CoStar and engaging local brokers as necessary
- Search criteria for Athens were:
 - Square footage range of 12,000 – 17,000
 - Located in the city of Athens
 - Office or Retail product to be used for office
- Search resulted four (4) available options (Note: after speaking with the brokers only three (3) options are available)
- Results are shown below with an average full service rent of \$29.77/ square foot

2500 Daniels Bridge Road	16,759 square feet available - Sublet	Asking price - \$19.00/ square foot. Modified Gross	Estimated Full service rent - \$29.27/ sf (added \$4.00 for U&J and \$6.27 for TI)
455 Epps Bridge Parkway – Building 200	13,600 square feet available – Direct	Asking price - \$25.00 / square foot Full Service	Full Service Rent - \$31.27 / sf (Note – added \$6.27 to rate for TI allowance)
3320 Old Jefferson Road – Unit 300	13,802 square feet available – Direct	Asking price - \$16.50 / square foot NNN	Estimated Full service rent – \$28.77/ sf (added \$2.00 for Maintenance, \$4.00 for U&J and \$6.27 for TI allowance)
155 Westpark Drive	After speaking with the broker, only 6,000 square feet is available	Asking price - \$23.00 / square foot Full Service	Estimated Full service rent - \$29.27/ sf (Note – added \$6.27 to rate for TI allowance)

Norcross Georgia Relocation Cost Information

Lease Budget Summary Sheet
 GVRA: Norcross
 Square Feet: 6,300

LEASE BUDGET SUMMARY SHEET				
GVRA				
Norcross				
Square Feet:	6,300			
Average Market Rate	\$ 17.33	(Retail)		
Utilities & Janitorial:	\$ 4.00			
Tenant Improvement Allowance:	\$ 6.27			
Total:	\$ 27.60			
Annual Rent:			\$ 173,880	
New Furniture Budget:	Pricing	Qty		
Closed (220 sf)	\$ 3,550.00	0	\$ -	*
Closed (120 sf)	\$ 1,394.00	2	\$ 2,788	*
Open (64 sf)	\$ 2,197.00	4	\$ 8,788	
Open (49 sf)	\$ 2,094.00	14	\$ 29,316	*
Open (20 sf)	\$ 1,123.00	0	\$ -	*
10% Installation			\$ 4,089	*
Voice/Data System (Cabling 2 per FT)	Pricing	Qty		
CAT 6	\$ 600.00	10	\$ 6,000	*
10% Installation			\$ 600	*
Audio Visual:			\$ -	
Security/Access Cameras (interior/external):			\$ 5,000.00	
Moving Cost:	\$ 1.50		\$ 9,450	*
Total (Capital Expenses/Non-Construction):			\$ 239,911	
Note: * indicates one-time costs				

Norcross Georgia Search Criteria - Available Options

- SPC searched the market using CoStar and engaging local brokers as necessary
- Search criteria for Norcross were:
 - Square footage range of 6,000 – 7,000
 - Located in the city of Norcross

- Office or Retail product to be used for office
- Search resulted thirty- three (33) available options which were further refined to focus on Technology Park due to the proximity of bus transit and the fact the office park has roving security patrol.
- The top four (4) options are shown below with an average full service rent of \$26.08/ square foot

40 Technology Parkway - S	6,643 square feet available – Direct	Asking price - \$17.25 / square foot Full service	Estimated Full service rent - \$23.52 / sf (Note – added \$6.27 to rate for TI allowance)
50 Technology Parkway - S	4,000 – 8,000 square feet available - New	Asking price – \$19.00 / square foot Full service	Estimated Full service rent - \$25.27/ sf (Note – added \$6.27 to rate for TI allowance)
330 Research Ct – Technology Park	7,500 square feet available - Direct	Asking price - \$17.00 / square foot Modified gross	Estimate Full service rent - \$27.27/ sf (added \$4.00 for U&J and \$6.27 for TI)
655 Engineering Drive – Technology Park	3,000 – 26,000 square feet available – Direct	Asking price - \$22.00/ square foot Full service	Estimated Full service rent - \$28.27 / sf (Note – added \$6.27 to rate for TI allowance)

SPC Staff Recommendation

Lease City	Lease #	Lease Expiration	Total Square Feet (SF)	2018 Rental Rate Per Month	Current (2018) Full Service Rental Rate per SF (Annual)	Average Market Rate per SF - Full Service (Office)	Average Market Rate per SF - Full Service (Retail)	Not to Exceed Rent for a Relocation	One Time Relocation Costs
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Norcross	6572	06/30/29	6,300	\$ 14,228.92	\$ 27.10	\$ 18.36	\$ 21.33	\$ 27.60	\$ 66,031
Thomasville	7268	06/30/26	4,900	\$ 6,837.69	\$ 16.75	\$ 14.92	\$ 18.77	\$ 25.04	
Valdosta	6582	06/30/22	9,800	\$ 12,654.01	\$ 15.49	\$ 16.58	\$ 19.50	\$ 25.77	

Narrative Analysis

Results of the Summary Market Information show four (4) of the six (6) lease rates to within the Office and Retail range and two (2) of the six (6) to be above the market range. College Park, Gainesville, Thomasville and Valdosta are within the market range highlighted in blue above. While some of these leases are near the top of the market range, effort should be placed on those leases that are not within the market range. Athens and Norcross are outside market range but when considering the limited availability of acceptable options, the Not to Exceed Rent for a Relocation which includes the additional cost of tenant improvements (highlighted in green) and relocation costs (highlighted in red), the current rental rate is not unreasonable.

SPC Staff Recommendation

- For the four (4) leases with rental rates within the market range SPC recommends no action.
- For the two (2) leases with rental rates above SPC’s average market rate, SPC does not recommend relocation but rather a negotiation with the current landlord in an attempt to reduce the current rental rate.

Note: SPC will engage the landlord on GVRA’s behalf if requested.