

**FEDERAL FISCAL YEAR 2018  
MONITORING REPORT  
ON THE  
NEVADA BUREAU OF VOCATIONAL  
REHABILITATION (NBVR)  
VOCATIONAL  
AND  
SUPPORTED EMPLOYMENT PROGRAMS**



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

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# SECTION 1: THE FEDERAL MANDATE AND SCOPE OF THE REVIEW

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## A. Background

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

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 Nevada Bureau of Vocational Rehabilitation (NBVR) in Federal fiscal year (FFY) 2018, RSA—

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

In addition, RSA reviewed a sample of individual case service records to assess internal controls for the accuracy and validity of 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 from September 24 through 27, 2018, is

described in detail in the [FFY 2018 Vocational Rehabilitation Program Monitoring and Technical Assistance Guide](#).

### **B. Review Team Participants**

Members of the RSA review team included Jim Doyle, Christy Cavataio, and Sam Pierre (Vocational Rehabilitation Program Unit); Craig McManus (Fiscal Unit); Jason Hunter (Technical Assistance Unit); and Rimal Desai (Data Collection and Analysis Unit). Although not all team members participated in the on-site visit. Each contributed to the gathering and analysis of information, along with the development of this report.

### **C. Acknowledgments**

RSA wishes to express appreciation to the representatives of NBVR for the cooperation and assistance extended throughout the monitoring process. RSA also appreciates the participation of the State Rehabilitation Council (SRC), the Client Assistance Program, and other stakeholders in the monitoring process, including partners from the Nevada Department of Employment, Training & Rehabilitation, Nevada Job Connect, Washoe County School District, Nevada Office of Workforce Innovation for a New Nevada (OWINN), Nevada Department of Education and Nevada One-Stop Career Centers.

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

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### **A. Purpose**

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

### **B. Analysis of the Performance of the VR Program**

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

### **The VR Process**

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

The total number of applicants for VR services decreased from 3,241 individuals in FFY 2015, to 3,037 individuals in FFY 2017. During the same time period, the total number of individuals determined eligible for VR services decreased from 3,877 individuals to 2,960 individuals. Conversely, the total number of individuals with an individualized plan for employment (IPE) who received services increased from 4,250 individuals in FFY 2015, to 4,470 individuals in FFY 2017. As a result, the percentage of individuals determined eligible for services who received no services declined from 31.2 percent in FFY 2015, to 26.3 percent in FFY 2017.

The percentage of individuals who exited from the VR system as applicants remained relatively stable over the review period at 7.4 percent in both FFY 2015 and the first three quarters of FFY 2017, although the number of individuals decreased from 231 individuals in FFY 2015, to 148 individuals in the first three quarters of FFY 2017. From FFY 2015 through the first three quarters of FFY 2017, of the 573 individuals who exited as applicants, 136 individuals were below the age of 25.

During the same time period, the number of individuals whose service records were closed who exited from the VR system without an employment outcome, after eligibility determination, but before an IPE was signed and VR services provided, decreased from 1,209 individuals (38.9 percent) in FFY 2015, to 807 (28.8 percent) in FFY 2016, and to 588 individuals (29.3 percent) in FFY 2017. The percentage of individuals below the age of 25 similarly decreased from 40.1 percent in FFY 2015, to 29.5 percent in the first three quarters of FFY 2017. From FFY 2015 through the first three quarters of FFY 2017, of the 2,604 individuals who exited at this stage of the VR process, 760 individuals were below the age of 25. Relatively few individuals exited the VR system during the provision of trial work experiences during the review period.

At the time of the review, NBVR was not on an order of selection (OOS), nor did it communicate that it was considering implementing an OOS.

### **Employment Outcomes**

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

While the percentage of all individuals with disabilities who exited with employment increased from 28.5 percent (886 individuals) in FFY 2015 to 32.0 percent (897 individuals) in FFY 2016 and appears on trend in the first three quarters of FFY 2017 at 28.8 percent (578 individuals), the percentage of individuals exiting without employment increased steadily from 24.6 percent in FFY 2015, to 32.2 percent in FFY 2016, to 33.5 percent in the first three quarters of FFY 2017. Consequently, NBVR's employment rate for all individuals decreased from 53.6 percent in FFY 2015, to 49.8 percent in FFY 2016, to 46.2 percent in the first three quarters of FFY 2017, with a lower employment rate for individuals below age 25 throughout the same period. The percentage of competitive employment outcomes for all individuals increased slightly from 94.6 percent in FFY 2015, to 95.2 percent in the first three quarters of FFY 2017, with 89.4 percent of individuals below the age of 25 achieving competitive employment outcomes in FFY 2015, and rising slightly in FFY 2016 to 92.3 percent and to 90.7 percent in the first three quarters of FFY 2017.

From FFY 2015 through the first three quarters of FFY 2017, the median hourly earnings and average hourly earnings for all individuals who obtained employment after receiving VR services remained consistent. During the review period, the median hourly earnings for individuals who achieved competitive employment outcomes remained consistent at \$10.00 per hour, but the median hours worked decreased from 32 hours to 30 hours per week. As a result,

the quarterly median earnings for competitive employment outcomes had a slight decrease from \$4,290 in FFY 2015, to \$4,095 in the first three quarters of FFY 2017. The percentage of competitive employment outcomes meeting SGA decreased from 63.7 percent in FFY 2015, to 62.8 percent in FFY 2016, to 55.3 percent through the first three quarters of FFY 2017.

From FFY 2015 through the first three quarters of FFY 2017, the median hourly earnings for individuals below the age of 25 who achieved competitive employment outcomes increased from \$8.78 to \$9.00 per hour, lower than for all individuals, but indicating a positive trend. The median hours worked for competitive employment outcomes remained steady at 25 hours per week from FFY 2015 through the first three quarters of FFY 2017. In addition, the percentage of competitive employment outcomes meeting SGA decreased from 46.3 percent in FFY 2015, to 38 percent in the first three quarters of FFY 2017, significantly lower than for all individuals. These data, along with the data discussed below on the types of occupational outcomes achieved by individuals achieving employment, characterize the overall quality of employment outcomes.

### **VR Services Provided**

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

NBVR reported a significant decline in the percentage of all individuals with disabilities receiving bachelor or graduate degree training from FFY 2015 (17.0 percent) through the first three quarters of FFY 2017 (9.4 percent) and an increase in the percentage of individuals receiving junior or community college training from 2.4 percent in FFY 2015, to 8.9 percent in the first three quarters of FFY 2017. The percentage of all individuals receiving training in occupational or vocational training also declined from 19.1 percent in FFY 2015, to 13.6 percent in the first three quarters of FFY 2017. The percentage of individuals receiving postsecondary education, despite the decline in bachelor and graduate training over the review period, approaches nearly one-fifth of all individuals served receiving such services and coupled with the percentage of individuals receiving occupational or vocational training, appears to be reflected in the quality of employment outcomes for these individuals (see Table 8a). Postsecondary training and occupational or vocational training appear to be significant factors in the achievement of quality employment outcomes.

NBVR reported similar trends for individuals below the age of 25, with a smaller percentage of individuals receiving bachelor or graduate degree training from FFY 2015 through the first three quarters of FFY 2017 and an increasing percentage of individuals receiving junior or community college training. Similarly, the percentage of individuals receiving occupational or vocational training declined over the review period. Individuals below the age of 25, however, did not demonstrate similar results in the quality of employment outcomes as shown by data on occupational categories and wages (see Table 8b).

NBVR reported decreases in several career services throughout the review period:

- The percentage of career assessment decreased from 82.9 percent in FFY 2015, to 62.0 percent in the first three quarters of FFY 2017;
- The percentage of job search assistance decreased from 40.6 percent in FFY 2015, to 16.1 percent in the first three quarters of FFY 2017; and
- The percentage of job placement assistance decreased from 52.1 percent in FFY 2015, to 38.9 percent in the first three quarters of FFY 2017.

According to reported data, less than 1.0 percent of individuals received vocational counseling and guidance and customized employment services, and the percentage of individuals receiving benefits counseling was similarly low. Individuals who received transportation, maintenance, and rehabilitation technology were reported in higher percentages; however, a disproportionate percentage of services were recorded as “other services” (from 40.6 percent in FFY 2015, to 41.3 percent in FFY 2016, and 36.9 percent in the first three quarters of FFY 2017).

As demonstrated by the data and through discussions with the agency while on-site, NBVR underreported VR services provided to its consumers on its RSA-911 reports, such as vocational rehabilitation guidance and counseling, benefits counseling, and customized employment services. NBVR attributed the underreporting of VR services to a case management system coding error and staff training issues. NBVR reported that vocational rehabilitation guidance and counseling is provided to every individual receiving VR services, but it was not always reported in the case management system by the VR counselors. The agency indicated its plans to provide training to VR counselors to accurately report all VR services provided in-house.

NBVR reported the implementation of a Business Development Team to increase its outreach in the north and south regions of the state in an effort to build and retain relationships with consumers, employers, and community partners to create and coordinate in-house programs such as work readiness training, soft skills, job seeking skills, and disability awareness training. The team also collaborates with other state agencies such as the Office of Economic Development and Office of Workforce Development for a New Nevada (OWINN) to expand services to individuals with disabilities and to promote co-enrollment in the various state-operated programs.

### **Outcomes by Disability Type**

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

From FFY 2015 through the first three quarters of FFY 2017, the percentage of individuals by disability type achieving employment outcomes remained relatively stable. In the first three quarters of FFY 2017, individuals with psychosocial and psychological disabilities represented the largest percentage of individuals achieving employment outcomes (30.5 percent), followed by individuals with intellectual and learning disabilities (28.9 percent), and individuals with physical disabilities (24.6 percent). However, the employment rates decreased over the review period for each of these groups, with the highest in the first three quarters of FFY 2017 being



individuals with psychosocial and psychological disabilities (45.0 percent), followed by individuals with physical impairments (42.5 percent), and individuals with intellectual and learning disabilities (42.3 percent). The highest employment rates remained relatively consistent throughout the review period, with individuals with auditory and communicative disabilities achieving an employment rate of 67.2 percent in the first three quarters of FFY 2017 and representing 10.0 percent of all individuals achieving an employment outcome. The employment rate for individuals with visual disabilities in the first three quarters of FFY 2017 was 52.1 percent) and represented 5.8 percent of all individuals achieving an employment outcome.

For individuals below the age of 25, individuals with intellectual and learning disabilities represented the largest percentage of those achieving an employment outcome during the review period, ranging from 63.3 percent in FFY 2015, to 63.3 percent in the first three quarters of FFY 2017; however, the employment rate decreased from 56.9 percent to 46.2 percent in FFY 2016, and 38.4 percent in the first three quarters of FFY 2017. The percentage of individuals with psychosocial and psychological disabilities achieving an employment outcome increased slightly from 20.3 percent in FFY 2015, to 23.8 percent in the first three quarters of FFY 2017, with a relatively stable employment rate decreasing only slightly from 53.5 percent in FFY 2015, to 52.3 percent in the first three quarters of FFY 2017. The employment rates for individuals with auditory and communicative disabilities and individuals with visual impairments were consistently lower than for all individuals, while the employment rate for individuals with physical disabilities did not differ substantially when compared to the employment rate for all individuals.

### **Compliance with the Statutory Time Frame for Application to Eligibility Determination**

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

NBVR demonstrated substantial compliance with the statutory time frame for application to eligibility determination during the review period. From FFY 2015 to FFY 2016, the percentage of all individuals with disabilities who were determined eligible within 60 days from the date of application increased from 93.9 percent to 94.6 percent. For the first three quarters of FFY 2017, NBVR completed timely eligibility determinations for 96.5 percent of all the individuals whose service records were closed.

From FFY 2015 to FFY 2016, the percentage of individuals below the age of 25 who were determined eligible within 60 days from the date of application remained consistent at 95.7 percent. For the first three quarters of FFY 2017, NBVR completed timely eligibility determinations for 97.2 percent of individuals below the age of 25 whose service records were closed.

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

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

The percentage of all individuals served whose IPEs were developed within 90 days from the date of eligibility determination steadily increased from 84.6 percent in FFY 2015, to 87.0 percent in FFY 2016. For the first three quarters of FFY 2017, NBVR developed timely IPEs for 91.8 percent of the individuals whose service records were closed.

For individuals below the age of 25, NBVR demonstrated similar performance to that for all individuals whose IPEs were developed within the 90-day time frame. The percentage of IPEs developed within 90 days from the date of eligibility determination for individuals below the age of 25 at service record closure increased from 87 percent in FFY 2015, to 89.1 percent in FFY 2016. For the first three quarters of FFY 2017, timely IPEs were developed for 90.7 percent of the individuals below the age of 25 whose service records were closed.

## **Types of Occupational Outcomes for Individuals Who Achieved Employment**

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

During the first three quarters of FFY 2017, the following occupations represent the highest percentages for all individuals whose cases were closed:

- Office and administrative support at 15.6 percent (median hourly wage: \$10.00);
- Installation, maintenance, and repair at 15.3 percent (median hourly wage: \$9.00);
- Sales and related at 10.0 percent (median hourly wage: \$9.25); and
- Transportation and material moving at 9.6 percent (median hourly wage: \$11.72).

For individuals below the age of 25 who exited the VR system during the first three quarters of FFY 2017 with an employment outcome, the following occupations represent the highest percentages for individuals whose cases were closed:

- Installation, maintenance, and repair at 20.4 percent (median hourly wage: \$8.45);
- Food preparation and serving related at 14.6 percent (median hourly wage: \$8.64);
- Office and administrative support at 13.1 percent (median hourly wage: \$9.00); and
- Sales and related at 12.4 percent (median hourly wage: \$8.52).

Recognizing that the highest occupational categories represent lower-paying jobs and may not maximize employment opportunities and advancement, NBVR reported to RSA that it is working with local universities, colleges, and other service providers to support individuals that

are pursuing careers in the field of healthcare, science, technology, and advanced business training that can lead to stackable credentials. NBVR believes increasing these partnerships across the State will result in improvements in both the quantity and quality of employment outcomes for individuals served.

NBVR also has partnered with the State's Department of Administration Human Resource Management Office implementing the "700-hour program." The "700-hour program" provides placement of individuals with disabilities in a temporary State government position, not to exceed 700 hours. NBVR VR counselors certify individuals who meet the minimum qualifications for a position on a 700-hour list. The 700-hour appointment may be converted to a regular appointment before the completion of the 700 hours, subject to a trial or probationary period. If an individual is converted to a regular appointment, the individual's hours in the position as a 700-hour appointment are counted towards his or her completion of a trial or probationary period. From January 1, 2018 through September 30, 2018, the NBVR reported 61 successful placements with an average hourly wage of \$15.10 per hour as a result of this program. NBVR has distributed information to all State agencies, including briefings on the process, with the anticipation that this program will continue to grow.

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

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

From FFY 2015 through the first three quarters of FFY 2017, 5,563 individuals exited the VR program without achieving an employment outcome. Of those individuals who exited without employment in the first three quarters of FFY 2017, 45.2 percent were reported as having their service record closed because the individual was no longer interested in receiving services; 28.8 percent exited due to NBVR not being able to locate or contact them; and 19.1 percent were closed for "all other reasons."

From FFY 2015 through the first three quarters of FFY 2017, 1,583 individuals below the age of 25 exited the VR program without achieving an employment outcome. Of those individuals below the age of 25 who exited without employment, NBVR reported the reasons as being unable to locate or contact (37.9 percent); no longer interested in receiving services (35.3 percent); and closed for all other reasons (13.3 percent).

NBVR reported that before closing a case as "unable to locate or contact," the agency makes repeated attempts to contact the individual or the individual's family or representative by telephone, mail and/or email requesting that the individual contact the VR agency. If these attempts to contact or locate the individual fail over a reasonable period, a closure letter is sent to the last known address informing the individual that the case has been closed.

### **C. Internal Controls**

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

### **Policies and Procedures**

Prior to the on-site monitoring review, RSA requested documentation from NBVR that outlines its policies and procedures related to the case service record; reporting on the RSA-911; and internal control process (e.g., ensuring data accuracy, reliability, and timely submission), along with a description of case file organization or documents used by NBVR staff to organize case files. NBVR provided RSA with a description of various parts of its quality assurance (QA) process, including Section 20: Participant's Service Record, Section 24: Formal Case Review Process, QA team case review instruments, and previous QA case review summary reports.

NBVR has a QA team that conducts a district-wide review in May and statewide case reviews in November each year. The QA Team consists of Quality Control Specialists, District Managers, Rehabilitation Supervisors, Rehabilitation Counselors, and Administrators to assist with the reviews.

The service records are reviewed through NBVR's electronic case management system. The QA team organizes the review process and selects the cases to be reviewed. This information is relayed to rehabilitation counselors, technicians, and administrative assistants in sufficient time to ensure that all documents not generated by the electronic case file (e.g., reports, medical records, social security information) have been submitted to designated staff for scanning into the electronic case records. All documents must be in the files prior to the review.

The QA team uses a review instrument to complete all reviews. The QA team tallies the review results and completes a summary report of the findings, which is submitted to the Deputy Administrator of Program Services, the Chief of Program Services and the respective District Managers within 15 business days of the completion of the review. Once the summary report of findings has been issued, management and its designees, with technical assistance from the QA team when requested, develop and implement an action plan for quality improvement for any areas identified by the QA team.

## **Review**

RSA conducted a review of 30 service records comprised of individuals who achieved employment after receiving VR services. Although RSA randomly selected service records closed in the first quarter of program year (PY) 2018, all 30 case service records were incorrectly identified as having successfully employed individuals due to a reporting error by NBVR. 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. RSA believes the data verification summary accurately represents the scope of the service record review.

Of the 30 service records reviewed—

- 97 percent of the application dates reported on the RSA-911 matched the source documentation;
- 73 percent of the eligibility dates matched the source documentation; and
- 70 percent of IPE dates matched the source documentation.

Additionally, the service record review verified that—

- 63 percent of service records showed that the start date of employment in primary occupation were accurately recorded or had appropriate documentation;
- 50 percent of service records showed employment status at closure accurately recorded;
- 30 percent of service records showed weekly earnings at employment accurately recorded;
- 83 percent of service records showed type of closure accurately recorded; and
- 47 percent of service records showed date of closure accurately recorded.

The majority of application dates and types of closures reported on the RSA-911 matched the dates on the source documentation reviewed. However, the case record review also identified that eligibility dates, IPE dates, employment start dates, and wage verification, as documented in the case service records, were not consistent with data reported in the RSA-911, NBVR's case management system, or the source documentation in the case records.

## **D. Observations and Recommendations**

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

## **Observation 2.1 Inaccurate reporting and Coding of VR Services**

During the on-site monitoring review, NBVR acknowledged that the agency was underreporting the number of eligible individuals receiving various VR services under an IPE. Examples of VR services provided to individuals that were underreported in the first three quarters of FFY 2017 include--

- Vocational rehabilitation counseling and guidance (0.5 percent);
- Benefits counseling (0.6 percent); and
- Customized employment services (0.9 percent).

According to NBVR, all of these VR services are being provided by VR counselors or other in-house staff and are not purchased services. NBVR acknowledged VR services provided in-house or provided through comparable benefits were not accurately coded in the case management system and, therefore, were not being reported on the RSA-911.

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

- In the first three-quarters of FFY 2017, NBVR reported that 36.9 percent of all individuals served, whose cases were closed, received “Other Services,” and
- In the first three-quarters of FFY 2017, NBVR reported that 27.3 percent of individuals below the age of 25, whose cases were closed, received “Other Services” in the same period.

## **Recommendations 2.1 Inaccurate reporting and Coding of VR Services**

RSA recommends that NBVR—

- 2.1.1 Expand NBVR’s written internal control policies and procedures for ensuring the accuracy and validity of data reported through the RSA-911, specifically for services provided;
- 2.1.2 Develop a quality assurance process for determining if services are being reported accurately and take appropriate measures to ensure proper reporting of services whether they are provided in-house, or purchased; and
- 2.1.3 Provide training to ensure that VR counselors and their supervisors understand the RSA-911 reporting and coding requirements.

**Agency Response:** Thank you. NBVR will take these into consideration.

**Request for Technical Assistance:** No.

## **Observation 2.2 Attrition**

A substantial number of individuals are exiting the VR program as applicants or as eligible individuals either before services are provided or after services but without achieving an employment outcome.

For all individuals who exited without employment—

- From FFY 2015 through the first three quarters of FFY 2017, over 30 percent of all individuals determined eligible for VR services exited the VR program without employment outcomes, before an IPE was signed or before receiving services;
- In FFY 2015, 676 individuals exited the VR program without achieving an employment outcome. Of those individuals, 30.4 percent were reported as being unable to locate or contact and 41.7 percent were no longer interested in receiving services;
- In FFY 2016, 599 individuals exited the VR program without achieving an employment outcome. Of those individuals, 31.4 percent were reported as being unable to locate or contact and 43.4 percent were no longer interested in receiving services;
- For the first three quarters of FFY 2017, 412 individuals exited the VR program without achieving an employment outcome. Of those individuals, 28.8 percent were reported as being unable to locate or contact and 45.2 percent were no longer interested in receiving services.

For individuals below age 25—

- In FFY 2015, 227 individuals below the age of 25 exited the VR program without achieving an employment outcome. Of those individuals, 37.3 percent were reported as being unable to locate or contact and 40.1 percent were no longer interested in receiving services;
- In FFY 2016, 228 individuals below the age of 25 exited the VR program without achieving an employment outcome. Of those individuals, 40.9 percent were reported as being unable to locate or contact and 41.8 percent were no longer interested in receiving services; and
- For the first three quarters of FFY 2017, 174 individuals below the age of 25 exited the VR program without achieving an employment outcome. Of those individuals, 37.9 percent were reported as being unable to locate or contact and 35.3 percent were no longer interested in receiving services.

## **Recommendations 2.2 Attrition**

RSA recommends that NBVR—

- 2.2.1 Evaluate the cause for the decline in individuals accessing NBVR services and the increase in those exiting at various stages of the VR process before achieving an

- employment outcome, including the availability of services for individuals from unserved or underserved populations;
- 2.2.2 Based on the information obtained, develop goals with measurable targets to decrease the number of individuals exiting the VR program at various stages of the process; and strategies to achieve these goals;
  - 2.2.3 Develop and implement outreach plans and methods to improve service delivery access for all individuals with disabilities, including those from unserved and underserved populations; and
  - 2.2.4 Evaluate the success of strategies used to improve the accessibility of services for all populations that may require NBVR services.

**Agency Response:** Thank you. NBVR will take these into consideration.

**Request for Technical Assistance:** No.

### **E. Findings and Corrective Actions**

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

#### **2.1 Untimely Development of the IPE:**

**Issue:** Did NBVR develop IPEs within 90 days from the date of eligibility determination for each individual.

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

**Analysis:** As part of the monitoring process, RSA analyzed the length of time it took for NBVR to develop IPEs for individuals determined eligible for VR services. The data reported by NBVR on the RSA-911 show that—

- For all individuals served whose service records were closed in FFY 2015, 84.6 percent had an IPE developed within the Federally required 90-day period; and
- For all individuals served whose service records were closed in FFY 2016, 87.0 percent had an IPE developed within the Federally required 90-day period.



During the first three quarters of FFY 2017, 91.8 percent of all individuals served whose service records were closed had an IPE developed within the Federally required 90-day period, demonstrating improvement in performance for this requirement and substantial compliance.

**Conclusion:** As demonstrated by the FFYs 2015 and 2016 performance data, NBVR did not develop IPEs for each eligible individual whose service record was closed within 90 days following the date of eligibility determination. As a result of the analysis, NBVR did not develop IPEs in a timely manner pursuant to 34 C.F.R. § 361.45(a)(1) and within the Federally required 90-day time frame pursuant to 34 C.F.R. § 361.45(e).

### **Corrective Action Steps:**

RSA requires that NBVR—

- 2.1.1 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;
- 2.1.2 Develop goals and strategies to improve VR counselor performance specific to timely IPE development; and
- 2.1.3 Comply with 34 C.F.R. §§ 361.45(a)(1) and (e) to ensure IPEs are developed within the statutory 90-day time frame from the date of eligibility determination.

**Agency Response:** NBVR agrees.

**Request for Technical Assistance:** No.

## **2.2 Internal Controls for Case File Documentation**

**Issue:** Do NBVR's internal controls ensure that case files adhere to the record of service requirements at 34 C.F.R. § 361.47. Specifically, in fulfilling these requirements, do the internal controls ensure that NBVR adheres to the requirements for closing the record of services of an individual who has achieved an employment outcome pursuant to 34 C.F.R. § 361.56.

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

Pursuant to 34 C.F.R. § 361.56, the service records for individuals who have achieved an employment outcome may only be closed if: an employment outcome described in the

individual's IPE in accordance with 34 C.F.R. § 361.46(a)(1) has been achieved and is consistent with an individual's unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice; the employment outcome is maintained for an appropriate period of time, but not less than 90 days to ensure stability of the employment outcome and the individual no longer needs VR services; the outcome is considered to be satisfactory and agreed to by the qualified rehabilitation counselor employed by the DSU and the individual who must agree that the individual is performing well in the employment; and the individual has been informed of post-employment services through appropriate modes of communication.

Under 34 C.F.R. § 361.47(a)(15), prior to closing a service record, VR agencies must maintain documentation verifying that the provisions of 34 C.F.R. § 361.56 have been satisfied. More specifically, under 34 C.F.R. § 361.47(a)(9), VR agencies must maintain documentation verifying that an individual who obtains employment is compensated at or above minimum wage and that the individual's wage and level of benefits are not less than that customarily paid by the employer for the same or similar work performed by individuals without disabilities.

**Analysis:** While on-site, RSA reviewed 30 service records of individuals with disabilities, all of whom achieved an employment outcome. As stated before, NBVR reported that the agency underreported 253 cases for the first quarter of FFY 2017 on the RSA 911. The agency indicated that it had an internal error in its system regarding a hidden date field that prevented the extraction of program data for individuals whose case records were closed without employment after receiving VR services and closed after the development of an IPE but before VR services have been provided. Therefore, RSA only reviewed 30 service records for the individuals who achieved employment and whose records were closed after receiving VR services.

During the service record review, RSA observed nine service records, or 30 percent of all service records reviewed, in which the dates that the VR counselor and the eligible individual signed the IPE did not match the date in NBVR's case management system and the date reported on the RSA-911 report.

In addition, RSA observed that documentation in the service records verifying the employment status of individuals at the time of closure was insufficient. Of the service records reviewed, 15 records, or 50 percent, did not include documentation that verified the hourly wage of the individual at the time of exit. In several cases, the service record did not document any follow-up the VR counselor may have had with the individual to verify the individual's wage, relying on the individual's self-report at the time employment was first obtained. Further, 21 records, or 70 percent of all service records reviewed, did not include sufficient documentation to substantiate the individual's employment status at the time of exit. RSA could not find any documentation that NBVR verified that the individual remained employed before NBVR closed the service record. In these instances, RSA observed that the service records reviewed lacked documentation to support that VR counselors or job developers verified that the individual

maintained employment for at least 90 days and that the placement continued to be stable at the time of closure, as required at 34 C.F.R. § 361.56(b).

Furthermore, 16 records, or 53 percent of all service records reviewed, did not include sufficient documentation to substantiate the individual's date of exit. The service records reviewed lacked documentation that the individual no longer needed VR services, the individual and VR counselor considered the employment outcome to be satisfactory, and both agreed that the individual is performing well in employment in accordance with 34 C.F.R. § 361.56(c). Also, in some instances the service record closure letters in the case management system did not match the dates that were reported on the RSA-911. Due to the lack of supporting documentation, RSA was not able to verify whether NBVR informed the individual of the availability of post-employment services as required by 34 C.F.R. §361.56(d).

NBVR must maintain documentation to verify the accuracy of reporting of Federal requirements. For some of the service records reviewed, NBVR did not maintain case files that substantiated these reporting requirements indicating that its internal controls in this area need improvement. Therefore, without documentation that the data elements were valid, RSA was unable to verify whether the date VR services began under the IPE, start date of employment, weekly earnings, and the employment outcomes that NBVR reported on the RSA-911 were completely accurate.

**Conclusion:** As a result of the analysis, RSA determined that NBVR's internal controls did not ensure the service record requirements at 34 C.F.R. § 361.47 were met. Specifically, NBVR's internal controls did not ensure the requirements were met for closing the record of services of an individual who has achieved an employment outcome pursuant to 34 C.F.R. § 361.56.

**Corrective Action Steps:**

RSA requires that NBVR—

- 2.2.1 Develop internal control policies and procedures to ensure that the provisions of 34 C.F.R. § 361.47 have been met and through service record documentation, the requirements at 34 C.F.R. §§ 361.56 are met;
- 2.2.2 Review current internal control mechanisms for effectiveness and adjust the internal controls as necessary; and
- 2.2.3 Review current mechanisms used to collect and aggregate the results of these reviews and use the results to inform the training and evaluation of staff.

**Agency Response:** NBVR agrees.

**Request for Technical Assistance:** No.

## **F. Technical Assistance**

During the monitoring process, RSA provided technical assistance to NBVR as described below.

- RSA reviewed 2 C.F.R. § 200.303 and provided possible methods to improve the agency's internal controls process and accountability tracking of cases;
- RSA reviewed 34 C.F.R. § 361.47 and provided technical assistance on maintaining required supporting documentation in the case service records; and
- RSA provided technical assistance to agency staff to improve the accurate collection and reporting of all data elements required for the RSA-911 report.

NBVR did not request further technical assistance in this focus area.

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

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### **A. Purpose**

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

### **B. Service Delivery Overview**

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

### **Structure of Service Delivery**

NBVR provides a continuum of pre-employment transition services and transition services through approximately 48 VR counselors assigned to 16 school districts across the State. The agency has developed agreements with each local educational agency (LEA) that contains a high school. Nevada estimates there are 217 high schools, including charter schools, across the 16 school districts. Nevada has a 17th district without a high school present. NBVR has three

Transition Coordinators dedicated solely to pre-employment transition services. In addition, NBVR has dedicated eight VR counselors as transition specialists assigned to specific school districts. All other VR counselors are assigned to the remaining school districts and work partially with students and youth with disabilities transitioning from high school, while also maintaining a general caseload.

NBVR created a new statewide transition coordinator position in early 2017 to facilitate and coordinate the outreach and provision of transition services and pre-employment transition services across the State following an RSA technical assistance review conducted in September 2016, and the subsequent recommendations from the review. In addition, NBVR hired three contractual part-time transition coordinator positions designated to the north, south and rural areas of the State to work directly with the school districts as a point of contact and in collaboration with NBVR's statewide transition coordinator.

The transition coordinators are responsible for coordinating or providing the five required activities under pre-employment transition services to students with disabilities who are eligible or potentially eligible for VR services within their respective areas of the State. Specifically, the transition coordinators are responsible for—

- Providing job exploration counseling, counseling on enrollment opportunities in comprehensive transition programs and postsecondary education at institutions of higher education, and instruction in self-advocacy to students who are potentially eligible and eligible for VR services;
- Conducting outreach to all LEAs;
- Coordinating the identification of all students with disabilities in need of pre-employment transition services and facilitating the referral process; and
- Facilitating parental agreement for students to receive pre-employment transition services.

NBVR reported that VR counselors, including transition specialists, are responsible for working with the schools to identify and work with students with disabilities who are interested in applying for VR services. Once the student has submitted an application, the transition specialist will work with the student throughout the process, including the provision or coordination of pre-employment transition services.

In addition to NBVR directly providing pre-employment transition services through its transition coordinators and VR counselors, all five required activities are available to students with disabilities through fee-for service contracts with providers and CRPs, third-party cooperative arrangements with school districts and community colleges, the Jobs for Nevada Graduates (JAG) program, and Project Search sites.

## **Outreach and Identification of Students and Youth with Disabilities**

NBVR has five transition specialists in the southern portion of the state dedicated to working directly with specific school districts for the coordination of transition and pre-employment transition services for students with disabilities. In the northern and rural areas of the State, VR counselors are assigned to each school district and work in collaboration with special education teachers for referrals of students with disabilities. School districts are responsible for the identification of students with disabilities who may be interested in transition services or pre-employment transition services and making the necessary referrals to the appropriate transition specialist assigned to the school district. Transition specialists are responsible for ensuring all school districts are aware of the NBVR transition specialist and the services available to eligible or potentially eligible students through the conduct or participation of transition fairs, transition nights, coordination with regional parent centers and distribution of information on transition services and referral forms.

Referrals for pre-employment transition services or transition services are generally coordinated between the special education teacher and the transition coordinator, the transition specialist or VR counselor. Referrals for services are submitted through a “request for services” form, which is the referral form for pre-employment transition services that identifies the services being requested. In addition, NBVR may receive notification of students with disabilities interested in pre-employment transition services with receipt of an invoice from a provider. Once an invoice is received, NBVR registers the student in its case management system with the required demographic information.

## **Provision of Pre-Employment Transition Services**

In addition to the direct provision of services by VR counselors, NBVR provides pre-employment transition services to students that are potentially eligible and those students who have been determined eligible for VR services through—

- Fee-for-service authorizations with providers and community rehabilitation providers (CRPs);
- Four third-party cooperative arrangements (TPCAs);
- Five Project Search programs; and
- The Nevada JAG program.

During the on-site review, NBVR reported that the primary method for providing pre-employment transition services has been through contracts with approved providers on a fee-for-service basis. Providers are private entities that are typically individuals approved by the State to provide services and are generally smaller than CRPs.

NBVR reported having approximately 20 contracts in place with providers across the State, which provide one or more pre-employment transition services with the majority providing all five required activities. At the time RSA conducted its technical assistance review in September

2016, NBVR had only a small number of agreements established with providers for the provision of pre-employment transition services. Of these agreements, only one of the five required activities, counseling on self-advocacy services, was made available; however, since RSA's technical assistance review, NBVR has focused efforts to expand the availability of pre-employment transition services across the State to include all five required activities.

Once a provider receives the request for services form identifying the services being requested for a student, the provider coordinates the scheduling of the requested modules with the school, typically the special education teacher. Providers may establish their own curriculum for each required activity, or may use the agency's established curriculum, ME!.

At the time of the on-site review, NBVR was also establishing virtual pre-employment transition services targeting all students with disabilities in Nevada. In collaboration with the National Technical Assistance Center on Transition (NTACT) and the Nevada Department of Education (NDE), NBVR has been exploring making available Virtual Job Shadow, an on-line program designed to provide students with job exploration services, including career exploration inventories that provide simulated job tasks, to all students with disabilities between the ninth and twelfth grades. The goal of the Virtual Job Shadow is to assist students with disabilities to explore different vocational opportunities and identify the necessary skills needed to pursue vocational interests identified by the students. NBVR and NDE identified the need for 14,000 seat licenses funded ~~in whole or~~ in part by the VR agency, to accommodate the approximate number of students with disabilities with an IEP plan in Nevada. At the time of the on-site review, NBVR and NTACT were exploring methods to ensure all students participating in the Virtual Job Shadow program are first registered with NBVR to enable the agency to follow the progress made by students during participation in the program. In addition, NBVR indicated that it plans to use the on-line modules available through WINTAC to ensure students in the rural areas of the State have full access to all five required activities.

NBVR reported the direct provision of job exploration counseling, counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs and workplace readiness training by VR counselors in rural areas where few providers may be available or when the student's circumstances may benefit from services being provided by the VR agency as opposed to a provider, such as when school districts restrict outside providers coming into the school due to safety concerns.

According to the data reported by NBVR through the RSA-911 for PY 2017, as shown in Table 10 of Appendix A, the number of required activities directly provided by NBVR staff was minimal, and for some required activities, no services were reported as being provided. Of the 2,862 individuals served during the fourth quarter of PY 2017, only three required activities were provided to students with disabilities. NBVR did not report providing workplace readiness training, work-based learning experiences, or instruction in self-advocacy services to any students with disabilities. NBVR believes the low number of students being reported is primarily due to reporting issues and how its case management system collects no-cost services.



NBVR also provides pre-employment transition services through the Nevada JAG program. In Nevada, JAG is a private, non-profit organization that assists students at risk with the necessary support and structure to successfully graduate from high school to become employed or enrolled in postsecondary education programs. NBVR and JAG had an agreement in place at the time of the review allowing for the provision of all five required activities on a fee-for-service basis for students with disabilities enrolled in JAG above its established baseline determined during the 2015-2016 academic school year. At the time of the review, NBVR reported working in collaboration with 41 of the 53 high schools that maintain a JAG program, noting the other 12 schools did not have any students with disabilities enrolled in their JAG programs. During the 2017-2018 academic year, JAG provided pre-employment transition services to 188 students with disabilities in collaboration with NBVR and the number of students is projected to grow each year.

NBVR also provides pre-employment transition services through five Project SEARCH sites with an additional site being finalized at the time of the on-site review. The Project SEARCH curriculum focuses on team building, workplace safety, technology, self-advocacy, maintaining employment, financial literacy, health and wellness, preparing for employment, and three internship rotations. Project SEARCH programming also includes individualized VR services (i.e. transportation) that are provided to eligible students with disabilities under an approved IPE. NBVR reported approximately 39 students with disabilities were being served through Project Search, 30 students in the southern and nine in the northern part of the State.

In July 2017, NBVR revised its policies governing VR services for students and youth with disabilities under Section 14 - Participant Services Policies and Procedures Manual, in accordance with the Rehabilitation Act and VR program regulations. NBVR incorporated the recommendations provided by the RSA review team from the technical assistance review in FFY 2016, and developed its policies in conjunction with WINTAC. The policies provide guidance specific to transition planning, outreach, the population served, scope of pre-employment transition services, process for transition services, and procedures for youth seeking employment at subminimum wage.

### **Provision of Transition Services**

NBVR provides transition services to students and youth with disabilities who have applied for and have been determined eligible for VR services upon the development and approval of an IPE. NBVR identifies transition services as a coordinated set of activities for students or youth with disabilities that are designed within an outcome-oriented process that promotes movement from school to post-school activities. These post-school activities may include postsecondary education, vocational training, competitive integrated employment, supported employment, continuing and adult education, independent living services or community participation and other VR services determined necessary to assist the individual to achieve his or her goal. In addition, these activities include instruction, community experiences, employment or other post-school objectives, and the acquisition of daily living skills, as appropriate, and functional vocational evaluations to determine the student's individualized needs. NBVR policies specify that the

services must be based upon the individual's needs taking into account the individual's preferences and interests.

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

### **State Educational Agency (SEA) Agreement**

NBVR has placed a higher emphasis on identifying students and youth with disabilities prior to exiting the school system for the provision of transition and pre-employment transition services. Since RSA's technical assistance review, conducted in September 2016, NBVR revised the State Educational Agency (SEA) agreement in accordance with the requirements of Section 101(a)(11)(D) of the Rehabilitation Act and Section 612(a)(12) of the Individuals with Disabilities Education Act (IDEA), as amended in 2004, to ensure that students with disabilities are prepared for employment, postsecondary education, and community living upon exit from high school. This agreement creates a consistent process for NBVR and the secondary schools to refer students, share relevant information, and understand the responsibilities of both entities throughout the transition process.

NBVR and NDE finalized the formal interagency agreement in January 2017, following technical assistance provided by RSA and WINTAC. The three-year agreement includes a description for the provision of pre-employment transition services for students with disabilities; consultation and technical assistance to students with disabilities and NDE staff; the inclusion of transition planning in each student's IEP; the roles and responsibilities for both entities; and the collaboration, outreach, and identification procedures necessary to ensure all students with disabilities are appropriately served in accordance with 34 C.F.R. § 361.22(b). In addition, the interagency agreement clarifies the process and timelines that must be followed to ensure the documentation requirements in Section 511 of the Rehabilitation Act have been met, including the transmission of the required documentation to NBVR upon becoming aware that the student is seeking subminimum wage within the required timelines at 34 C.F.R. § 397.30.

Finally, the interagency agreement details the process for dispute resolution. This process specifies informal disputes must be resolved in accordance with 34 C.F.R. § 361.53(d) for the reimbursement of costs incurred by NBVR and pursuant to 34 C.F.R. § 300.154 for the reimbursement of costs incurred by NDE.

### **IPE Development for Students and Youth with Disabilities**

NBVR policies (Section 14, Students and Youth with Disabilities, Part IV) state that students determined eligible for VR services must have an IPE developed as early as possible during the transition planning process and signed before the student leaves the school setting. All IPEs for students and youth with disabilities determined eligible for services must be developed within 90 days of the eligibility determination, or an exception must be agreed to by the individual, as

described in NBVR policies titled Counseling and Guidance, Assessment of Vocational Needs and Individualized Plan for Employment (Section 10). If the student determined eligible for VR services is receiving special education services, the IPE must be developed in coordination with the student's individualized education program (IEP).

NBVR policies (Section 14) identify the option of a projected post-school employment outcome on the IPE for students with disabilities who need additional VR services to determine the individual's primary vocational goal and the necessary VR services to achieve the goal. The intent of the projected post-school employment outcome on the IPE is to provide students with disabilities with specific, predetermined activities and VR services that provide additional career exploration that facilitate a vocational employment goal agreed upon by the student and the VR counselor. NBVR's policies allow for projected goals to be identified as "all other service workers" while the student participates in work-based learning activities and other vocational activities that will allow the student to further explore vocational goals of interest. In addition, NBVR's policies state the student's IPE must be amended at the earliest point and prior to the implementation of any educational services (tuition), on-the-job training, or job placement services.

### **C. Observations and Recommendations**

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

#### **Observation 3.1 Inaccurate Reporting of Pre-Employment Transition Services**

NBVR's performance data reported on the RSA-911 during PY 2017, as reported in Table 10 of Appendix A, did not accurately reflect the full scope and number of pre-employment transition services provided by its VR counselors and through TPCAs and JAG.

- During the first quarter of PY 2017 (July 1-September 30, 2017), NBVR reported directly providing pre-employment transition services to two students with disabilities, of which no student was reported to have received work readiness training, work-based learning experiences, or instruction in self-advocacy directly by the VR agency;
- During the second quarter of PY 2017 (October 1-December 31, 2017), NBVR reported directly providing pre-employment transition services to no individuals through its VR staff;
- During the third quarter of PY 2017 (January 1-March 30, 2018), NBVR reported that three individuals received pre-employment transition services provided directly through its VR staff, of which one individual received job exploration counseling and two individuals receive counseling on enrollment opportunities in postsecondary education programs at institutions of higher education;
- During the fourth quarter of PY 2017 (April 1-June 30, 2018), NBVR reported providing three pre-employment transition services to individuals through its staff. One individual received job exploration counseling and two individuals received counseling on

enrollment opportunities in postsecondary education programs at institutions of higher education;

- Pre-employment transition services provided through NBVR's four TPCAs were not reported in the RSA-911; and
- Students with disabilities receiving pre-employment transition services through the JAG contract were not reported by NBVR in the RSA-911 report.

### **Recommendation 3.1: Inaccurate Reporting of Pre-Employment Transition Services**

RSA recommends that NBVR—

- 3.1.1 Analyze and revise policies to ensure all five required activities under pre-employment transition services, including no-cost authorizations, are entered into its case management system for purposes of reporting through the RSA-911 as required under PD-16-04;
- 3.1.2 Develop staff procedures and training to ensure all staff who provide pre-employment transition services appropriately track and report the services; and
- 3.1.3 Conduct regular analysis of the agencies data related to pre-employment transition services to ensure all services are being accurately reported prior to the submission of the RSA-911 report.

**Agency Response:** Thank you. NBVR will take these into consideration.

**Request for Technical Assistance:** No.

### **3.2 Decrease in Percentage and Quality of Employment Outcomes**

**Observation:** From FFY 2015 through the first three quarters of FFY 2017, the percentage of individuals closed with an employment outcome after receiving services decreased for individuals who are below the age of 25 and the quality indicators for employment outcomes primarily have declined.

- The percentage of individuals under age 25 who exited with an employment outcome after receiving VR services decreased from 28.6 percent in FFY 2015, to 24.8 percent through the first three quarters of 2017;
- The percentage of individuals who exited without an employment outcome after receiving VR services increased from 24.8 percent in FFY 2015 to 34.6 percent through the first three quarters of FFY 2017;
- The employment rate decreased from 53.5 percent in FFY 2015 to 41.7 percent through the first three quarters of FFY 2017;
- Although the median hourly wage increased from \$8.78 in FFY 2015 to \$9.00 through the first three quarters of FFY 2017, and the median hours worked remained the same at 25 hours, the quarterly median earnings for competitive employment outcomes decreased from \$3,224 in FFY 2015 to \$2,964 through the first three quarters of FFY 2017;

- The percentage of individuals who achieved competitive employment meeting SGA decreased from 64.1 percent to 44.9 percent from FFY 2015 through the first three quarters of FFY 2017; and
- The five most common occupational classifications and median hourly wages for employment outcomes for all individuals below the age of 25 at exit during the first three quarters of FFY 2017 were reported as—
  - Installation, maintenance and repair occupations at 20.4 percent (\$8.45);
  - Food preparation and serving related occupations at 14.6 percent (\$8.64);
  - Office and administrative support occupations at 13.1 percent (\$9.00);
  - Sales and related occupations at 12.4 percent (\$8.52); and
  - Building and grounds cleaning and maintenance occupations at 11.7 percent (\$9.25).

### **Recommendation 3.2 Decrease in Percentage and Quality of Employment Outcomes**

RSA recommends that NBVR—

- 3.2.1 Develop strategies to ensure counselors are providing essential labor market information and guidance to youth below the age of 25 in order to improve the quality of employment outcomes;
- 3.2.2 Identify career pathways available for student and youth with disabilities eligible for VR services necessary to explore work-based learning experiences while they are still enrolled in educational programs; and
- 3.2.3 Analyze the provision of VR services needed to ensure individuals are prepared for occupations to meet quality employment outcomes based on the market analysis.

**Agency Response:** Thank you. NBVR will take these into consideration.

**Request for Technical Assistance:** No.

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

RSA’s review of NBVR’s performance in this focus area did not result in the identification of findings to improve performance.

### **E. Technical Assistance**

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

## **Provision of Pre-Employment Transition Services**

During the on-site review, RSA provided technical assistance related to the nature and scope of required activities under pre-employment transition services (34 C.F.R. § 361.48(a)(2)) and further described in the preamble to the final regulations (81 FR 55629, 55694-55695 (August 19, 2016)).

- RSA provided technical assistance on the purpose of pre-employment transition services, clarifying that required activities are intended to assist students with disabilities in early job exploration and that additional VR services are provided if the individual is interested and has applied for VR services. in accordance with the guidance in the preamble to the final VR regulations in 81 FR 55629, 55695 (August 19, 2016).
- RSA clarified NBVR should obtain, approve, and maintain curricula from each of its providers for each required activity being made available or purchased prior to the initiation of any pre-employment transition service for students with disabilities being referred. According to the contract template language NBVR uses with each of its providers, the provider must submit a curriculum for approval to NBVR.
- RSA recommended NBVR revise its progress reports for pre-employment transition services submitted by its providers to include the required activities provided during the reporting period with the associated dates.
- RSA clarified that pre-employment transition services may not include any administrative costs.
- RSA clarified students with disabilities receiving pre-employment transition services should be notified about the availability of the Client Assistance Program in accordance with 34 C.F.R. § 361.57.

## **Planning for the Provision of Pre-Employment Transition Services**

RSA provided technical assistance to NBVR on the development of its fiscal forecasting model and inclusion of the number of potentially eligible and eligible students with disabilities (currently served and projected to be served) in need of the required activities under pre-employment transition services, as well as the current and projected costs for required and pre-employment transition coordination activities, in order for NBVR to reasonably identify the funds available and remaining to engage in authorized activities (34 C.F.R. § 361.48(a)(3)). At the time of the onsite monitoring review, RSA clarified that NBVR should develop its forecasting model and reserve the funds necessary to serve all students with disabilities requesting or in need of pre-employment transition services prior to expending funds towards authorized activities.

## **Projected Plans**

RSA provided NBVR technical assistance on the requirements and limitations of implementing a projected plan for students and youth with disabilities. Pursuant to section 102(b)(4)(A) of the

Rehabilitation Act and 34 C.F.R. § 361.46(a)(2)(ii), a projected plan may be used for students or youth with disabilities with specific transition and support needs. NBVR policies and procedures allow for the implementation of a projected goal to allow the VR counselor to further evaluate the services and activities that will guide the student's career exploration to facilitate the identification of a vocational goal based on the individual's informed choice. In accordance with NBVR's policies (Section 14), an IPE with a projected goal "must be revised to a specific vocational goal once this process is completed."

RSA discussed the need for VR counselors to limit the projected plans to only those VR services that have been identified as needed to fully evaluate the individual's needs and any transition or support services identified, and not to include other VR services that may be necessary prior to a specific vocational goal being developed and agreed upon. RSA further recommended the VR counselor amend the individual's IPE to include a vocational goal that is agreed upon with the individual and the VR counselor and include all of the required components of an IPE, pursuant to Section 102(b)(4) and 34 C.F.R § 361.46(a), to assist the individual to obtain his or her vocational goal.

### **Informed Choice for Students with Disabilities Receiving Pre-Employment Transition Services**

RSA provided technical assistance to NBVR regarding the requirement for students with disabilities to have the ability to exercise their right to informed choice involving the provision of pre-employment transition services in collaboration with the school staff and NBVR staff and consistent with the student's IEP. NBVR's procedures outlining the process the agency follows when working with students with disabilities, including Processes for Pre-ETS Tracking, Pre-Employment Transition Services (Pre-ETS) Process, and Standard Operating Procedures (2.27.2018), describe a process where once a provider receives the request for services form identifying the services being requested for a student, the provider coordinates the scheduling of the requested modules with the school, typically the special education teacher.

During the on-site portion of the review, NBVR informed RSA the students and the student's parents have the opportunity to contact NBVR with any questions after receiving the parental consent form or may notify the school of the required activities of interest when filling out the request for pre-employment transition services form, which includes a list of the five required activities and a summary sheet.

RSA clarified for NBVR that in accordance with 34 C.F.R. § 361.52(a), recipients of services must be provided the opportunity to exercise informed choice throughout the rehabilitation process after being provided the necessary information about the availability of services, including pre-employment transition services, and must have the opportunity to exercise informed choice in the selection of the entity that will provide the service. This point was further emphasized in the preamble to the VR program regulations, clarifying that informed choice, as outlined in 34 C.F.R. § 361.52, applies throughout the VR process; therefore, students with disabilities receiving pre-employment transition services under 34 C.F.R. § 361.48(a) must be

given the opportunity to exercise their informed choice.” (81 FR 55629, 55695 (August 19, 2016)).

### **Prior Authorization for Pre-Employment Transitions Services**

RSA clarified students with disabilities must be known to the agency prior to receiving pre-employment transition services funded by the agency. During the on-site visit, NBVR indicated that its staff are typically notified that a student with a disability requires pre-employment transition services at the time the provider submits an invoice for services already provided to the student. Once NBVR receives the invoice, along with the student’s parental consent form and Pre-ETS Request form, the VR administrative assistant enters the required data elements for the student in the case management system.

Pursuant to Section 113(a) of the Rehabilitation Act and 34 C.F.R. § 361.48(a), pre-employment transition services must be provided to a student with a disability who is eligible or potentially eligible for VR services in accordance with Section 7(37) of the Rehabilitation Act and 34 C.F.R. § 361.5(c)(51), and must be currently enrolled or attending a recognized education program, eligible to receive special education services under IDEA or considered an individual with a disability under Section 504 of the Rehabilitation Act. The student with a disability must meet the age requirements established in the State of Nevada, which is no younger than 16 years of age and no older than 21 years of age (or 22 years when meeting the requirements at NRS 388.5223). Furthermore, the VR agency must collect and report the required data elements for students with disabilities receiving pre-employment transition services in accordance with RSA PD-16-04.

RSA communicated the importance of NBVR maintaining its decision-making authority when purchasing pre-employment transition services through its providers, including the Nevada JAG. NBVR expressed an interest to work with Nevada JAG to mutually serve students with disabilities and increase the number of students with disabilities being served by JAG above the baseline number established during the 2015-2016 school year, or 95 students for the 2018-2019 school year.

The contract between NBVR and JAG at the time of the review (effective August 2018) covers three years, not to exceed \$750,000.00. Payments are made on a fee-for-service basis for each student that include modules for all five required activities and include additional fees for work-based learning experiences site development, report development and exit interviews, and hourly monitoring fees while on-site.

NBVR is invoiced on a semi-annual basis, and will, at the time the invoice is received, obtain the name, date of birth and attendance record of each student served per school with a description of the pre-employment transition services received and a corresponding invoice for services. Students are then registered with NBVR and entered into the case management system. NBVR reported that the parental consent form and the student’s disability documentation, including the IEP, are not obtained, but rather are verified by the school. Students may participate in the JAG



program and receive funding for pre-employment transition services for up to four years while enrolled in school.

RSA requested the curriculum used by JAG for each of the five required activities. In response, RSA received the 87 Life Skills and Core Competencies available on JAG's national website. RSA determined the following:

- Students with disabilities who receive pre-employment transition services through JAG follow the same curricula as other JAG students not eligible for pre-employment transition services;
- Pre-employment transition services are provided to students with disabilities in the same classroom and setting as students not eligible to receive services;
- The curriculum for JAG students was established prior to the student being referred for pre-employment transition services; and
- Students with disabilities referred from JAG to NBVR are eligible to receive funding for pre-employment transition services using the JAG curricula up to four academic years.

RSA provided technical assistance to NBVR that all pre-employment transition services must be determined on an individual basis, including the specific required activities needed by the student in coordination with the student's IEP, the provider for the service and the duration needed for each service.

### **Third-Party Cooperative Arrangements for the Provision of Pre-Employment Transition Services**

RSA provided technical assistance regarding its TPCAs providing pre-employment transition services. Specifically, RSA clarified that while TPCAs may include other VR services, only the five required activities and coordination activities may be identified as pre-employment transition services.

- RSA clarified that all students served through its TPCAs must be accurately tracked in the agency's case management system in accordance with RSA PD-16-04.
- RSA provided technical assistance to NBVR regarding the development of a personnel activity report (PAR) that could be used by its providers to account for time spent providing pre-employment transition services and time spent providing VR services for each student. The provider of each TPCA must accurately account for time spent on each cost objective for NBVR to properly determine the specific expenditures and amount that can be counted towards the 15 percent reserve. In addition, RSA discussed the need for NBVR to develop a clear set of procedures for its providers to use that accurately describe this process, including the time intervals a provider should account for when tracking his or her time. Additional information about this is included under Section 5 of this report.

- RSA provided technical assistance to NBVR that only students with disabilities who have graduated with an adjusted diploma would qualify for the TPCAs for the provision of pre-employment transition services and not students who graduated with a standard diploma. Students who graduated with a standard diploma are no longer eligible for IDEA services through the LEA, in accordance with 20 C.F.R § 1411.
- RSA advised NBVR to revise the agreements to exclude any reference to allowing only individuals considered significantly or most significantly disabled as meeting the requirements for the TPCA before enrollment.
- RSA advised NBVR that TPCAs established for the provision of pre-employment transition services should include goals and objectives that are specific to pre-employment transition services and not oriented to VR services-related goals or employment outcomes.

## **SECTION 4: FOCUS AREA – STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM**

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### **A. Purpose**

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

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

#### **Delivery of Supported Employment Services**

NBVR significantly expanded the service delivery options for individuals seeking supported employment outcomes through the following models: customized employment, individual placement and support, and traditional supported employment. 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. NBVR has demonstrated a commitment to individuals achieving competitive integrated supported employment and the agency has worked closely with CRPs and other partners on securing employment outcomes in competitive integrated settings.

NBVR provides supported employment services through fee-for-service agreements or contracts with CRPs as well as through two TPCAs. The TPCAs primarily provide pre-employment transition services, but also provide supported employment services in their scope of work. NBVR requires VR counselors to facilitate clear, open, and collaborative communication between the supported employment team, which includes the individual service recipient, the job coach, the supported employment coordinator, and the VR counselor.

NBVR established a dedicated team of VR counselors and technicians in March 2018 that serve dually as the Supported Employment and the Section 511 team, which is comprised of one rehabilitation supervisor located in the south; one rehabilitation counselor III located in the south; two rehabilitation counselor II's – one located in the south and one in the north; and one program officer located in the south.

In its supported employment capacity, the team connects with one another through emails, phone, and a business communication platform format, through which they staff cases, strategize, and develop supported employment plans. The team's caseload consists primarily of individuals receiving customized employment and supported employment services; however, team members also serve as consultants and as a resource for other VR counselors throughout the State that may have a limited number of supported employment cases on their caseloads.

In its Section 511 role, the team provides all of the coordination, planning, organization, and vendor service delivery arrangements for required Career Counseling Information and Referral presentations to individuals employed in subminimum wage work environments. The team coordinates this activity statewide working closely with CRPs.

The State Department of Health and Human Services (HHS) has three Centers with designated teams that provide job developers and job coaches, as well as extended services, to individuals seeking supported employment. The Centers are Desert Regional (south), Sierra Regional (north), and Rural Regional (rural). Four NBVR transition counselors participate in these teams to assist in ensuring the collaboration of timely transition to and delivery of extended services. NBVR struggles to generate an adequate number of vendors, particularly in rural areas, to meet the supported employment needs of individuals with the most significant disabilities.

NBVR worked with the WINTAC to create an agreement that includes a statement solidifying the partnership between NBVR, HHS and other vendor partners involved in the delivery of supported employment services. Activities covered under the agreement include coordinating employment services for individuals with the most significant disabilities from school to post-school activities, strategies for achieving competitive integrated employment, conduct of cross organizational staff training, and participation in HHS's annual Section 511 and person-centered planning meetings with individuals receiving services and their parents. In addition to NBVR and natural supports, other sources of extended services include Ticket-to-Work, and the State Mental Health agency in the northern part of the State.

At the time of the review, NBVR was providing, through a statewide pilot, customized employment to ten individuals who participate with agency vendors and the supported employment team. The pilot uses the Discovery process, which includes an initial Discovery meeting comprised of the individual, family members, agency staff members and people important in that individual's life. The initial Discovery meeting provides information to begin Discovery activities in the community with the individual. The goal of the Discovery process is to determine the individual's interests and abilities for at least three vocational clusters. These vocational themes are further explored with the individual to determine the vocational goal for job development. Job development involves working collaboratively with the individual and the employer to negotiate a customized job that meets the needs of the employer and the individual to ensure successful employment.

Pathway to Work, considered by NBVR to be particularly successful, has been responsible for the competitive integrated employment of over 70 individuals since its inception in 2014. While training at a community partner's job site, each participant is provided with four hours of individualized instruction, job coaching, and work experience involving three to five different job tasks. Each participant also has access to a local vendor's job developer who assist in developing a resume, applying for jobs, and preparing for interviews. NBVR pays the participant \$8.25 an hour for a daily maximum of four hours while in attendance at the community training site. Hourly wages for program participants and partner services, such as training and job coaching, are paid for out of VR funds.

With the assistance of WINTAC, NBVR updated its supported employment policies as of July 1, 2018. These policies were reviewed by RSA.

### **Performance of the Supported Employment Program**

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

- The number of individuals who achieved a supported employment outcome increased from 77 individuals in FFY 2015 to 87 individuals in FFY 2016, but then decreased in the first three quarters of FFY 2017 to 76 individuals;
- The services provided most often to individuals in competitive supported employment for the first three quarters of FFY 2017 included: job placement assistance (93 percent), assessment (73 percent), maintenance (51 percent), transportation (48 percent), and on-the-job supports – SE (32 percent);
- For the first three quarters of FFY 2017, the average hours worked per week for competitive employment outcomes were 23.97, and median hourly earnings for competitive employment outcomes were \$9.00 per hour for individuals served whose service records were closed after obtaining supported employment; and
- The three occupations most often achieved by individuals who obtained competitive supported employment outcome closures for the first three quarters of FFY 2017 included installation, maintenance, and repair occupations; food preparation and serving related occupations; and office and administrative support occupations.

### **C. Observations and Recommendations**

RSA's review of NBVR's performance in this focus area resulted in the identification of the following observation and recommendations to improve performance.

#### **4.1 Inaccurate Reporting of Supported Employment Services and Outcomes**

**Observation:** NBVR reported providing supported employment services. However, due to coding and reporting errors, the performance data reflected low numbers and percentages of supported employment outcomes and services.

During the pre-onsite supported employment conference call, and the on-site monitoring review supported employment session, the VR agency revealed that it was inaccurately coding and reporting supported employment closures and services delivered. Specifically, while the case management system identified when the counselor entered a service or employment outcome, it was not subsequently being reported on the 911, therefore the data under-represented the agency's actual performance.

#### **Recommendation 4.1: Inaccurate Reporting of Supported Employment Services and Outcomes**

RSA recommends that NBVR—

- 4.1.1 Implement internal controls that ensure accurate and complete data collection and reporting as well as financial accountability; and
- 4.1.2 Review all coding and reporting procedures to ensure that reported employment outcomes on the RSA 911, including supported employment outcomes, are accurately reflected at exit.

**Agency Response:** Thank you. NBVR will take these into consideration.

**Request for Technical Assistance:** No.

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

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

#### **E. Technical Assistance**

- RSA provided a review of NBVR's Supported Employment program policies to ensure that the updated policies and procedures incorporated all of the new requirements in the Rehabilitation Act; and
- RSA provided guidance with respect to internal controls to ensure that supported employment services are charged appropriately as allowable expenditures under the Supported Employment program to Title VI funds.

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

### **A. Purpose**

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

### **B. Overview and Analysis**

A review of NBVR's fiscal data indicates the agency consistently undermatched its VR formula award allotment during FFYs 2015 through 2017, representing the three years of this review period. NBVR relinquished \$8,900,000 of Federal VR funds in FFY 2015, \$8,200,000 in FFY 2016, and \$9,500,000 in FFY 2017, representing 36.8 percent, 32.0 percent, and 36.7 percent of the VR formula award, respectively.

The sources of match that NBVR reported for the three years include State appropriations as the primary source, followed by Randolph-Sheppard set-aside expenditures, TPCAs, inter-agency transfers of funds, and other sources. The agency indicated Section 7 of State legislation appropriating State funds in current and previous biennial budgets includes language that requires proportionate matching of Federal funds with non-Federal funds. As a result, the VR agency indicated it is unable to match and expend more of its Federal formula VR allotment because this statutory language prevents it from carrying over Federal funds from the year of appropriation to the subsequent FFY.

Program income earned fluctuated over the three-year period, from \$812,685 in FFY 2015, to \$429,460 in FFY 2016, and to \$715,480 in FFY 2017. VR fund carryover decreased during the three-year period, from \$1,040,268 in FFY 2015 to \$85,227 in FFY 2017. These data trends are reflected in the RSA-2 data, which indicates a slight but steady increase in total expenditures during the review period, from \$18,399,065 in FFY 2015 to \$19,987,353 in FFY 2017.

### **C. Findings and Corrective Actions**

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

## 5.1 Prior Approval Not Obtained

**Issue:** Does NBVR obtain prior written approval from RSA before purchasing items requiring prior approval in accordance with 2 C.F.R. §§ 200.407 and 200.439.

**Requirement:** The Uniform Guidance at 2 C.F.R. § 200.407 includes a list of specific circumstances for which prior approval from the Federal awarding agency in advance of the occurrence is either required for allowability or recommended in order to avoid subsequent disallowance or dispute based on the unreasonableness or nonallocability. For example, 2 C.F.R. § 200.439(b)(1) states that capital expenditures for general purpose equipment, buildings, and land are unallowable as direct charges, except with the prior written approval of the Federal awarding or pass through entity. The Uniform Guidance provisions at 2 C.F.R. §§ 200.62(a) and 200.303(a) also require that the agency have a process, and establish and maintain effective internal control over the Federal award, which provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award.

On November 2, 2015, the Department of Education adopted the final regulations found in 2 C.F.R. 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 the implementation of the new requirements. To ensure that RSA grantees were aware of the applicability of the prior approval requirements, RSA included a special clause on grant award notifications for FFY 2015 awards necessitating implementation of these requirements in FFY 2016. The special clause stated, in pertinent part, “that the prior approval requirements listed in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) (2 C.F.R. part 200) are applicable to this award... Grantees are responsible for ensuring that prior approval, when required, is obtained prior to incurring the expenditure. Grantees should pay particular attention to the prior approval requirements listed in the Cost Principles (2 C.F.R. part 200 subpart E).” In addition, information regarding the requirements in 2 C.F.R. part 200 was communicated to grantees via RSA’s listserv on September 23, 2015.

**Analysis:** RSA requested the agency’s written policies, procedures, or processes that ensure the agency’s implementation of the prior approval requirements. NBVR did not have prior approval policies or procedures consistent with those identified in Uniform Guidance at 2 C.F.R. § 200.407 that require approval from RSA as the Federal awarding agency. To determine whether the lack of processes resulted in non-compliance with the prior approval requirements, RSA discussed NBVR expenditures during the on-site visit and established that NBVR had been purchasing equipment that exceeded the capitalization threshold. The items purchased met the definition of equipment in accordance with 2 C.F.R. §§ 200.33 and 200.439, exceeding the State’s capitalization threshold of \$5,000. As a result, it was determined that the agency required prior approval from RSA as the Federal awarding agency before purchasing the equipment, but prior approval was not sought or obtained. In addition, without written policies the agency does



not have a process to determine the allowability of such costs as is required in 2 C.F.R. § 200.302(b)(7).

**Conclusion:** As a result of the analysis, NBVR did not meet the prior approval requirements pursuant to the Uniform Guidance (2 C.F.R. § 200.407) or the requirement to have written procedures for determining the allowability of costs in accordance with Subpart E – Cost Principles within Uniform Guidance (2 C.F.R. § 200.302(b)(7)).

### **Corrective Action Steps:**

#### **RSA requires that NBVR—**

5.1.1 Develop and implement policies and procedures, as well as a written internal control process, including a monitoring component, to ensure ongoing compliance with the prior approval requirements, including those in RSA Technical Assistance Circular (TAC) - 18-02.

**Agency Response:** NBVR agrees.

**Request for Technical Assistance:** Yes, to review our policies and procedures.

## **5.2 Obligations and Expenditures Not Properly Assigned to Correct Period of Performance**

**Issue:** Does NBVR meet obligation and expenditure requirements in 2 C.F.R. § 200.71 and 34 C.F.R. § 76.707. Does NBVR assign obligations and expenditures to the correct Federal award in accordance with 34 C.F.R. § 361.12, 2 C.F.R. §§ 200.77, 200.302, 200.303(a), 200.309, and 34 C.F.R. § 76.702.

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

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

An obligation means “orders placed for property and services, contracts and subawards made, and similar transactions during a given period that require payment by the non-Federal entity during the same or a future period” (2 C.F.R. § 200.71). For expenditures to be allowable under the Federal award, agencies must demonstrate that the obligation occurred within the period of performance of the Federal award. EDGAR regulations at 34 C.F.R. § 76.707 explain when a State incurs an obligation for various kinds of services and property. Expenditures must be for payment of actual obligations. Obligations must be charged to a Federal award and must occur within the appropriate period of performance. Therefore, in order to properly account for and liquidate expenditures, grantees must be able to assign an obligation to a Federal award based upon the date the obligation was made (34 C.F.R. §§ 76.703 and 76.709).

**Analysis:** During the on-site visit RSA and NBVR discussed the agency’s ability to track and report obligations in its systems. When NBVR VR Counselors and Rehabilitation Technicians prepare authorizations for purchased client services, the case management system used by NBVR assigns the funds to a budget account code (e.g., 3265 for General Vocational Rehabilitation). Additional coding to track the funds includes general ledger and category codes; however, the primary indicator is a job number that ties to a FFY, source of funds and service type (e.g., 8412618V is General VR authorized in FFY 2018 and the last letter points to cost categories within the VR program).

A review of State appropriations legislation and discussions with the VR agency indicated Section 7 of appropriations language in current and previous biennial budgets requires proportionate matching of Federal funds with non-Federal funds. As a result, the VR agency indicated it must proportionately split all VR expenditures 21.3 percent from non-Federal sources and 78.7 percent from Federal VR funds, preventing it from carrying over Federal funds from the year of appropriation to the subsequent FFY.

After VR services are provided, community rehabilitation programs (CRPs) and vendors submit invoices, which are approved by field staff and then sent to Financial Management in the Nevada

Department of Employment, Training and Rehabilitation (DETR), the DSA, for approval and payment. Total expenditures are uploaded to the draw workbook with the assigned budget account, general ledger, and job numbers (e.g., 8412618V). The agency uses the term “soft match” to refer to non-State appropriated non-Federal funds used as match in the VR program. The two primary sources of soft match are set-aside expenditures from the Randolph-Sheppard program and certified expenditures from TPCAs. The Financial Management office calculates the draws, always maintaining proportionate matching through an aggregate ratio of 78.7 percent Federal VR funds to 21.3 percent non-Federal funds for all expenditures. The amount of total expenditures is reduced by the amount of General State appropriation funds necessary, after accounting for soft match sources, to maintain the 78.7/21.3 ratio of Federal to non-Federal VR funds. The Federal funds represent the amount of the draw from the VR award and the proportionate non-Federal funds are paid from the General State appropriation. It should be noted that, in an effort to ensure payments are made in a timely manner, financial management staff in DETR first pay the total expenses out of State funds from the Controller’s office, then use the Federal draw to reimburse the State expenditures the calculated Federal portion from the draw workbook.

However, while the assignment of an obligation to a FFY fund source and job number occurs at the time of the authorization, there is no coding to identify the amount of non-Federal or Federal funds obligated at the time of authorization because this process is conducted by the Financial Management office in DETR after services are rendered and invoices submitted. Additionally, while an aggregate batch of expenditures from a draw sheet can be split, indicating 21.3 percent is match, (e.g., General State appropriated funds, SWCAP funds, Randolph-Sheppard set-aside expenditures, TPCA match, or any of the three inter-agency transfers of funds sources), there is no mechanism to assign and track a non-Federal obligation source or amount during authorization.

While on-site, RSA inquired about the process used to report unliquidated obligations on the SF-425 report. RSA was informed by NBVR staff that the agency uses transactional information from its data warehouse and calculates the non-Federal at 21.3 percent of the total and the Federal share at 78.7 percent of the total transactions that occurred after the end date of the Federal report. This process does not meet the obligation requirements of the VR program because it does not assign the unliquidated obligations to a non-Federal fund source and bases the obligation amount solely on a calculated projection. In addition, the SF-425 instructions for reporting unliquidated obligations indicate TPCA contract balances are reported as obligated; however, since TPCAs include certified expenditures of cooperating agency staff, the value of the time cannot be counted as obligated until the cooperating agency staff work the time on the TPCA. This process does not meet the obligation requirements at 34 C.F.R. § 76.707.

Since NBVR does not typically have a carryover year because of its State statute requiring the agency to proportionately match expenditures, the liquidation period for obligations made by the end of the year of appropriation is 90 days, and during the on-site visit, agency staff indicated this is a challenge. Additionally, the agency occasionally must process invoices from prior FFYs, referred to as stale claims, and during the on-site visit financial management staff indicated it is

required to pay for any valid claim no matter when submitted. RSA's review of sample invoices submitted as part of the document request identified a stale claim. During the on-site visit, RSA reviewed the invoice and coding with agency staff and determined that the agency paid for obligations and services rendered in FFY 2016 with FFY 2017 funds, outside the period of performance of the award. During the review, RSA and NBVR staff discussed the practice of using State funds that are not counted as match for the VR program to pay for claims outside the period of performance of the obligation and service. NBVR indicated there are times during which the agency pays for the non-Federal share of the expenditure with reverted funds.

NBVR reported that it also receives refunds from previous expenditures. Discussions during the on-site visit and a review of draw sheets indicated that when the agency receives a refund, it is credited to the current year award, instead of applied to the FFY award from which the original expenditure was made, as required in 2 C.F.R. § 200.406(a).

**Conclusion:** Based upon RSA's analysis, it has determined that NBVR is not in compliance with the Federal requirements in 34 C.F.R. § 361.12, 34 C.F.R. § 76.702, and 2 C.F.R. § 200.302 to accurately account for and report non-Federal and Federal obligations and ensure expenditures are paid from the correct Federal award for the VR award. Additionally, the agency did not have sufficient internal controls to ensure that: 1) obligations and expenditures assigned to a FFY were only for allowable costs under the DSU's approved State plan during the period of performance of the award; 2) all obligation dates were correctly recorded in the agency's accounting system and assigned to non-Federal and Federal sources; and 3) all non-Federal and Federal obligations and expenditures were accurately reported on the appropriate Federal Financial Reports for the appropriate awards.

RSA is concerned that NBVR's financial management system does not meet Federal requirements because the agency is not able to ensure—

- Accurate fiscal data collection and financial accountability, as required by 34 C.F.R. § 361.12;
- The proper disbursement of and accounting for Federal funds, as required by 34 C.F.R. § 76.702; and
- Non-Federal and Federal obligations and expenditures are assigned and liquidated within the period of performance of the Federal award in accordance with the award's terms and conditions, as required by 34 C.F.R. § 76.707 and 2 C.F.R. § 200.302.

As a recipient of Federal VR program funds, NBVR must have procedures in place that ensure proper and efficient administration of its VR program, and that enable NBVR to carry out all required functions. The methods of administration must ensure accurate data collection and financial accountability (34 C.F.R. § 361.12 and 2 C.F.R. § 200.302).

### **Corrective Action Steps:**

RSA requires that NBVR—

- 5.2.1 Make requisite revisions to its financial data collection and analysis process to bring it into compliance so that NBVR can—
  - Ensure all Federal and non-Federal obligations (TPCA contracts, VR services purchased through authorizations, and personal services by NBVR employees) are properly accounted for and obligated to the correct funding source and FFY award in the agency's financial management system;
  - Account for and accurately liquidate all expenditures from the correct FFY award, commensurate with the period of performance for the corresponding obligations based on when they were assigned; and
  - Accurately report non-Federal and Federal obligations and liquidations on the SF-425 report for the corresponding period of performance for Federal awards;
  
- 5.2.2 Update and implement policies and procedures to accurately account for and report all obligations and expenditures to the correct FFY award period of performance, ensuring the policies address—
  - The assignment of non-Federal and Federal obligations to the appropriate FFY award period of performance and the liquidation of such funds based upon the assignment of the obligation; and
  - The obligation of contract services and bulk authorizations in the financial management system to ensure liquidations are based upon the FFY in which the contracts were obligated, or in the case of TPCAs, when the cooperating agency staff time was worked; and
  
- 5.2.3 Develop and implement a written internal control process, including a monitoring component, to ensure ongoing compliance with Federal requirements for the areas mentioned in corrective actions 5.2.1 and 5.2.2.

**Agency Response:** BVR agrees.

**Request for Technical Assistance:** Yes.

### 5.3 Third-Party Cooperative Arrangements – Unallowable Match

**Issue:** Does NBVR meet TPCA requirements in 34 C.F.R. § 361.28, including match requirements for the VR program in 34 C.F.R. § 361.60.

**Requirement:** VR regulations permit VR agencies to enter into a TPCA for providing or contracting for the provision of VR services with another State agency or a local public agency that is providing part or all of the non-Federal share in accordance with requirements at 34 C.F.R. § 361.28(a).

The review period of FFY 2018 monitoring activities and documentation includes FFYs 2015 through 2017. Since the VR implementing regulations at 34 C.F.R. § 361.28 existed prior to the publication of the current regulations governing the VR program, which became effective on September 19, 2016 ([81 FR 55629](#)), and prior to the implementation of Uniform Guidance for RSA's formula award programs on October 1, 2015, the requirements related to the non-Federal share provided by a cooperating agency under a TPCA for this FFY 2018 monitoring period are based upon: 1) preamble language for the 1997 final VR regulations, published on February 11, 1997 (62 FR 6307, 6333); as well as 2) the current regulations governing the VR program ([81 FR 55629](#)), published on August 19, 2016, which became effective on September 19, 2016. The preamble language for the 1997 final VR regulations, published on February 11, 1997 (62 FR 6307, 6333) is below.

'Third-party in-kind contributions.' which are a permissible source of State matching funds under the Education Department General Administrative Regulations (EDGAR), are defined in 34 CFR 80.3 as "property or services which benefit a federally assisted project or program and which are contributed by non-Federal third parties without charge to the grantee...."

However, it is RSA's policy not to allow the use of third-party in-kind contributions to meet the State matching requirement under the VR program in the absence of specific statutory authority. Where the Rehabilitation Act permits the use of in-kind expenditures as match for certain programs, that authority is expressed [(e.g., the Independent Living Services For Older Individuals Who Are Blind program under section 752(f)(4) of the Rehabilitation Act)]. Thus, 34 CFR 361.60(b)(2) specifies that these contributions may not be used as part of the DSU's non-Federal share under the program. This provision is consistent with the definition of "State and local funds" under 34 CFR 361.76 of the current regulations and with the current regulatory prohibition on the use of in-kind contributions as match in 34 CFR 361.24(c).

Nevertheless, this prohibition has no effect on a DSU's ability to enter into third-party cooperative arrangements under 34 CFR 361.28 of the regulations for providing VR services with another public agency that is furnishing part or all of the non-Federal share under the program. **As long as the third party is contributing funds to support VR services, those dollars may be used as part of the DSU's non-Federal share (e.g.,**

**staff salaries paid by the third party that are allowable matching expenditures).**  
(emphasis added)

In light of this history, certified expenditures for staff time would not be considered in-kind contributions. Therefore, certified staff time provided by another public agency under a TPCA would be considered an allowable source of match. However, certified expenditures for staff time, absent a TPCA, would not be an allowable source of match.

While some State or local cooperating agencies may provide cash to the VR agency as non-Federal share under a TPCA, when certified expenditures are included as non-Federal share they must represent the expenditure of the public cooperating agency's funds on allowable goods or services that are specifically identified in the approved TPCA contract and budget. Additionally, the expenditure must occur within the period of time that the approved TPCA contract is in force. The most common example of a certified expenditure in a TPCA is the expenditures the cooperating agency makes in salary and wages to the cooperating agency staff members who directly provide the VR services to applicants and recipients of VR services. However, certified expenditures may not include third-party in-kind contributions (34 C.F.R. § 361.60(b)(2)), or expenditures made for goods or services prior to the implementation, or outside the scope, of the TPCA contract.

In addition, the current regulations governing the VR program ([81 FR 55629](#)), published on August 19, 2016 and effective on September 19, 2016, added a paragraph (c) to 34 C.F.R. § 361.28, further clarifying non-Federal share provided by cooperating agencies through TPCAs, stating—

- (c) The cooperating agency's contribution toward the non-Federal share required under the arrangement, as set forth in paragraph (a) of this section, may be made through:
  - (1) Cash transfers to the designated State unit;
  - (2) Certified personnel expenditures for the time cooperating agency staff spent providing direct vocational rehabilitation services pursuant to a third-party cooperative arrangement that meets the requirements of this section. Certified personnel expenditures may include the allocable portion of staff salary and fringe benefits based upon the amount of time cooperating agency staff directly spent providing services under the arrangement; and
  - (3) other direct expenditures incurred by the cooperating agency for the sole purpose of providing services under this section pursuant to a third-party cooperative arrangement that—
    - (i) Meet the requirements of this section;
    - (ii) Are verifiable as being incurred under the third-party cooperative arrangement; and

(iii) Do not meet the definition of third-party in-kind contributions under 2 CFR 200.96.

The Uniform Guidance requires the financial management system of each non-Federal entity to provide identification, in its accounts, of all Federal awards received and expended and the Federal programs under which they were received (2 C.F.R. § 200.302(b)). In addition, EDGAR provisions at 34 C.F.R. § 76.702 require States to use fiscal control and fund accounting procedures that ensure proper disbursement of and accounting for Federal funds.

**Analysis:** During the period of this review, from FFYs 2015 through 2017, NBVR administered five TPCAs with secondary schools and institutions of higher education. The TPCAs include certified expenditures as match for the VR program, as there is no transfer of cash from the cooperating agencies to the VR agency. Discussions with the agency on-site and a review of the TPCA contracts demonstrated that the TPCA is split into two separate budget categories: the Cooperative Agency Certified Expenditure Budget inclusive of cooperating agency staff time counted toward match for the VR program; and the Service Budget including cooperating agency staff time reimbursed with Federal VR funds drawn down from the match provided in the TPCA.

The requirements for TPCAs are that certified expenditures of cooperating agency staff time must be for the direct provision of VR services or other direct expenditures incurred by the cooperating agency for the sole purpose of providing services under a TPCA to count those expenditures as match for the VR program. During FFYs 2015 and 2016, the TPCA Cooperative Agency Certified Expenditure Budgets included personnel time spent on administrative activities and counted indirect costs as match for the VR program. It should be noted that in July 2017, some of the TPCAs were revised to focus the use of certified personnel time on cooperating agency staff who provide direct services to applicants and recipients of VR services, including students with disabilities.

Further discussion of internal controls that also affect certified expenditures under TPCAs can be found below in Finding 5.4.

**Conclusion:** As a result of this analysis, NBVR did not meet the VR requirements in 34 C.F.R. §§ 361.28 or 34 C.F.R. 361.60 related to non-Federal share reported as match for the VR program, because it did not implement internal controls to ensure cooperating agency staff time spent working on the TPCA was only for the direct provision of VR services to applicants and recipients of the VR program.

**Corrective Action Steps:**

RSA requires that NBVR—

5.3.1 Cease reporting as match for the VR program any non-Federal funds that do not meet the requirements of 34 C.F.R. §§ 361.28 and 361.60.

**Agency Response:** NBVR agrees.



**Request for Technical Assistance:** No.

#### **5.4 Internal Control Deficiencies**

**Issue:** Does NBVR maintain effective internal control over the Federal award to provide reasonable assurance that the agency is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the award.

**Requirement:** A State VR agency must assure, in the VR services portion of the Unified or Combined State Plan, that it will employ methods of administration that ensure the proper and efficient administration of the VR program. These methods of administration (i.e., the agency's internal controls) must include procedures to ensure accurate data collection and financial accountability (34 C.F.R. § 361.12).

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

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

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

In accordance with the Uniform Guidance, 2 C.F.R. § 200.303, among other things, a non-Federal entity must—

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

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

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

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

In its guidance *The Role of Internal Control, Documenting Internal Control, and Determining Allowability & Use of Funds*, the U.S. Department of Education (Department) made clear to grantees that internal controls represent those processes by which an organization assures operational objectives are achieved efficiently, effectively, and with reliable, compliant reporting.

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

**Analysis:** RSA found areas of concern, listed below, that fall within the internal control focus area.

#### **A. TPCA Contract Monitoring**

The Uniform Guidance at 2 C.F.R. § 200.303(c) requires grantees to implement internal controls sufficient to ensure the grantee evaluates and monitors the agency's activities to ensure compliance with Federal requirements. In addition, 2 C.F.R. § 200.328(a) requires NBVR to be responsible for the operation of all grant-supported activities. VR implementing regulations at 34 C.F.R. § 361.12 require NBVR to employ methods of administration necessary for the proper administration and for carrying out all functions under the State plan. These methods include procedures to ensure accurate data collection and financial accountability. As such, NBVR must monitor and evaluate grant-supported activities to ensure compliance of all activities performed under the VR program. During the on-site monitoring visit, RSA reviewed NBVR's TPCA contracts, as well as sample invoices and supporting documentation from the VOICE TPCA in Reno, where the Washoe County School District (WCSD) is the cooperating agency.

**1. Certified Expenditures** - A review of the TPCA contract, invoices and supporting documentation submitted by WCSD indicated there are multiple allocations to the salary of the Administrator at WCSD, including: TPCA-Federal reimbursement; TPCA-Match; TPCA-Pre-employment; and WCSD non-TPCA activities. NBVR requires cooperating agency staff to complete and maintain personnel activity reports (PARs) that correspond to the submitted invoice for the month, documenting the amount of time staff spent working on each cost objective or program. A review of the TPCA and invoice documentation indicated that the hourly rate of the Administrator's salary is an average based on the contractual salary across a defined period of time, stated as 31.6 weeks, five days per week, eight hours per day on the monthly worksheet submitted with the invoice. The total estimated annual hours worked used to determine the hourly rate is 1,264 hours for the 2018 - 2019 school year. RSA has concerns that the hourly rate is overinflated as this individual submitted invoices for atypical school months, including hours worked in June and July 2018 certified as part of the TPCA. In addition, since the invoice submission and worksheet appear based on an eight-hour workday, according to the documentation in one sample month reviewed, a maximum of 168 hours could have been worked in total for the sample month. A review of the Administrator's PARs for the same month demonstrated that the individual worked more than eight hours on multiple days, resulting in a reported net of 11.5 hours above the 168 for a total of 179.5 hours for the month. For the February invoice, of the 22 workdays reported between January 11 through February 9, the PARs indicated that on ten days more than eight hours were worked: on eight days nine hours were reported; on one day eight and one-half hours were reported, and on one day 11 hours were reported. A downward adjustment to the hourly rate of salary should have been made because the salary costs for that month must be spread across an additional 11.5 hours worked. This resulted in a disproportionately higher allocation of costs charged to the TPCA activities during the sample month, including match and Federal funds, because there was no downward adjustment to hourly rates based on actual hours worked and spread across all cost objectives of programs worked. This lack of internal controls has improperly inflated the amount of TPCA Federal VR and pre-employment costs reimbursed to the TPCA and reported on Federal financial reports.

In addition, reviews of other invoices received during the on-site visit for the VOICE TPCA identified further concerns with hourly rates of service. The invoice documentation appears to identify the pre-employment expenditure charges from the WCSD personnel. The August expenditures for the five instructors indicate they only worked 30 hours that month on the program, but the hourly rates reported as TPCA costs are all above \$200/hour, which is significantly higher than any other salaries, including the Administrator of WCSD. RSA discussed with NBVR staff the mechanisms to review and improve the TPCA contract work, including submission of the invoices and supporting documentation such as PARs and other data. Without sufficient controls to ensure rates of pay used to allocate and charge certified expenditures to the TPCA are reviewed, tracked, and reconciled to check that annual or monthly hours worked do not

exceed the hours used to calculate the rates of pay, NBVR is unable to demonstrate costs charged to the TPCA are reasonable, necessary, allocable, and allowable under the VR program, including certified expenditures used as match for the VR program or reimbursed with Federal VR funds.

**2. Unallowable Expenditures in a TPCA** – A review of the FFY 2016-2017 TPCA contract and budget documentation identified certain items of cost included in the contract that are not permitted under a TPCA. The Service Budget included line items for purchase of a van (\$26,000) and vehicle maintenance and repair costs (\$2,000). An invoice submitted in FFY 2018 documents a \$2,000-line item for the training of cooperating agency staff.

## **B. RSA-2 and RSA-911 Reporting**

Further discussions with DETR and NBVR staff during the week confirmed that services and the associated cost for the provision of the services provided through TPCAs are not reported on the RSA-2 and RSA-911 reports, since the tracking has not been sufficient and TPCAs do not include authorizations. The outcome of internal controls should provide the necessary data for the VR agency to accurately track, account for, and report on grant funds for services rendered to students and individuals with disabilities.

**Conclusion:** NBVR does not maintain effective internal controls over the Federal awards necessary to provide reasonable assurances that it is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the award, as required by 34 C.F.R. §§ 361.3(a) and 361.12, and 2 C.F.R. §§ 200.302 and 200.303. NBVR did not satisfy the requirements in 34 C.F.R. §§ 361.3 and 361.12, and 2 C.F.R. § 200.302(a) and (b)(4) that require a State's financial management systems to be sufficient to permit the tracing of funds to a level of expenditures adequate to establish that such funds have been used according to the Federal requirements, and that funds are spent solely on authorized VR activities, because an internal control deficiency exists for monitoring TPCA contracts, invoices and supporting documentation that does not permit NBVR to ensure all costs charged to the TPCA are reasonable, necessary, allocable and allowable under the VR program, as required by Federal cost principles in Uniform Guidance.

Specifically, NBVR does not have sufficient mechanisms to monitor and reconcile the value of TPCA cooperating agency staff time, including those certified as match for the VR program or reimbursed with Federal funds, to ensure that expenditures reported are accurate, allocable and allowable, in accordance with 2 C.F.R. § 200.405, or to track, account and report program and fiscal data for service provision accurately on the RSA-2 or RSA-911 reports.

## **Corrective Action Steps:**

RSA requires that NBVR—

- 5.4.1 Develop and implement written policies and procedures governing the oversight of grant-supported activities, as required by 2 C.F.R. § 200.328(a), particularly with respect to—
- Requiring uniform requirements and tools TPCA cooperating agencies can use to submit certified expenditures and supporting documentation that accurately tracks non-Federal and Federal activities, and reflects costs and services provided under pre-employment transition services and VR services;
  - Staff members' review of TPCA invoices prior to and during payment processing; and
  - Ensuring certified expenditures of cooperating agency staff time spent providing services under TPCAs with NBVR are verified before reporting the non-Federal portion as match for the VR program, or reimbursing the cooperating agency with Federal VR funds;
- 5.4.2 Develop and implement a mechanism to ensure costs for all pre-employment transition services required activities provided through TPCAs and VR services are allocable and allowable in accordance with 2 C.F.R. § 200.405 and Sections 110(d)(1) and 113 of the Rehabilitation Act; and
- 5.4.3 Develop and implement policies and procedures to accurately collect and report program and fiscal data on Federal performance reports, including the RSA-2 and RSA-911 reports, which reflect the actual costs per service(s) provided to students receiving required pre-employment transition services activities and other VR services.

**Agency Response:** NBVR agrees.

**Request for Technical Assistance:** Yes.

### **D. Technical Assistance**

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

- Prior Approval – RSA provided technical assistance on prior approval, including the most common categories that VR agencies have submitted to RSA, in accordance with Uniform Guidance at 2 C.F.R. § 200.407. During the on-site visit RSA discussed TAC-18-02, which provides further guidance and outlines a streamlined budget submission of prior approval requests for general purpose equipment and participant support costs.

- Pre-Employment Transition Services Reserve – RSA clarified with DETR staff that the 15 percent pre-employment transition services reserve calculation is based on the net award as of the end of the year of appropriation, to allow for changes to the formula award including maintenance of effort penalties, additional reallotment funds received, or relinquished reallotment funds or deobligations that an agency cannot match. In addition, RSA noted that NBVR was charging pre-employment transition services activities to non-Federal funds, thereby reducing the amount of Federal VR funds charged toward the reserve. RSA clarified that VR agencies are not required to charge pre-employment transition services to non-Federal sources, and if State accounting policies and procedures permit, the State may choose to make accounting adjustments to assign pre-employment transition services expenditures to the Federal VR reserve, as appropriate.
- Program Income – RSA clarified that provisions at 34 C.F.R. § 361.63(b) indicate that program income sources include financial contributions of VR participants based on financial needs tests.
- RSA-2 Reporting – RSA referred to instructions for the RSA-2 to clarify that all purchased participant services should be reported in Schedules I and III in the appropriate categories. This includes contracts, third-party cooperative arrangements, individual service authorizations, and bulk purchase orders for multiple consumers.
- Refunds – RSA clarified that when a refund is received from a prior year award, the refund must be applied to the FFY award from which the original expenditure was made, in accordance with 2 C.F.R. § 200.406(a).

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

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### **A. Purpose**

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

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

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

### **B. Implementation of WIOA Joint Final Rule**

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

#### **WIOA Partnership**

WIOA requires States and local areas to enhance coordination and partnerships with local entities and supportive service agencies for strengthened service delivery, including through Unified/Combined State Plans. Beyond the partnerships reflect in the Governance and One-Stop Operations sections of this focus area, Federal partners thought it was important for Federal agencies to inquire about the broader partnership activities occurring to implement many of the approaches called for within WIOA, such as career pathways and sector strategies. These require robust relationships across programs and with businesses, economic development, education, and

training institutions, including community colleges and career and technical education local entities and supportive service agencies.

NBVR describes a high level of collaboration among the workforce partners at all levels. In July 2017, the SWDB created a workgroup, Office of Workforce Innovation for a New Nevada (OWINN). The overall purpose of OWINN is to serve as a mechanism to support and maintain relationships between all core partners and coordinate with stakeholders and businesses to promote a higher level of cooperation and collaboration. In addition, OWINN furthers partner alignment through sector councils specific to apprenticeships and technical schools.

Nevada is organized into two local workforce development boards, North and South. A Memo of Understanding (MOU) is in place for each area.

## **Governance**

Statewide Workforce Development Boards (SWDBs) and Local Workforce Development Boards (LWDBs) must include representation from all six core programs, including the VR program. The VR representative on the SWDB must be an individual who has optimum policymaking authority for the VR program. NBVR has the required representation on the State board, through the designation of the State VR director. Each LWDB is required to have at least one representative from programs carried out under Title 1 of the Rehabilitation Act (other than Section 112 or Part C of that title). NBVR has district managers serving the north and south LWDBs. Each LWDB develops strategies and policies for an aligned workforce development system that partners with the education continuum, economic development, human services, and businesses specific to its area of the State

## **SWDB**

The State engages with businesses and other stakeholders through the SWDB and subcommittees with core partners to collaborate on initiatives and opportunities to support the partners in meeting common goals. The core partners engage in ongoing communication and coordination of activities on a bi-monthly basis.

The director of NBVR is the representative on the SWDB and does not represent other partner entities. Along with all partners, VR is involved in approval of local plans, evaluating one-stop effectiveness, accessibility, and extensive disability-related agency cross-training.

## **LWDB**

VR has equal partner representation on both the north and south LWDBs. There is one comprehensive one-stop center in each area as well as several affiliate sites. In addition to affiliate sites, there are several library sites through which interested individuals may access one-



stop information and referral services, which is particularly useful in addressing the accessibility needs of citizens living in rural or remote areas.

The LWDB in the south is comprised of a Standing Committee, Executive Committee, Committee Composition, and Programs Committee. Supporting the Programs Committee are the Business Engagement Panel, One-Stop Services Delivery Panel, Special Population Panel, and Youth Panel. Articles of operation include the role and function of committees and panels, as well as committee size, term and responsibilities. NBVR indicated that the northern LWDB is similarly organized, however specific committee structure details were not available.

### **One-Stop Operations**

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

At the time of the on-site review, Nevada had two comprehensive American Job Center (AJC) sites and 14 affiliate sites across the State. There are also eight library sites where VR has information about its program and how to access VR services, in addition to information about other one-stop partners. NBVR reported that all workforce partners work together to ensure that participants are co-enrolled, as applicable, so its customers can benefit from multiple programs and services with the goal of helping them achieve employment. NBVR 's staff are trained to refer customers to the appropriate one-stop programs and provide related information about the programs that best fit the individual's needs.

Since NBVR has representation on both LWDBs and the SWDB, the agency participated integrally in the State Plan revision, review and implementation process, including the cost-sharing agreement and MOU development. In addition, VR has collaborated with the local one-stops to launch a statewide initiative making available to all partner staff a three-hour disability awareness training. Each training session has VR representatives available to respond to questions about the Americans with Disabilities Act and reasonable accommodations in the one-stops.

The centers and affiliate sites have a reporting system for complaints which are reported to the Department of Labor. VR is consulted should a disability-related issue or concern arise, and individuals are referred for VR services, as appropriate.

### **Cost Allocation Plan**

There are two separate IFAs in the State, one each in the north and south. In each IFA, the mechanism identified in the MOUs the allocation of infrastructure costs based on partner

assigned seats rather than full-time equivalents. These seats are used to allocate costs at the individual one-stop locations throughout the State. In 2017, the IFA was exclusively for the comprehensive one-stop center in the south, but the affiliate locations were added to the agreement in 2018. In the north, the IFA is exclusively for the comprehensive one-stop center.

### **Performance Accountability**

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

As this report was being developed, NBVR had submitted its annual data required for the common performance measures for PY 2017. These data report the percentage of participants who obtained measurable skill gains (MSG) for all participants enrolled in a recognized credential program during PY 2017. NBVR will continue to submit performance data as it becomes available for post-exit measures for employment during the second and fourth quarters after exit, median quarterly wages during the second quarter after exit, and credential attainment one year after program exit. Once baseline data for each performance measure becomes available for two years, the statistical adjustment model will be developed and applied, and performance goals will be developed with NBVR for each performance indicator.

At the time of the review, NBVR reported that it was experiencing challenges with tracking and reporting measurable skill gains since it was preparing to implement a new case management system in March 2019. The agency gathers information manually regarding penetration rate and repeat business to evaluate performance indicator effectiveness in serving employers in collaboration with the other core partners in the State. Nevada is working toward a common registration system to avoid duplication of participant counts, but no automated system was in place at the time of the review and the State relies on self-reporting. While Nevada has a data sharing agreement with the Employment Security Division for unemployment insurance data and a policy in place to support this activity, it does not have an agreement in place for data sharing across other States.

### **C. Observations and Recommendations**

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

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

RSA's review of NBVR's performance in this focus area did not result in the identification of findings or corresponding corrective actions to improve performance.

#### **E. Technical Assistance**

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

- RSA provided clarification regarding what constitutes an affiliate site versus a library and other public office, which primarily provides information and referral, or linkages to other one-stop services.

## APPENDIX A: PROGRAM AND FISCAL PERFORMANCE DATA TABLES

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

**Table 1. Nevada Combined Agency Summary Statistics from RSA 113: FFYs 2015-2017**

| <b>Row</b> | <b>Performance category</b>  | <b>2015</b> | <b>2016</b> | <b>2017</b> |
|------------|--|-------------|-------------|-------------|
| 1          | Number of total applicants   | 3,241       | 3,208       | 3,037       |
| 2          | Number of total eligible individuals                                 | 3,877       | 3,132       | 2,960       |
| 3          | Agency implementing order of selection (Y/N)                         | No          | No          | No          |
| 4          | Number of individuals on order of selection waiting list at year-end | NA          | NA          | NA          |
| 5          | Percent eligible of individuals had IPE who received no services     | 31.2        | 25.8        | 26.3        |
| 6          | Number of individuals in plan receiving services                     | 4,250       | 4,565       | 4,470       |

Data source: RSA-113

**Table 2a. Nevada Combined Agency Case Status Information, Exit Status, and Employment Outcomes for All Individuals at Closure-FFYs 2015-2017**

| Row | Performance category   | 2015<br>Number | 2015<br>Percent | 2016<br>Number | 2016<br>Percent | 2017<br>Number | 2017<br>Percent |
|-----|--|----------------|-----------------|----------------|-----------------|----------------|-----------------|
| 1   | Exited as applicants   | 231            | 7.4             | 194            | 6.9             | 148            | 7.4             |
| 2   | Exited from trial work experience  | 17             | 0.5             | 5              | 0.2             | 23             | 1.1             |
| 3   | Exited with employment   | 886            | 28.5            | 897            | 32.0            | 578            | 28.8            |
| 4   | Exited without employment  | 766            | 24.6            | 903            | 32.2            | 673            | 33.5            |
| 5   | Exited from OOS waiting list   | NA             | NA              | NA             | NA              | NA             | NA              |
| 6   | Exited without employment outcomes, after eligibility, before an IPE was signed or before receiving services | 1,209          | 38.9            | 807            | 28.8            | 588            | 29.3            |
| 7   | Employment rate*   |                | 53.6            |                | 49.8            |                | 46.2            |
| 8   | Competitive employment outcomes  | 838            | 94.6            | 853            | 95.1            | 550            | 95.2            |
| 9   | Average hourly earnings for competitive employment outcomes**  | \$11.98        |                 | \$12.18        |                 | \$11.65        |                 |
| 10  | Average hours worked for competitive employment outcomes   | 30.85          |                 | 30.91          |                 | 30.25          |                 |
| 11  | Median hourly earnings for competitive employment outcomes   | \$10.00        |                 | \$10.00        |                 | \$10.00        |                 |
| 12  | Median hours worked for competitive employment outcomes  | 32.00          |                 | 32.00          |                 | 30.00          |                 |
| 13  | Quarterly median earnings for competitive employment outcomes***   | \$4,290.00     |                 | \$4,290.00     |                 | \$4,095.00     |                 |
| 14  | Competitive employment outcomes meeting SGA  | 534            | 63.7            | 536            | 62.8            | 304            | 55.3            |
| 15  | Competitive employment outcomes with employer-provided medical insurance                                     | 276            | 32.9            | 226            | 26.5            | 136            | 24.7            |

Data source: RSA-911

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

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

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

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

**Table 2b. Nevada Combined Agency Case Status Information, Exit Status, and Employment Outcomes for Individuals below Age 25 at Closure -FFYs 2015-2017**

| Row | Performance category   | 2015<br>Number | 2015<br>Percent | 2016<br>Number | 2016<br>Percent | 2017<br>Number | 2017<br>Percent |
|-----|--|----------------|-----------------|----------------|-----------------|----------------|-----------------|
| 1   | Exited as applicants   | 46             | 5.8             | 41             | 5.3             | 49             | 8.0             |
| 2   | Exited from trial work experience  | 5              | 0.6             | 1              | 0.1             | 19             | 3.1             |
| 3   | Exited with employment   | 227            | 28.6            | 222            | 28.5            | 151            | 24.8            |
| 4   | Exited without employment  | 197            | 24.8            | 254            | 32.6            | 211            | 34.6            |
| 5   | Exited from OOS waiting list   |                |                 |                |                 |                |                 |
| 6   | Exited without employment outcomes, after eligibility, before an IPE was signed or before receiving services | 318            | 40.1            | 262            | 33.6            | 180            | 29.5            |
| 7   | Employment rate*   |                | 53.5            |                | 46.6            |                | 41.7            |
| 8   | Competitive employment outcomes  | 203            | 89.4            | 205            | 92.3            | 137            | 90.7            |
| 9   | Average hourly earnings for competitive employment outcomes**  | \$9.58         |                 | \$9.58         |                 | \$9.75         |                 |
| 10  | Average hours worked for competitive employment outcomes   | 27.21          |                 | 27.84          |                 | 26.37          |                 |
| 11  | Median hourly earnings for competitive employment outcomes   | \$8.78         |                 | \$9.00         |                 | \$9.00         |                 |
| 12  | Median hours worked for competitive employment outcomes  | 25.00          |                 | 25.00          |                 | 25.00          |                 |
| 13  | Quarterly median earnings for competitive employment outcomes***   | \$3,224.00     |                 | \$3,224.00     |                 | \$2,964.00     |                 |
| 14  | Competitive employment outcomes meeting SGA  | 94             | 46.3            | 91             | 44.4            | 52             | 38.0            |
| 15  | Competitive employment outcomes with employer-provided medical insurance                                     | 47             | 23.2            | 37             | 18.0            | 24             | 17.5            |

Data source: RSA-911

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

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

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

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

**Table 2c. Nevada Combined Agency Case Status Information, Exit Status, and Employment Outcomes for Individuals Age 25 and Older at Closure -FFYs 2015-2017**

| Row | Performance category   | 2015 Number | 2015 Percent | 2016 Number | 2016 Percent | 2017 Number | 2017 Percent |
|-----|--|-------------|--------------|-------------|--------------|-------------|--------------|
| 1   | Exited as applicants   | 185         | 8.0          | 153         | 7.6          | 99          | 7.1          |
| 2   | Exited from trial work experience  | 12          | 0.5          | 4           | 0.2          | 4           | 0.3          |
| 3   | Exited with employment   | 659         | 28.5         | 675         | 33.3         | 427         | 30.5         |
| 4   | Exited without employment  | 569         | 24.6         | 649         | 32.0         | 462         | 33.0         |
| 5   | Exited from OOS waiting list   |             |              |             |              |             |              |
| 6   | Exited without employment outcomes, after eligibility, before an IPE was signed or before receiving services | 891         | 38.5         | 545         | 26.9         | 408         | 29.1         |
| 7   | Employment rate*   |             | 53.7         |             | 51.0         |             | 48.0         |
| 8   | Competitive employment outcomes  | 635         | 96.4         | 648         | 96.0         | 413         | 96.7         |
| 9   | Average hourly earnings for competitive employment outcomes**  | \$12.75     |              | \$13.01     |              | \$12.28     |              |
| 10  | Average hours worked for competitive employment outcomes   | 32.01       |              | 31.88       |              | 31.54       |              |
| 11  | Median hourly earnings for competitive employment outcomes   | \$10.25     |              | \$10.50     |              | \$10.30     |              |
| 12  | Median hours worked for competitive employment outcomes  | 35.00       |              | 35.00       |              | 35.00       |              |
| 13  | Quarterly median earnings for competitive employment outcomes***   | \$4,602.00  |              | \$4,680.00  |              | \$4,680.00  |              |
| 14  | Competitive employment outcomes meeting SGA  | 440         | 69.3         | 445         | 68.7         | 252         | 61.0         |
| 15  | Competitive employment outcomes with employer-provided medical insurance                                     | 229         | 36.1         | 189         | 29.2         | 112         | 27.1         |

Data source: RSA-911

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

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

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

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

**Table 3a. Nevada Combined Agency Source of Referral for All Individuals at Closure-  
FFYs 2015-2017**

| Row | Source of Referral   | 2015<br>Percent | 2016<br>Percent | 2017*<br>Percent |
|-----|--|-----------------|-----------------|------------------|
| 1   | Educational Institutions (elementary/secondary)                                      | 34.0            | 38.0            | 35.7             |
| 2   | Educational Institutions (post-secondary)  | 5.8             | 6.3             | 7.7              |
| 3   | Medical Health Provider (Public or Private)  | 0.7             | 1.6             | 1.9              |
| 4   | Welfare Agency (State or local government)   | 1.1             | 1.2             | 1.5              |
| 5   | Community Rehabilitation Programs  | 5.0             | 4.5             | 4.1              |
| 6   | Social Security Administration (Disability Determination Service or District office) | 5.8             | 4.6             | 5.7              |
| 7   | One-stop Employment/Training Centers   | 7.8             | 6.2             | 5.8              |
| 8   | Self-referral  | 26.0            | 27.0            | 26.8             |
| 9   | Other Sources  | 13.8            | 10.6            | 10.7             |
| 10  | American Indian VR Services Program  | 0               | 0               | 0                |
| 11  | Centers for Independent Living   | 0               | 0               | 0                |
| 12  | Child Protective Services  | 0               | 0               | 0                |
| 13  | Consumer Organizations or Advocacy Groups  | 0               | 0               | 0                |
| 14  | Employers  | 0               | 0               | 0                |
| 15  | Faith Based Organizations  | 0               | 0               | 0                |
| 16  | Family/Friends   | 0               | 0               | 0                |
| 17  | Intellectual and Developmental Disabilities Providers                                | 0               | 0               | 0                |
| 18  | Mental Health Provider (Public or Private)   | 0               | 0               | 0                |
| 19  | Public Housing Authority   | 0               | 0               | 0                |
| 20  | State Department of Correction/Juvenile Justice                                      | 0               | 0               | 0                |
| 21  | State Employment Service Agency  | 0               | 0               | 0                |
| 22  | Veteran's Administration   | 0               | 0               | 0                |
| 23  | Worker's Compensation  | 0               | 0               | 0                |
| 24  | Other State Agencies   | 0               | 0               | 0                |
| 25  | Other VR State Agencies  | 0               | 0               | 0                |
| 26  | Total Identified Referral Sources  | 100.0           | 100.0           | 100.0            |
| 27  | Other Referral Sources (unknown)   | 0               | 0               | 0                |

Data source: RSA-911

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



**Table 3b. Nevada Combined Agency Source of Referral for Individuals below Age 25 at Closure -FFYs 2015-2017**

| Row | Source of Referral   | 2015 Percent | 2016 Percent | 2017 Percent |
|-----|--|--------------|--------------|--------------|
| 1   | Educational Institutions (elementary/secondary)                                      | 51.2         | 62.6         | 57.4         |
| 2   | Educational Institutions (post-secondary)  | 3.5          | 2.6          | 5.2          |
| 3   | Medical Health Provider (Public or Private)  | 0            | 0.8          | 0.8          |
| 4   | Welfare Agency (State or local government)   | 0.6          | 0.3          | 0.2          |
| 5   | Community Rehabilitation Programs  | 3.7          | 2.1          | 1.6          |
| 6   | Social Security Administration (Disability Determination Service or District office) | 14.8         | 12.6         | 14.9         |
| 7   | One-stop Employment/Training Centers   | 4.0          | 2.4          | 3.3          |
| 8   | Self-referral  | 12.0         | 10.9         | 10.7         |
| 9   | Other Sources  | 10.2         | 5.9          | 5.9          |
| 10  | American Indian VR Services Program  | 0            | 0            | 0            |
| 11  | Centers for Independent Living   | 0            | 0            | 0            |
| 12  | Child Protective Services  | 0            | 0            | 0            |
| 13  | Consumer Organizations or Advocacy Groups  | 0            | 0            | 0            |
| 14  | Employers  | 0            | 0            | 0            |
| 15  | Faith Based Organizations  | 0            | 0            | 0            |
| 16  | Family/Friends   | 0            | 0            | 0            |
| 17  | Intellectual and Developmental Disabilities Providers                                | 0            | 0            | 0            |
| 18  | Mental Health Provider (Public or Private)   | 0            | 0            | 0            |
| 19  | Public Housing Authority   | 0            | 0            | 0            |
| 20  | State Department of Correction/Juvenile Justice                                      | 0            | 0            | 0            |
| 21  | State Employment Service Agency  | 0            | 0            | 0            |
| 22  | Veteran's Administration   | 0            | 0            | 0            |
| 23  | Worker's Compensation  | 0            | 0            | 0            |
| 24  | Other State Agencies   | 0            | 0            | 0            |
| 25  | Other VR State Agencies  | 0            | 0            | 0            |
| 26  | Total Identified Referral Sources  | 100.0        | 100.0        | 100.0        |
| 27  | Other Referral Sources   | 0            | 0            | 0            |

Data source: RSA-911

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

**Table 3c. Nevada Combined Agency Source of Referral for Individuals Age 25 and Older at Closure -FFYs 2015-2017**

| Row | Source of Referral   | 2015 Percent | 2016 Percent | 2017 Percent |
|-----|--|--------------|--------------|--------------|
| 1   | Educational Institutions (elementary/secondary)                                      | 28.2         | 28.5         | 26.3         |
| 2   | Educational Institutions (post-secondary)  | 6.6          | 7.7          | 8.7          |
| 3   | Medical Health Provider (Public or Private)  | 1.0          | 1.9          | 2.4          |
| 4   | Welfare Agency (State or local government)   | 1.3          | 1.6          | 2.1          |
| 5   | Community Rehabilitation Programs  | 5.4          | 5.5          | 5.2          |
| 6   | Social Security Administration (Disability Determination Service or District office) | 2.7          | 1.5          | 1.7          |
| 7   | One-stop Employment/Training Centers   | 9.1          | 7.7          | 6.9          |
| 8   | Self-referral  | 30.7         | 33.3         | 33.9         |
| 9   | Other Sources  | 15.0         | 12.4         | 12.8         |
| 10  | American Indian VR Services Program  | 0            | 0            | 0            |
| 11  | Centers for Independent Living   | 0            | 0            | 0            |
| 12  | Child Protective Services  | 0            | 0            | 0            |
| 13  | Consumer Organizations or Advocacy Groups  | 0            | 0            | 0            |
| 14  | Employers  | 0            | 0            | 0            |
| 15  | Faith Based Organizations  | 0            | 0            | 0            |
| 16  | Family/Friends   | 0            | 0            | 0            |
| 17  | Intellectual and Developmental Disabilities Providers                                | 0            | 0            | 0            |
| 18  | Mental Health Provider (Public or Private)   | 0            | 0            | 0            |
| 19  | Public Housing Authority   | 0            | 0            | 0            |
| 20  | State Department of Correction/Juvenile Justice                                      | 0            | 0            | 0            |
| 21  | State Employment Service Agency  | 0            | 0            | 0            |
| 22  | Veteran's Administration   | 0            | 0            | 0            |
| 23  | Worker's Compensation  | 0            | 0            | 0            |
| 24  | Other State Agencies   | 0            | 0            | 0            |
| 25  | Other VR State Agencies  | 0            | 0            | 0            |
| 26  | Total Identified Referral Sources  | 100.0        | 100.0        | 100.0        |
| 27  | Other Referral Sources   | 0            | 0            | 0            |

Data source: RSA-911

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

**Table 4a. Nevada Combined Agency Outcomes by Disability Type for All Individuals at Closure - FFYs 2015-2017**

| Row | Disability Type   | 2015 Number | 2015 Percent | 2016 Number | 2016 Percent | 2017 Number | 2017 Percent |
|-----|---|-------------|--------------|-------------|--------------|-------------|--------------|
| 1   | Visual - Individuals served                               | 105         | 6.4          | 97          | 5.4          | 73          | 5.8          |
| 2   | Visual - Employment rate                                  |             | 53.3         |             | 47.4         |             | 52.1         |
| 3   | Auditory and Communicative - Individuals served           | 234         | 14.2         | 215         | 11.9         | 125         | 10.0         |
| 4   | Auditory and Communicative - Employment rate              |             | 69.2         |             | 68.8         |             | 67.2         |
| 5   | Physical - Individuals served                             | 383         | 23.2         | 425         | 23.6         | 308         | 24.6         |
| 6   | Physical - Employment rate                                |             | 44.9         |             | 41.9         |             | 42.5         |
| 7   | Intellectual and Learning disability - Individuals served | 436         | 26.4         | 510         | 28.3         | 362         | 28.9         |
| 8   | Intellectual and Learning disability - Employment rate    |             | 58.0         |             | 51.4         |             | 42.3         |
| 9   | Psychosocial and psychological- Individuals served        | 491         | 29.7         | 553         | 30.7         | 382         | 30.5         |
| 10  | Psychosocial and psychological- Employment rate           |             | 49.3         |             | 47.6         |             | 45.0         |

Data source: RSA-911

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

**Table 4b. Nevada Combined Agency Outcomes by Disability Type for Individuals below Age 25 at Closure - FFYs 2015-2017**

| Row | Disability Type   | 2015 Number | 2015 Percent | 2016 Number | 2016 Percent | 2017 Number | 2017 Percent |
|-----|---|-------------|--------------|-------------|--------------|-------------|--------------|
| 1   | Visual - Individuals served                               | 12          | 2.8          | 6           | 1.3          | 5           | 1.4          |
| 2   | Visual - Employment rate                                  |             | 33.3         |             | 33.3         |             | 0.0          |
| 3   | Auditory and Communicative - Individuals served           | 33          | 7.8          | 27          | 5.7          | 11          | 3.0          |
| 4   | Auditory and Communicative - Employment rate              |             | 54.5         |             | 44.4         |             | 45.5         |
| 5   | Physical - Individuals served                             | 32          | 7.5          | 32          | 6.7          | 31          | 8.6          |
| 6   | Physical - Employment rate                                |             | 34.4         |             | 40.6         |             | 41.9         |
| 7   | Intellectual and Learning disability - Individuals served | 260         | 61.3         | 303         | 63.7         | 229         | 63.3         |
| 8   | Intellectual and Learning disability - Employment rate    |             | 56.9         |             | 46.2         |             | 38.4         |
| 9   | Psychosocial and psychological- Individuals served        | 86          | 20.3         | 108         | 22.7         | 86          | 23.8         |
| 10  | Psychosocial and psychological- Employment rate           |             | 53.5         |             | 50.9         |             | 52.3         |

Data source: RSA-911

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

**Table 4c. Nevada Combined Agency Outcomes by Disability Type for Individuals Age 25 and Older at Closure - FFYs 2015-2017**

| Row | Disability Type   | 2015 Number | 2015 Percent | 2016 Number | 2016 Percent | 2017 Number | 2017 Percent |
|-----|---|-------------|--------------|-------------|--------------|-------------|--------------|
| 1   | Visual - Individuals served                               | 93          | 7.6          | 91          | 6.9          | 68          | 7.6          |
| 2   | Visual - Employment rate                                  |             | 55.9         |             | 48.4         |             | 55.9         |
| 3   | Auditory and Communicative - Individuals served           | 201         | 16.4         | 188         | 14.2         | 114         | 12.8         |
| 4   | Auditory and Communicative - Employment rate              |             | 71.6         |             | 72.3         |             | 69.3         |
| 5   | Physical - Individuals served                             | 351         | 28.6         | 393         | 29.7         | 277         | 31.2         |
| 6   | Physical - Employment rate                                |             | 45.9         |             | 42.0         |             | 42.6         |
| 7   | Intellectual and Learning disability - Individuals served | 176         | 14.3         | 207         | 15.6         | 133         | 15.0         |
| 8   | Intellectual and Learning disability - Employment rate    |             | 59.7         |             | 58.9         |             | 48.9         |
| 9   | Psychosocial and psychological- Individuals served        | 405         | 33.0         | 445         | 33.6         | 296         | 33.3         |
| 10  | Psychosocial and psychological- Employment rate           |             | 48.4         |             | 46.7         |             | 42.9         |

Data source: RSA-911

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

**Table 5a. Nevada Combined Agency Number of Days from Application to Eligibility Determination for All Individuals at Closure - FFYs 2015-2017**

| Number of Days        | 2015<br>Number | 2015<br>Percent | 2016<br>Number | 2016<br>Percent | 2017*<br>Number | 2017*<br>Percent |
|-----------------------|----------------|-----------------|----------------|-----------------|-----------------|------------------|
| 0 – 60 days           | 2,686          | 93.9            | 2,465          | 94.6            | 1,774           | 96.5             |
| More than 60 days     | 175            | 6.1             | 142            | 5.4             | 65              | 3.5              |
| <b>Total eligible</b> | 2,861          | 100.0           | 2,607          | 100.0           | 1,839           | 100.0            |

Data source: RSA-911

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

**Table 5b. Nevada Combined Agency Number of Days from Application to Eligibility Determination for Individuals below Age 25 at Closure - FFYs 2015-2017**

| Number of Days        | 2015<br>Number | 2015<br>Percent | 2016<br>Number | 2016<br>Percent | 2017<br>Number | 2017<br>Percent |
|-----------------------|----------------|-----------------|----------------|-----------------|----------------|-----------------|
| 0 – 60 days           | 710            | 95.7            | 706            | 95.7            | 527            | 97.2            |
| More than 60 days     | 32             | 4.3             | 32             | 4.3             | 15             | 2.8             |
| <b>Total eligible</b> | 742            | 100.0           | 738            | 100.0           | 542            | 100.0           |

Data source: RSA-911

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

**Table 5c. Nevada Combined Agency Number of Days from Application to Eligibility Determination for Individuals Age 25 and Older at Closure - FFYs 2015-2017**

| Number of Days        | 2015<br>Number | 2015<br>Percent | 2016<br>Number | 2016<br>Percent | 2017<br>Number | 2017<br>Percent |
|-----------------------|----------------|-----------------|----------------|-----------------|----------------|-----------------|
| 0 – 60 days           | 1,976          | 93.3            | 1,759          | 94.1            | 1,247          | 96.1            |
| More than 60 days     | 143            | 6.7             | 110            | 5.9             | 50             | 3.9             |
| <b>Total eligible</b> | 2,119          | 100.0           | 1,869          | 100.0           | 1,297          | 100.0           |

Data source: RSA-911

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

**Table 6a. Nevada Combined Agency Number of Days from Eligibility\* Determination to IPE for All Individuals Served at Closure- FFYs 2015-2017**

| Number of Days      | 2015<br>Number | 2015<br>Percent | 2016<br>Number | 2016<br>Percent | 2017<br>Number | 2017<br>Percent |
|---------------------|----------------|-----------------|----------------|-----------------|----------------|-----------------|
| 0 – 90 days         | 446            | 84.6            | 1,172          | 87.0            | 1,019          | 91.8            |
| More than 90 days   | 81             | 15.4            | 175            | 13.0            | 91             | 8.2             |
| <b>Total served</b> | 527            | 100.0           | 1,347          | 100.0           | 1,110          | 100.0           |

Data source: RSA-911

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

\*Eligibility occurred on or after July 22, 2014

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

| Number of Days      | 2015<br>Number | 2015<br>Percent | 2016<br>Number | 2016<br>Percent | 2017<br>Number | 2017<br>Percent |
|---------------------|----------------|-----------------|----------------|-----------------|----------------|-----------------|
| 0 – 90 days         | 120            | 87.0            | 344            | 89.1            | 303            | 90.7            |
| More than 90 days   | 18             | 13.0            | 42             | 10.9            | 31             | 9.3             |
| <b>Total served</b> | 138            | 100.0           | 386            | 100.0           | 334            | 100.0           |

Data source: RSA-911

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

\*Eligibility occurred on or after July 22, 2014

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

| Number of Days      | 2015<br>Number | 2015<br>Percent | 2016<br>Number | 2016<br>Percent | 2017<br>Number | 2017<br>Percent |
|---------------------|----------------|-----------------|----------------|-----------------|----------------|-----------------|
| 0 – 90 days         | 326            | 83.8            | 828            | 86.2            | 716            | 92.3            |
| More than 90 days   | 63             | 16.2            | 133            | 13.8            | 60             | 7.7             |
| <b>Total served</b> | 389            | 100.0           | 961            | 100.0           | 776            | 100.0           |

Data source: RSA-911

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

\*Eligibility occurred on or after July 22, 2014

**Table 7a. Nevada Combined Agency VR Services Provided for All Individuals Served\* at Closure – FFYs 2015-2017**

| Row | Services Provided**                                    | 2015 Percent | 2016 Percent | 2017 Percent |
|-----|--|--------------|--------------|--------------|
| 1   | Training- Graduate degree training                     | 9.1          | 5.9          | 3.6          |
| 2   | Training- Bachelor degree training                     | 7.9          | 6.4          | 5.8          |
| 3   | Training- Junior or community college training         | 2.4          | 7.8          | 8.9          |
| 4   | Training- Occupational or vocational training          | 19.1         | 16.5         | 13.6         |
| 5   | Training- On-the-job training                          | 1.6          | 1.8          | 0.8          |
| 6   | Training- Apprenticeship training                      | 0.0          | 0.4          | 0.5          |
| 7   | Training- Basic academic remedial or literacy training | 0.8          | 0.6          | 0.2          |
| 8   | Training- Job readiness training                       | 22.9         | 27.6         | 11.4         |
| 9   | Training- Disability-related skills training           | 2.6          | 3.4          | 1.6          |
| 10  | Training- Miscellaneous training                       | 6.4          | 4.7          | 3.1          |
| 11  | Career- Assessment                                     | 82.9         | 74.2         | 62.0         |
| 12  | Career- Diagnosis and treatment of impairment          | 36.6         | 28.1         | 13.2         |
| 13  | Career- Vocational rehab counseling and guidance       | 0.4          | 0.8          | 0.5          |
| 14  | Career- Job search assistance                          | 40.6         | 36.7         | 16.1         |
| 15  | Career- Job placement assistance                       | 52.1         | 47.1         | 38.9         |
| 16  | Career- On-the-job supports-short term                 | 7.7          | 7.8          | 8.2          |
| 17  | Career- On-the-job supports-SE                         | 2.5          | 2.7          | 3.7          |
| 18  | Career- Information and referral services              | 35.5         | 30.9         | 13.2         |
| 19  | Career- Benefits counseling                            | 0.0          | 1.4          | 0.6          |
| 20  | Career- Customized employment services                 | 0.0          | 0.6          | 0.9          |
| 21  | Other services- Transportation                         | 66.8         | 63.1         | 56.0         |
| 22  | Other services- Maintenance                            | 51.0         | 46.4         | 42.8         |
| 23  | Other services- Rehabilitation technology              | 18.8         | 20.6         | 18.6         |
| 24  | Other services- Reader services                        | 0.0          | 0.0          | 0.1          |
| 25  | Other services- Interpreter services                   | 5.1          | 5.6          | 4.3          |
| 26  | Other services- Personal attendant services            | 0.4          | 0.1          | 0.2          |
| 27  | Other services- Technical assistance services          | 0.6          | 0.7          | 0.2          |
| 28  | Other services- Other services                         | 40.6         | 41.3         | 36.9         |

Data source: RSA-911

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

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

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



**Table 7b. Nevada Combined Agency VR Services Provided for Individuals Served\* below Age 25 at Closure- FFYs 2015-2017**

| Row | Services Provided**                                    | 2015 Percent | 2016 Percent | 2017 Percent |
|-----|--|--------------|--------------|--------------|
| 1   | Training- Graduate degree training                     | 9.9          | 7.1          | 2.8          |
| 2   | Training- Bachelor degree training                     | 8.0          | 4.8          | 3.9          |
| 3   | Training- Junior or community college training         | 4.0          | 10.1         | 11.6         |
| 4   | Training- Occupational or vocational training          | 16.5         | 11.3         | 9.1          |
| 5   | Training- On-the-job training                          | 1.2          | 1.9          | 0.8          |
| 6   | Training- Apprenticeship training                      | 0.0          | 0.6          | 0.6          |
| 7   | Training- Basic academic remedial or literacy training | 0.2          | 0.2          | 0.3          |
| 8   | Training- Job readiness training                       | 30.7         | 35.3         | 17.4         |
| 9   | Training- Disability-related skills training           | 1.4          | 4.2          | 3.9          |
| 10  | Training- Miscellaneous training                       | 4.2          | 4.0          | 4.1          |
| 11  | Career- Assessment                                     | 83.7         | 77.7         | 62.4         |
| 12  | Career- Diagnosis and treatment of impairment          | 13.0         | 6.3          | 3.0          |
| 13  | Career- Vocational rehab counseling and guidance       | 0.0          | 1.1          | 0.0          |
| 14  | Career- Job search assistance                          | 56.1         | 47.3         | 18.5         |
| 15  | Career- Job placement assistance                       | 66.0         | 56.3         | 46.4         |
| 16  | Career- On-the-job supports-short term                 | 16.0         | 16.2         | 14.9         |
| 17  | Career- On-the-job supports-SE                         | 4.7          | 4.6          | 6.1          |
| 18  | Career- Information and referral services              | 44.8         | 37.8         | 21.5         |
| 19  | Career- Benefits counseling                            | 0.0          | 0.8          | 0.3          |
| 20  | Career- Customized employment services                 | 0.0          | 0.6          | 1.9          |
| 21  | Other services- Transportation                         | 63.2         | 53.4         | 46.7         |
| 22  | Other services- Maintenance                            | 49.1         | 40.3         | 39.2         |
| 23  | Other services- Rehabilitation technology              | 11.3         | 13.2         | 14.4         |
| 24  | Other services- Reader services                        | 0.0          | 0.0          | 0.3          |
| 25  | Other services- Interpreter services                   | 5.2          | 3.2          | 2.2          |
| 26  | Other services- Personal attendant services            | 0.7          | 0.0          | 0.3          |
| 27  | Other services- Technical assistance services          | 0.0          | 0.0          | 0.0          |
| 28  | Other services- Other services                         | 24.1         | 26.9         | 27.3         |

Data source: RSA-911

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

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

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

**Table 7c. Nevada Combined Agency VR Services Provided for Individuals Served\* Age 25 and Older at Closure - FFYs 2015-2017**

| Row | Services Provided**                                    | 2015 Percent | 2016 Percent | 2017 Percent |
|-----|--|--------------|--------------|--------------|
| 1   | Training- Graduate degree training                     | 8.9          | 5.4          | 3.9          |
| 2   | Training- Bachelor degree training                     | 7.8          | 6.9          | 6.5          |
| 3   | Training- Junior or community college training         | 1.8          | 6.9          | 7.8          |
| 4   | Training- Occupational or vocational training          | 20.0         | 18.4         | 15.4         |
| 5   | Training- On-the-job training                          | 1.7          | 1.8          | 0.8          |
| 6   | Training- Apprenticeship training                      | 0.0          | 0.3          | 0.4          |
| 7   | Training- Basic academic remedial or literacy training | 1.1          | 0.8          | 0.2          |
| 8   | Training- Job readiness training                       | 20.2         | 24.8         | 9.0          |
| 9   | Training- Disability-related skills training           | 3.0          | 3.1          | 0.7          |
| 10  | Training- Miscellaneous training                       | 7.1          | 4.9          | 2.7          |
| 11  | Career- Assessment                                     | 82.7         | 73.0         | 61.8         |
| 12  | Career- Diagnosis and treatment of impairment          | 44.7         | 35.9         | 17.3         |
| 13  | Career- Vocational rehab counseling and guidance       | 0.6          | 0.8          | 0.7          |
| 14  | Career- Job search assistance                          | 35.2         | 32.9         | 15.1         |
| 15  | Career- Job placement assistance                       | 47.3         | 43.7         | 35.9         |
| 16  | Career- On-the-job supports-short term                 | 4.9          | 4.8          | 5.4          |
| 17  | Career- On-the-job supports-SE                         | 1.7          | 2.0          | 2.7          |
| 18  | Career- Information and referral services              | 32.2         | 28.4         | 9.8          |
| 19  | Career- Benefits counseling                            | 0.0          | 1.7          | 0.8          |
| 20  | Career- Customized employment services                 | 0.0          | 0.5          | 0.4          |
| 21  | Other services- Transportation                         | 68.0         | 66.5         | 59.7         |
| 22  | Other services- Maintenance                            | 51.7         | 48.6         | 44.3         |
| 23  | Other services- Rehabilitation technology              | 21.4         | 23.2         | 20.4         |
| 24  | Other services- Reader services                        | 0.0          | 0.0          | 0.0          |
| 25  | Other services- Interpreter services                   | 5.1          | 6.4          | 5.2          |
| 26  | Other services- Personal attendant services            | 0.3          | 0.2          | 0.1          |
| 27  | Other services- Technical assistance services          | 0.8          | 0.9          | 0.2          |
| 28  | Other services- Other services                         | 46.3         | 46.5         | 40.8         |

Data source: RSA-911

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

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

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

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

| Row | SOC for Competitive Integrated Employment Outcomes | 2015 Percent | 2015 Median Hourly Wage | 2016 Percent | 2016 Median Hourly Wage | 2017 Percent | 2017 Median Hourly Wage |
|-----|--|--------------|-------------------------|--------------|-------------------------|--------------|-------------------------|
| 1   | Architecture and Engineering Occupations           | 0.2          | \$29.94                 | 0.6          | \$25.00                 | 0.4          | \$25.50                 |
| 2   | Arts, Design, Entertainment, Sports, and Media     | 1.1          | \$15.58                 | 1.6          | \$12.42                 | NA           | NA                      |
| 3   | Building and Grounds Cleaning and Maintenance      | 8.1          | \$9.00                  | 5.5          | \$9.00                  | 9.3          | \$9.00                  |
| 4   | Business and Financial Operations Occupations      | 3.0          | \$15.00                 | 2.8          | \$14.15                 | 2.9          | \$16.15                 |
| 5   | Community and Social Services Occupations          | 1.8          | \$15.00                 | 2.1          | \$19.39                 | 2.0          | \$19.00                 |
| 6   | Computer and Mathematical Occupations              | 0.8          | \$15.00                 | 0.5          | \$14.50                 | 1.1          | \$11.92                 |
| 7   | Constructive and Extraction Occupations            | 1.2          | \$14.50                 | 1.4          | \$12.75                 | 0.9          | \$13.17                 |
| 8   | Education, Training, and Library Occupations       | 2.0          | \$17.00                 | 2.7          | \$14.00                 | 3.1          | \$14.35                 |
| 9   | Farming, Fishing, and Forestry Occupations         | 0.2          | \$19.86                 | 0.1          | \$10.00                 | NA           | NA                      |
| 10  | Food Preparation and Serving Related Occupations   | 7.8          | \$9.00                  | 10.9         | \$8.77                  | 8.7          | \$8.98                  |
| 11  | Healthcare Practitioners and Technical Occupations | 1.2          | \$27.75                 | 2.5          | \$20.50                 | 1.5          | \$12.25                 |
| 12  | Healthcare Support Occupations                     | 2.9          | \$12.19                 | 2.5          | \$10.00                 | 4.2          | \$11.00                 |
| 13  | Installation, Maintenance, and Repair Occupations  | 16.5         | \$9.50                  | 12.4         | \$9.00                  | 15.3         | \$9.00                  |
| 14  | Legal Occupations                                  | 0.2          | \$18.50                 | NA           | NA                      | 0.2          | \$11.00                 |
| 15  | Life, Physical, and Social Science Occupations     | 0.2          | \$49.53                 | NA           | NA                      | NA           | NA                      |
| 16  | Management Occupations                             | 1.8          | \$16.00                 | 1.6          | \$15.85                 | 1.6          | \$14.78                 |
| 17  | Military Specific Occupations                      | NA           | NA                      | NA           | NA                      | NA           | NA                      |
| 18  | Office and Administrative Support Occupations      | 15.9         | \$10.00                 | 17.6         | \$10.00                 | 15.6         | \$10.00                 |
| 19  | Personal Care and Service Occupations              | 4.4          | \$9.00                  | 3.5          | \$8.42                  | 3.3          | \$10.00                 |
| 20  | Production Occupations                             | 5.7          | \$10.46                 | 6.2          | \$11.00                 | 6.0          | \$10.70                 |
| 21  | Protective Service Occupations                     | 4.2          | \$9.50                  | 3.4          | \$10.25                 | 4.0          | \$10.00                 |
| 22  | Randolph-Sheppard vending facility clerk*          | NA           | NA                      | NA           | NA                      | NA           | NA                      |
| 23  | Randolph-Sheppard vending facility operator*       | NA           | NA                      | 0.1          | \$20.00                 | 0.4          | \$8.67                  |
| 24  | Sales and Related Occupations                      | 13.1         | \$9.00                  | 10.7         | \$9.00                  | 10.0         | \$9.25                  |
| 25  | Transportation and Material Moving Occupations     | 7.6          | \$10.50                 | 11.3         | \$11.00                 | 9.6          | \$11.72                 |
| 26  | Total competitive employment outcomes              |              | \$11.98                 |              | \$12.18                 |              | \$11.65                 |

Data source: RSA-911

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

\*RSA specific occupational classifications

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

| Row | SOC for Competitive Integrated Employment Outcomes | 2015 Percent | 2015 Median Hourly Wage | 2016 Percent | 2016 Median Hourly Wage | 2017 Percent | 2017 Median Hourly Wage |
|-----|--|--------------|-------------------------|--------------|-------------------------|--------------|-------------------------|
| 1   | Architecture and Engineering Occupations           | NA           | NA                      | 1.0          | \$15.00                 | NA           | NA                      |
| 2   | Arts, Design, Entertainment, Sports, and Media     | 0.5          | \$10.00                 | 1.0          | \$12.71                 | NA           | NA                      |
| 3   | Building and Grounds Cleaning and Maintenance      | 9.9          | \$9.00                  | 4.4          | \$8.75                  | 11.7         | \$9.25                  |
| 4   | Business and Financial Operations Occupations      | 1.5          | \$10.50                 | 0.5          | \$8.25                  | NA           | NA                      |
| 5   | Community and Social Services Occupations          | NA           | NA                      | 1.0          | \$13.50                 | NA           | NA                      |
| 6   | Computer and Mathematical Occupations              | 0.5          | \$9.00                  |              |                         | 0.7          | \$11.50                 |
| 7   | Constructive and Extraction Occupations            | 1.5          | \$10.00                 | 1.0          | \$10.00                 | 1.5          | \$10.00                 |
| 8   | Education, Training, and Library Occupations       | 1.5          | \$8.27                  | 0.5          | \$10.00                 | 0.7          | \$11.75                 |
| 9   | Farming, Fishing, and Forestry Occupations         | NA           | NA                      | NA           | NA                      | NA           | NA                      |
| 10  | Food Preparation and Serving Related Occupations   | 13.3         | \$8.50                  | 18.5         | \$8.40                  | 14.6         | \$8.64                  |
| 11  | Healthcare Practitioners and Technical Occupations | 0.5          | \$13.25                 | 0.5          | \$9.25                  | NA           | NA                      |
| 12  | Healthcare Support Occupations                     | 1.0          | \$12.82                 | 2.4          | \$9.00                  | 3.6          | \$12.50                 |
| 13  | Installation, Maintenance, and Repair Occupations  | 20.7         | \$9.00                  | 21.5         | \$9.00                  | 20.4         | \$8.45                  |
| 14  | Legal Occupations                                  | NA           | NA                      | NA           | NA                      | NA           | NA                      |
| 15  | Life, Physical, and Social Science Occupations     | NA           | NA                      | NA           | NA                      | NA           | NA                      |
| 16  | Management Occupations                             | NA           | NA                      | NA           | NA                      | NA           | NA                      |
| 17  | Military Specific Occupations                      | NA           | NA                      | NA           | NA                      | NA           | NA                      |
| 18  | Office and Administrative Support Occupations      | 14.8         | \$8.70                  | 17.6         | \$9.00                  | 13.1         | \$9.00                  |
| 19  | Personal Care and Service Occupations              | 6.4          | \$8.27                  | 3.4          | \$8.28                  | 3.6          | \$10.00                 |
| 20  | Production Occupations                             | 4.9          | \$11.25                 | 6.8          | \$9.76                  | 6.6          | \$10.00                 |
| 21  | Protective Service Occupations                     | 1.5          | \$9.50                  | 2.0          | \$11.50                 | NA           | NA                      |
| 22  | Randolph-Sheppard vending facility clerk*          | NA           | NA                      | NA           | NA                      | NA           | NA                      |
| 23  | Randolph-Sheppard vending facility operator*       | NA           | NA                      | NA           | NA                      | NA           | NA                      |
| 24  | Sales and Related Occupations                      | 14.3         | \$8.44                  | 9.8          | \$9.00                  | 12.4         | \$8.52                  |
| 25  | Transportation and Material Moving Occupations     | 7.4          | \$9.00                  | 8.3          | \$10.00                 | 10.9         | \$11.50                 |
| 26  | Total competitive employment outcomes              |              | \$9.58                  |              | \$9.58                  |              | \$9.75                  |

Data source: RSA-911

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

\*RSA specific occupational classifications

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

| Row | SOC for Competitive Integrated Employment Outcomes | 2015 Percent | 2015 Median Hourly Wage | 2016 Percent | 2016 Median Hourly Wage | 2017 Percent | 2017 Median Hourly Wage |
|-----|--|--------------|-------------------------|--------------|-------------------------|--------------|-------------------------|
| 1   | Architecture and Engineering Occupations           | 0.3          | \$29.94                 | 0.5          | \$26.05                 | 0.5          | \$25.50                 |
| 2   | Arts, Design, Entertainment, Sports, and Media     | 1.3          | \$15.74                 | 1.9          | \$12.42                 | NA           | NA                      |
| 3   | Building and Grounds Cleaning and Maintenance      | 7.6          | \$9.08                  | 5.9          | \$9.00                  | 8.5          | \$9.00                  |
| 4   | Business and Financial Operations Occupations      | 3.5          | \$16.10                 | 3.5          | \$14.30                 | 3.9          | \$16.15                 |
| 5   | Community and Social Services Occupations          | 2.4          | \$15.00                 | 2.5          | \$21.25                 | 2.7          | \$19.00                 |
| 6   | Computer and Mathematical Occupations              | 0.9          | \$15.00                 | 0.6          | \$14.50                 | 1.2          | \$12.00                 |
| 7   | Constructive and Extraction Occupations            | 1.1          | \$18.00                 | 1.5          | \$13.00                 | 0.7          | \$13.50                 |
| 8   | Education, Training, and Library Occupations       | 2.2          | \$17.01                 | 3.4          | \$14.50                 | 3.9          | \$15.11                 |
| 9   | Farming, Fishing, and Forestry Occupations         | 0.3          | \$19.86                 | 0.2          | \$10.00                 | NA           | NA                      |
| 10  | Food Preparation and Serving Related Occupations   | 6.0          | \$9.13                  | 8.5          | \$9.00                  | 6.8          | \$9.00                  |
| 11  | Healthcare Practitioners and Technical Occupations | 1.4          | \$28.00                 | 3.1          | \$20.75                 | 1.9          | \$12.25                 |
| 12  | Healthcare Support Occupations                     | 3.5          | \$11.85                 | 2.5          | \$10.00                 | 4.4          | \$10.94                 |
| 13  | Installation, Maintenance, and Repair Occupations  | 15.1         | \$9.88                  | 9.6          | \$10.00                 | 13.6         | \$9.75                  |
| 14  | Legal Occupations                                  | 0.3          | \$18.50                 | NA           | NA                      | 0.2          | \$11.00                 |
| 15  | Life, Physical, and Social Science Occupations     | 0.3          | \$49.53                 | NA           | NA                      | NA           | NA                      |
| 16  | Management Occupations                             | 2.4          | \$16.00                 | 2.2          | \$15.85                 | 2.2          | \$14.78                 |
| 17  | Military Specific Occupations                      | NA           | NA                      | NA           | NA                      | NA           | NA                      |
| 18  | Office and Administrative Support Occupations      | 16.2         | \$10.60                 | 17.6         | \$10.50                 | 16.5         | \$10.44                 |
| 19  | Personal Care and Service Occupations              | 3.8          | \$9.12                  | 3.5          | \$8.76                  | 3.1          | \$10.00                 |
| 20  | Production Occupations                             | 6.0          | \$10.34                 | 6.0          | \$12.00                 | 5.8          | \$11.38                 |
| 21  | Protective Service Occupations                     | 5.0          | \$9.75                  | 3.9          | \$10.25                 | 5.3          | \$10.00                 |
| 22  | Randolph-Sheppard vending facility clerk*          | NA           | NA                      | NA           | NA                      | NA           | NA                      |
| 23  | Randolph-Sheppard vending facility operator*       | NA           | NA                      | 0.2          | \$20.00                 | 0.5          | \$8.67                  |
| 24  | Sales and Related Occupations                      | 12.8         | \$9.00                  | 11.0         | \$9.23                  | 9.2          | \$9.56                  |
| 25  | Transportation and Material Moving Occupations     | 7.7          | \$11.30                 | 12.2         | \$11.00                 | 9.2          | \$12.00                 |
| 26  | Total competitive employment outcomes              |              | \$12.75                 |              | \$13.01                 |              | \$12.28                 |

Data source: RSA-911

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

\*RSA specific occupational classifications

**Table 9a. Nevada Combined Agency Reason for Exit for All Individuals Who Did Not Achieve an Employment Outcome at Closure- FFYs 2015-2017**

| <b>Row</b> | <b>Reason for Closure</b>   | <b>2015<br/>number</b> | <b>2015<br/>Percent</b> | <b>2016<br/>number</b> | <b>2016<br/>Percent</b> | <b>2017*<br/>number</b> | <b>2017*<br/>Percent</b> |
|------------|---|------------------------|-------------------------|------------------------|-------------------------|-------------------------|--------------------------|
| 1          | Unable to locate or contact   | 676                    | 30.4                    | 599                    | 31.4                    | 412                     | 28.8                     |
| 2          | Disability too significant to benefit from VR services - ineligible | 11                     | 0.5                     | 9                      | 0.5                     | 17                      | 1.2                      |
| 3          | No longer interested in receiving services or further services      | 928                    | 41.7                    | 828                    | 43.4                    | 647                     | 45.2                     |
| 4          | Death   | 9                      | 0.4                     | 9                      | 0.5                     | 10                      | 0.7                      |
| 5          | Transferred to another agency                                       | 16                     | 0.7                     | 15                     | 0.8                     | 31                      | 2.2                      |
| 6          | No disabling condition – ineligible                                 | 24                     | 1.1                     | 8                      | 0.4                     | 7                       | 0.5                      |
| 7          | No impediment to employment - ineligible                            | 13                     | 0.6                     | 8                      | 0.4                     | 8                       | 0.6                      |
| 8          | Transportation not feasible or available                            | 4                      | 0.2                     | 4                      | 0.2                     | 2                       | 0.1                      |
| 9          | Does not require VR services - ineligible                           | 5                      | 0.2                     | 1                      | 0.1                     | 5                       | 0.3                      |
| 10         | All other reasons   | 518                    | 23.3                    | 414                    | 21.7                    | 273                     | 19.1                     |
| 11         | Extended employment   | 1                      | 0.0                     | 0                      | 0                       | 2                       | 0.1                      |
| 12         | Individual in institution other than a prison or jail               | 17                     | 0.8                     | 13                     | 0.7                     | 13                      | 0.9                      |
| 13         | Individual is incarcerated in a prison or jail                      | 0                      | 0                       | 1                      | 0.1                     | 5                       | 0.3                      |

Data source: RSA-911

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

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

| <b>Row</b> | <b>Reason for Closure</b>   | <b>2015<br/>number</b> | <b>2015<br/>Percent</b> | <b>2016<br/>number</b> | <b>2016<br/>Percent</b> | <b>2017<br/>number</b> | <b>2017<br/>Percent</b> |
|------------|---|------------------------|-------------------------|------------------------|-------------------------|------------------------|-------------------------|
| 1          | Unable to locate or contact   | 211                    | 37.3                    | 228                    | 40.9                    | 174                    | 37.9                    |
| 2          | Disability too significant to benefit from VR services - ineligible | 3                      | 0.5                     | 2                      | 0.4                     | 15                     | 3.3                     |
| 3          | No longer interested in receiving services or further services      | 227                    | 40.1                    | 233                    | 41.8                    | 162                    | 35.3                    |
| 4          | Death   | 3                      | 0.5                     | 1                      | 0.2                     | 3                      | 0.7                     |
| 5          | Transferred to another agency                                       | 8                      | 1.4                     | 9                      | 1.6                     | 22                     | 4.8                     |
| 6          | No disabling condition - ineligible                                 | 4                      | 0.7                     | 3                      | 0.5                     | 2                      | 0.4                     |
| 7          | No impediment to employment - ineligible                            | 1                      | 0.2                     | 0                      | 0                       | 1                      | 0.2                     |
| 8          | Transportation not feasible or available                            | 2                      | 0.4                     | 1                      | 0.2                     | 1                      | 0.2                     |
| 9          | Does not require VR services - ineligible                           | 0                      | 0                       | 0                      | 0                       | 3                      | 0.7                     |
| 10         | All other reasons   | 101                    | 17.8                    | 74                     | 13.3                    | 61                     | 13.3                    |
| 11         | Extended employment   | 1                      | 0.2                     | 0                      | 0                       | 2                      | 0.4                     |
| 12         | Individual in institution other than a prison or jail               | 5                      | 0.9                     | 7                      | 1.3                     | 11                     | 2.4                     |
| 13         | Individual is incarcerated in a prison or jail                      | 0                      | 0                       | 0                      | 0                       | 2                      | 0.4                     |

Data source: RSA-911

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

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

| <b>Row</b> | <b>Reason for Closure</b>   | <b>2015<br/>number</b> | <b>2015<br/>Percent</b> | <b>2016<br/>number</b> | <b>2016<br/>Percent</b> | <b>2017<br/>number</b> | <b>2017<br/>Percent</b> |
|------------|---|------------------------|-------------------------|------------------------|-------------------------|------------------------|-------------------------|
| 1          | Unable to locate or contact   | 465                    | 28.1                    | 371                    | 27.5                    | 238                    | 24.5                    |
| 2          | Disability too significant to benefit from VR services - ineligible | 8                      | 0.5                     | 7                      | 0.5                     | 2                      | 0.2                     |
| 3          | No longer interested in receiving services or further services      | 701                    | 42.3                    | 595                    | 44.0                    | 485                    | 49.8                    |
| 4          | Death   | 6                      | 0.4                     | 8                      | 0.6                     | 7                      | 0.7                     |
| 5          | Transferred to another agency                                       | 8                      | 0.5                     | 6                      | 0.4                     | 9                      | 0.9                     |
| 6          | No disabling condition - ineligible                                 | 20                     | 1.2                     | 5                      | 0.4                     | 5                      | 0.5                     |
| 7          | No impediment to employment - ineligible                            | 12                     | 0.7                     | 8                      | 0.6                     | 7                      | 0.7                     |
| 8          | Transportation not feasible or available                            | 2                      | 0.1                     | 3                      | 0.2                     | 1                      | 0.1                     |
| 9          | Does not require VR services - ineligible                           | 5                      | 0.3                     | 1                      | 0.1                     | 2                      | 0.2                     |
| 10         | All other reasons   | 417                    | 25.2                    | 340                    | 25.2                    | 212                    | 21.8                    |
| 11         | Extended employment   | 0                      | 0                       | 0                      | 0                       | 0                      | 0                       |
| 12         | Individual in institution other than a prison or jail               | 12                     | 0.7                     | 6                      | 0.4                     | 2                      | 0.2                     |
| 13         | Individual is incarcerated in a prison or jail                      | 0                      | 0                       | 1                      | 0.1                     | 3                      | 0.3                     |

Data source: RSA-911

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



**Table 10 Provision of Pre-Employment Transition Services for PY 2017**

**Number of Individuals Receiving Services by Type**

| <b>PY 2017<br/>Quarter</b> | <b>Individuals<br/>Who Have<br/>Received a<br/>Pre-ETS<br/>Service</b> | <b>JEC *<br/>Provided<br/>by Staff</b> | <b>JEC *<br/>Purchased</b> | <b>WBLE **<br/>Provided<br/>by Staff</b> | <b>WBLE **<br/>Purchased</b> | <b>CEO ***<br/>Provided<br/>by Staff</b> | <b>CEO ***<br/>Purchased</b> | <b>WRT ****<br/>Provided<br/>by Staff</b> | <b>WRT ****<br/>Purchased</b> | <b>ISO *****<br/>Provided<br/>by Staff</b> | <b>ISO *****<br/>Purchased</b> |
|----------------------------|--|--|----------------------------|--|------------------------------|--|------------------------------|---|-------------------------------|--|--------------------------------|
| Q1                         | 1670   | 1                                      | 155                        | 0  | 12                           | 1  | 64                           | 0   | 205                           | 0  | 448                            |
| Q2                         | 1898   | 0                                      | 154                        | 0  | 49                           | 0  | 144                          | 0   | 502                           | 0  | 1,450                          |
| Q3                         | 2411   | 1                                      | 479                        | 0  | 76                           | 2  | 367                          | 0   | 870                           | 0  | 1,828                          |
| Q4                         | 2871   | 1                                      | 758                        | 0  | 1,27                         | 2  | 489                          | 0   | 1,248                         | 0  | 2058                           |

Data source: RSA-911

\* *Job exploration counseling*

\*\* *Work-based learning experiences*

\*\*\* *Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs*

\*\*\*\* *Workplace readiness training*

\*\*\*\*\* *Instruction in self-advocacy*

## Fiscal Data Tables

**Table 6.1 Nevada-Combined (NV-C) VR Resources and Expenditures—FFYs 2015–2017**

| VR Resources and Expenditures                         | 2015         | 2016         | 2017         |
|---|--------------|--------------|--------------|
| Total program expenditures                            | \$18,691,316 | \$20,478,618 | \$20,393,344 |
| Federal expenditures                                  | \$14,710,066 | \$16,116,672 | \$16,049,562 |
| State agency expenditures (4 <sup>th</sup> quarter)   | \$3,867,250  | \$4,375,881  | \$4,343,782  |
| State agency expenditures (latest/final)              | \$3,981,250  | \$4,361,946  | \$4,343,782  |
| Federal formula award amount                          | \$24,188,896 | \$25,605,404 | \$25,881,489 |
| MOE penalty from prior year                           | -            | \$620,995    | -            |
| Federal award amount relinquished during reallocation | \$8,900,000  | \$8,200,000  | \$9,500,000  |
| Federal award amount received during reallocation     | -            | -            | -            |
| Federal funds transferred from State VR agency        | -            | -            | -            |
| Federal funds transferred to State VR agency          | -            | -            | -            |
| Federal award amount (net)                            | \$15,288,896 | \$16,784,409 | \$16,381,489 |
| Federal award funds deobligated                       | \$578,830    | -            | \$331,928    |
| Federal award funds used                              | \$14,710,066 | \$16,784,409 | \$16,049,561 |
| Percent of formula award amount used                  | 60.81%       | 65.55%       | 62.01%       |
| Federal award funds matched but not used              | -\$421,213   | -\$667,735   | \$0          |

**Table 6.1 Nevada-Combined - 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.<br><b>Source/Formula:</b> Table 6.1: Federal expenditures plus State expenditures (latest/final)   |
| Federal expenditures                                 | The cumulative amount of disbursements from Federal funds.<br><b>Source/Formula:</b> SF-425 line 10e from latest/final report   |
| State expenditures (4 <sup>th</sup> quarter)         | The cumulative amount of disbursements and unliquidated obligations from State funds through September 30 <sup>th</sup> of the award period.<br><b>Source/Formula:</b> SF-425 line 10j from 4 <sup>th</sup> 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.<br><b>Source/Formula:</b> 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.<br><b>Formula/Source:</b> 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.<br><b>Source/Formula:</b> Table 6.2: MOE difference from prior year  |
| Federal award amount relinquished during reallotment | Amount of Federal award voluntarily relinquished through the reallotment process.<br><b>Formula/Source:</b> RSA-692   |
| Federal award received during reallotment            | Amount of funds received through the reallotment process.<br><b>Source/Formula:</b> 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).<br><b>Formula/Source:</b> 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).<br><b>Formula/Source:</b> Agency transfer request documentation  |
| Federal award amount (net)                           | Federal award amount available after accounting for adjustments to award (e.g., MOE penalties, relinquishment, reallotment and transfers).<br><b>Formula/Source:</b> Federal formula award calculation, RSA-692, agency documentation, SF-425 : Federal formula calculation minus MOE penalty minus funds relinquished in reallotment plus funds received in reallotment 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.<br><b>Source/Formula:</b> Agency deobligation request documentation, G5 closeout reports   |
| Federal award funds used                             | Amount of Federal award funds expended.<br><b>Source/Formula:</b> Federal formula calculation, RSA-692, agency documentation, SF-425 lesser of the 4 <sup>th</sup> 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.<br><b>Source/Formula:</b> 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.<br><b>Source/Formula:</b> Table 6.2 Federal award funds matched (actual) minus Table 6.1 Federal award funds used   |

**Table 6.2 Nevada-Combined (NV-C) Non-Federal Share and Maintenance of Effort—FFYs 2015–2017**

| <b>Non-Federal Share (Match) and Maintenance of Effort (MOE)</b> | <b>2015</b>  | <b>2016</b>  | <b>2017</b>  |
|--|--------------|--------------|--------------|
| Match required per net award amount                              | \$4,137,910  | \$4,543,835  | \$4,433,618  |
| Match provided (actual)  | \$3,867,250  | \$4,361,946  | \$4,343,782  |
| Match difference**   | \$270,660    | \$181,889    | \$89,836     |
| Federal funds matched (actual)                                   | \$14,288,853 | \$16,116,674 | \$16,049,560 |
| Percent Federal funds matched                                    | 93.46%       | 96.02%       | 97.97%       |
| MOE required   | \$4,488,245  | \$4,336,449  | \$3,871,565  |
| MOE: Establishment/construction expenditures                     | -            | -            | -            |
| MOE actual   | \$3,867,250  | \$4,361,946  | \$4,343,782  |
| MOE difference**   | \$620,995    | -\$25,497    | -\$472,217   |

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

**Table 6.2 Nevada-Combined - Non-Federal Share and Maintenance of Effort—  
Descriptions, Sources and Formulas**

| <b>Non-Federal Share (Match) and Maintenance of Effort (MOE)</b> | <b>Source/Formula</b>  |
|--|--|
| Match required per net award amount                              | Non-Federal funds required based upon the net amount of the Federal award.<br><b>Source/Formula:</b> (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.<br><b>Source/Formula:</b> SF-425 line 10j lesser of the 4 <sup>th</sup> 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.<br><b>Source/Formula:</b> SF-425 lesser of the 4 <sup>th</sup> 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.<br><b>Source/Formula:</b> (Match provided actual divided by .213) multiplied by .787   |
| Percent of Federal funds matched                                 | Percent of Federal funds matched.<br><b>Source/Formula:</b> Federal funds matched divided by Federal award amount net  |
| 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.<br><b>Source/Formula:</b> (For FFY two year prior) SF-425 4 <sup>th</sup> 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.<br><b>Source/Formula:</b> SF-425 latest/final report: line 12a   |
| MOE actual   | Non-Federal share provided by agency minus establishment/construction expenditures for CRPs.<br><br><b>Source/Formula:</b> 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.   |
| MOE difference**   | The difference between MOE required and the actual MOE provided.<br><b>Source/Formula:</b> MOE required minus MOE actual   |

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

**Table 6.3 Nevada-Combined (NV-C) Program Income and Carryover—FFYs 2015–2017**

| <b>Program Income and Carryover</b>   | <b>2015</b>  | <b>2016</b>  | <b>2017</b>  |
|---------------------------------------|--------------|--------------|--------------|
| Program income received               | \$812,685    | \$429,460    | \$715,480    |
| Program income disbursed              | \$812,685    | \$429,460    | \$715,480    |
| Program income transferred            | \$125,276    | \$45,827     | \$14,572     |
| Program income used for VR program    | \$687,409    | \$383,633    | \$700,908    |
| Federal grant amount matched          | \$14,288,853 | \$16,116,674 | \$16,049,560 |
| Federal expenditures 9/30             | \$13,355,141 | \$14,385,691 | \$16,049,562 |
| Federal unliquidated obligations 9/30 | \$893,487    | \$1,782,469  | \$0          |
| Carryover amount                      | \$1,040,268  | \$620,564    | \$0          |
| Carryover as percent of award         | 6.80%        | 3.70%        | 0%           |

**Table 6.3 Nevada-Combined - Program Income and Carryover—Descriptions, Sources and Formulas**

| <b>Program Income and Carryover</b>   | <b>Source/Formula</b>   |
|---------------------------------------|---|
| Program income received               | Total amount of Federal program income received by the grantee.<br><b>Source/Formula:</b> SF-425 latest/final line 10l  |
| Program income disbursed              | Amount of Federal program income disbursed, including transfers.<br><b>Source/Formula:</b> SF-425 latest/final: line 10m plus line 10n  |
| Program income transferred            | Amount of Federal program income transferred to other allowable programs.<br><b>Source/Formula:</b> 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.<br><b>Source/Formula:</b> 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.<br><b>Source/Formula:</b> Table 6.2 Federal funds matched actual  |
| Federal expenditures 9/30             | Federal funds expended by 9/30 of the FFY of appropriation. This does not include unliquidated obligations.<br><b>Source/Formula:</b> SF-425 4 <sup>th</sup> quarter: line 10e  |
| Federal unliquidated obligations 9/30 | The unliquidated amount of Federal funds matched that the grantee did not liquidated by 9/30 of the FFY of appropriation<br><b>Source/Formula:</b> SF-425 4 <sup>th</sup> quarter: line 10f   |
| Carryover amount                      | The unobligated amount of Federal funds matched that the grantee did not obligate by 9/30 of the FFY of appropriation. Carryover amounts do not include any unliquidated Federal obligations as of 9/30.<br><b>Source/Formula:</b> SF-425 4 <sup>th</sup> quarter: line 10h |
| Carryover as percent of award         | Amount of carryover expressed as a percentage of total Federal funds available.<br><b>Source/Formula:</b> SF-425 latest/final: Carryover amount divided by Federal net award amount.  |

**Table 6.4 Nevada-Combined (NV-C) RSA-2 Expenditures—FFYs 2015–2017\***

| <b>RSA-2 Expenditures</b>                    | <b>2015</b>  | <b>2016</b>  | <b>2017</b>  |
|--|--------------|--------------|--------------|
| Total expenditures                           | \$18,399,065 | \$18,445,632 | \$18,980,558 |
| Administrative costs                         | \$5,485,667  | \$5,617,319  | \$6,114,204  |
| Administration as Percent expenditures       | 29.81%       | 30.45%       | 32.21%       |
| Purchased services expenditures              | \$6,978,577  | \$6,795,681  | \$7,251,146  |
| Purchased services as a Percent expenditures | 37.93%       | 36.84%       | 38.20%       |
| Services to groups                           | \$20,197     | \$200,018    | -            |
| Services to groups percentage                | 0.11%        | 1.08%        | 0.00%        |

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

**Table 6.4 Nevada-Combined - RSA-2 Expenditures—Descriptions, Sources and Formulas\***

| <b>RSA-2 Expenditures</b>                       | <b>Sources/Formula</b>   |
|---|--|
| 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.<br><b>Source:</b> RSA-2: Schedule 1.4 |
| Administrative costs                            | Total amount expended on administrative costs under the VR program.<br><b>Source/Formula:</b> RSA-2: Schedule 1.1  |
| Administration as percent of expenditures       | Administrative costs expressed as a percentage of all expenditures.<br><b>Source/Formula:</b> Administrative costs divided by total expenditures   |
| Purchased services expenditures                 | Expenditures made for services purchased by the agency.<br><b>Source/Formula:</b> RSA-2: Schedule 1.2.B  |
| Purchased services as a percent of expenditures | Purchased services expressed as a percentage of total expenditures.<br><b>Source/Formula:</b> 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.<br><b>Source/Formula:</b> RSA-2: Schedule 1.3   |
| Services to groups percentage                   | Services to groups expressed as a percentage of total expenditures.<br><b>Source/Formula:</b> 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: DATA VERIFICATION RESULTS

| Data Element  | Number with required documentation | Number without required documentation | Percent with required documentation | Percent without required documentation |
|---|------------------------------------|---------------------------------------|-------------------------------------|--|
| Date of Application   | 29                                 | 1                                     | 97%                                 | 3%                                     |
| Date of Eligibility Determination                                 | 22                                 | 8                                     | 73%                                 | 27%                                    |
| Date of IPE   | 21                                 | 9                                     | 70%                                 | 30%                                    |
| Start Date of Employment in Primary Occupation at Exit or Closure | 19                                 | 11                                    | 63%                                 | 37%                                    |
| Weekly Earnings at Exit or Closure                                | 15                                 | 15                                    | 50%                                 | 50%                                    |
| Employment Status at Exit or Closure                              | 9                                  | 21                                    | 30%                                 | 70%                                    |
| Type of Exit or Closure   | 25                                 | 5                                     | 83%                                 | 17%                                    |
| Date of Exit or Closure   | 14                                 | 16                                    | 47%                                 | 53%                                    |

| Summary  | Number (of 30) | Percent (of 30) |
|--|----------------|-----------------|
| Files with all required documentation                            | 0              | 0%              |
| Files with documentation for four or more data elements examined | 24             | 80%             |
| Files with no required documentation                             | 0              | 0%              |

## APPENDIX C: SUPPORTED EMPLOYMENT PROGRAM PROFILE

| Summary Statistics – Supported Employment Outcomes         |                |                 |                |                 |                |                 |
|--|----------------|-----------------|----------------|-----------------|----------------|-----------------|
| Performance category                                       | 2015<br>Number | 2015<br>Percent | 2016<br>Number | 2016<br>Percent | 2017<br>Number | 2017<br>Percent |
| Supported employment (SE) outcomes                         | 77             |                 | 87             |                 | 76             |                 |
| Competitive employment outcomes                            | 72             | 93.5            | 80             | 92.0            | 69             | 90.8            |
| Median hourly earnings for competitive employment outcomes | \$8.58         |                 | \$9.00         |                 | \$9.00         |                 |
| Average hours worked for competitive employment outcomes   | 23.26          |                 | 24.39          |                 | 23.97          |                 |

Data source: RSA-911

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

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

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

| Top Five Services Provided to Individuals in Competitive Supported Employment |              |
|---|--------------|
| Services Provided   | 2017 Percent |
| Job placement assistance  | 92.8         |
| Assessment  | 72.5         |
| Maintenance   | 50.7         |
| Transportation  | 47.8         |
| On-the-job supports-SE  | 31.9         |

Data source: RSA-911

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

| Top Five Occupations by Percentages of Employment Outcomes with Median Hourly Earnings for All Individuals Who Achieved Competitive Supported Employment Outcomes at Closure for FFY17 |              |                         |
|--|--------------|-------------------------|
| SOC Code   | 2017 Percent | 2017 Median Hourly Wage |
| Installation, Maintenance, and Repair Occupations  | 27.5         | \$9.00                  |
| Food Preparation and Serving Related Occupations   | 14.5         | \$8.87                  |
| Office and Administrative Support Occupations  | 14.5         | \$9.00                  |
| Transportation and Material Moving Occupations   | 13.0         | \$11.72                 |
| Building and Grounds Cleaning and Maintenance  | 11.6         | \$8.27                  |

Data source: RSA-911

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