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VOCATIONAL REHABILITATION

August 25, 2023

Legislative Counsel Bureau
401 S. Carson Street
Carson City, NV 89701

RE: **Section 1(c) of NRS 218G.270 – 6 month “Status Report”**

Dear Mr. Crossman,

In accordance with the requirements set forth in Section 1(c) of Nevada Revised Statutes (NRS) 218G.270, the following is the Department of Employment, Training and Rehabilitation (DETR) Division of Rehabilitation’s 6 month “Status Report” regarding the implemented and pending corrective actions.

The 2022 Legislative Counsel Bureau (LCB) audit of the Rehabilitation Division had eight (8) findings, of which DETR accepted all eight (8) recommendations. Of those 8 recommendations the division has “fully implemented” corrective actions for 5 of those findings, and “partially implemented” corrective actions for remaining 3 findings. In the report below, please find a list of the recommendations, DETR’s initial response to those findings, the 60-day plan for corrective actions and the 6-month status report.

Recommendation #1

Develop a detailed program planning document, such as a logic model, for equitable and community tailored Pre- Employment Transition Services (Pre-ETS) program delivery that will assist the Division with increasing Pre-ETS spending to meet federal requirements and assure youth in rural districts receive adequate services. The Division should include school districts in the planning process.

DETR’s Initial Response

- The agency will develop a logic model and specific plans for delivery of Pre-ETS program services to ensure all areas of the state are adequately served (including all rural districts).

- In August of 2022, the agency started receiving technical assistance from the National Technical Assistance Center on Transition (NTACT-C). Through the collaboration with NTACT-C, DETR's Bureau of Vocational Rehabilitation (VR) will receive recommendations and resources in order to improve its Pre-ETS program.
- Nevada DETR VR will continue refining our statewide Pre-ETS structure to emphasize focus on this subject area and to ensure agency resources are dedicated to this purpose.
- DETR VR is working with the State Department of Education, Office of Inclusive Education to develop clearer and more focused State Education Agreements and Local Education Agreements with every school district to better define collaboration and Pre-ETS statewide.
- To improve Pre-ETS program delivery and meet federal spending requirements, the agency is seeking legislative approval to expand our Pre-ETS team in order to:
 - have adequate coverage throughout the state, 2) have greater reach to all the districts and
 - 3) have capacity to be appropriately responsive to all school districts and to provide tailored opportunities and contacts in each district.
- To ensure unique needs of each school district are met and improve the quality of Pre-ETS services in local/district, DETR VR has directly funded Transition Coordinator positions in many school districts utilizing Pre-ETS funds. These Coordinators work for the school district and are funded by VR. This will increase service to those districts and improve reporting.
- DETR VR is participating in the State Education District Administrator's meeting at least annually to share program and Pre-ETS updates and introduce new programs and staff. This is to ensure school districts know who their Pre-ETS contacts are and are aware of current Pre-ETS opportunities available in their district. It is also an opportunity to hear from Directors what they need from DETR VR to better meet the needs of students with disabilities.
- In partnership with Nevada Department of Education, DETR VR has purchased Virtual Job Shadow licenses for every student with disabilities receiving public instruction in Nevada, ages 14+. These licenses were initially purchased in December 2018 and since renewed every year, most recently in October 2022. This provides a Pre-ETS resource to rural schools that would otherwise have limited access and ensures that every student with disabilities in Nevada has an opportunity for Pre-ETS exposure.
- PAES Labs (Practical Assessment Exploration System) are being purchased for districts/schools that have physical space and staff to administer the labs and provide Pre-ETS reporting back to the agency. These are especially impactful in rural communities that have limited Pre-ETS resources.

DETR's 60-Day Corrective Action Plan

- The Statewide Transition Coordinator is meeting monthly with the VRTAC-QM on the development of agency's logic model for Pre-ETS services.
- On January 6th, Deputy Administrator of the Programs presented at SEDA meeting with attendance of over 200 Special Education Professionals including 16 county Special

Education Administrators. The presentation included topics such as VR staff collaboration with Schools and Transition Best Practices, overview of State Education Agreement (SEA) with VR, and PAES Labs.

- In the past 60 days DETR VR has ordered 9 PAES Labs for the following counties: Washoe (5), Churchill, Clark, Lincoln (2).
- DETR VR and the State Department of Education, Office of Inclusive Education have developed and signed a State Education Agreement on February 3rd, 2023, which better defines collaboration and Pre-ETS service delivery statewide.
- Deputy Administrator Merrill and Education Programs Professional Jennifer Kane from State Department of Education, submitted a proposal to present on the SEA Agreement at the Annual International Division on Career Development and Transition Conference in Reno, NV on October 18-21, 2023.
- DETR VR and Nevada Department of Education have purchased **19,978** Virtual Job Shadow licenses for every student with disabilities receiving public instruction in Nevada, ages 14+.

DETR's 6-month Corrective Action Plan-Response

Partially implemented

Expected Completion: July 2024

- Logic Model -VR Nevada staff attended the Capacity Building Institute in May 2023 held in Charlotte, NC where several states shared Pre-ETS logic models (exhibit 1.1). VR Nevada is reviewing these logic models and working to customize one to meet Nevada needs which will help the division to meet Pre-ETS spending. Additionally, VR Nevada has initiated an internal audit of the Pre-ETS program on June 1, 2023. This audit intends to document our Pre-ETS service delivery program and develop written implementation guidelines for program continuity. While VR Nevada does not have a completed logic model yet, we have had formal strategic planning for Pre-ETS going back to 2022 and updated annually, and made available on our VRNevada.org website, forward facing to the public and staff. (exhibit 1.2). A number of stakeholders are included in the development of VR's strategic plan including various representatives of school districts.
- Schools included in the process - The VR Nevada Statewide Transition Coordinator has established a quarterly meeting for all school districts, including rural districts. Flyers have been developed and have begun circulation through the State of Nevada Office of Inclusive Education and amongst school districts themselves (exhibit 1.3). This is an opportunity for school districts to share their Pre-ETS concerns and needs with VR Nevada and creates an opportunity for VR to share and collaborate on new methods of Pre-ETS delivery, make connections with new District staff and work for increased Pre-ETS across the state. In addition to the quarterly meetings specific to schools, VR is planning two *Town Hall* meetings to solicit feedback on VR services, including Pre-ETS services. These town halls will be held on November 6th and 15th 2023 (exhibit 1.4).

These meetings will be both in-person and virtual. All VR staff, in particular the Pre-ETS team has been advertising these meetings to parents, students, and with school staff.

- Serving youth in rural districts -VR Nevada is now fully staffed in all rural offices with counselors assigned to every rural school. Additionally, every student with a disability served under an IEP or 504 plan, has a license to use the Virtual Job Shadow/Pathful Explore for individualized Pre-ETS.
- In the last 10 months VR Nevada has purchased 10 PAES Labs for schools across Nevada. Of note was the purchase of a lab for Pyramid Lake Jr/Sr High School, which is a tribal high school serving the Paiute Tribe. Lastly, Deputy Administrator Merrill attended the Summer “Mountain Madness” Special Education District Administrators (SEDA) meeting with the State Department of Education, Office of Inclusive Education on June 29, 2023 and made another presentation about partnership, PAES Labs, Pre-ETS and Virtual Job Shadow availability to all districts.
- The agency has developed fiscal reports to appropriately determine and track the required 15% Pre-ETS reserve. Reporting includes the number of clients served, the cost per client for the provision of the Pre-ETS activities (required/coordination/authorized), the funding used and required, current and future year projections, and more. (exhibit 1.5)
- Deputy Administrator Merrill and Education Programs Professional Jennifer Kane from State Department of Education, submitted a proposal and were invited to present on the SEA Agreement at the Annual International Division on Career Development and Transition (DCDT) Conference in Reno, NV on October 18-21, 2023.

Recommendation #2

Improve communication with all school districts regarding the services and methods available for program delivery in congruity with program planning.

DETR’s Initial Response

- DETR VR is working with the State Department of Education, Office of Inclusive Education to develop clearer and more focused State Education Agreement and Local Education Agreements with every school district to better define collaboration and Pre-ETS statewide.
- DETR VR is meeting monthly with State Department of Education, Office of Inclusive Education to improve communication and collaborate for increased congruity in the program.
- DETR VR has enhanced communication efforts to include a letter to every high school and middle school principal explaining VR services and Pre-ETS at the beginning of each school year.
- To ensure unique needs of each school district are met and improve the quality of Pre-ETS services in local/districts, DETR VR has directly funded Transition Coordinator positions in three school districts utilizing Pre-ETS funds. These Coordinators work for

the school district and are funded by DETR VR. This will increase communication and service to those districts and improve Pre-ETS reporting.

- DETR VR is participating in the State Education District Administrator's (SEDA) meeting at least annually to share program and Pre-ETS updates and introduce new programs and staff. This is to ensure school districts know who their Pre-ETS contacts are and are aware of current Pre-ETS opportunities available in their district. It is also an opportunity to hear from Directors what they need from VR to better meet the needs of students with disabilities.
- The agency has purchased Virtual Job Shadow licenses for every student with disabilities receiving public instruction in Nevada, ages 14+. DETR VR will host a Zoom quarterly VR Services chat with all the school districts in the state to increase consistent communication regarding available Pre-ETS and transition services to students with disabilities.

DETR's 60-Day Corrective Action Plan

- DETR VR collaborated with the State Department of Education, Office of Inclusive Education over 22.5 hours, to develop clearer and more focused State Education Agreement. That new agreement was executed on February 5, 2023. Local Education Agreements with every school district are being developed with the SEA agreement as a model, to better define collaboration and Pre-ETS statewide.
- DETR VR Deputy Administrator of Programs has been meeting monthly with the Director and lead Education Programs Professional at the State Department of Education, Office of Inclusive Education to improve communication and collaborate for increased congruity in the program.
- DETR VR and Nevada Department of Education have purchased **19,978** Virtual Job Shadow licenses for every student with disabilities receiving public instruction in Nevada, ages 14+.
- DETR VR will host a Zoom quarterly VR Services beginning in the new 2023-2024, academic year in October 2023 to align with the DCDT Conference being held in Reno and then continuing quarterly in Spring 2024. This will enhance communication efforts with every high school and middle school explaining VR services and Pre-ETS and improving collaborative dialog.
- DETR VR has partnered with Washoe County School District to bring in two Transition Coordinators for academic year 2023-2024. The two Transition Coordinators will assist with PAES lab implementation and functioning, as well as will support DETR VR's efforts to accurately track and monitor Pre-ETS funds.
- On January 6th, Deputy Administrator of the Programs presented at SEDA meeting with attendance of over 200 Special Education Professionals including 16 county Special Education Administrators. The presentation included topics such as VR staff collaboration with Schools and Transition Best Practices, overview of State Education Agreement (SEA) with VR, and PAES Labs.

DETR's 6-month Corrective Action Plan-Response

Fully implemented

- DETR VR is meeting monthly with State Department of Education, Office of Inclusive Education to improve communication and collaborate for increased congruity in the program.
- DETR VR has enhanced communication efforts to include a letter to every high school and middle school principal explaining VR services and Pre-ETS at the beginning of each school year. In follow up to the letter being sent to each school, Pre-ETS staff contact each assigned school to plan in-school presentations geared at students and families and school personnel describing Pre-ETS and the process to request services.
- To ensure unique needs of each school district are met and improve the quality of Pre-ETS services in local/districts, DETR VR has directly funded Transition Coordinator positions in many school districts utilizing Pre-ETS funds. These Coordinators work for the school district and are funded by DETR VR. This will increase communication and service to those districts and improve Pre-ETS reporting.
- DETR VR is participating in the State Education District Administrator's (SEDA) meeting at least annually to share program and Pre-ETS updates and introduce new programs and staff. This is to ensure school districts know who their Pre-ETS contacts are and are aware of current Pre-ETS opportunities available in their district. It is also an opportunity to hear from Directors what they need from VR to better meet the needs of students with disabilities.
- DETR VR collaborated with the State Department of Education, Office of Inclusive Education over 22.5 hours, to develop clearer and more focused State Education Agreement. That new agreement was executed on February 5, 2023. Local Education Agreements with every school district are being developed with the SEA agreement as a model, to better define collaboration and Pre-ETS statewide.
- DETR VR will host a Zoom quarterly VR Services beginning in the new 2023-2024, academic year in October 2023 to align with the DCDT Conference being held in Reno and then continuing quarterly in Spring 2024. This will enhance communication efforts with every high school and middle school explaining VR services and Pre-ETS and improving collaborative dialog. 3 VR staff proposals for DCDT presentations were accepted. (exhibit 2.1)
- VR Nevada Bureau Chief has met monthly for 4 months with Lonyae Bigby, Special Education Director of the Clark County School District (5th largest in the nation) to improve services to students with disabilities and to finalize their LEA agreement. Beginning in the upcoming academic school year, the VR team will be meeting with transition staff in CCSD to kick off transition programming for this academic year.
- VR is planning two *Town Hall* meetings to solicit feedback on VR services, including Pre-ETS services. These town halls will be held on November 6th and 15th 2023 (exhibit 2.2). These meetings will be both in-person and virtual.

Recommendation #3

Create policies and procedures to accurately track Pre-ETS services and participant data throughout the State.

DETR's Initial Response

- DETR VR has implemented procedures for the appropriate assignment of Pre-ETS authorizations and services through its case management system, AWARE. This allows for the accurate tracking of Pre-ETS services being provided and the funds being used. These are necessary components to ensure the accurate collection and reporting of program and fiscal data on Federal performance reports, including the RSA-2 and RSA-911 reports.
- DETR VR has restructured the Pre-ETS team to ensure adequate oversight and increased management support is provided. Once the hiring freeze was lifted a vacant Rehabilitation Manager 1 was filled and organizational chart revised to give the Program Officer 3 (Statewide Transition Coordinator) supervision. In addition to moving the Rehabilitation Manager 1, an Administrative Assistant 1 was added to the team to provide administrative support which did not exist during the review years. These two restructuring moves helped improve data collection and entry, accuracy of reporting as well as program monitoring and supervision.
- Pre-ETS services were significantly impacted due to COVID requirements as that impacted the agency's access to students, due to the fact that students were adjusting to education from home with their primary schools. DETR VR had to redesign its service delivery model in a very short period of time to ensure that it would be flexible to exist in the pandemic world in which we were working.
- DETR VR funded three (3) additional contracted Transition Coordinators (total of six (6) Transition Coordinators) to assist schools with Pre-ETS delivery, assist the program with data tracking for ensuring service delivery, service quality and coordination and improve communication with schools and school districts.
- DETR VR added three (3) more Agency funded (via Pre-ETS) Transition Coordinators to be housed within rural school districts to also be additional staffing support for PAES labs and to ensure Pre-ETS reporting.

DETR's 60-Day Corrective Action Plan

- To ensure the accurate collection and reporting of program and fiscal data DETR VR has implemented the following procedures. Staff are required to utilize the Policy Manual and VR Desk Guide on the SharePoint site to determine and ensure that services being authorized are allowable costs under both State and Federal rules and regulations. Additionally, adherence with federal regulations, applicable laws, and state and agency policies during the provision of VR services are part of the VR Counselor's and Supervisors work performance standards.
 - Adding Pre-ETS participants into AWARE
 - Processing Pre-ETS authorizations
 - Determining the FFY of Obligation

- Pre-Authorization
- Payment Processing
- Monthly Expense Report
- DETR VR is also strategizing additional ways to gather, report, and track Pre-ETS services. DETR VR has met with Alliance, the vendor of the agency's case management system, who shared details of a vendor portal which may be a potential solution to the tracking, monitoring and reporting of documented Pre-ETS activities.
- DETR VR added three (3) more Agency funded (via Pre-ETS) Transition Coordinators in Las Vegas and Reno to ensure local Pre-ETS activities are captured. The Transition Coordinators in both Las Vegas and Reno have been assigned geographic areas to better serve assigned schools and monitor Pre-ETS.

DETR's 6-month Corrective Action Plan-Response

Fully implemented

- The agency has developed fiscal reports to appropriately determine and track the required 15% Pre-ETS reserve. Reporting includes the number of clients served, the cost per client for the provision of the Pre-ETS activities (required/coordination/authorized), the funding used and required, current and future year projections, and more. (exhibit 3.1)
- A new policy guide has been developed regarding the set-aside determination/15% reserve. (exhibit 3.2) Training has been provided to internal accounting and Pre-ETS team on function codes and Pre-ETS sub-service categories in the AWARE system. Additionally, this information was shared with all program staff at our Data Integrity Day on April 27, 2023.
- The MA IV meets bi-monthly for a Pre-ETS Planning Meeting with the Statewide Transition Coordinator and District Manager I to review Pre-ETS progress, invoices, current trends for all activities related to the Pre-ETS program.
- VR Nevada has initiated an internal audit of the Pre-ETS program on June 1, 2023. (exhibit 3.3) This audit is intended to document our Pre-ETS service delivery program and develop written implementation guidelines for program continuity. Upon completion of this internal audit, procedures will be created, and staff will be trained in the new procedures and changes to the internal desk guide.
- The Agency is in the process of submitting a work program (exhibit 3.5) for the October 2023 IFC to establish an expense category specifically for Pre-ETS. Creating a new expense category specifically for Pre-ETS will improve the accuracy of our financial and programmatic reporting. Currently, these expenses are combined with all other VR services, making it difficult at times to discern the true costs associated with them. By introducing a dedicated category, we can more precisely track and report the expenses related to Pre-ETS, ensuring that our reporting is accurate. Additionally, VR will be able to clearly delineate the 15% it is required to reserve and expend for Pre-ETS as required in the Grant Award. Per the Award, "...a State must reserve and expend at least 15 percent of its state allotment, under the State Vocational Rehabilitation Services (VR)

grant (ALN 84.126A), to provide, or arrange for the provision of, preemployment transition services to students with disabilities.”

Recommendation #4

Enhance supervisory oversight processes to ensure counselors perform and document reviews of Individualized Plans of Employment (IPE) at least annually from the date of the original IPE

DETR’s Initial Response

- DETR VR has requested a custom report be developed by Alliance (our case management system creator) to track, at the case level, the completion of Annual Reviews. Our Rehabilitation Supervisors will be the users of the report. They will use the report to monitor the completion of Annual Reviews for their subordinate Rehabilitation Counselors.
- DETR VR has rewritten counselor work performance standards to include Annual Reviews of IPEs to emphasize this task at the counselor performance level.
- DETR VR has rewritten Rehabilitation Supervisor work performance standards to measure supervisor performance based on counselor achievement of WPS goals.
- DETR VR case review instrument has been revised to create an independent question pertaining only to Annual Reviews. Previous versions of the document included IPE signature requirements with the topic of Annual Reviews.
- As Annual Reviews must only be signed by the counselor per federal regulations, DETR VR is redesigning this form to better align with those regulations and reduce administrative burden on our clients. DETR VR is working with Alliance to modify the Annual Review module in AWARE for this purpose.

DETR’s 60-Day Corrective Action Plan

- DETR VR has developed “Activity Due with Aging” report to track, at the case level, the completion of Annual Reviews. Starting in February 2023 Rehabilitation Supervisors have started receiving this report every Monday and work the report to monitor the completion of Annual Reviews for their subordinate Rehabilitation Counselors and to address any exceptions.
- DETR VR has redesigned the Annual Review Form and process to better align with federal regulations and reduce administrative burden on our clients. DETR VR has worked with Alliance to modify the Annual Review module in AWARE for this purpose.
- DETR VR has conducted an extensive internal audit of all open VR cases and identified cases without an Annual Review. DETR VR Counselors have been provided reporting of cases out of compliance. DETR VR has devoted February’s Data Integrity Day where the entire agency focused on remediation of those cases out of compliance.

DETR’s 6-month Corrective Action Plan-Response

Partially implemented

Expected Completion: October 2023

- As Annual Reviews must only be signed by the counselor per federal regulations, DETR VR has redesigned (enter the date) the Annual Review form to better align with regulations and reduce administrative burden on our clients. Subsequently, the VR desk guide has been updated to reflect the changes in procedure. (exhibit 4.1)
- Annual Review dates have been added to the aging report completed by all Rehabilitation Counselors on a weekly basis which better assists counseling staff with monitoring upcoming and completed Annual Reviews. (exhibit 4.2)
- DETR VR has approximately 341 Annual Reviews that have been identified as out of compliance with 13% improvement since the previous quarter per the Annual Review Activity Due Report. (exhibit 4.3)
- DETR VR implemented the newly revised case review instrument. (exhibit 4.4)

Recommendation #5

Establish controls over IPE plan approvals when spending exceeds planned amounts and established thresholds. Processes should include periodically reviewing system reports to ensure spending remains within approved amounts.

DETR's Initial Response

- DETR VR is working with Alliance to develop a report to be used at the VR Supervisor level to monitor IPE spending at the case level to prevent overspending.
- DETR VR is putting system controls in place to prevent issuing authorizations over the plan limit. DETR VR is also working with the vendor and/or identifying funding source to pay for the upgrade to the system.
- Work with Alliance to enable the Vendor Module which will link counseling spending to contract limits, also an act to prevent overspending.
- The DETR VR Administrative team conducts a weekly IPE committee to review spending authority that exceeds defined thresholds for cost or complexity.

DETR's 60-Day Corrective Action Plan

- DETR VR in collaboration with Alliance has scheduled implementation of Aware Vendor Module in Winter 2024. This module will link counseling spending to contract limits and will also act to prevent overspending.
- Until the new module is implemented, the agency will utilize monthly internally generated reports of total plan costs for supervisors to review and monitor/prevent overspending.

DETR's 6-month Corrective Action Plan-Response

Partially implemented

Expected Completion: September 2024

- DETR VR in collaboration with Alliance has scheduled implementation of Aware Vendor Module in Fall 2024, in order for the agency to have sufficient time to obtain contractual and budgetary legislative approvals. This module will link counseling spending to contract limits and will also act to prevent overspending. (exhibit 5.1)
- Until the new module is implemented, the agency will utilize monthly internally generated reports of total plan costs for supervisors to review and monitor/prevent overspending.
- The Management Analyst IV will be responsible for monitoring and preparing the spending report until the module is implemented. This report will be reviewed quarterly with Rehabilitation Management and Administration. (exhibit 5.2)
- The DETR VR Executive Team conducts a weekly IPE committee to review spending authority that exceeds defined thresholds for cost or complexity. (exhibit 5.3)

Recommendation #6

Enhance policies, procedures, and controls regarding elderly clients obtaining hearing aids to increase evidence and confidence that services delivered are in line with Vocational Rehabilitation program purposes.

DETR's Initial Response

- DETR VR will implement additional internal controls regarding hearing aids per the recommendations provided to increase evidence and confidence that services delivered are in line with VR program purposes.
- The cost of hearing aids will be declining due to the change in the federal law which states that hearing aids no longer require a prescription. They will now be over the counter requiring no oversight for purchase. This may lower the price and reduce referrals to VR for this purpose.
- DETR VR will revise its current hearing aid consultation request to address repeat purchases and to ensure the requested hearing aids will meet participants' vocational need.
- If a potential client has a job at application and needs a hearing aid to keep the job, DETR VR collects details about their employer for successful closure per federal case closure requirements.
- DETR VR is required by federal regulations and VR Professionals Code of Ethics not to assume intent of clients with disabilities seeking services, but to assess whether the disability they have presents impediment to employment.
- Per the Rehab Act, DETR VR is prohibited from considering the following factors in the determination of eligibility of an individual with a disability and/or the provision of VR services:

- The cost of requested services
- The age of the individual seeking services
- The nature and scope of requested services
- DETR VR can only restrict access to our services to the extent which federal regulations allow us to, adding additional restrictions could put agency at a legal liability.

DETR's 60-Day Corrective Action Plan

- In collaboration with the Deaf/Hard of Hearing staff team, DETR VR has revised the VR Desk Guide on the section regarding the provision of hearing aids. The changes to the VR Desk Guide incorporate Federal guidelines in the provision of over-the-counter hearing aids and strengthens the existing five-year funding rule. The Desk Guide also clarifies and simplifies the agencies procedures regarding the provision of hearing aid services which will enable agency staff to better implement and enforce the guidelines.
- DETR VR is also working on revising the hearing aid consultation request (Case Consultation Report) which is used by the State Hearing Consultant to approve hearing aid cases.
- DETR VR in collaboration with Alliance has scheduled implementation of Aware Vendor Module in Winter 2024. This module will link counselor spending to contract limits and will also act to prevent overspending.

DETR's 6-month Corrective Action Plan-Response

Fully implemented

- In collaboration with the Deaf/Hard of Hearing staff team, DETR VR has revised and implemented the VR Desk Guide on the section regarding the provision of hearing aids. The changes to the VR Desk Guide incorporate Federal guidelines in the provision of over-the-counter hearing aids. VR staff will receive mandatory training on the Desk Guide revisions in October 2023. (exhibit 6.1)
- DETR VR revised the hearing aid consultation request (Case Consultation Report) which is used by the State Hearing Consultant to approve hearing aid cases. The case consultation report was revised to ask more specific questions of the State Hearing Consultant and formalizes the Consultant's recommendation and approval. (exhibit 6.2)
- DETR VR revised the participant Equipment Agreement form which documents the purchase of hearing aids. The participant Equipment Agreement form now includes the date of purchase, the warranty information, and provides disclosures that the participant will sign (exhibit 6.3)
- DETR VR has also added another Rehabilitation Counselor who has specialized education and training in deaf studies/ASL to serve the deaf/hard of hearing community in the northern part of the state, including the most rural communities. This counselor is located in Ely, NV.

Recommendation #7

Routinely monitor vendors providing services to identify if vendors are providing a disproportionate level of services.

DETR's Initial Response

- DETR VR will track vendor authorizations and spending through AWARE and DAWN. Detailed reports will be provided to the Deputy Administrator of Programs, Deputy Administrator of Operations, and the Bureau Chief quarterly.
- DETR VR will implement additional internal controls regarding the potential misuse of services by both vendors and clients to ensure VR services are not being taken advantage of.
- DETR VR will work with our case management system vendor (Alliance) to enhance systems capabilities in order to track vendor authority and ensure spending does not exceed contractual limits.
- DETR VR has no control over who refers clients and the intentions of the clients who apply. Recognizing that, DETR VR utilizes consultants to review hearing aid and dental procedures to ensure that all services are needed and appropriate. While DETR VR has limited vendors for certain services, which may result in most referrals going to a few vendors, DETR VR is working to procure more vendors and thereby prevent disproportionate levels of service.

DETR's 60-Day Corrective Action Plan

- DETR VR leadership team will devote one meeting quarterly to work with the internal Contracts Unit to review individual vendor spending, to ensure that no one vendor is getting a disproportionate number of referrals and ensure that contractor resources are being used equitably.
- DETR VR in collaboration with Alliance has scheduled implementation of Aware Vendor Module in Winter 2024. This module will link counselor spending to contract limits and will also act to prevent overspending.

DETR's 6 month Corrective Action Plan-Response

Fully implemented

- DETR VR Executive Team has started meeting quarterly with the Contracts Unit to review individual vendor spending report, to ensure that no one vendor is getting a disproportionate number of referrals and ensure that contractor resources are being used equitably. Example provided. (exhibit 7.1)
- In the event that disproportionate use is recognized, the Executive Team will request reporting to identify the individual staff who are using that vendor and determine if it is across the board or isolated to an individual or few staff. The Executive Team will implement a customized solution to address the identified infractions and will take action to remedy.

- DETR VR in collaboration with Alliance has scheduled implementation of Aware Vendor Module in Fall 2024, in order for the agency to have sufficient time to obtain contractual and budgetary legislative approvals. This module will link counseling spending to contract limits and will also act to prevent overspending.

Recommendation #8

Develop policies and procedures to continually identify underserved clients and implement strategies to ensure the equitable provision of services.

DETR's Initial Response

- DETR VR procures a Comprehensive Needs Assessment Survey (CSNA) Report every three (3) years from industry recognized professionals to evaluate the operations and effectiveness of the program. DETR VR will ensure that this aspect of the performance is evaluated.
- DETR VR will develop policies and procedures to continually identify underserved clients and implement strategies to address the shortfalls.
- DETR VR will conduct outreach to targeted communities, social & religious organizations.
- DETR VR will work to expand its social media and web-based presence to expand outreach and target underserved populations. DETR VR will also create targeted media campaigns to reach specific cultures and underserved communities.

DETR's 60-Day Corrective Action Plan

- DETR VR has developed and is implementing a Social Media Plan for 2023 with targeted outreach and a goal of increasing visibility, access and participation from underserved Nevada communities.
- DETR VR has updated its website www.vrnevada.org to be available in the 5 most prevalent languages in Nevada: English, Spanish, Tagalog, Korean and Chinese. This will facilitate participation from these most prevalent cultures and underserved communities in Nevada.
- DETR VR has collaborated with Workforce Connections on seating VR staff in underserved Las Vegas communities.
- DETR VR has procured the real-time American Sign Language (ASL) interpreting service, ASL Anywhere and purchased iPads with the ASL Anywhere app to facilitate communication with individuals who are Deaf/Hard of Hearing who come into the main VR offices seeking information or services.

DETR's 6 month Corrective Action Plan-Response

Fully implemented

- VR is planning two *Town Hall* meetings to solicit feedback on VR services, including Pre-ETS services. These town halls will be held on November 6th and 15th 2023 (exhibit 8.1). These meetings will be both in-person and virtual.
- DETR VR has updated its website www.vrnevada.org to be available in the 5 most prevalent languages in Nevada: English, Spanish, Tagalog, Korean and Chinese. This will facilitate participation from these most prevalent cultures and underserved communities in Nevada. (exhibit 8.2) The agency also has plans to continue expanding the number of languages that the website is available in.
- DETR VR has fully developed and is successfully implementing a Social Media Plan for 2023 with targeted outreach and a goal of increasing visibility, access and participation from underserved Nevada communities. (exhibit 8.3)
- DETR VR has collaborated with Workforce Connections on seating VR staff in underserved Clark County communities, to ensure accessibility of our program to potential clients.
- Using the data compiled from the CSNA, DETR VR in conjunction with the Nevada State Rehabilitation Council (NSRC) has identified underserved populations for increased VR effort. These populations will be tracked quarterly for expected improvement in community outreach efforts.
- DETR VR has implemented the use ASL Anywhere in the two district offices in Reno and Las Vegas. The ASL Anywhere app facilitates communication with individuals who are Deaf/Hard of Hearing; DETR VR staff report this resource has been effective with individuals seeking services on a walk-in basis.

Thank you and if you have any further questions or wish to have more information, please do not hesitate to contact Drazen Elez, Administrator of the DETR Rehabilitation Division, at d-elez@detr.nv.gov or at 702-486-0506.

Sincerely,



Administrator
Rehabilitation Division

cc: Christopher Sewell, DETR Director
Joshua Marhevka, DETR Deputy Director
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6-Month “Status Report” Overview

Recommendations	Description	6-month Recommendation Status	Expected Completion Date
#1	Develop a detailed program planning document, such as a logic model, for equitable and community tailored Pre- Employment Transition Services (Pre-ETS) program delivery that will assist the Division with increasing Pre-ETS spending to meet federal requirements and assure youth in rural districts receive adequate services. The Division should include school districts in the planning process.	<i>Partially implemented</i>	July 2024
#2	Improve communication with all school districts regarding the services and methods available for program delivery in congruity with program planning.	<i>Fully implemented</i>	
#3	Create policies and procedures to accurately track Pre-ETS services and participant data throughout the State.	<i>Fully implemented</i>	
#4	Enhance supervisory oversight processes to ensure counselors perform and document reviews of Individualized Plans of Employment (IPE) at least annually from the date of the original IPE.	<i>Partially implemented</i>	October 2023
#5	Establish controls over IPE plan approvals when spending exceeds planned amounts and established thresholds. Processes should include periodically reviewing system reports to ensure spending remains within approved amounts.	<i>Partially implemented</i>	September 2024
#6	Enhance policies, procedures, and controls regarding elderly clients obtaining hearing aids to increase evidence and confidence that services delivered are in line with Vocational Rehabilitation program purposes.	<i>Fully implemented</i>	
#7	Routinely monitor vendors providing services to identify if vendors are providing a disproportionate level of services.	<i>Fully implemented</i>	
#8	Develop policies and procedures to continually identify underserved clients and implement strategies to ensure the equitable provision of services.	<i>Fully implemented</i>	