

Corrective Action Plan for

Initial CAP - current status:

Monitoring Report PDF format: [NV_2021_Section_107_Pre-ETS-Final.pdf \(ed.gov\)](#)

Monitoring Report Publication Date: June 12, 2023

Submitted by: Brett Martinez

Submitted on: August 2, 2023

Completed by:

Completed on:

Approved by: Shannon Moler

Approved on: August 14, 2023

CAP Resolved Date:

Number of findings:

Number of resolved findings:

Percent resolved:

Finding 1: Noncompliance with Pre-Employment Transition Services Requirements

Finding Headline: Rehabilitation Services Administration’s (RSA) annual review and finding regarding the State’s failure to satisfy requirements governing the provision of pre-employment transition services in Federal fiscal year (FFY) 2021, as determined by RSA in accordance with Section 107(a) of the Rehabilitation Act of 1973 (Rehabilitation Act)

Finding Requirement: Pursuant to Section 107(a)(1) of the Rehabilitation Act, RSA conducts an annual review of the Nevada Vocational Rehabilitation Division (NV VRD) to determine whether the State is substantially complying with the requirements of its Unified State Plan, including requirements governing the provision of pre-employment transition services to students with disabilities. The most recent FFY 2021 financial reports submitted by NV VRD the most recent final financial reports available to RSA, demonstrate the State failed to satisfy the requirements of Section 110(d)(1) and 113 of the Rehabilitation Act by not reserving and expending at least 15 percent of its VR grant amount on the provision of pre-employment transition services for students with disabilities. For this reason, RSA is requiring NV VRD to submit a response and corrective action plan, pursuant to Section 107(b)(2) of the Rehabilitation Act.

Mandated Corrective Action: The State must develop and implement a corrective action plan that results in sustained compliance with the pre-employment transition service requirements by September 30, 2024. The plan must:

- address the root cause of the State’s noncompliance with the reservation requirements;
- contain a solid, workable plan for action;
- contain a timeline for implementation that will be completed by September 30, 2024;
- be supported by documentation (i.e., fiscal reports) to show the agency has implemented the actions;
- demonstrate verifiable improvement toward meeting requirement on a quarterly basis;
- provide a methodology that allows agency(ies) to review internally whether the corrective actions have resolved the root cause of the noncompliance with the reservation requirements and to review whether the actions are consistent with the progress needed to meet the key dates in the timeline; and
- ensure implementation of internal controls necessary for the agency to maintain compliance with the requirements on an ongoing basis.

RSA Focus Area: Pre-Employment Transition Services

Agency Planned Corrective Action Steps

Corrective action 1.1

Action: Identify the root causes of non-compliance and develop a workplan, with deliverable actions and specific timelines, that provides a methodology for agency(ies) to review internally whether the corrective actions have resolved the root cause of the noncompliance with the reservation requirements and to review whether the actions are consistent with the progress needed to ensure compliance by September 30, 2024.

Standard to be Met and Method of Evaluation: Submission of documentation for review and approval by RSA (i.e., work plan; policies and procedures; case review process, to include policy and case review tool; sample invoices; State system of accounting expenditure data; financial reports, including the RSA-17; and the RSA-911 that demonstrates that the agency traces pre-ETS expenditures at the required level of detail necessary) that demonstrates it has implemented the corrective actions in order to meet compliance with the requirements and those actions resulted in improved compliance.

Planned start date: September 1, 2023

Actual start date: July 1, 2022

Projected completion date: September 30, 2024

Actual completion date:

Quarterly Updates: 04/30/2024

1.1.1 Loss of Third-Party Cooperative Arrangements (TPCA) due to COVID-19 pandemic.

- NV VRD has signed a Data Sharing Agreement with NV DOE. We have received the initial raw data report. This will significantly improve our ability to accurately report number of students that have received Pre-EST services.
- 17 Summer Camps for students with disabilities planned for Summer of 2024.
 - Rural Nevada
 - Elko CRAVE Overnight @ Great Basin College (June 10th-14th)
 - Spring Creek High School (June 11th-27th)
 - Elko High School (June 17th -20th & June 24th – 27th)
 - White Pine High School – Ely Nevada (August 5th – 9th)
 - Southern Nevada
 - College of Southern Nevada (CSN) Henderson – Aviation and Welding (June 10th – 14th)
 - CSN Charleston – Behavior Health (June 17th – 21st)
 - CSN North Las Vegas – Automotive, Culinary Arts and Media Technology (June 27th – 21st)
 - University of Nevada Las Vegas – On the Right Track – Day Time Camp (June 17th – 28th)
 - UNLV CRAVE – Overnight Camp (June 10th – 14th)
 - Camp Beyond the Deaf Home (June 10-15th)
 - Camp iCapABLE – Camp for the “at-risk” including those individuals who are foster and/or justice involved (July 22nd-26th)
 - Northern Nevada
 - Churchill High School (June 3rd – 7th)

- Carson High School (June 11th – 27th & July 9th – 18th)
 - Northern CRAVE – Overnight Camp @ Western Nevada College (June 8th – 12th)
 - Reno @ TMCC (July 8th – 12th)
 - Newton Learning Center (July 8th – 12th)
 - N2S2 Camp for Blind and Visually Impaired @ TMCC (July 15th – 19th)
- LEA agreements have all been signed and executed.
 - Clark County School District
 - Washoe County School District
 - Carson City School District
 - Churchill County School District
 - Douglas County School District
 - Elko County School District
 - Eureka County School District
 - Humboldt County School District
 - Lander County School District
 - Lincoln County School District
 - Lyon County School District
 - Mineral County School District
 - Nye County School District
 - Pershing County School District
 - Storey County School District
 - White Pine County School District
 - Practical Assessment Exploration System (PAES) Labs – NV VRD purchased a new lab for Pyramid Lake High School which will serve Native American students with a disability in a rural part of Northern Nevada.
 - Project Discovery and iAchieve Life Skills Series –The NV VRD is in discussions with Clark County School District (CCSD is the 5th largest in the nation) to provide Project Discovery and iAchieve online tools to 12 schools in CCSD.
 - Summer Youth Internship Program (SYIP) –Already the NV VRD has over 105 students signed up for the SYIP which begins on July 11, 2024.
- 1.1.2 Senate Bill 459 – (81st Session, 2021, Section 7) – Fully Implemented by 01/30/2024
- 1.1.3 The state’s governor’s office directive in 2012 to only have one fiscal code for both state appropriation and federal funds. – Fully Implemented by 01/30/2024
- 1.1.4 Challenges in getting legislative approval to add new NV VRD staff. – Fully Implemented by 01/30/2024

- 1.1.5 Lack of available vendors to provide pre-ETS services in the state.
- NV VRD collaborated with the largest CRP in Nevada to create a mechanism for Pre-ETS service delivery through the provision of a PAES Lab. The PAES Lab has been delivered and set up for Pre-ETS service delivery. This CRP will leverage existing relationships with the Clark County School District to provide Pre-ETS services to students with disabilities in Clark County.
 - NV VRD has added 8 community rehabilitation programs vendors to the slate of those available to provide direct Pre-ETS services inclusive of the five required activities as well as camps.
- 1.1.6 NV VRD has had to cut 19%, or \$612k, of its appropriated general fund in State Fiscal Year 2021. – Fully Implemented by 01/30/24.
- March 2024 reports attached.

Updates 01/30/2024:

- 1.1.1 Loss of Third-Party Cooperative Arrangements (TPCA) due to COVID-19 pandemic.
- Following the loss of TPCA's during the COVID-19 pandemic, one of the goals for Nevada Vocational Rehabilitation Division has been to develop adequate infrastructure in each school district in the state to be able to deliver variety of Pre-ETS services to all students with disabilities in the State of Nevada. These efforts include exploratory and introductory Pre-Employment transition services. As well as providing instruction to persons supporting students with disabilities and dissemination of information about innovative, effective, and efficient approaches to improve the transition of students with disabilities from school to postsecondary education or an employment outcome. NV VRD has developed joint projects and programs with all school districts and major universities in the state. Examples of some of those Pre-ETS services, projects and programs are:
 - Practical Assessment Exploration System (PAES) – one of the main tools through which NV VRD delivers required Pre-ETS services in Nevada schools. The labs have a multi-year useful life with only having small annual expense for replacement of supplies. PAES labs are purchased using authorized funds and planned for after annual determination that adequate Authorized Pre-ETS funds are available.
 - Pathful Explore (Virtual Job Shadow-VJS) – is a tool which in partnership with Nevada Department of Education, NV VRD uses to ensure availability of exploratory and introductory Pre-Employment transition services to all 14+ students with disabilities in Nevada who have an IEP or 504 Plan. VJS licenses are purchased annually using authorized funds and planned for after annual determination that adequate Authorized Pre-ETS funds are available.

- Transition coordinators who are available to provide push-in pre-ETS instruction to every school. These are contract positions, utilizing coordination activities to assist in the facilitation and delivery of Pre-ETS instruction in the classroom.
- NV VR Parent Academy – in collaboration with the NV Center for Excellence in Disability at University of Nevada Reno (UNR), Nevada VRD is developing a Parent Training Academy to help families of students with disabilities smoothly transition from secondary education to post-secondary and employment working with Nevada VR.
- Summer Camps for students with disabilities
 - Two general Pre-ETS Summer Camps (Reno and Las Vegas)
 - Blind Camp – expansion of Pre-ETS Summer Camps
 - Deaf Camp – expansion of PreETS Summer Camps
 - Transition Fair at UNLV
- VR Goggles - TransfrVR goggles are virtual reality instruments that are used to provide the Pre-ETS activity of job exploration counseling to potentially eligible and VR eligible students with disabilities in individual and group format. NV VRD Transition coordinators as well as other VRD staff proctor student experiences using the goggles.
- Project Discovery and iAchieve Life Skills Series – are complimentary tools to the PAES Labs.
- Summer Youth Internship Program (SYIP) – has been expanded in summer of 2023 to include private employers. This program has been established in 2018 and has seen a significant growth over the last two years in the number of students with disabilities who have been paired with internships across the state. Those clients ages 17-21 can earn an income and gain work experience over the summer, some of them landing full-time jobs at the completion of their internship.
- SEA agreement was renewed and fully executed on February 3, 2023.
- LEA agreements were revised in 2023 to follow the renewed SEA, and are pending signature:
 - Clark County School District
 - Washoe County School District
 - Carson City School District
 - Churchill County School District
 - Douglas County School District
 - Elko County School District
 - Eureka County School District
 - Humboldt County School District
 - Lander County School District
 - Lincoln County School District
 - Lyon County School District
 - Mineral County School District
 - Nye County School District
 - Pershing County School District
 - Storey County School District
 - White Pine County School District

1.1.2 Senate Bill 459 – (81st Session, 2021, Section 7)

- The root cause of this element in our view has been fully resolved, as the language which created challenges in spending of non-federal match funds, has been removed and other internal controls put in place to track spending levels of all funding streams.
- Senate Bill 511 passed (82nd Session, 2023) removing the previous language of “...the portion provided by appropriation from the State General Fund or the State Highway Fund must be decreased to the extent that the receipts of the money from other sources is exceeded, but such a decrease must not jeopardize the receipts of such money as is to be received from other sources.”
 - See attached “SB459” and “SB511”.
- Monthly review is conducted for state appropriated funds that have been expended. Process began 7/1/2022.
 - See attached “General Fund Tracker” excel document.
- State match is reviewed weekly as federal drawdowns are prepared to ensure compliance with the appropriate state match requirement.
 - See attached “Procedure - RSA G5 Draws”

1.1.3 The state’s governor’s office directive in 2012 to only have one fiscal code for both state appropriation and federal funds.

- The root cause of this issue in our view has been fully resolved, as the NV VRD in working with Nevada Controller’s office has established separate fiscal codes for each source of funds and developed corresponding policies, procedures and internal controls.
- Beginning in FFY22 NV VRD implemented a new process to code state and federal transactions separately, to ensure more accurate tracking of expenditures.
- Additionally, NV VRD has improved the AWARE service/sub-service categories specifically as it relates to authorizing services for pre-ETS.
 - See attached email “_FY22 SARF DETR 901”
 - See attached “WPC64559”. Establishment of a new expense category to properly account for and track pre-ETS.

- See attached State of Nevada Office of the Controller “Acctg_Policies_Procedures”
- See attached “VR Fiscal Monitoring Guide”
- See attached “Policy Data Validation”
- See attached “Internal Control - 3c Regular Accts Payable”
- See attached “Grant Funding and Job Numbers”
- See attached “Procedure – Match Job Number”

1.1.4 Challenges in getting legislative approval to add new NV VRD staff.

- In the 2023 Legislative Session, NV VRD was approved to receive three new full-time Transition Coordinator positions. Recruitment activities are completed and candidates hired into these new positions effective December 2023.
- The Statewide Transition Coordinator will monitor and evaluate performance of the Pre-ETS Transition Coordinators and Contractors, as required by state HR policies.
- NV VRD repurposed a generalist Rehabilitation Manager I position to a focused and dedicated manager of the Pre-ETS and Blind Services programs. This position will provide oversight to the Pre-ETS team which includes the Statewide Transition Coordinator and all Transition Coordinators.
- In the 2023 legislative session, the NV Governor approved two consecutive annual wage raises for state employees to increase retention and encourage new staff to join state employment.

1.1.5 Lack of available vendors to provide pre-ETS services in the state.

- NV VRD staff have been working on recruiting new vendors to provide Pre-ETS services in the state, by encouraging existing employment providers to expand into Pre-ETS services delivery and finding out-of-state Pre-ETS vendors that are looking to expand into Nevada.
- In December 2023, one of NV VRD’s largest Pre-ETS vendors agreed to expand their services in Clark County by adding two new educational coaches. They have also expanded their program to provide more on campus supports for youth in post-secondary education statewide.
- NV VRD collaborated with the largest CRP in Nevada to create a mechanism for Pre-ETS service delivery through the provision of a PAES Lab. This CRP will leverage existing relationships with the Clark County School District to provide Pre-ETS services to students with disabilities in Clark County.

1.1.6 NV VRD has had to cut 19%, or \$612k, of its appropriated general fund in State Fiscal Year 2021.

- NV VRD has resolved this issue in part by implementing specific fiscal codes for state general fund appropriation and Section 110 Federal VR Grant. At the end of State Fiscal Year 2023, NV VRD had expended all its appropriation funding and had 0% (percent) of legislatively awarded general funds that are reverted to the state budget at the close of the state fiscal year.
 - See attached “FY233265 Closing Doc Summary”.
- Improved AWARE service/sub-service categories specifically as it relates to authorizing services for pre-ETS.
 - See attached email “PreETS Service Categories for Authorizations and Actual Services for VR cases”.
- Extra administrative support staff were assigned to assist with the processing of pre-ETS invoices and entering potentially eligible students into AWARE.
- Monthly review of rate of expenditure of state appropriated general fund and tracking of obligations and expenditure levels of required 15% Pre-ETS reserve.
- Improved AWARE service/sub-service categories will allow for the appropriate assignment and tracking of these services through our case management system and closer oversight by Management Analyst IV.
- Increased focus on making appropriate obligations during the 4th quarter of the Federal Fiscal Year, during the monthly meetings.

Root Causes:

1. Loss of Third-Party Cooperative Arrangements (TPCA) due to COVID-19 pandemic.

- The majority of pre-ETS services prior to FFY21 were provided through our TPCA partnerships.
- After the loss of TPCA due to the financial struggles of our partners, our agency has lost over 40%+ of the pre-ETS expenditures.
- Impacted fiscal spending and access to potentially eligible students.
- Decrease of \$478k in pre-ETS spending due to loss of TPCA’s from FFY20 to FFY21.
- Lack of adequate NV VRD staff support.
- School district staff turnover and relationship building with schools and school districts.
 - Schools are not mandated to establish relationships with NV VRD.
 - The need for NV VRD to establish deeper relationships with the schools is clear, however, it was made nearly impossible with the high rates of turnover during the pandemic.

2. Senate Bill 459 – (81st Session, 2021, Section 7)

- Mandated state agencies to first use non-general fund sources first for its expenditures.
- Challenging to estimate the match NV VRD was going to have by the end of the state fiscal year as we were having to revert 5%-20% of the appropriated general fund.
- 3. The state's governor's office directive in 2012 to only have one fiscal code for both state appropriation and federal funds.**
 - Made it very challenging to plan for, track and ensure that the appropriate level of pre-ETS were being expended.
- 4. Challenges in getting legislative approval to add new NV VRD staff.**
 - This would allow for increased management and delivery of pre-ETS services.
 - Only one position was appropriated by the State Legislature in 2017 to manage the entire statewide pre-ETS program for NV VRD.
 - In the absence of pre-ETS specific staff, NV VRD has relied on hiring temp contractors to provide pre-ETS services. However, due to lack of benefits and job security, these positions have very high turnover rates which creates challenges in developing and maintaining relationships with school districts as well as students with disabilities and their families.
- 5. Lack of available vendors to provide pre-ETS services in the state.**
 - Particularly those that can access Clark County School District (Nevada's largest school district)
 - Vendors to serve 15 rural school districts.
- 6. NV VRD has had to cut 19%, or \$612k, of its appropriated general fund in State Fiscal Year 2021.**

Workable Plan for Action:

- 1. The state has determined that it needs to elevate the pre-ETS program within the hierarchy of the agency and ensure appropriate support and oversight.**
 - In the restructure NV VRD has created a new district with statewide duties, which included a District Manager I that directly managed Statewide Transition Coordinator.
 - In addition, extra administrative support staff were assigned to assist with the processing of pre-ETS invoices and entering potentially eligible students into AWARE.
- 2. NV VRD, in our annual strategic planning, decided to establish a schedule for routine internal program auditing by our internal Quality Assurance Team.**
 - This will ensure that we keep our procedures in step with our policies.
 - That Staff are following the policies and procedures.
 - That the Statewide Transition Team is working most efficiently to achieve pre-ETS.
- 3. Improved AWARE service/sub-service categories specifically as it relates to authorizing services for pre-ETS.**
 - This allows for the appropriate assignment and tracking of these services through our case management system.
- 4. Develop fiscal reporting specific to pre-ETS to monitor compliance and to appropriately determine and track the required 15% reserve.**
 - Administration and staff will meet monthly to review.

Timeline:

The agency is in the process of determining a specific timeline for each of the following items. NV VRD anticipates for all to completed and implemented by 09/30/2024.

- 1. Update staff Work Performance Standards (WPS) to reflect 15% pre-ETS spending/effort expectation for all caseloads.**
 - Train staff on how to capture pre-ETS spending via authorizations for paid services,
 - how to capture authorized services when they are providing the service,
 - and how to capture pre-ETS coordination activities.
- 2. NV VRD will make pre-ETS available to all students with disabilities in the State of Nevada by using:**
 - Virtual Job Shadow (VJS,)
 - Practical Assessment Exploration System (PAES),
 - Transition coordinators who are available to provide push-in pre-ETS instruction to every school.
- 3. Increased compensation for State employees**
 - Will help keep staff and encourage new staff to come to NV VRD.
 - Reduce vacancy rates.
- 4. Continued support of comprehensive transition programs.**
 - Path 2 Independence at University of Nevada, Reno (UNR)
 - Project FOCUS at University of Nevada, Las Vegas (UNLV)
- 5. Request additional transition coordinators through the legislature.**
- 6. Work with staff to capture all coordination services to schools on timesheets.**
- 7. Update all LEA agreements and have pre-ETS requirements detailed, and reporting expectations identified.**
- 8. Update SEA agreement which includes training on pre-ETS to districts.**
- 9. New PAES labs (portable) that are not dependent on a dedicated classroom space.**
- 10. Apply for Disability Innovation Fund (DIF) grant which, if awarded, will create better collaboration and pre-ETS resources.**
- 11. New collaboration with CCSD to provide transition coordinators for schools or each district.**
- 12. Development of new summer camp experiences (D/HH & Blind).**
- 13. Allow more vendors to provide post-secondary Campus Connections.**
- 14. CCSD Transition Academy- “boot camp” style after-school activities.**
- 15. A work readiness program for transition students only.**
- 16. Blind Connect residential skills training for BSBVI transition students that covers all pre-ETS and work experience.**
- 17. Increased focus on making appropriate obligations during the 4th quarter of the Federal Fiscal Year.**
- 18. Expand pre-ETS camp offerings to include disability specific groups, industry or occupational categories (STEAM, hospitality, etc.), and different times of the year (Summer, Winter break, afterschool and weekends).**

RSA State team comments:

Resolved? No

Corrective action 1.2

Action: Develop and implement pre-employment transition service internal controls that provide for ongoing monitoring of pre-employment transition services and program expenditures to ensure the State meets and sustains compliance with the requirements. This includes monitoring of pre-employment transition service program and fiscal data to ensure it accurately reflects Federal requirements and RSA reporting guidelines.

Standard to be Met and Method of Evaluation: Submission of a work plan to develop and implement comprehensive pre-employment transition service internal controls necessary for the agency(ies) to reach and maintain compliance with the Federal requirements. Workplan must include:

- Identification of the internal control processes NV VRD have determined are necessary to ensure compliance with the pre-employment transition service requirements. Must include an ongoing monitoring component that ensures sustained compliance with requirements.
- Submission of draft pre-employment transition service internal controls to RSA for review and feedback.
- Implementation of approved internal controls in a timely manner that enables the NV VRD to implement controls and demonstrate the processes resulted in compliance by September 30, 2024.

Planned start date: September 1, 2023

Actual start date: July 1, 2023

Projected completion date: September 30, 2024

Actual completion date:

Quarterly Updates:

- Internal monitoring was performed during September 2023. The self-monitoring report aims to ensure compliance with federal regulations and to verify that pre-ETS authorizations and payments are being appropriately administered. NV VRD received a 94% accuracy score.
 - See attached “Report – 2023 Pre-ETS Internal Monitoring”.
- NV VRD continues to monitor its pre-ETS set aside determination to ensure compliance with the percentage of funds required to be reserved and expended. Additionally, to monitor the amount of funds available, if any, to be used on required activities. Through the first quarter of FFY24 NV VRD projects it does have funds available to use on required activities.

- See attached policy/procedure/report “...Pre-ETS Set-Aside Determination”.
- NV VRD continues to monitor and project its pre-ETS expenditures to ensure compliance with the percentage of funds to be reserved and expended. Through the first quarter of FFY24 NV VRD is projected to reach 15.58% for pre-ETS expenditures by yearend.
 - See attached procedure/report “Procedure Pre-ETS Monthly Report” and “Report FFY24 Dec Pre-ETS”.
- NV VRD continues to conduct its Data Integrity Days monthly for data cleansing assignments to ensure accurate data entry for accurate reporting, providing case management demonstration and documentation, and provide Q&A to assist with any changes or updates to the desk manual, policy, procedure, and/or internal controls.

Internal Control Processes:

- 1. NV VRD has developed fiscal reports to appropriately determine and track the required 15% pre-ETS reserve.**
 - Pre-ETS monthly expense report.
 - Displays current and projected federal year pre-ETS expenditures by the required, coordination, and authorized activities.
 - Displays current and projected level of pre-ETS spending and where the agency sits as it relates to reaching the required 15%.
 - Set-Aside Determination Report.
 - Reporting includes total federal award drawn and matched, the pre-ETS 15% minimum requirement, the number of clients served, the cost per client for the provision of the pre-ETS activities, the federal funding used on pre-ETS activities (required/coordination/authorized), current and future year projections, and more.
 - Pre-ETS Internal Monitoring Report.
 - Document review consists of a random sampling of pre-ETS authorizations and payments.
 - Review of authorizations from the AWARE case management system to ensure obligations are being assigned to the appropriate federal fiscal year award.
 - Review of authorizations from the AWARE case management system to ensure services are being pre-authorized.
 - Review samples of paid expenditures to ensure payments are being assigned to the appropriate federal fiscal year award.
- 2. NV VRD has established a schedule for routine internal program auditing by our internal Quality Assurance Team.**
 - This will ensure that we keep our procedures in step with our policies.
 - That Staff are following the policies and procedures.
 - That the Statewide Transition Team is working most efficiently to achieve pre-ETS.

Methodology for Implementation:

- 1. Provide training to NV VRD accounting and pre-ETS teams on proper use of fiscal codes and pre-ETS sub-service categories in the AWARE system.**
 - This information was shared with all staff at our Data Integrity Day (DID) on April 27, 2023.
- 2. Management Analyst IV, Statewide Transition Coordinator, and District Manager I currently meeting bi-monthly. In this forum the following activities occur:**
 - Review reports and pre-ETS progress, invoices, and current trends for all activities related to the pre-ETS program.
 - Monthly reporting to track current progress.
 - Routinely review and monitor reports.
 - Identify program and fiscal shortcomings.
 - Escalate major concerns to Rehabilitation Administration.
 - Brainstorm ideas for further implementing established processes, or new processes, to meet fiscal shortfalls based on current program and statewide needs (i.e., PAES labs in rural communities, etc.).
 - Continuously identify areas for programmatic improvement including summer camps, internships, work-based learning opportunities, etc.
- 3. As a result of the annual strategic planning, internal quality control and administration will assess all units in the VR program.**
 - VR Nevada initiated an internal audit of the pre-ETS program on June 1, 2023. 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 incorporated into the newly revised procedures in the current VR Desk Guide. Staff will then be trained in the new procedures and changes to the internal desk guide.
- 4. Expand business development team's sphere of concern to include pre-ETS employers, sites, and internship development.**

RSA State team comments:

Resolved? No

Public Burden Statement (OMB-1820-0694):

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1820-0694 that expires on 2.29.2024. Public reporting burden for this collection of information is estimated to average 975 hours including development of corrective action plan and quarterly

reporting per response, time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain benefit (Section 107A of the Rehabilitation Act of 1973, as amended by Title IV of the Workforce Innovation and Opportunity Act). If you have any comments concerning the accuracy of the time estimate, suggestions for improving this individual collection, or if you have comments or concerns regarding the status of your individual form, application or survey, please contact Joseph Doney, Rehabilitation Services Administration, 550 12th St SW, Washington, DC 20202-5176 / joseph.doney@ed.gov, directly.
