

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

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## Vocational Rehabilitation Fiscal and Programmatic Policies

### Fiscal Policy 1: RSA Vocational Rehabilitation Fiscal Policies

Applies to (check all that apply):

<input type="checkbox"/> Vocational Rehabilitation – Administration
<input type="checkbox"/> Vocational Rehabilitation – Staff
<input type="checkbox"/> Fiscal - Administration
<input type="checkbox"/> Fiscal – Staff
<input type="checkbox"/> Other Staff (please specify)
<input type="checkbox"/> Additional Comments

#### Purpose

To establish Fiscal Policies in accordance with the Rehabilitation Services Administration (RSA) uniform guidance and protocols.

#### Prior Approval Requirements

#### Background

The U.S. Department of Education, at 2 CFR §3474.1, adopted – effective as of December 26, 2014 – the Office of Management and Budget’s (OMB’s) Uniform Administrative Requirement, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) codified at 2 CFR part 200 (79 FR 76091 (Dec. 19, 2014)). The Uniform Guidance requires prior written approval (prior approval) from the Rehabilitation Services Administration (RSA) before State VR agencies take any of the following actions, or incur any of the below outlined expenditures or obligations.

### **Expenditures and Obligations**

#### **A. Capital Expenditures, Equipment, and Real Property:**

1. Encumbering title to or disposing of real property purchased with Federal funds (2 CFR § 200.311(b))
2. Transferring real property title to the Federal awarding Agency or to a third party (2 CFR § 200.311(c)(3))
3. Direct charging capital expenditures for general purpose equipment, buildings, and land (2 CFR § 200.439(b)(1))
4. Direct charging capital expenditures for improvements to land, buildings, or equipment which materially increase their value or useful life (2 CFR § 200.439(b)(3))
5. Direct charging special arrangement and alteration costs incurred specifically for a Federal award (2 CFR § 200.462(a))
6. Encumbering equipment purchased with Federal funds (2 CFR § 200.313(c)(1))
7. Direct charge capital expenditures for special purpose equipment over \$5,000 (2 CFR § 200.439(b)(2))

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**Note:** See RSA-TAC-18-02 for guidance on submitting streamlined prior approval requests for certain general purpose equipment.

### B. Participant Support Costs:

1. Participant support costs paid to or on behalf of participants or trainees (but not employees) (2 CFR §§ 200.456, 200.75)

**Note:** See RSA-TAC-18-02 for guidance on submitting streamlined prior approval requests for certain participant support costs.

### C. Other Costs and Expenditures:

1. Using unrecovered indirect costs, including indirect costs on cost sharing or matching (2 CFR § 200.306(c))
2. Changing the scope or the objective of the project or program (2 CFR § 200.308(c)(1))
3. Incurring project costs 90 calendar days before the Federal awarding Agency makes the award (2 CFR § 200.308(d)(1))
4. Incurring project costs more than 90 calendar days pre-award (2 CFR § 200.308(d)(1))
5. Direct charging the salaries of administrative and clerical staff if all conditions in 200.413 are met, excluding 200.413(c)(3) (2 CFR § 200.413(c))
6. Severance payments to foreign nationals employed by the non-Federal entity outside the United States (2 CFR § 200.431(i)(4) and (5))
7. Inclusion of costs of entertainment, including amusement, diversion, and social activities and any associated costs that do not have a programmatic purpose (2 CFR § 200.438)
8. Inclusion of allowable pre-award costs (2 CFR § 200.458)
9. Exchange rate fluctuations that result in a need for additional Federal funding or a reduction in the project's scope (2 CFR § 200.440(a))
10. Costs resulting from non-Federal entity violations of, alleged violations of, or failure to comply with, Federal, State, tribal, local or foreign laws and regulations (2 CFR § 200.441)
11. Costs of organized fund raising for the purposes of meeting the Federal program objectives (2 CFR § 200.442(a))
12. Costs of housing, housing allowances, and personal living expenses for employees (2 CFR § 200.445(b))
13. Costs of insurance or of contributions to any reserve covering the risk of loss of, or damage to, Federal Government property (2 CFR § 200.447(b)(2))
14. Costs of membership in any civic or community organization (2 CFR § 200.454(c))
15. Costs such as incorporation fees, brokers' fees, fees to promoters, organizers or management consultants, attorneys, accountants, or investment counselor, whether or not employees of the non-Federal entity in connection with establishment or reorganization (2 CFR § 200.455)
16. Costs of selling and marketing any products or services of the non-Federal entity (unless allowed under §200.421 Advertising and public relations) (2 CFR § 200.467)
17. Use of foreign tax reimbursement for approved activities under the Federal award (2 CFR § 200.470(c))
18. Inclusion of travel costs for officials covered by 200.444 General costs of government (2 CFR § 200.474(a))
19. Travel costs for dependents for travel of duration of six months or more (2 CFR § 200.474(c)(2))

## Allotment and Payment of Federal Funds for Vocational Rehabilitation Services (\$361.65)

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(i) Pursuant to section 110(d) of the Act, the State must reserve at least 15 percent of the State's allotment, received in accordance with section 110(a) of the Act for the provision of pre-employment transition services, as described in §361.48(a) of this part.

(ii) The funds reserved in accordance with paragraph (3)(i) of this section--

(A) Must only be used for pre-employment transition services specified in §361.48(a); and

(B) Must not be used to pay for administrative costs, (as defined in §361.5(c)(2)) associated with the provision of such services or any other vocational rehabilitation services.

Exemption From the Reservation of Funds Requirement for Pre-Employment Transition Services (§ 361.65) found in the preamble Final VR Regulations at 81 FR 55701 (August 19, 2016)

Use of Reserved Funds for Other Vocational Rehabilitation Services found in the preamble Final VR Regulations at 81 FR 55701 (August 19, 2016)

Funds reserved, pursuant to section 110(d)(1) of the Act, for providing pre-employment transition services must be used solely for the activities set forth in section 113 of the Act, as amended by WIOA, and final 361.48(a). If a student with a disability requires other vocational rehabilitation services, the Designated State (DSU) must pay for those services with the remainder of the VR program allotment.

Amount of Funds to be Reserved found in the preamble Final VR Regulations at 81 FR 55701-55702 (August 19, 2016)

Section 110(d)(1) of the Act, as amended by WIOA, requires States to reserve "at least" 15 percent of their VR program allotment for providing pre-employment transition services. Final §361.65(c)(3) mirrors the statutory requirement. Although several commenters referred to the 15 percent reservation requirement as a "limit," the Act as amended by WIOA, and final 361.65(c)(3) do not restrict States from spending more than 15 percent of their allotments for the provision of these services.

Application of the Reservation of Funds to the State and to the State Allotment found in the preamble Final VR Regulations at 81 FR 55702 (August 19, 2016)

Section 113(a) of the Act requires pre-employment transition services to be paid for with funds reserved from the VR program allotment pursuant to section 110(d)(1) of the Act, as amended by WIOA. We agree with commenters that the reservation of funds for providing pre-employment transition services is a State requirement, not a DSU-specific requirement. Section 110(d) of the Act, as amended by WIOA, and final §361.65(a)(3)(i) require the State--not the DSU--to reserve the funds, thereby making this a matter that must be resolved at the State level when there are two agencies in the State. The State allotment, from which funds must be reserved, refers to the Federal funds awarded pursuant to section 110(a) of the Act, not State funds appropriated to the DSUs by State legislatures.

Effect of Reallotment and Carryover on the Reservation of Funds found in the preamble Final VR Regulations at 81 55702 (August 19, 2016)

Under section 110(b)(3) of the Act, funds received during reallotment are an increase to the State's allotment. Similarly, funds relinquished during reallotment are a reduction to the State's allotment. Therefore, funds received or relinquished by a State during reallotment affect the amount of funds that must be reserved for providing pre-employment transition services.

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Section 19 of the Act, which governs the carryover of grant funds, applies to all VR program funds, including funds reserved for providing pre-employment transition services. Section 19(b) of the Act permits grantees to carry over Federal funds for obligation and expenditure in the subsequent Federal fiscal year only to the extent that the DSU has provided sufficient non-Federal expenditures to match those funds. This means that grantees may carry over Federal funds reserved for providing pre-employment transition services into the subsequent Federal fiscal year only to the extent that they have provided the requisite 21.3 percent non-Federal share by the end of the Federal fiscal year in which the funds were awarded. In addition, because they have been matched in the fiscal year for which they were appropriated, the funds reserved for providing pre-employment transition services that are eligible for carryover into the succeeding Federal fiscal year may only be obligated in that succeeding Federal fiscal year and expended for providing pre-employment transition services.

Tracking of the Reserved Funds found in the preamble Final VR Regulations at 81 FR 55703 (August 19, 2016)

When tracking expenditures incurred for the provision of pre-employment transition services, DSUs may need to develop a cost objective (i.e., a separate accounting code) that is different from the one used for other VR program cost allocation purposes, thereby enabling DSUs to track pre-employment transition services expenditures properly with the reserved funds. Similarly, DSUs should account for personnel time to ensure the proper allocation of staff time between the provision of pre-employment transition services and other vocational rehabilitation services, just as the DSU does when its personnel work on multiple programs. DSUs must track pre-employment transition services in a manner that ensures the reserved funds are used only for the provision of services set forth in section 113 of the Act and final §361.48(a). Although this could increase administrative burden slightly, it is only in this manner that a DSU can be certain it is expending reserved funds appropriately. Use of Reserved Funds for Authorized Activities found in the preamble Final VR Regulations at 81 FR 55703 (August 19, 2016)

As stated in final §361.48(a)(3), a DSU may provide "authorized" pre-employment transition services only to the extent that reserved funds remain after providing the "required" activities. As part of the Comprehensive Statewide Needs Assessment, States should determine the number of potential individuals eligible for pre-employment transition services. This data will enable the States to target the amount of the reserved funds necessary for ensuring the "required" pre-employment transition services are provided to students with disabilities. To the extent the States demonstrate that they have made the required pre-employment transition services available to the population identified in the Comprehensive Statewide Needs Assessment, the States have met the requirement to provide the "required" pre-employment transition services prior to the "authorized" activities. Any reserved funds remaining beyond the targeted amount necessary for the "required" activities may then be used for "authorized" activities in final 361.48(a)(3).

Pursuant to §361.65(a)(3)(ii)(A); funds reserved for providing pre-employment transition services may be used to pay for the costs of providing all of the services "specified" in final 361.48(a). Proposed §361.65(a)(3)(ii)(A) referred to services "authorized" in final §361.48(a).

### **Carry Over Requirements**

Applicable Programs:

- State Vocational Rehabilitation Services (CFDA 84.126A)
- Consumer Assistance Program (CFDA 84.161A)
- Protection and Advocacy of Individual Rights (CFDA 84.240A)

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- State Supported Employment Services (CFDA 84.187A)
- Independent Living Services for Older Individuals Who are Blind (CFDA 84.177B)

#### Requirements

This award has a one-year grant period, as specified in Box 6 (“Federal Funding Period”) on the Grant Award Notification (GAN).

1. Section 19(a)(1) of the Rehabilitation Act of 1973, as amended (Rehabilitation Act), permits grantees to carry over Federal funds for obligation and expenditure in the subsequent Federal Fiscal Year (FFY). This means that grantees may carry over Federal funds for one year beyond the year of appropriation, which is the Federal Funding Period listed in Box 6 on the GAN. For example, the year of appropriation for FFY 2015 awards began on October 1, 2014 and ended on September 30, 2015. The subsequent, or carryover year, for FFY 2015 awards started on October 1, 2015 and will end on September 30, 2016. However, section 19(b) of the Rehabilitation Act requires grantees to satisfy the applicable non-Federal share requirement for the year in which the Federal funds were appropriated in order to carry over those funds to the subsequent FFY. This means that grantees must satisfy the match requirement, if applicable, by the end of the year of appropriation, as specified in Box 6 on the GAN in order to carry over unused grant funds for obligation in the next FFY. The programs with a non-Federal share requirement and, thus, subject to section 19(b) are:

- State Vocational Rehabilitation Services – 21.3 percent;
- State Supported Employment Services – 10 percent for the total amount of expenditures incurred with the half of the allotment reserved to provide supported employment services, including extended services, to youth with the most significant disabilities; and
- Independent Living Services for Older Individuals Who are Blind – 10 percent.

In order to satisfy the carry over requirement of section 19(b) of the Rehabilitation Act, non-Federal obligations counted toward satisfying a program’s match requirement must be: 1) incurred during the year of appropriation (see Box 6 of the GAN); and 2) liquidated either in the year of appropriation (see Box 6 of the GAN) or in the subsequent FFY including the 90 day liquidation period. This means that non-Federal obligations that are cancelled, or otherwise fail to liquidate, following the year of appropriation, may not be used toward satisfying the match requirement. In such instances, the grantee must adjust its records to reflect a lower match amount which could affect the amount of Federal funds to be carried over. Failure to liquidate sufficient non-Federal obligations or make the necessary accounting adjustments could result in more funds being carried over than were authorized which could result in RSA seeking recovery of those funds.

2. Section 19(a)(2) of the Rehabilitation Act permits grantees to carry over program income for obligation and expenditure in the subsequent FFY. Grantees do not need to satisfy a non-Federal share requirement to carry over program income funds. Notwithstanding 2 CFR 200.305(a) and to the extent that program income funds are available, grantees must disburse those funds (including repayments to a revolving fund), rebates, refunds, contract settlements, audit recoveries, and interest earned on such funds before requesting additional funds from the U.S. Department of Education.

3. The grants listed above are subject to section 19 of the Rehabilitation Act with regard to the carry-over of funds, not Section 421(b) of the General Education Provisions Act (20 U.S.C. 1225(b), commonly referred to as the “Tydings period” or the “period permitted by the Tydings Amendment”.

### **Monitoring Technical Assistance Guide (MTAG) for Federal Compliance Monitoring Reviews**

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In its monitoring of VR and Supported Employment programs, the Federal State Monitoring and Program Improvement Division (SMPID) will use specific areas of focus when reviewing the performance and compliance of an Agency. These areas of focus entail:

- Performance of the VR and Supported Employment programs, including competitive integrated employment outcomes; Transition services and employment outcomes for youth with disabilities; including pre-employment transition services for students with disabilities;
- Supported employment for individuals with the most significant disabilities, including youth with the most significant disabilities;
- Fiscal integrity of the VR and Supported Employment programs; and
- Progress of VR agencies toward implementing certain requirements under title I of WIOA governing unified and combined planning, performance accountability, and the one-stop service delivery system.

As a result of the activities reviewed in each of the focus areas, teams may identify:

- Strategies used by VR agencies to improve competitive integrated employment outcomes, and provide pre-employment transition services to students with disabilities and supported employment services, including extended services, to youth with the most significant disabilities;
- Recommendations to improve the performance of the VR and Supported Employment programs;
- Compliance findings and corrective actions to resolve the findings;
- The need for technical assistance that will enable VR agencies to improve performance or carry out corrective actions; and;
- The need for additional technical assistance.

SMPID will begin the monitoring process for the VR agencies under review upon the issuance of the MTAG for each fiscal year and conclude all on-site visits by September 30. However, the monitoring process for each VR Agency under review is not intended to last the length of the entire fiscal year. Review teams and the VR agencies will discuss and agree as to when to begin the monitoring process at a time in the year that is most convenient for the teams and the VR agencies. The process includes all preparation and planning, the conduct of an on-site visit, and the development and issuance of draft and final monitoring reports.

In preparation for the on-site visits, the review teams will conduct teleconferences as determined by the review teams and VR agencies to:

- Discuss the monitoring process and the substance of the focus areas included in this MTAG with VR Agency management;
- Identify any outstanding technical assistance needs;
- Gather information pertinent to the focus areas of the review from representatives of the VR Agency, SRC and Consumer Assistance Program, as appropriate; and
- Develop the agenda with VR Agency management and personnel.

Additionally, the teams will review documents requested from the VR agencies related to each of the focus areas prior to the on-site visits. These documents may include, but are not limited to:

- Policies and procedures related to transition and pre-employment transition services as well as supported employment services;
- Fiscal information;
- Sample monitoring reports of VR Agency contractors; and
- Written third-party cooperative arrangements if used by the VR Agency to obtain matching funds.

The review teams will use the information obtained from these documents, analyses of programmatic and fiscal data, and the teleconferences described above to identify, in collaboration with the VR agencies, on-site

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activities and develop the agendas. The review teams will make every effort to maximize the opportunity to prepare for and conduct substantive review activities prior to the on-site visit.

On-site activities may include site visits to schools, CRPs, or other area offices necessitated by the review of the focus areas. These visits will generally occur within the surrounding geographic area of the State Capitol, or the city in which the VR Agency's primary administrative office is located. The review team or the designated State Director may invite VR Agency management and personnel, the leadership of the designated State Agency, and the Chairperson of the State Rehabilitation Council (SRC) to participate in both the entrance and, if one is scheduled, the wrap-up meeting. The wrap-up meeting is optional, and staff from the designated State Agency or designated State are not required to attend, but may attend upon invitation as deemed appropriate by the VR Agency Director.

Subsequent to the on-site visits, the review teams may require further documentation from the VR agencies to supplement information obtained prior to or during the visits. Additional teleconferences may also be necessary to clarify any outstanding questions or concerns the teams have or to gather further detail about a particular issue. Within twenty (20) business days after the end of the on-site visits and any follow-up activities, review teams will conduct a teleconference with VR agencies and other appropriate stakeholders to discuss preliminary program and fiscal observations and potential findings. Potential findings may require review by the Department's Office of the General Counsel, and hence may not be fully developed or available to share at this time. During this teleconference, review teams may also discuss any technical assistance needs and performance trends identified during the on-site visit.

The review teams will develop draft reports that contain:

- A description of the technical assistance provided during the reviews;
- Analysis, observations, and recommendations to improve performance pertaining to each of the focus areas; and;
- Programmatic and fiscal compliance findings, as warranted, and corrective actions to resolve these findings.

Review teams will complete and provide the draft monitoring reports to the VR agencies once the draft reports have completed internal review by RSA and, as needed, relevant departmental or inter-departmental review. Every effort will be made to provide draft monitoring reports in a timely manner. VR agencies will then have twenty (20) business days to submit written responses to the draft reports directly to the teams responsible for developing reports, unless extenuating circumstances require an extension. VR agencies must request any extension of this period by submitting a written justification to the review teams, which will notify the VR agencies if, and for how long, the requests are approved.

The VR Agency responses should include:

- Identification of factual errors;
- Responses to any programmatic or fiscal recommendations, compliance findings, and corrective actions;
- Supporting documentation or data as needed to substantiate VR Agency responses; and;
- Requests for technical assistance to assist the Agency to carry out the recommendations and corrective actions identified in the draft reports.

The review teams may engage in discussions with the VR Agency management and personnel to assist the agencies with developing the responses to the draft reports. In addition, the review teams may conduct teleconferences with the VR agencies to clarify information included in the VR Agency responses and request additional documentation to support statements made in the responses. Preliminary discussions may also occur at this time between the agencies and the



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review teams as to whom they believe will best be equipped to provide any technical assistance that is identified as a result of the review.

Based on the information VR agencies provide in response to the draft reports, the review teams will develop the final monitoring reports, making any corrections as needed. The review teams may also modify or eliminate an observation, recommendation, compliance finding, or corrective action after consulting with SMPID management and the Office of the General Counsel as warranted. In addition to the information included in the draft reports, the final reports will contain the VR agency responses to the drafts and the requests for technical assistance that will enable the agencies to carry out the recommendations and corrective actions. Documentation or exhibits the VR agency submits in support of responses to the draft report will be included in the final report at RSA's discretion. Review teams may request additional assurances or documentation from the VR agencies in connection with programmatic or fiscal findings. The final reports will indicate when such material is required. Once completed, the review teams will provide electronic copies of the final reports to the VR agencies and the SRCs. SMPID will then publish the reports on the RSA website, and the teams will notify the VR agencies, SRCs, technical assistance center representatives, and other stakeholders involved in the review process of the location of the reports on the website.

Within thirty (30) business days from the issuance of the final reports, VR agencies, jointly with the review teams, will develop corrective action plans (CAP) to address any compliance findings identified through the monitoring process. RSA does not expect that compliance findings will be resolved in 30 business days, but that VR agencies will develop a plan to address the compliance issues identified in the final report. To enable the VR agencies to more easily develop the plans and to promote consistency in the information they contain, all CAPs will be developed, approved, and tracked through RSA's website. The content of the CAPs will include:

- Programmatic or fiscal findings as stated in the final report;
- Corrective actions required to resolve the findings contained in the final reports;
- Specific steps the agencies will take to complete the corrective actions;
- Timelines within which the agencies expect to complete each step of the corrective actions; and;
- Target dates for resolution of the findings. Review teams will transmit to VR agencies instructions for the submission of their CAPs through the RSA website.

Once the CAPs are approved and implemented, VR agencies will utilize the RSA website to provide quarterly progress reports on implementing the CAPs. VR agencies should plan to submit the first CAP progress report no later than twenty (20) business days after the end of the first full quarter following the approval of the CAP, and then twenty (20) business days after each subsequent quarter is concluded, until all corrective actions are completed and the CAP is closed-out.

All participants in the Federal monitoring process, including VR Agency management and personnel, SRC members, the Consumer Assistance Program personnel, Technical Assistance Centers, and other stakeholders, may, at any point in the monitoring process, provide written comment and suggestions for improvement of the review process to RSA.

To preserve the ensurance of integrity of data and segregation of duties as it pertains to fiduciary functions and responsibilities, the following actions are implemented:

#### **Reserving funds:**

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- A separate project has been created in the State's financial system (First State Financials -FSF) solely to set aside 15% of the total VR grant for Pre-employment transition services.
- Payments for Pre-employment transition services will be charged to the VR grant (Appropriation 40292) and select Project # 00000000012006 for Pre-employment transition services (as shown below).

The screenshot displays the DE\_GM\_POST\_AWARD system interface. The browser address bar shows the URL: https://fsfd-erp.state.de.us/psc/h92od/EN. The page title is "DE\_GM\_POST\_AWARD". The interface includes a navigation menu with "Grants Management" selected. The main content area shows project details for Project 00000000012006. Key fields include: \*Description: FY 18 VR PRETS; \*Integration: STATE; Project Type: GM35; Percent Complete: 0.00; Project Health: (dropdown); Processing Status: Active; Project Status: Approved; Contract Number: SAI00003384. The "Project Schedule" section shows \*Start Date: 10/01/2018 and \*End Date: 12/31/2018. The "Description" section shows a text area with "PRETS 15% required" and a "Long Description" field. Buttons for "Save as Template" and "Copy Project" are visible at the bottom.

- Non- Pre-employment transition services expenditures are paid from Appropriation #40292, Project #00000000011399.

#### Tracking funds:

- Pre-employment transition services expenditures are tracked automatically by FSF due to the designation of the Pre-employment transition services project #.
- These expenditures will be monitored by the Accountant.
- During monthly meetings with VR District Administrator, the Sr. Fiscal Administrative Officer will include monthly updates of how much has been spent, remaining balance and discuss if any necessary adjustments need to be made.
- "Activity codes" are being created in FSF under the Pre-employment transition services project. These will allow the fiscal staff to access a drop down that will include all the authorized activities shown below.

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<b>Pre-ETS Codes (Required Activities)</b>	
RSA Prets 1.	1. Job Exploration
RSA Prets 2.	2. Work-Base Learning Experience
RSA Prets 3.	3. Counseling Opportunities for Post-Secondary Education
RSA Prets 4.	4. Workplace Readiness
RSA Prets 5.	5. Self-Advocacy
<b>Pre-ETS (Authorized Services)</b>	
RSA Prets 6.	6. ILS services; inclusion in communities; competitive integrated workplaces;
RSA Prets 7.	7. Intellectual disabilities and individuals with significant disabilities coordinating services for independent living, post-secondary and competitive employment
RSA Prets 8.	8. Training for Transition Staff
RSA Prets 9.	9. Disseminating information about innovative, effective and efficient approaches to achieve Pre-ETS goals.
RSA Prets 10.	10. Coordinating activities with transition services with LEAs.
RSA Prets 11.	11. Applying evidence-based findings (to improved policy procedure, practice, and training personnel.)
RSA Prets 12.	12. Developing a model transition demonstration project.
RSA Prets 13.	13. Establishing or supporting multistate or regional partnerships i.e. States, LEAs, designated State units, DDS, private businesses, or other participants for Pre-ETS consumers.
RSA Prets 14.	14. Disseminating information and strategies to improve transition to post-secondary activities for underserved populations.
<b>Pre-ETS (Coordinating Services)</b>	
RSA Pret 15	15. Attending individualized education program meetings for students with disabilities, when invited
RSA Pret 16	16. Working with the local workforce development boards, one-stop centers, and employers to develop work opportunities for students with disabilities.

### **Payments:**

- Expenditures to be charged to Pre-employment transition services are initially authorized by DVI's Transitional Counselor.
- The authorization is done in DVI's Visually Impaired Consumer Registry (VICR).
- Transition counselor obtains information when required about the proposed item to be purchased. Quotes only need to be entered into FSF.
- Quotes are only required for the purchase of technology per IRM standards and for purchases of goods and services not otherwise covered under an existing state contract exceeding \$10,000.00 or covered under a state mandatory use contract. State procurement thresholds can be reviewed here: <http://gss.omb.delaware.gov/contracting/spp.shtml>
- Input purchase into VICR with appropriate fiscal (budget string) coding. Quotes shall not be entered into VICR. Once submitted and approved by all necessary approval levels in VICR, VICR will generate an automated email with the SUBJECT LINE written as "VICR Generated PO #: INSERTED HERE Vendor: INSERTED HERE" to the DVI mailbox account [dvipurchasefiscal@state.de.us](mailto:dvipurchasefiscal@state.de.us)
- Once received in the dvipurchasefiscal email account, the Fiscal Administrative Officer / Accountant will provide coding to the DVI Admin to enter into FSF along with quotes attached (if necessary).
- The DVI admin will enter the purchase order into FSF. At this stage, the Admin may submit the VICR generated purchase order (from VICR or forwarded electronically from the email account) to the vendor in order to provide services in a timely manner to the consumer.
- Once all approvals are completed in FSF, the fiscal office will forward the final, completed documentation to the originating employee and supervisor to complete purchasing.

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- Emails will only be deleted by the DVI fiscal office once invoices/receipts/packing slips have been matched to the purchases in the resource account mailboxes. These items shall be matched by the Admin replying to the original purchase email in the [dvipurchasefiscal@state.de.us](mailto:dvipurchasefiscal@state.de.us) email account with a cc: to fiscal and by attaching the documentation (invoice/receipt/packing slip).
- The DVI fiscal office will then match the invoice/receipts/packing slips to the purchase orders and may delete the emails. This close out process shall occur as expenses are incurred with all emails being reviewed by the fiscal office within 10 business days of the close of each quarter throughout the state fiscal year.
- Pending purchases can be viewed by fiscal, admin, and supervisory staff within the email resource accounts at any time to ensure timely processing.

#### **The provision, tracking, and assignment of costs for authorized activities – this includes:**

- VR staff authorizes the expenditure as Pre-employment transition services.
- Fiscal staff enters the payment into the system using the Pre-employment transition services code.
- Proof of VR authorization of Pre-employment transition services is attached to the Payment Voucher. This can either be written on an invoice or a printout from the VICR system showing that this expenditure was designated as a Pre-ets.
- FSF has specific user roles. These roles serve as another level of internal controls. The Business Manager approves payments put into the system by the Accounting Staff. The approver cannot prepare payments. The staff member that makes payments cannot approve the payments in the system.

#### **RSA Purchased Service Expenditures by Service Category**

All State Vocational Rehabilitation agencies are required to reserve at least 15% of their VR grant award for providing pre-employment transition services. The Division for the Visually Impaired (DVI) currently uses RSA codes in the description section of payment vouchers to properly show expenditures that are for pre-employment transition services and adheres to the following protocols:

- DVI will monitor pre-employment transition services transactions to ensure compliance with federal standards.
- Senior Fiscal Administrative officer, Fiscal Administrative officer and VR District Administrator currently meet monthly to ensure that we are following the Federal and State guidelines.

A voucher detail query report is printed out monthly by DVI's Senior Accountant and is also sent electronically to the Division's Vocational Rehabilitation District Administrator as well as the Division's Fiscal Administrative Officer and Senior Fiscal Administrative Officer. This report is then sorted by the various RSA codes which allows the Division's Fiscal to maintain expenditure balances for various services including the pre-employment transition services.

The expenditure service categories are as follows:

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Code	Service Category
RSA 1	1. Assessment
RSA 2	2. Diagnosis and Treatment of Impairments
RSA 3	3. Vocational Rehabilitation Counseling and Guidance
RSA 4	4. Graduate College or University Training
RSA 5	5. Four-Year College or University Training
RSA 6	6. Junior or Community College Training
RSA 7	7. Occupational or Vocational Training
RSA 8	8. On-the-job Training
RSA 9	9. Apprenticeship Training
RSA 10	10. Basic Academic Remedial or Literacy Training
RSA 11	11. Adult Education (ASE)
RSA 12	12. Job Readiness Training
RSA 13	13. Job Exploration
RSA 14	14. Disability Related Skills Training
RSA 15	15. Miscellaneous Training
RSA 16	16. Job Search Assistance
RSA 17	17. Job Placement Assistance
RSA 18	18. On-the-job Supports: Time-limited (Retention)
RSA 19	19. Supported Employment Services
RSA 20	20. On-the-job Supports: Supported Employment
RSA 21	21. Transportation
RSA 22	22. Maintenance
RSA 23	23. Rehabilitation Technology
RSA 24	24. Reader

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## Vocational Rehabilitation Fiscal and Programmatic Policies

RSA 25	25. Interpreter
RSA 26	26. Personal Attendant
RSA 27	27. Technical Assistance
RSA 28	28. Information and Referral
RSA 30	30. Benefits Counseling
RSA 31	31. Customized Employment
RSA 28	28. Other Services
RSA 29	29. Work based Learning Experience
RSA 30	30 BEP
RSA 31	31. Customized Employment
RSA 32	32. Career Counseling on Employment Opportunities
RSA 33	33. Self-Advocacy
	Pre-ETS Codes (Required Activities)
RSA Prets 1.	1. Job Exploration
RSA Prets 2.	2. Work-Base Learning Experience
RSA Prets 3.	3. Counseling Opportunities for Post-Secondary Education
RSA Prets 4.	4. Workplace Readiness
RSA Prets 5.	5. Self-Advocacy
	Pre-ETS (Authorized Services)
RSA Prets 6.	6. ILS services; inclusion in communities; competitive integrated workplaces;
RSA Prets 7.	7. Intellectual disabilities and individuals with significant disabilities coordinating services for independent living, post-secondary and competitive employment
RSA Prets 8.	8. Training for Transition Staff
RSA Prets 9.	9. Disseminating information about innovative, effective and efficient approaches to achieve Pre-ETS goals.
RSA Prets 10.	10. Coordinating activities with transition services with LEAs.
RSA Prets 11.	11. Applying evidence-based findings (to improved policy procedure, practice, and training personnel.)
RSA Prets 12.	12. Developing a model transition demonstration project.

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RSA Prets 13.	13. Establishing or supporting multistate or regional partnerships i.e. States, LEAs, designated State units, DDS, private businesses, or other participants for Pre-ETS consumers.
RSA Prets 14.	14. Disseminating information and strategies to improve transition to post-secondary activities for underserved populations.
	Pre-ETS (Coordinating Services)
RSA Prets 15	15. Attending individualized education program meetings for students with disabilities, when invited
RSA Prets 16	16. Working with the local workforce development boards, one-stop centers, and employers to develop work opportunities for students with disabilities, including internships, summer employment and other employment opportunities available throughout the school year, and apprenti
RSA 17.	17. Working with schools, including those carrying out activities under section 614(d) of the IDEA, to coordinate and ensure the provision of pre-employment transition services;
RSA 18	18. When invited, attending person-centered planning meetings for individuals receiving services under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.

### SF-425 Form

In accordance with RSA-PD-15-05; issued February 5, 2015; while the SF-425 report is designed for single grant and multiple grant award reporting, the U.S. Department of Education's (Department's) policy is that multiple grant award reporting is not permitted for Department grants. The SF-425 attachment (SF-425A), which is to be used for reporting multiple grants, is not to be used for Department grants and is not included with this PD. As such, references to multiple grant reporting and to the SF-425A in items 2, 5 and 10 of the SF-425 are not applicable to Department grantees. The Department requires grantees to complete a separate SF-425 for each grant they receive.

1. Federal Agency and Organizational Element to Which Report is Submitted: Data entry is not required for this field. RSA is the default entry.

2. Federal Grant or Other Identifying Number Assigned by Federal Agency: Data entry is not required for this field. The grantee's grant award number is the default entry. This is the Award Number listed in Box 2 of the Grant Award Notification (GAN). The grant award number is also referred to as the Federal Award Identification Number (FAIN). If the information on the form is not correct, please notify the RSA Fiscal Unit contact for your award.

3. Recipient Organization: Data entry is not required for this field. The organization's name and address associated with the grant will be the default entry. This is the organization information listed in Box 1 of the GAN. If the information on the form is not correct, please notify the RSA Fiscal Unit contact for your award.

4a. DUNS Number: Data entry is not required for this field. The Grantee Data Universal Numbering System (DUNS) number associated with the grant will be the default entry. This is the DUNS number listed in Box 8 of the GAN. If the information on the form is not correct, please notify the RSA Fiscal Unit contact for your award.

## Division for the Visually Impaired

### Vocational Rehabilitation Fiscal and Programmatic Policies

4b. EIN: Data entry is not required for this field. The Employer Identification Number (EIN) associated with the grantee will be the default entry. This number is also known as the Tax Identification Number (TIN). If the information on the form is not correct, please notify the RSA Fiscal Unit contact for your award.

5. Recipient Account Number or Identifying Number: This is an optional data element. Enter an account number or any other identifying number assigned by the grantee to the award. This number is for the grantee's use only and is not required by RSA. Data entry is limited to 30 characters.

6. Report Type: Indicate if report is final. A report can be marked as final at the end of the period of performance if the grantee has liquidated its obligations and no additional reporting is required for the grant award. The final report must indicate that Federal and non-Federal funds have been liquidated. There must be no cash on hand, all obligations must be liquidated, and program income must be disbursed.

7. Basis of Accounting (Cash/Accrual): Specify whether a cash or accrual basis was used for recording transactions related to the grant award and for preparing the SF-425. For cash basis accounting, expenses are recorded when they are paid. Accrual basis of accounting refers to the accounting method where expenses are reported when incurred. Accrued expenditures are recorded when goods or services are received, regardless of when cash is received or paid. To report accrual information, the grantee is not required to convert its accounting system to the accrual basis, but shall develop such accrual information through an analysis of the documentation on hand (2 CFR 200.302 and 200.327).

Note: A grantee can report using either a cash or accrual basis of accounting. However, if a grantee changes from one basis to another, the grantee should inform RSA of the change. To ensure grantees are not utilizing separate bases of accounting for awards covering the same timeframe, changes should coincide with the end of the fiscal year.

8. Project/Grant Period (From/To): Data entry is not required for this field. The grant period will be entered by default and will be the same as Box 6 on the GAN that documents when Federal sponsorship begins and ends. The grant period represents the period for which the funds were awarded in accordance with 34 CFR 77.1. The grant period is one year. However, Federal funds which remain unobligated at the end of the year of appropriation may be carried over for obligation in the succeeding fiscal year only to the extent that the agency complied with the matching requirement applicable to the State VR Services program for the fiscal year for which the funds were appropriated (Section 19 of the Rehabilitation Act and 34 CFR 361.64(b)).

9. Reporting Period End Date: Data entry may be required for this field if the grantee is submitting a final report. The reporting period end date entered by default will correspond with the required reporting period (3/31 and 9/30). The period covered is always the beginning date of the grant through the end of the reporting period. When submitting a final SF-425 form: • if all funds are obligated by 9/30 of the fiscal year in which the award was made and liquidated within 90 days, the reporting period end date shall be 9/30 of the fiscal year in which the award was made; • if Federal funds are carried over for obligation in the succeeding fiscal year, and all funds are obligated by either 3/31 or 9/30 of the carryover year and liquidated within 90 days, the reporting period end date for the final report shall be 9/30 of the carryover year; and • if Federal funds are carried over for obligation in the succeeding fiscal year, a late liquidation request extension has been approved, and funds were obligated by 9/30 of the carryover year and liquidated by the approved date for late liquidation, the reporting period end date for the final report shall remain 9/30 of the carryover year, but the final report shall be due 45 days after the end date of the approved late liquidation extension period.

10. Transactions



## Division for the Visually Impaired

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10a. Federal Cash Receipts: The grantee must enter the net amount of Federal VR funds on line 10a that the grantee has drawn down from G5. This amount is obtained by running a G5 External Award Activity Report (<https://www.g5.gov>) using date parameters. • For semi-annual reports, the date parameters will be the start date of the award and the reporting period end date. • For final reports, the date parameters will be the start date of the award and the date award funds were liquidated. The net amount of Federal VR funds drawn down will be shown on the G5 report and should be entered as the amount on line 10a of the SF-425 form. Grantees may want to maintain copies of the G5 External Award Activity Reports as supporting documentation that verifies the accuracy of the amount reported on line 10a.

10b. Federal Cash Disbursements: Enter the cumulative amount of actual disbursements made from Federal VR funds drawn down during the reporting period. Disbursements are the sum of actual cash expenditures made for direct charges for goods and services, the amount of indirect expenses charged to the award, and the amount of cash advances and payments made to contractors/vendors.

10c. Federal Cash on Hand (10a minus 10b equals 10c): Data entry is not required for this field. This data element is calculated automatically. If more than three business days of cash are on hand, RSA requires an explanation on line 12, Remarks, explaining why the drawdown was made prematurely or other reasons for the excess cash. Grantees must minimize the time elapsing between drawdown of Federal funds and disbursement by the grantee in accordance with Federal regulations (31 CFR part 205 and 2 CFR 200.305(b)).

10d. Total Federal Funds Authorized: Data entry is not required for this field. This data element is updated automatically and represents the total amount of Federal funds awarded to the grantee as of the end of the reporting period.

10e. Federal Share of Expenditures: Enter the amount of expenditures incurred with Federal funds (also known as Federal fund expenditures).

- For reports prepared on a cash basis, the agency should report Federal fund expenditures as the sum of cash disbursements for direct charges for goods and services, the amount of indirect expenses charged, and the amount of payments made to contractors/vendors.
- For reports prepared on an accrual basis, grantees should report Federal fund expenditures as the sum of cash disbursements for direct charges for goods and services, the amount of indirect expenses incurred, the amount of payments made to contractors/vendors, and the increase or decrease in the amounts owed by the recipient for goods received and services performed by employees, contractors/vendors, and other payees.

***Do not include Federal program income received by the grantee on line 10e. See line 10l for instructions regarding the reporting of Federal program income.***

Grantees must include all Federal VR fund expenditures incurred under the VR program on line 10e, including Federal expenditures incurred for the provision of pre-employment transition services. The amount expended on pre-employment transition services, included on line 10e, must also be reported separately in Section 12, line 12b – Remarks.

10f. Federal Share of Unliquidated Obligations: Enter the Federal portion of unliquidated obligations incurred by the grantee. Unliquidated obligations include direct and indirect expenses for goods and services incurred by the grantee, but not yet paid or charged to the VR grant award, including amounts due to contractors/vendors. When submitting a final SF-425 report, this line should be zero.

## Division for the Visually Impaired

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On line 10f, do not include: 1. expenditures reported on line 10e; and 2. future fund commitments (e.g., a long term contract) for which an obligation or expense has not been incurred pursuant to 34 CFR 76.707.

Note: Grantees have 90 days from the end of the period of performance to liquidate Federal obligations (2 CFR 200.328(b)(1)), which applies regardless of whether the grantee uses a cash or accrual basis of accounting. If the timing of liquidating obligations precludes submission of the final SF-425 report within 90 days after the period of performance, grantees must submit a late liquidation request. The request for late liquidation must be made in accordance with the Department's guidance on late liquidations. If approved, the grantee must liquidate the approved obligations and submit the final SF-425 report within 45 days after the approved late liquidation extension date. When submitting a final SF-425 report, line 10f should be zero.

10g. Total Federal Share (sum of 10e and 10f equals 10g): Data entry is not required for this field. This data element is calculated automatically.

10h. Unobligated Balance of Federal Funds (10d minus 10g equals 10h): Data entry is not required for this field. This data element is calculated automatically. For the final report, this represents the amount of Federal VR funds awarded that the grantee did not request or draw down.

10i. Total Recipient Share Required: Data entry is not required for this field. This data element is calculated automatically using the following formula, and reflects the 21.3 percent match requirement: (line 10a divided by 0.787) multiplied by (0.213).

10j. Recipient Share of Expenditures: Enter the total amount of non-Federal VR expenditures incurred for the reporting period. This amount must include the grantee's non-Federal share of actual cash disbursements or outlays (less any rebates, refunds, or other credits), including payments to contractors, the grantee's non-Federal share of unliquidated obligations (reported separately on line 12d – Remarks), and the Non-Federal Share of Expenditures for the Establishment or Construction of Facilities for Community Rehabilitation Program (CRP) Purposes as reported on line 12a. The amount reported on line 10j does not include Federal program income earned by the grantee. See line 10l for instructions regarding the reporting of Federal program income.

The amount reported on line 10j should be equal to or greater than the amount reported on 10i (required non-Federal share amount) to ensure Federal funds are being drawn down proportionally in accordance with the Cash Management Improvement Act (CMIA) (31 CFR 205.15(d)). By 9/30 of the fiscal year in which the award was made, the grantee must have provided the requisite non-Federal share for any Federal VR funds that will be carried over for obligation in the succeeding fiscal year, in addition to the non-Federal share required for Federal VR funds that have been obligated or expended by 9/30 of the fiscal year in which the VR award was made.

10k. Remaining Recipient Share to Be Provided (10i minus 10j equals 10k): Data entry is not required for this field. This data element is calculated automatically. If the amount is a positive number, this figure represents the amount of non-Federal share the grantee was required to provide, but did not, by the end of grant period. If the amount is a negative number, this figure represents the amount of non-Federal share provided by the grantee that exceeds the non-Federal share required based upon the amount of Federal funds drawn down. Grantees must ensure Federal funds are drawn down proportionally in accordance with the CMIA (31 CFR 205.15(d)) (2 CFR 200.305(b)).

10l. Total Federal Program Income Earned: Enter the total amount of Federal program income (program income) earned and received by the grantee as of the end of the reporting period. Program income is considered earned in the fiscal year in which the funds are received by the grantee (34 CFR 361.63 and 2 CFR 200.80). Therefore, the amount reported on line 10l should not change after the grantee submits its fourth quarter SF-425 report.

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### Vocational Rehabilitation Fiscal and Programmatic Policies

Program income means gross income received by the grantee that is directly generated by an allowable activity supported under the VR program to VR applicants or consumers (2 CFR 200.307). Sources of program income include, but are not limited to: payments from the Social Security Administration (SSA) for assisting Social Security beneficiaries and recipients to achieve employment outcomes, payments received from workers' compensation funds, fees for services to defray part or all of the costs of services provided to VR applicants and consumers, income generated by a State-operated CRP for services to VR applicants and consumers, consumer financial contributions resulting from financial means tests, and payments or reimbursements from insurers for consumer services. Do not include refunds or rebates as program income.

Note: A VR grantee may choose to use SSA payments earned by the VR program for eligible formula grant programs funded under the Rehabilitation Act (Section 108 of Rehabilitation Act and 34 CFR 361.63(c)(2)). The flexibility to transfer program income received from SSA in accordance with 34 CFR 361.63(c)(2) is not granted to the VR agency with regard to program income earned from other sources. Each program earning, or receiving for its use, SSA payments must report the funds as program income earned or received on line 10l. For example, if the VR program receives \$100,000 in SSA payments and keeps it for its own program use, the VR grantee must include the \$100,000 on line 10l. However, if the VR program receives \$100,000 in SSA payments, but transfers the entire amount to the Independent Living for Older Individuals who are Blind (OIB) program, both the VR and OIB programs must report the \$100,000 on line 10l of their respective SF-425s. In so doing, the VR program would report that the funds were "expended" by reporting the transfer on line 10n – Program Income Expended in Accordance with the Addition Alternative and would also report the transfer of program income to the OIB program on line 12f – Remarks. In addition, in this example, the OIB program would report the program income on line 10l as received and report the program income as transferred from the VR program in the Remarks section on line 12b – Remarks of its own SF-425.

Program income from SSA payments recorded as received in the VR program and transferred to an eligible receiving program is considered expended in the VR program. Include the amount of SSA payments transferred on line 10n; additionally, include that amount under the correct line in Section 12 – Remarks that corresponds to the eligible program receiving the transferred VR SSA payments. Program income from SSA payments transferred to other eligible programs is restricted to the grant award year that corresponds to the fiscal year in which it was earned in the VR program. For example, SSA payments earned in the VR program in FY 2015 may be transferred to the FY 2015 OIB program at any time during the period of performance of the FY 2015 award.

Program income earned may be expended in accordance with the deduction or addition alternative.

10m. Program Income Expended in Accordance with the Deduction Alternative: For those grantees using the deduction alternative, enter the amount of program income that was used to reduce the Federal share of the total VR program costs. This reporting alternative is available to the grantee agency even though the use of the addition alternative is also authorized under the VR program (34 CFR 361.63(c)(3)). The grantee must expend program income funds in accordance with the same standards of allowability, reasonableness and allocability (2 CFR 200.403, 200.404 and 200.405) that are applicable to Federal funds (Section 108 of the Rehabilitation Act and 34 CFR 361.63(c)(3); and 2 CFR 200.307(e)(1), 200.401, and 200.408). Be advised that if a grantee utilizes the deduction alternative, the amount of program income entered will reduce the Federal share, which will result in the return of these funds to the Department.

10n. Program Income Expended in Accordance with the Addition Alternative: For those grantees using the addition alternative, enter the amount of program income that was used to supplement the Federal share of the total program costs. The amount reported on line 10n represents actual disbursements (i.e., outlays of program income by the grantee). The outlay of program income funds must meet the same standards of allowability, reasonableness and allocability (2 CFR

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### Vocational Rehabilitation Fiscal and Programmatic Policies

200.403, 200.404 and 200.405) that are applicable to Federal funds (Section 108 of the Rehabilitation Act and 34 CFR 361.63(c)(3); and 2 CFR 200.307(e)(2), 200.401, and 200.408).

10o. Unexpended Program Income (10l minus 10m or 10n equals 10o): Data entry is not required for this field. This data element is calculated automatically. When submitting a final SF-425 report, this line should be zero. Program income that has not been disbursed by the end of the liquidation period must be returned to the Department.

Note: In accordance with 2 CFR 200.305(b)(5), “to the extent available, the non-Federal entity must disburse funds available from program income (including repayments to a revolving fund), rebates, refunds, contract settlements, audit recoveries, and interest earned on such funds before requesting additional cash payments.” [emphasis added]

#### 11. Indirect Expense:

Indirect costs are generally charged to Federal awards via an indirect cost rate. Any grantee that wishes to claim indirect costs under Department awards must prepare an indirect cost proposal and submit it to the cognizant Federal agency for approval (2 CFR part 200 – Appendix VII, paragraph D). Grantees claiming indirect expenses based on an approved cost allocation plan (CAP) (2 CFR part 200 – Appendix VII, paragraph F.3, rather than an indirect cost rate, should follow the directions included in the line item instructions below).

11a. Type of Rate(s): Select whether the approved indirect cost rate is Provisional, Predetermined, Final, or Fixed. If based on an approved CAP, select CAP from the drop-down menu.

11b. Rate: Enter the approved indirect cost rate(s) in effect during the reporting period. For CAPs only, enter 100 percent of the costs attributable to this award.

11c. Period From; Period To: Enter the beginning and ending effective dates for the approved indirect cost rate(s) or CAP.

11d. Base: Enter the amount of the base against which the approved indirect cost rate(s) was applied. The base includes allowable expenditures to which the approved indirect cost rate may be applied. For CAPs, enter the total amount of the CAP costs (include both non-Federal and Federal).

11e. Amount Charged (11b multiplied by 11d equals 11e): Data entry is not required for this field. This data element is calculated automatically.

11f. Federal Share: Enter the Federal share of the amount in 11e.

11g. Totals: Data entry is not required for this field. This data element is calculated automatically.

#### 12. Report Data Elements:

This section is used to report data elements unique to the VR program that are necessary to ensure compliance with program requirements. This section can also be used, as needed, to clarify and explain amounts reported, including sources of matching funds, and changes from amounts previously reported.

12a. Non-Federal Share of Expenditures for the Establishment or Construction of Facilities for Community Rehabilitation Program Purposes: Enter the non-Federal share of expenditures, also included in the total amount of non-Federal expenditures reported on line 10j, incurred for the establishment or construction of facilities for CRP purposes (34 CFR 361.62(b)). Only include those costs for activities that would meet the definition of “establishment of a facility for a

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community rehabilitation program” at 34 CFR 361.5(b)(18) and “construction of a community rehabilitation program” at 34 CFR 361.5(b)(12). Do not include staffing costs or other costs associated with establishment projects, such as those additional costs included in the definition of “establishment of a community rehabilitation program” at 34 CFR 361.5(b)(17). If no funds were used for this purpose during the reporting period, enter zero on this line. Do not include Federal funds used for this purpose.

**Pre-Employment Transition Services:** Enter the total amount of Federal expenditures incurred for the provision of pre-employment transition services to individuals eligible to receive such services (i.e., students with disabilities). Only include Federal funds that were used to pay for activities that are authorized under Section 113 of the Rehabilitation Act. Agencies are required to reserve not less than 15 percent of the total Federal VR allotment, received under section 110 of the Rehabilitation Act, for the provision of pre-employment transition services under section 113. The formula to determine if an agency has spent the funds required is (line 10d multiplied by 0.15). The amount reported on line 12b must also be included in the total amount reported on line 10e – Federal Share of Expenditures.

12c. Not Applicable.

**12d. Recipient Share of Unliquidated Obligations:** Enter that portion of unpaid obligations to be paid with non-Federal funds meeting the requirements in 34 CFR 361.60(b). This amount is also included in the amount reported on line 10j.

**12e. Federal Program Income (VR SSA Payments Only) Transferred to the State Independent Living Services (SILS) Program:** Enter the amount of SSA payments received by the VR program and transferred to the SILS program (Section 108 of the Rehabilitation Act and 34 CFR 361.63(c)(2)). This amount should also be reported as program income received on the corresponding SF-425 submitted for the SILS program. See line 10l instructions for further guidance.

**12f. Federal Program Income (VR SSA Payments Only) Transferred to the Independent Living Services for Older Individuals who are Blind (OIB) Program:** Enter the amount of SSA payments received by the VR program and transferred to the OIB program (Section 108 of the Rehabilitation Act and 34 CFR 361.63(c)(2)). This amount should also be reported as program income received on the corresponding SF-425 submitted for the OIB program. See line 10l instructions for further guidance.

**12g. Federal Program Income (VR SSA Payments Only) Transferred to the Consumer Assistance Program:** Enter the amount of SSA payments received by the VR agency and transferred to the Consumer Assistance Program (Section 108 of the Rehabilitation Act and 34 CFR 361.63(c)(2)). This amount should also be reported as program income received on the corresponding SF-425 submitted by the Consumer Assistance Program. See line 10l instructions for further guidance.

**12h. Federal Program Income (VR SSA Payments Only) Transferred to the State Supported Employment Services (SE) Program:** Enter the amount of SSA payments received by the VR program and transferred to the SE program (Section 108 of the Rehabilitation Act). This amount should also be reported as program income received on the corresponding SF-425 submitted by the SE program. See line 10l instructions for further guidance.

**12i. Total Program Income Transferred:** Data entry is not required for this field. The sum of lines 12e, 12f and 12g is calculated automatically.

#### 13. Certification:

Through the electronic submission of this report, the grantee’s certifying official indicates: “By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures,

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### **Vocational Rehabilitation Fiscal and Programmatic Policies**

disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise." (2 CFR 200.415 and U.S. Code, Title 18, Section 1001).

13a. Typed or Printed Name and Title of Authorized Certifying Official: Enter name and title of authorized certifying official or their designee.

13b. Signature of Authorized Certifying Official: Place a checkmark in the signed box to indicate that a hardcopy of the completed form has been signed by the certifying official authorized to legally bind the grantee and is maintained by the grantee.

13c. Telephone (Area Code, Number and Extension): Enter the telephone number (including area code and extension) of the individual listed in line 13a.

13d. E-mail Address: Enter the email address of the individual listed in line 13a.

13e. Date Report Submitted: Enter the date that the report is submitted to RSA. The report date must be within five days of the date submitted to RSA.

After the form is submitted electronically, RSA fiscal unit staff will mark the form as received. This action does not constitute approval or verification of the financial data submitted by the grantee.

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

### Fiscal Policy 2: RSA Vocational Rehabilitation Fiscal Cost Containment

Applies to (check all that apply):

<input type="checkbox"/> Vocational Rehabilitation – Administration
<input type="checkbox"/> Vocational Rehabilitation – Staff
<input type="checkbox"/> Fiscal - Administration
<input type="checkbox"/> Fiscal – Staff
<input type="checkbox"/> Other Staff (please specify)
<input type="checkbox"/> Additional Comments

#### Purpose

To develop a Policy for the certifying of Cost Containment practices for procuring and providing goods and services for which the Division for the Visually Impaired’s Vocational Rehabilitation Program requests payment.

This policy is subject to revision as additional guidance is issued from the U.S. Department of Labor.

#### References

20 CFR 404.2101 through 404.2127 for the SSDI program and 20 CFR 416.2201 through 416.2227 for the SSI program.

#### Background

The Social Security Administration (SSA) administers a Vocational Rehabilitation (VR) Reimbursement Program to help people with disabilities gain employment. Under this program, SSA reimburses State VR agencies for the costs of the services they provide to beneficiaries with disabilities if such services result in the person's achieving work at a specified earnings level.

#### Legislative Authority

The Social Security Act (the Act) contains the legislative authority for SSA's VR program. Section 222(d) of the Act provides the authority for SSA to reimburse State VR agencies for the cost of rehabilitation services to Social Security Disability Insurance (SSDI) beneficiaries. Section 1615 of the Act provides the authority to reimburse the cost of services provided to disabled or blind Supplemental Security Income (SSI) recipients.

#### Purposes of the Program

The purpose of SSA's VR Cost Reimbursement Program is to:

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

- Make VR services more readily available to disabled or blind Social Security beneficiaries and recipients; and
- Achieve estimated savings for the Social Security Title II Trust Funds and the Title XVI general revenue Fund.

State VR agencies shall be reimbursed from the Title II Trust Fund for VR services to SSDI beneficiaries and from the Title XVI general Fund for services to SSI recipients.

### General Requirements

SSA will reimburse a State vocational rehabilitation (VR) agency for the reasonable and necessary costs incurred in providing VR services to a Social Security Disability Insurance or Supplemental Security Income disability or blindness beneficiary. The primary conditions for paying a provider for the cost of such services are as follows:

- The individual served must be a disability beneficiary at the time the services were provided.
- The services must have contributed to the beneficiary's employment at the SGA level.
- The services must be determined to be reasonable and necessary; and
- There must be estimated savings to the Trust or general Funds from the person's reduced reliance on program benefits. (The amount that can be paid to a VR provider may be limited in situations where the anticipated savings to the Trust Fund and general Fund, is less than the amount claimed by the provider.)

### Policy

The Division's Vocational Rehabilitation Unit staff are responsible for ensuring the following criteria is met and documented:

1. The costs must be incurred only for the VR services.
2. The costs must be based on payment rates or other payment guidelines contained in the provider's written cost containment policies.
3. The costs must be the lowest reasonable cost for the VR services for which the provider is requesting payment while allowing for sufficient flexibility to meet an individual's needs.

In addition, the following protocols shall be adhered to when submitting payment under this Policy:

The State VR agency should download and complete the SSA-199 form found at [www.socialsecurity.gov/online/ssa199.pdf](http://www.socialsecurity.gov/online/ssa199.pdf) and provide the following information.

### Procedures

1. Provide the name of the person for who services were provided and reimbursement is sought.
2. Indicate the type of disability benefit (SSDI or SSI) the VR consumer received during the period for which payment is requested and indicate the individual's social security number.
3. Indicate the social security number of the account on which the individual is receiving benefits if the number is different than the VR consumer's own number.
4. Indicate whether the VR consumer is or is not blind/legally blind.



## Division for the Visually Impaired

### Vocational Rehabilitation Fiscal and Programmatic Policies

a) Enter the month and year (MM/YY) the VR consumer first entered the VR process by either signing an application for services or, if earlier, by receiving intake and assessment services (necessary for evaluating the individual's VR potential.)

b) Enter the month, day and year (MM/DD/YY) the VR consumer and the State VR agency signed the IPE.

6. Enter the month and year (MM/YY) the VR consumer began to work during the period for which payment is being requested for the cost of VR services.

If an individual who has completed a "continuous period" of SGA has not medically recovered as of the date of completion of the period, the determination as to whether VR services contributed will depend on whether the continuous period began one year or less after VR services ended or more than one year after VR services ended.

7. Enter the date, which is the earlier of:

- the month and year (MM/YY) that the VR agency determines the consumer's participation in the VR program ends;  
or
- the month and year (MM/YY) representing the 9th continuous month of SGA.

If the date shown in item 7 represents the completion of the 9th month of SGA, then indicate in "Remarks" the following: "Completion of 9th continuous month of SGA shown in item 7."

8. Tracking refers to that period of time after a VR consumer's case is closed (item 7 above) through the completion of the 9-month continuous period of SGA or 9 months after the VR closure date (item 7); whichever occurs first.

List the months (MM/YYYY) that the State VR agency tracked the individual's work activity after closing the case (after the month in item 7). Exclude any month(s) during this period in which the State VR agency provided a post-employment service.

9. Indicate if the State VR agency provided, initiated or coordinated medical services under an Individual Plan for Employment (IPE) or similar document.

10. Leave Blank

11. Item 11 is the amount the State VR agency paid for a specific item or purchased service for a beneficiary during the current period of VR services. The current period of VR services is the period from the date the beneficiary entered the VR process (item 5) through the date of VR closure or the 9th continuous month of SGA, whichever is earlier (item 7).

Enter the total cost on line 11 (Direct Costs) from the total cost of services taken from item 17d on the reverse side of the claims form. These are the costs the State VR agency incurred to purchase a specific item or service for an individual (for example, a wheelchair, special glasses, training costs) which are not paid for, or not payable, by some other source (for example, an insurance company).

Any services, if purchased, and outside the budget scope of the Rehabilitation Services Administration's (RSA) "Annual VR Rehabilitation Program/Cost Report", RSA-2 is an additional expense incurred by the VR agency and can be claimed as a direct cost. This service must be purchased and used specifically for the disabled individual for whom a reimbursement claim is being filed.

## Division for the Visually Impaired

### Vocational Rehabilitation Fiscal and Programmatic Policies

Direct costs cannot be claimed for services that are provided by State VR agency employees. Services that are provided by the VR agency's employees to beneficiaries are billable as indirect costs. In the VR reimbursement program, these services are defined as ACP costs and are factored into payments for reimbursement claims based on the RSA-2.

12. Enter the total administrative, counseling and placement costs (also known as indirect costs) which are related to the current payment period. Include ACP costs for the month(s) after the State VR agency closed the case and in which postemployment services (other purchased services) are claimed. These costs should be based on the net payment period and the cost formulas for the federal fiscal years (October 1 - September 30) that correspond with these dates.

The amount of ACP costs reimbursed to a VR agency is calculated based on the cost formula selected annually by the VR agency. The VR cost formula is used to determine a set monthly ACP amount to reimburse the agency for every month of the beneficiary's VR payment period for each fiscal year.

13. Enter the total amount of tracking costs claimed. These are costs incurred only to track or monitor a beneficiary's work activity for up to 9 months after the VR closure date (shown in item 7) or from the month after the VR closure date (shown in item 7) to the 9th month of SGA; whichever scenario occurs first.

SSA may pay for up to 9 months of tracking if the VR consumer completes a 9-month continuous period of SGA, if the services provided contributed to the SGA, and if the tracking occurs within the specified payment period. This amount should be based on the tracking cost formula for the federal fiscal year(s) (October 1 - September 30) for the tracking period mentioned above.

Tracking costs and ACP costs cannot be claimed for the same month. Therefore, tracking costs are not payable for any month(s) when post-employment costs (other purchased services) are claimed. ACP costs should be claimed for that period.

14. Enter the total amount of "other" expenses and identify what type of "other" expenses were incurred and the month they were incurred in the "Remarks" section of the form. Include the cost of post-employment services under this item.

Post-employment services are services provided to assist individuals in maintaining their current employment. A State VR agency may request payment for these purchased services if they are provided after the period of VR ended and before the end of the payment period. State VR agency expenditures for these services may be claimed by showing them in Item 14. Services should be identified consistent with the codes.

15. Enter the total cost claimed for providing rehabilitation services to this VR consumer. This amount is the total of items 11 through 14.

16. For claims filed based upon the VR consumer's completion of a 9-month continuous period of SGA, indicate the principal type of occupation which the individual performed. to obtain the occupation code to be shown in item 16. The occupation codes and Titles are taken from the Department of Labor's (DOL) Dictionary of Occupational Titles (DOT).

It is important to note; in addition to maintaining a hard-copy file of the above submitted form, Vocational Rehabilitation Unit staff are responsible for maintaining this information in both the Consumer's hard-copy file as well as in the Division's Visually Impaired Consumer Registry (VICR) system, in the event the Social Security Administration or the Rehabilitation Services Administration requests such documentation.

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

### Fiscal Policy 3: RSA Vocational Rehabilitation Fiscal Internal Controls

Applies to (check all that apply):

<input type="checkbox"/> Vocational Rehabilitation – Administration
<input type="checkbox"/> Vocational Rehabilitation – Staff
<input type="checkbox"/> Fiscal - Administration
<input type="checkbox"/> Fiscal – Staff
<input type="checkbox"/> Other Staff (please specify)
<input type="checkbox"/> Additional Comments

#### Scope

The Delaware Division for the Visually Impaired sets-forth the following policies, protocols, and procedures for the internal safe-guarding of Divisional financial assets.

#### Policies/Protocols/Procedures

The following policies, protocols, and procedures shall be followed and adhered to by the Divisional fiscal team..

#### Policy

Internal Controls are safeguards utilized by the fiscal team to achieve the following goals.

- Safeguard Department and Division assets through segregation of responsibilities and well-designed internal controls to protect assets from accidental loss or loss from fraud.
- Ensure the reliability and integrity of financial information through internal controls to ensure that management has accurate, timely, and complete information, including accounting records in order to plan, monitor, and report business operations.
- Ensure compliance with Federal, State, and local laws and Regulations affecting the operations of the Division.
- Promote efficient and effective operations through providing an environment in which management and staff can maximize the efficiency and effectiveness of their operations.
- Accomplishment of goals and objectives to provide a mechanism for management to monitor the achievement of operational goals and objectives.

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

The fiscal team is responsible for carrying out the internal control activities as set-forth by the Senior Fiscal Administrative Officer. It is further the responsibility of the Senior Fiscal Administrative Officer to ensure proper training on the internal control mechanisms is delivered to and maintained by each employee within the Division's Fiscal .

The framework of the Division's internal control system includes:

- **Control environment:** A sound fiscal environment shall be maintained by the Senior Fiscal Administrative Officer through communication, and example. This includes a focus on integrity, a commitment to investigating discrepancies, diligence in designing safeguarding systems, and assigning responsibilities. This is accomplished through staff meetings, verification of coding changes from one funding source to another-such as salary reallocations from specific Grant funds to general funds, and segregations of responsibilities.
- **Risk Assessment:** The Senior Fiscal Administrative Officer shall continuously monitor and identify the areas in which the greatest threat or risk of inaccuracies or loss exist. To be most efficient, the greatest risks should receive the greatest amount of effort and level of control. For example, dollar amount or the nature of the transaction (for instance, those that involve cash,) might be an indication of the related risk.
- **Monitoring and Reviewing:** The internal control system over-all is periodically reviewed by the Senior Fiscal Administrative Officer. By performing a periodic assessment, the Senior Fiscal Administrative Officer ensures that internal control activities have not become obsolete or lost due to turnover or other factors. They should also be enhanced to remain sufficient for the current state of risks.
- **Information and communication:** The Senior Fiscal Administrative Officer is solely responsible for the dissemination of information to all Fiscal staff to ensure the integrity and operational soundness of the internal control system.

### Authorization:

Authorization is the basis by which the authority to complete the various stages of a transaction is delegated. These stages include the processes of Recording (initiate, submit, process), Approving (pre-approval, post entry review), and Reconciling.

All transactions and activities should be carried out and approved by employees acting within their range of knowledge and proper span of control. Proper authorization practices serve as a proactive approach for preventing invalid transactions from occurring.

### Documentation:

In the context of internal controls, paper or electronic communication which supports the completion of the lifecycle of a transaction meets the criteria for documentation. Anything that provides evidence for a transaction, who has performed each action pertaining to a transaction, and the authority to perform such activities, are all considered within the realm of documentation for these purposes.

Documents provide a financial record of each event or activity, and therefore ensure the accuracy and completeness of transactions. This includes expenses, revenues, inventories, personnel, and other types of transactions. Proper documentation provides evidence of what has transpired as well as provides information for researching discrepancies.

Supporting documentation may come in paper or electronic form.

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

### Reconciliation:

Reconciliation is the process of comparing transactions and activity to supporting documentation. Further, reconciliation involves resolving any discrepancies that may have been discovered.

The process of reconciliation ensures the accuracy and validity of financial information. Also, a proper reconciliation process ensures that unauthorized changes have not occurred to transactions during processing. Procedures to ensure proper reconciliation include weekly First State Financials (FSF) budgetary activity reports to ensure allowable expenses have been maintained. These reports are compared to fiscal records and then reconciled by the Fiscal Administrator Officer. Following this, the Senior Fiscal Administrative Officer conducts a final review of the reconciliation to ensure accuracy. Also, daily expenditure/payment vouchers are reviewed and reconciled by the Fiscal Administrative Officer, after which, the Senior Fiscal Administrative Officer conducts a final review of the vouchers.

Divisional staff should be thoroughly trained on all Fiscal methodologies that pertain specifically to their job functions and responsibilities.

### Security:

The security of the Division's assets and records centers on the Senior Fiscal Administrative Officer ensuring the following three-types of safeguards; Administrative, Physical, and Technical; are being maintained by Fiscal staff.

#### **Administrative security:**

The protection of assets and records through the states security safeguards which includes training, access to the state's Payroll Human Resources Statewide Technology (PHRST) and First State Financials (FSF) accounting systems, and the Department of Finance. This includes the above mentioned processes of authorization and reconciliation.

#### **Physical security:**

The protection of physical records and assets from loss by theft or damage.

#### **Technical security:**

The protection of electronic records from loss by theft, damage, or loss in transport.

Assets and records should be kept secure at all times to prevent unauthorized access, loss, or damage. The security of assets and records is essential for ongoing operations, accuracy of information, and the privacy of personal information included in some records.

### Segregation of Responsibilities:

Segregation of responsibilities is the means by which no one person has sole control over the lifespan of a transaction. Ideally, no one person should be able to initiate, record, authorize and reconcile a transaction. Additionally, the segregation of responsibilities assures that mistakes, intentional or unintentional, cannot be made without being discovered by another person.

## Division for the Visually Impaired

### Vocational Rehabilitation Fiscal and Programmatic Policies

All Fiscal staff adhere to the Office of Management and Budget's Budget and Accounting Policy (<https://budget.delaware.gov/accounting-manual/>) Manual standard operating procedures encompassed below to ensure Internal Control Best Practices.

#### Accounts Payable:

Ensure that payment documents are processed correctly by having different fiscal staff involved in the payment process. While virtually all fiscal staff members have a responsibility in this process, it is the responsibility of the Senior Fiscal Administrative Officer to ensure this through the maintainment of the following implemented best practice encompassing segregation of responsibilities:

- Purchase approvals shall be maintained by the Fiscal 's Accountant.
- The approval of invoices for payment shall be completed by the Counselor/Caseworker or Program Manager of the making the purchase.
- The reviewing and reconciliation of financial records shall be maintained by the Fiscal Administrative Officer with a final review completed by the 's Senior Fiscal Administrative Officer.

Best practices adhered to by all Fiscal staff to ensure accountability of fiduciary responsibilities includes:

- The Fiscal Administrative Officer shall review and update signature authorizations on an annual basis.
- The Fiscal 's Accountant and Accounting Specialist shall verify receipt of goods and services against contract/ Purchase Order and invoice information. The Fiscal Administrative Officer shall provide oversight to this process.
- The Accounting Specialist shall reconcile internal financial records.
- The Fiscal Administrative Officer shall monitor and ensure that invoices are paid within 30-days of the invoice date as per the Office of Management and Budget's Budget and Accounting Policy Manual.

The reconciliation activities adhered to confirm the proper payment for approved purchases and that billing is accurate. Monthly ledger reconciliations to validate transactions are performed by the fiscal Senior Accountant and reviewed by the Fiscal Administrative Officer following the below best practices:

- Review vendor invoices for accuracy by comparing charges to Purchase Orders.
- Verify that the goods and services purchased have been received.
- Perform monthly reconciliations of operating ledgers to assure accuracy and timeliness of expenses.

#### Cash:

To ensure that cash payments and assets are protected, accurately processed, and properly reported, all Fiscal staff shall follow the internal control practices of segregating responsibilities, obtaining appropriate authorizations and approvals, securing assets, and reconciling cash.

In order to ensure the integrity of all cash receipts and transactions, the Senior Fiscal Administrative Officer shall ensure that bank deposits are made in the state accounts at both Citizens and PNC Bank by the Senior Accountant and Fiscal Administrative Officer respectively. Payroll checks shall be deposited in the Citizen's account on a regularly scheduled

## Division for the Visually Impaired

### Vocational Rehabilitation Fiscal and Programmatic Policies

basis. BEP funds shall be deposited by the Fiscal Administrative Officer in the various established BEP PNC Bank accounts. By adhering to proper segregation of responsibilities, no single Fiscal staff person shall have control over the entire cash process.

The fiscal staff shall adhere to the following best practices for cash transaction management ensuring various Fiscal staff are specifically assigned a different responsibility role:

- The Senior Accountant shall be responsible for the receiving and making payroll deposits within the Citizens bank account. Deposits shall be reviewed by the Fiscal Administrative Officer.
- The Accountant shall record cash payments when applicable and reconcile cash receipts via generated reports of cash bank deposits made.
- The Fiscal's Senior Accountant and Accountant shall generate invoices for goods and services, follow-up on collection of returned checks, and ensure check payments are completed where applicable.
- The Fiscal Administrative Officer shall be responsible for receiving and making BEP deposits in the various established PNC bank accounts. Deposits shall be reviewed by the Senior Fiscal Administrative Officer.

The Senior Fiscal Administrative Officer shall ensure the number of fiscal personnel assigned specific responsibilities pertaining to cash receipt and transactions is kept to a minimum number of staff to further confirm the accounting and tracking of cash handling prior to deposit.

Cash accountability ensures that cash is accounted for, properly documented and secured, and traceable to specific cash handlers.

The Senior Fiscal Administrative Officer shall continuously monitor all liquid cash assets to ensure proper cash accountability exists through maintaining the practice of confirming the four W's during a process:

- Who has access to cash;
- Why they have access to cash;
- Where cash is at all times;
- What has occurred from the transaction's beginning to end.

In addition, the Senior Fiscal Administrative Officer shall ensure Fiscal staff adhere to the following best practices:

- Record cash receipts when received.
- Keep funds secured.
- Document transfers.
- Give receipts to each customer.

## Division for the Visually Impaired

### Vocational Rehabilitation Fiscal and Programmatic Policies

- Don't share passwords.
- Fiscal Administrative Officer verifies cash deposits.
- Fiscal Administrative Officer approves all voided refunded transactions.

The Senior Fiscal Administrative Officer shall ensure the Fiscal staff member's reconciliation activities confirm that recorded transactions have been done so correctly through the performance of monthly reconciliations of cash receipts and bank account statements to corroborate accurate checks and balances.

Cash transactions are not common, and would only occur on occasion for BEP, such as Food Truck Vendor payments. When applicable, the Fiscal Administrative Officer shall adhere to the following best practices:

- Compare receipts to deposit records.
- Record cash receipts when received.
- Count and balance cash receipts daily.
- Perform periodic surprise cash counts.
- Make deposits for any cash received for the BEP in the designated PNC bank account once the cash received reaches \$50.00. If under that threshold, the Fiscal Administrative Officer shall place the cash in an envelope marked with the date, who the payment is from, and what the payment is for, and lock it in the fiscal safe until such time of deposit.

#### Information Systems:

The Senior Fiscal Administrative Officer shall adhere to the following best practices to ensure consumer financial, personal, and identifiable information is safeguarded through limitation of access to such information within Fiscal personnel.

- Limit business system and data access to assigned Fiscal personnel.
- Adhere to Federal, State, and Departmental security and privacy policies for E-mail, Web browsing, and electronic communications.
- Determine approval hierarchies and maintain strict segregation of responsibilities.
- Through continuously working with the Division's Information System Support Specialist, maintain and update implemented security measures to protect access to electronic resources and private information.



## Division for the Visually Impaired

### Vocational Rehabilitation Fiscal and Programmatic Policies

- Report and then address in conjunction with the Division Director and the Division's Information System Support Specialist any suspected access and/or security violations by and with Fiscal staff members.

#### Payroll:

As with other financial aspects of the Division's operations, segregation of responsibilities must be implemented and adhered to regarding payroll processing. The Senior Fiscal Administrative Officer shall maintain the following best practices regarding payroll functions through the segregation of responsibilities:

- The Administrative Officer shall prepare and update online payroll and personnel data as required for the Business Enterprise Program only.
- The Fiscal Administrative Officer shall approve such Business Enterprise Program online payroll actions once completed by the Administrative Officer.
- The Fiscal Administrative Officer shall be responsible for any Payroll Funding Adjustments (PFA) for all employees connected to and within the First State Financials (FSF) system.
- The Fiscal Administrative Officer shall review bi-weekly payroll expense reports for all employee's payroll that is generated through FSF..

#### Purchasing:

To ensure proper segregation of responsibilities, the Senior Fiscal Administrative Officer shall assign purchasing functions to different designated fiscal staff to ensure no single employee has complete control over purchasing activities. Fiscal staff shall adhere to the following best practices to maintain the segregation of responsibilities for purchasing activities:

- The Program Administrator shall approve purchases for their Program .
- The Program Administrative Specialist shall order and receive materials for their respective s.
- The Program Administrator shall approve invoices for payment for their Program .
- The fiscal Accounting Specialist, Accountant, and Senior Accountant shall all review and reconcile financial records. Following this, the Accounting Specialist shall prepare the payment voucher(s) and submit to the Fiscal Administrative Officer for review. Once approved, the Fiscal Administrator Officer shall submit to the Senior Fiscal Administrative Officer for final review and approval, at which time, the voucher(s) shall be returned to the Accounting Specialist for entry into Excel, posting on the Division's shared-drive, and hard-copy files.
- The Program 's respective Administrative Specialist shall perform inventory counts.

Additionally, the Senior Fiscal Administrative Officer and fiscal staff shall maintain accountability through the authorization, review, and approval of purchases based on signed agreements.

The Program's Administrative Assistant or Counselor shall enter the recommended equipment purchase request into the Division's Visually Impaired Consumer Registry (VICR) automated system. Following this, the following shall commence:

## Division for the Visually Impaired

### Vocational Rehabilitation Fiscal and Programmatic Policies

- The Program's Administrator shall approve the purchase.
- At that point, the Fiscal Administrative Officer shall approve the purchase.
- Following this, VICR shall generate a Purchase Order which the ordering originator shall receive and then forward onto the Fiscal Resource Mailbox.
- The Fiscal Administrative Officer shall then send the Purchase Orders to the appropriate vendors to purchase the equipment if the order is for under \$1,000.00. If over \$1,000.00, the Purchase Order shall be returned to the Program's Administrative Assistant to be entered into the FSF system.
- If the initial order is over \$2,500.00, the request shall be forwarded to the Division Director for initial approval.

All Purchase Orders are entered into the state's First State Financial (FSF) system through the following sequence of events:

- The requesting Administrative Specialist requests the coding through the Fiscal Resource Mail Box.
- Once received, the Fiscal Senior Accountant, Accountant, or the Accounting Specialist approves the requests and then enters the information into the FSF system and E-mails the requesting Administrative Specialist of the approval.
- If the Administrative Specialist's request exceeds \$5,000.00, then the Fiscal staff shall notify the Fiscal Administrative Officer who shall submit the request to the Division Director as well as the Office of Management and Budget (OMB) for approval prior to going forward with the request.

For Direct Claims, an internal Purchase Order is created for any Division-related expenditures under \$1,000.00. The internal Purchase Order is created by the Program's Administrative Assistant, approved by the Program's Administrator, and then E-mailed to the Fiscal's Resource Mail Box. Upon receipt, the Fiscal Administrative Officer verifies the availability of funding with the requesting Program's Grant, and then assigned an internal Purchase Order number and electronically send the information back to the initializing Administrative Specialist for purchasing of the item(s). If any Direct Claim requests are received by the Fiscal that surpass the \$1,000.00 threshold, then the Division Director's approval shall be required.

The fiscal staff shall adhere to the following best practices to ensure this accountability process:

- Compliance with all Federal, State, and Departmental and Divisional Procurement practices and policies.
- Review and update signature authorizations on an annual basis for the purposes of check signatories. This information is then forwarded to the Division of Accounting for their records.
- The Fiscal Administrative Officer shall obtain pre-approval for any procurement expenditures from the proper designated authorities where applicable.
- The Accountant shall reconcile financial transactions for accuracy of recorded transactions.
- The Fiscal Administrative Officer shall monitor to ensure that invoices are paid within the 30-day time period as established by the Budget and Accounting Policy Manual, found on Page 26, Chapter 7, Section 17 (7.17).

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### Vocational Rehabilitation Fiscal and Programmatic Policies

The Fiscal Senior Administrative Officer; and/or designated fiscal staff; shall review all supplier invoices, packing slips, and Purchase Orders to ensure accuracy of the information for correct quantity ordered and invoice amount charged. A monthly ledger reconciliation reviewed and approved by the Fiscal Senior Administrative Officer shall be performed to ensure the validation of appropriate financial transactions.

#### Travel:

As with all other aspects of the Division's Fiscal functions, the processes of travel expenses, State of Delaware issued credit cards, and required Departmental and Divisional paperwork shall also be divided among designated Fiscal staff to ensure segregation of responsibilities for the safeguarding of such assets. The Senior Fiscal Administrative Officer shall ensure this through the following best practice procedures:

- Once Divisional staff have submitted the completed travel request, the event's agenda, per diem rates, hotel information, transportation information, and quotes for all contained therein, the Senior Fiscal Administrative Officer shall initiate the travel pre-authorization and prepare the expense claims.
- The Senior Fiscal Administrative Officer shall review all appropriations for accuracy, verify funding availability, and approve the travel preauthorization and the expense claim. If funds are not available for the submitted travel request(s) from the requestor's Grant budget, the Senior Fiscal Administrative Officer shall seek alternative funding mechanisms through sources such as general funds, donation accounts, and other such venues. Following this, the Senior Fiscal Administrative Officer shall submit all documentation, including an explanation as to why funding is not available from the requestor's Grant budget and a justification as to why an alternative funding source could be used, to the Division director for final approval.

The Senior Fiscal Administrative Officer shall maintain accountability through adhering to the authorization review and expense approval best practice protocols below to ensure the best use of public funds and comply with Federal, State, and the Department's travel policies:

- Ensure that the proper expense approvals and travel authorizations have been completed.
- Ensure all Departmental required travel forms have been completed properly by the requestor and signed by all authorized required personnel.
- Evaluate expenses to ensure they are the most economical for the travel situation.
- Verify that expenses are appropriate to the fund source charged.
- The only exception to the State Travel Policy would be an employee's request to exceed the Federal per diem rate stipulated for the geographical area of travel. As per the State of Delaware Budget and Accounting Policy Manual; Chapter 11, Travel Policy; the Senior Fiscal Administrative Officer shall submit a detailed explanation in writing to the Division Director as to why an increase in per diem rates would be necessary for the employee. As further stated in Chapter 11; The Division Director shall have the authorization to approve such a request up to 150% of

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

the per diem rate. If the request is above the 150% threshold, and the Division Director maintains the request is warranted, the Division Director shall then submit the request to the Department’s Secretary for final approval.

Following the submission of staff travel receipts within seven (7) days of return from travel, fiscal staff shall perform reconciliation activities to ensure that travel costs are accurate and appropriate, as well as monthly ledger reviews to confirm payment of approved charges through adhering to the following best practices:

- The Fiscal Administrative Officer shall review expenditures, receipts, and per diem rate thresholds to ensure accuracy of accounting and allowable and appropriate expense perimeters.

The screenshot displays the 'DE\_GM\_POST\_AWARD' system interface. The browser address bar shows 'https://fsfpd.erp.state.de.us/psc/fn92pd/EM'. The page title is 'DE\_GM\_POST\_AWARD'. The main content area shows project details for 'Project 00000000012006'. Key fields include: \*Description: 'FY 18 VR PRETS', \*Integration: 'STATE', Project Type: 'GM35', Percent Complete: '0.00', and Project Health: 'As Of'. The processing status is 'Active' and the project status is 'Approved'. A contract number 'SAI000003384' is also visible. The 'Project Schedule' section shows a start date of '10/01/2018' and an end date of '12/31/2018'. A description entry is shown with a date/time stamp of '01/22/18 11:42:59AM' and user ID 'H081MAR'. The description text reads 'PRETS 15% required'. There are buttons for 'Save as Template' and 'Copy Project' at the bottom.

- Any expenditures charged to the Pre-ets project can be tracked and reported by performing a query in FSF for any charges made to the VR Pre-employment transition services project.
- DVI is in the process of working with the State’s Division of Accounting to create “activity codes” under the Pre-employment transition services project. These will allow the fiscal staff to access a drop down that will include all the authorized activities. Currently, the authorized activities are listed in the payment voucher’s description.

## **Division for the Visually Impaired**

### Vocational Rehabilitation Fiscal and Programmatic Policies

- Tracking, inquiring or reporting the expenditures by authorized activities is done by querying FSF for expenditures under the Pre-ets project and then sorting by description.

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## Division for the Visually Impaired

### Vocational Rehabilitation Fiscal and Programmatic Policies

#### Fiscal Policy 4: RSA Vocational Rehabilitation Pre-Employment Transition Services

Applies to (check all that apply):

<input type="checkbox"/> Vocational Rehabilitation – Administration
<input type="checkbox"/> Vocational Rehabilitation – Staff
<input type="checkbox"/> Fiscal - Administration
<input type="checkbox"/> Fiscal – Staff
<input type="checkbox"/> Other Staff (please specify)
<input type="checkbox"/> Additional Comments

#### Fiscal Procedures for Pre-Employment Transition Services

Pursuant to Section 110 of the Rehabilitation Act of 1973 as amended by the Workforce Innovation and Opportunity Act (WIOA) Section 113, the Division for the Visually Impaired’s fiscal team will adhere to the following procedures for reserving funds, tracking and accounting of the provision of Pre-Employment Services including staff time.

#### Reserving Funds for Pre-Employment Transition Services:

A separate project has been created in the State’s financial system (First State Financials -FSF) solely to set aside 15% of the total VR grant for Pre-employment transition services.

Payments for Pre-employment transition services will be charged to the VR grant (Appropriation 40292) and select Project # 00000000012006 for Pre-employment transition services (as shown below).

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

The screenshot displays the 'DE\_GM\_POST\_AWARD' system interface. The top navigation bar includes 'Grants Management' and 'DE\_GM\_POST\_AWARD'. Below this, there are tabs for 'General Information', 'Project Department', 'Project Costing Definition', 'Manager', 'Location', 'Phases', 'Approval', 'Justification', 'User Fields', and 'Rates'. The main content area shows project details for 'Project 00000000012008'. Key fields include: 'Description' (FY 18 VR PRETS), 'Integration' (STATE), 'Project Type' (GM35), 'Percent Complete' (0.00), and 'Project Health'. The 'Processing Status' is 'Active' and 'Project Status' is 'Approved'. A 'Contract Number' of SAI000003384 is also visible. The 'Project Schedule' section shows a start date of 10/01/2018 and an end date of 12/31/2018. A description entry is shown with a date/time stamp of 01/22/18 11:42:59AM and user ID H081MAR, with the text 'PRETS 15% required'. At the bottom, there are buttons for 'Save as Template' and 'Copy Project'.

Non- Pre-employment transition services expenditures are paid from Appropriation #40292, Project #00000000011399.

### Tracking funds:

- Pre-employment transition services expenditures are tracked automatically by FSF due to the designation of the Pre-employment transition services project #.
- These expenditures will be monitored by the Accountant.
- During monthly meetings with VR District Administrator, the Sr. Fiscal Administrative Officer will include monthly updates of how much has been spent, remaining balance and discuss if any necessary adjustments need to be made.
- “Activity codes” are being created in FSF under the Pre-employment transition services project. These will allow the fiscal staff to access a drop down that will include all the authorized activities shown below.

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

<b>Pre-ETS Codes (Required Activities)</b>	
RSA Prets 1.	1. Job Exploration
RSA Prets 2.	2. Work-Base Learning Experience
RSA Prets 3.	3. Counseling Opportunities for Post-Secondary Education
RSA Prets 4.	4. Workplace Readiness
RSA Prets 5.	5. Self-Advocacy
<b>Pre-ETS (Authorized Services)</b>	
RSA Prets 6.	6. ILS services; inclusion in communities; competitive integrated workplaces;
RSA Prets 7.	7. Intellectual disabilities and individuals with significant disabilities coordinating services for independent living, post-secondary and competitive employment
RSA Prets 8.	8. Training for Transition Staff
RSA Prets 9.	9. Disseminating information about innovative, effective and efficient approaches to achieve Pre-ETS goals.
RSA Prets 10.	10. Coordinating activities with transition services with LEAs.
RSA Prets 11.	11. Applying evidence-based findings (to improved policy procedure, practice, and training personnel.)
RSA Prets 12.	12. Developing a model transition demonstration project.
RSA Prets 13.	13. Establishing or supporting multistate or regional partnerships i.e. States, LEAs, designated State units, DDS, private businesses, or other participants for Pre-ETS consumers.
RSA Prets 14.	14. Disseminating information and strategies to improve transition to post-secondary activities for underserved populations.
<b>Pre-ETS (Coordinating Services)</b>	
RSA Pret 15	15. Attending individualized education program meetings for students with disabilities, when invited
RSA Pret 16	16. Working with the local workforce development boards, one-stop centers, and employers to develop work opportunities for students with disabilities.

### Payments:

- Expenditures to be charged to Pre-employment transition services are initially authorized by DVI’s Transitional Counselor.
- The authorization is done in DVI’s Visually Impaired Consumer Registry (VICR).
- Transition counselor obtains information when required about the proposed item to be purchased. Quotes only need to be entered into FSF.
- Quotes are only required for the purchase of technology per IRM standards and for purchases of goods and services not otherwise covered under an existing state contract exceeding \$10,000.00 or covered under a state mandatory use contract. State procurement thresholds can be reviewed here: <http://gss.omb.delaware.gov/contracting/spp.shtml>
- Input purchase into VICR with appropriate fiscal (budget string) coding. Quotes shall not be entered into VICR. Once submitted and approved by all necessary approval levels in VICR, VICR will generate an automated email with the SUBJECT LINE written as “VICR Generated PO #: INSERTED HERE Vendor: INSERTED HERE” to the DVI mailbox account [dvipurchasefiscal@state.de.us](mailto:dvipurchasefiscal@state.de.us)
- Once received in the dvipurchasefiscal email account, the Fiscal Administrative Officer / Accountant will provide coding to the DVI Administrative Specialist to enter into FSF along with quotes attached (if necessary).
- The DVI Administrative Specialist will enter the purchase order into FSF. At this stage, the Admin may submit the VICR generated purchase order (from VICR or forwarded electronically from the email account) to the vendor in order to provide services in a timely manner to the consumer.
- Once all approvals are completed in FSF, the fiscal office will forward the final, completed documentation to the originating employee and supervisor to complete purchasing.
- Emails will only be deleted by the DVI fiscal office once invoices/receipts/packing slips have been matched to the purchases in the resource account mailboxes. These items shall be matched by the Admin replying to the



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original purchase email in the [dvipurchasefiscal@state.de.us](mailto:dvipurchasefiscal@state.de.us) email account with a cc: to fiscal and by attaching the documentation (invoice/receipt/packing slip).

- The DVI fiscal office will then match the invoice/receipts/packing slips to the purchase orders and may delete the emails. This close out process shall occur as expenses are incurred with all emails being reviewed by the fiscal office within 10 business days of the close of each quarter throughout the state fiscal year.
- Pending purchases can be viewed by fiscal, admin, and supervisory staff within the email resource accounts at any time to ensure timely processing.

#### **Internal Controls:**

The Accounts Payable module of the state's financial system (FSF) has specific user roles and authority levels. These roles serve as another level of internal controls. The Business Manager approves payments entered into the system by the Accounting Staff. The approver cannot prepare payments. The staff member that makes payments cannot approve the payments in the system.

The FSF Approval levels / steps are as follows:

Internal Accounting – Performed by Accounting Specialist, Accountant & Sr. Accountant

Business Manager – Performed by Sr. Fiscal Administrative Officer, Division Deputy Director & Division Director.

- Once the VR Counselor has developed the Individual Plan for Employment with the consumer, the VRC will review the plan with the VR District Administrator.
- The VR Administrative Specialist enters expenditures in the Visually Impaired Consumer Registry using the pre-programmed codes to identify services/activities.
- Definitions and a legend will be provided to all team members and can be found on the VR shared network folder for reference.
- The VRC reviews the requisition, pre-programmed codes for activities and services and authorizes in VICR. If the requisition is not accurate, the VRC will request the Administrative Specialist to modify the requisition.
- The VR District Administrator reviews the authorization, the pre-programmed codes for activities and services and approves or denies according to the elements of the IPE and VR Best Practices. In addition, the VR District Administrator also reviews the case narratives of service time.
- If all of the elements are met, the VR District Administrator authorizes and it becomes a worklist item on the fiscal team's worklist in the VICR.
- The fiscal team reviews the expenditures, ensures the appropriate object code and funding is applied and sends to the Administrative Specialist for ordering if under \$2,500.
- If over \$2,500 the expenditure is routed to the Division Director for review and authorization. Once all of the requirements are met, the approved expenditure is provided to fiscal who will send to the VR Administrative Specialist to be ordered.

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

### Reporting:

For reporting purposes, the Sr. Fiscal Administrative Officer / Fiscal Administrative Officer will query in FSF for any charges made to the VR Pre-employment transition services project. These documents will be used to complete any Federal Reports.

### Staff-time tracking:

DVI Transition counselors account for their time by recording their time into the Visually Impaired Consumer Registry (VICR). The Counselor enters the dates, activity and time in five minute intervals under each activity. Each category is broken down by required activities, authorized activities, and vocational rehabilitation services.

Pre-ETS Required Activities are:

1. Job Exploration
2. Work-based Learning Experience
3. Counseling Opportunities for Post-Secondary Education
4. Workplace Readiness
5. Self-Advocacy

Pre-ETS Authorized Activities are:

1. ILS Services, inclusion in communities, competitive integrated workplaces
2. Intellectual disabilities and individuals with significant disabilities coordinating services for independent living, post-secondary and competitive employment
3. Training for Transition Staff
4. Disseminating information about innovative effective and efficient approaches to achieve PRE-ETS goals
5. Coordinating activities with transition services with Local Education Agencies
6. Applying evidence-based finding (to improve policy, procedures, practice and training personnel)
7. Developing a model transition demonstration project.
8. Establishing or support multistate or regional partnerships i.e. States, LEAs, Designated State Units, DDDS, private businesses or other participants for Pre-ETS consumers
9. Disseminating information and strategies to improve transition to post-secondary activities for underserved populations.

Vocational Rehabilitation Activities:

1. Assessment
2. Diagnosis

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3. Vocational Rehabilitation Counseling and Guidance
4. Graduate College or University Training
5. Four-Year College or University Training
6. Junior or Community College Training
7. Occupational or Vocational Training
8. On the job training
9. Apprenticeship Training
10. Basic Academic Remedial or Literacy Training
11. Adult Education
12. Job Readiness Training
13. Job Exploration
14. Disability Related Skills Training
15. Miscellaneous Training
16. Job Search Assistance
17. Job Placement Assistance
18. On-the job supports: Time-limited (retention)
19. Supported Employment Services
20. On-the job- supports: Supported Employment
21. Transportation
22. Maintenance
23. Rehabilitation Technology
24. Reader
25. Interpreter
26. Personal Attendant
27. Technical Assistance
28. Information and Referral
29. Benefits Counseling
30. Customized Employment

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31. Other Services
32. Work-based learning experience
33. Business Enterprise Program
34. Career Counseling on Employment Opportunities
35. Self-Advocacy

After entry, fiscal team will access the Visually Impaired Consumer Registry to retrieve service time on a monthly basis. The fiscal team will retrieve the contact log report and sort according to activities. Once the staff time is segregated by category, the fiscal team will use this service time to apply cost allocation measures to the personnel.

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# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

### Programmatic Policy 1: RSA Vocational Rehabilitation Post-Secondary Education

Applies to (check all that apply):

<input type="checkbox"/> Vocational Rehabilitation – Administration
<input type="checkbox"/> Vocational Rehabilitation – Staff
<input type="checkbox"/> Fiscal - Administration
<input type="checkbox"/> Fiscal – Staff
<input type="checkbox"/> Other Staff (please specify)
<input type="checkbox"/> Additional Comments

#### Purpose

Local Workforce Development Boards (LWDBs), in consultation with the Chief Local Elected Officials, must establish WIOA Title I eligibility policies and procedures consistent with the guidance provided in this policy (**W/OA Section 107fdn**). In formulating local policies and procedures, Local Boards must specifically address the following WIDA Title I Youth eligibility issues:

- Local parameters for the definition of Required Additional Assistance.
- Local parameters for the definition of self-sufficiency

This policy is subject to revision as additional guidance is issued from the U.S. Department of Labor.

#### References

20 CFR 681.21 O; 20 CFR 681.230; Education Code EDC Section 58500; TCA 9-6-30; TEGL 21-16; WIOA Section 107(d); WIOA Section 129(a)(1)(B); WIOA Section 129(a)(3); WIOA Section 188(a)(5); Violence Against Women Act of 1994 Section 41403(6); McKinney Vento Homeless Assistance Act Section 725(2), Social Security Act (42 USC 677).

#### Background

The Workforce Innovation and Opportunity Act (WIOA) presents new opportunities to improve job and career options for our nation's workers and jobseekers through an integrated, job-driven public workforce system that links diverse talent to businesses. WIOA places a priority on serving out-of-school youth, providing work-based experience, and improving services to youth with disabilities. WIOA promotes career pathways, increased attainment of recognized credentials and post-secondary certificates or degrees. Youth must meet eligibility requirements to participate in the WIOA Title I Youth Program. Eligible youth are those who are 14-24 years of age and face specific barriers to school completion or employment.

WIOA establishes separate criteria for Out-Of-School Youth (OSY) and In-School Youth (ISY).

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1) An Out-Of-School Youth (OSY) is defined as an individual who is:

A) Not attending any school at the time of enrollment;

B) Not younger than 16 or older than 24 at the time of enrollment (participants may continue to receive services beyond the age of 24 once they are enrolled in the program **20 CFR 681.210**); and

Meets one or more of the following conditions:

I. School dropout;

II. Within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter;

III. Recipient of a secondary school diploma or its recognized equivalent who is low-income and basic skills deficient or an English language learner;

IV. An offender who has been subject to any stage of the criminal justice Process;

V. A homeless individual, aged 16 to 24 who meets the criteria defined in **Violence Against Women Act of 1994 Section 41403(6)**, a homeless child or youth aged 16 to 24 who meets the criteria defined in of the **McKinney Vento Homeless Assistance Act Section 725(2)**, or who is a runaway;

VI. An individual in foster care or who has aged out of the foster care system or who has attained 16 years of age and left foster care of guardianship or adoption, a child eligible for assistance under the **Social Security Act (42 USC 677)**, or in an out-of-home placement;

VII. Pregnant or parenting;

VIII. An individual with a disability such as visual impairment, hearing impairment, or medical, psychiatric, or mental health diagnosis;

IX. Low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment (**WIOA Section 3(46)** and **WIOA Section 129(a)[1J](BJ)**).

2) An In-School Youth (ISY) is defined as an individual who is:

A) Attending school at the time of enrollment. If the youth is enrolled in the WIOA summer youth program during the summer and is in between school years, the youth is considered ISY if they are enrolled to continue school in the fall. If a youth is enrolled in the youth program between high school graduation and post-secondary education, the youth is considered an ISY if they are registered for post-secondary education, even if they have not yet begun post-secondary classes at the time of enrollment. If the youth does not follow through with attending post-secondary education, then such a youth would be considered an OSY if the eligibility determination is made after the point that the youth decided not to attend secondary education. Post-secondary classes must be credit-bearing classes;

B) Not under the age of 14 or (unless an individual with a disability who is attending school under State law) older than 21 at the time of enrollment;

C) Low-income.

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Non-Low Income (5% exception): The 5% exception applies to "covered individuals". A covered individual is: 1) an in-school youth; or 2) an out-of-school youth with a secondary school diploma or equivalent and is basic skills deficient or an English Language Learner or requires additional assistance to enter or complete an educational program or to secure or hold employment. If a youth is a covered individual and is not low income, this youth qualifies for the 5% exception. However, WIOA places a limitation on in-school youth served under this exception: no more than 5% of in-school youth served as non-low income can fall within the "requires additional assistance" category. Note: If an out-of-school youth falls within a category other than the criteria in 2) above, regardless of whether they are not low income, they are eligible as an out-of-school youth without having to use the 5% exception.

#### Determining Additional Assistance for In-School and Out-of-School Youth Criteria:

Youth participants are defined as requiring additional assistance to enter or complete an educational program or to secure and hold employment. The following criteria are used to determine requiring additional assistance:

Youth is In-School:

- A) Has poor attendance patterns in an educational program during the last 12 months;
- B) Has been expelled from school within the last 12 calendar months;
- C) Has been suspended from school at least within the last 12 calendar months;
- D) Has below average grades;
- E) Has been previously placed in out-of-home care (foster care, group home or kinship care) for more than 6 months and is between the ages of 14-21; or
- F) Has a currently incarcerated parent(s) or guardian.

Youth is Out-of-School:

- A) Has dropped out of a post-secondary educational program during the past 12 calendar months;
- B) Has a poor work history, to include no work history, or has been fired from a job in the last 6 calendar months;
- C) Has previously been placed in out-of-home care (foster care), been suspended from school at least within the last 12 calendar months;
- D) Has below average grades;
- E) Has been previously placed in out-of-home care (foster care, a group home, or kinship care) for more than 6 months and is between the ages of 14-21; or
- F) Has a currently incarcerated parent(s) or guardian.

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Eligible youth must also be a citizen or national of the United States or lawfully admitted or possess other immigrant authorized status by the Attorney General to work in the United States (**WIOA Section 188(a)(5)**).

WIOA requires the Governor of each State to submit a Unified or Combined State Plan to the Secretary of Labor that includes a four-year strategy for the State's workforce development system, and to submit a modification to that plan after two years. States must have Federally approved State Plans to receive funding for the WIOA six core programs (Adult, Dislocated Worker, and Youth Formula programs (WIOA Title I), Adult Education and Family Literacy Act (AEFLA) program (WIOA Title II), Wagner-Peyser Employment Service program (WIOA Title III), and Vocational Rehabilitation (VR) program (WIOA Title IV)).

Funds reserved for pre-employment transition services **may not be used** to pay for tuition and other costs of attending postsecondary education, since this is not among those activities that are required or authorized under section 113 of the Act and final §361.48(a). **These and other necessary services, however, may be provided with VR funds not reserved for the provision of pre-employment transition services so long as they are provided pursuant to an approved individualized plan for employment under section 103(a) of the Act and final §361.48(b) of these final regulations.**

From WINTAC, Student with a Disability (§361.5(c)51), the following is excerpted:

Educational Programming - The definition of a "student with a disability" in final §361.5(c)(51), for purposes of the VR program, should be interpreted as applying to students also enrolled in educational programs outside secondary school, including postsecondary education programs, so long as the students satisfy the age requirements set forth in final §361.5(c)(51).

- Furthermore, as was set forth in the NPRM, the Secretary believes that the definition applies to secondary students who are homeschooled, as well as students in other non-traditional secondary educational programs. These individuals remain covered by the definition of a "student with a disability" in final 361.5(c)(51).
- Postsecondary education students may benefit from certain pre-employment transition services set forth in section 113 of the Act, as amended, and final §361.48(a), all of which are limited to "students with disabilities."
- This broader interpretation of the definition will increase the potential for DSUs to maximize the use of funds reserved for the provision of **pre-employment transition services** by increasing the number of students who can receive these services. Therefore, we have revised the definition of "student with a disability" in final §361.5(c)(51) to include students in secondary, postsecondary, and other recognized education programs.

However, this broader interpretation does not expand the list of required or authorized activities in section 113 of the Act, as amended by WIOA, and final §361.48(a). A DSU can use the reserved funds to provide **pre-employment transition services**, as set forth in final §361.48(a), to students with disabilities in postsecondary education or other educational programs who meet the age requirements of the definition.

- For example, a DSU may provide work-based learning activities such as internships to an individual with a disability in a postsecondary education program who otherwise satisfies the definition of a "student with a disability," but may not use the reserved funds (dedicated to the provision of **pre-**



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**employment transition services** under final §361.48(a)) to provide services and activities not specifically included in section 113 of the Act and final §361.48(a).

- **In other words, a DSU may not use the funds reserved for pre-employment transition services to pay for tuition and other costs of attending postsecondary education, since this is not among those activities that are required or authorized under section 113 of the Act and final §361.48(a). These and other necessary services, however, may be provided with VR funds not reserved for the provision of pre-employment transition services so long as they are provided pursuant to an approved individualized plan for employment under section 103(a) of the Act and final §361.48(b) of these final regulations.**

Pre-Employment Transition Services (Pre-ETS) are designed to support the transition from school into adult life of high school students with disabilities. Specifically, Pre-ETS services provide students with an introduction to work that will serve to both inform their future vocational choices, develop work habits, and obtain experience that will make them more marketable in the competitive workforce. In order to pave the way for employment, Pre-ETS provide vocational exploration, hard and soft skills training, and competitive integrated vocational experiences to high school students aged 14-24 as stipulated in the Delaware Individuals with Disabilities Education Act (IDEA) Regulations.

Provision of Services:

The provision of Pre-Employment transition services has the following **required** activities:

- Job exploration counseling; The VR Transition Counselor will use labor market information and the Career Compass Guide from Office of Labor Market Information when advising students on careers, career pathways, and labor market information through traditional VR guidance and counseling. The VR Transition Counselor will also utilize the Career Pathways to model to facilitate an individual's career interest as a system strategy to integrate educational instruction, workforce development, and linking these to labor market trends and employer needs.
- Work-based learning experiences; ( i.e. in-school, after school, internships or community-based opportunities), The VR Transition Counselor, with the assistance of the VR Business Consultant, will develop and implement activities throughout the year to engage students in learning about the world of work provided in an integrated environment to the maximum extent possible.
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at Institutions of Higher Education; The VR Transition Counselor will provide guidance and counseling services to the student and promote participation in community events such as college nights, financial-aid workshops, career fairs, and career exploration through partner agencies. In addition, the VR Transition Counselor will attend and actively participate in Individualized Education Program meetings with the local education agencies, and regularly facilitate on an individual basis or small work groups at the school with the students. Examples of topics the VR Transition Counselors will cover during the individual or small work groups are: Career Compass and Career Scope analysis, identifying career goals, High School / college comparison, financial-aid, resume writing, completing employment applications, job fairs, employer expectations, and budgeting. The VR Transition Counselor will spearhead activities throughout the year but specifically during Spring Break and the summer to provide additional opportunities such as college tours and employer visits.

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- Workplace readiness training to develop social skills and independent living; The VR Transition Counselor will provide workplace readiness training to develop social skills and independent living skills for each potentially eligible or eligible individual through activities such as Children's Beach House, Family Information Sessions, College Week, Mission Transition, and paid internships.
- Instruction in self-advocacy, including peer mentoring; The VR Transition Counselor will provide resources and facilitates workshops on self-advocacy and peer-mentoring. The VR Transition Counselors collaborate with community partners to access community opportunities and encourage attendance by the students.

When services are not available in certain areas of the state, the VR Transition Counselor will discuss the need with the VR District Administrator and the Senior Social Services Administrator to acquire the services. The Senior Social Services Administrator will contact community rehabilitation programs and the Division of Vocational Rehabilitation to discuss opportunities to collaborate through a contractual process. Should a future Division contractor be unable to fulfill their geographical, service provision, or other specific stipulations contained therein the signed and agreed upon contract, the Division team shall be able to maintain the level of service provision required within their own staff personnel.

The VR counselor shall document the development, progress, and achievements of required activities prior to the provision of authorized activities in the Visually Impaired Consumer Registry.

#### Authorized Activities

If funds remain available after all necessary required activities have been made available, the Division for the Visually Impaired will expend funds on authorized activities in compliance with Section 113© of the Act and 34 CFR:361.48(a(3)) of the VR Regulations. The Division for the Visually Impaired provides authorized activities directly and in conjunction with community partners:

- Implement effective strategies that increase independent living and inclusion in their communities and competitive integrated workplaces. The VR Transition Counselor will refer students to DVI's Independent Living Services Program for training and skill development in independent living. The referral will be completed in the Visually Impaired Consumer Registry within five business days. The VR Transition Counselor will meet on a monthly basis to discuss progress of the student. The VR Transition Counselor will notate in the Visually Impaired Consumer Registry the details of the meeting. The Transition Counselor will refer the students to DVI's internal Business Consultants or community rehabilitation programs for employment in competitive integrated work places. The Transition Counselor will follow-up on a monthly basis with the Business Consultant or the Community Rehabilitation Program and note progress within the Visually Impaired Consumer Registry.
- Develop and improve strategies for individuals with intellectual and significant disabilities to live independently, participate in postsecondary education experiences, and obtain and retain competitive integrated employment; The VR Transition Counselor will work in conjunction with the Division of Developmental Disabilities Studies for services to students with vision loss and intellectual and significant disabilities.
- Provide training to vocational rehabilitation counselors, school transition staff, and others supporting students with disabilities; The Division for the Visually Impaired's Vocational Rehabilitation team on annual basis will provide professional development opportunities to VRC, school transition staff and other stakeholders.
- Disseminate information on innovative, effective, and efficient approaches to implement and achieve pre-employment transition services goals; The VR Transition Counselor through monthly attendance at Transition Cadre meetings disseminate information on pre-employment transition services goals.

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- Coordinate activities with transition services provided by local educational agencies under the Delaware IDEA Act;
- Apply evidence-based findings to improve policy, procedure, practice, and training personnel;
- Develop model transition demonstration projects;
- Establish or support multistate or regional partnerships that involve States, local educational agencies, designated State Units, developmental disability agencies, private businesses, or other participants for Pre-ETS consumers; and
- Disseminate information and strategies to improve the transition to postsecondary activities for underserved populations.
- Improve the transition to postsecondary activities of those who are traditionally unserved

If funds remain available after all necessary required and authorized activities have been made available, the Division for the Visually Impaired will expend funds on coordinated activities in compliance with Section 113© of the Act and 34 CFR:361.48(a(3)) of the VR Regulations. The Division for the Visually Impaired provides coordinated activities directly and in conjunction with community partners. Coordinated Activities include:

- Attend individualized education program meetings for students with disabilities,
- Work with the local workforce development boards, one-stop centers, and employers to develop work opportunities for students with disabilities, including internships, summer employment and other employment opportunities available throughout the school year, and apprenticeships;
- Work with schools to ensure the implementation of transition activities for students who either are in the eighth grade, or who are 14-years of age, (whichever occurs first), as stipulated in the Delaware IDEA Regulations, to coordinate and ensure the provision of pre-employment transition services;
- Attend person-centered planning meetings for individuals receiving services under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.);

The VR Transition Counselor shall document the development, progress, and achievements of required, authorized and coordinated activities in the Visually Impaired Consumer Registry.

The VR Transition Counselor will also follow relevant sections of the VR Casework Manual when applicable.

#### Time Tracking

DVI Transition Counselors account for their time by recording their time into the Visually Impaired Consumer Registry (VICR). The Counselor enters the dates, activity and time in five minute intervals under each activity. Each category is broken down by required activities, authorized activities, and vocational rehabilitation services. The Division's Vocational Rehabilitation counselors shall enter notes in the VICR system to record student activity, student interaction, and services provided. The VICR system utilizes internal service codes which correlate to the records history entered. VR team members are required to enter their time spent providing services and all interaction with students.

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The procedure for staff documenting student services and interactions in VICR are as follows:

- Search for appropriate student name in the system.
- Select student referral record for VR.
- Select options
- Select view contact note on drop down
- Select Add
- Select Contact Method and select method from the drop down (i.e. plan amendment, telephone, school visit and etc.)
- New Drop Down - Select appropriate required services from the drop down box. (Job exploration, work-based learning and etc.)
- Select contact hours and enter number of hours and minutes. (i.e. direct preparation, no-direct, and travel)
- Input notes outlining student's interaction, services, and follow-up.
- Save content.

The VR District Administrator will review on a monthly basis during case reviews from the VICR system to obtain number of hours spent providing services and interactions with students and other reports that provide a picture of the individual cases and caseload.

The process used to track and account for counselor time spent providing authorized activities separately from other VR activities.

The procedure for staff documenting student services and interactions in VICR are as follows:

- Search for appropriate student name in the system.
- Select student referral record for VR.
- Select options
- Select view contact note on drop down
- Select Add
- Select Contact Method and select method from the drop down (i.e. plan amendment, telephone, school visit and etc.)
- New Drop Down - Select appropriate authorized activities from the drop down box. (Job exploration, work-based learning and etc.)
- Select contact hours and enter number of hours and minutes. (i.e. direct preparation, no-direct, and travel)
- Input notes outlining student's interaction, services, and follow-up.
- Save content.
- 

The VR District Administrator during case reviews will review the time designated for authorized activities from the VICR system to obtain number of hours spent providing services and interactions with students and other reports that provide a picture of the individual cases and caseload.

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The Division also utilizes the VICR system to document coordinated services and staff time. The staff will enter notes in the VICR system to record student activity, student interaction, and services provided. The VICR system has service codes that are tied to the records that staff enter notes. Staff are required to enter staff time spent providing services and all interaction with students.

The procedure for staff documenting student services and interactions in VICR are as follows:

- Search for appropriate student name in the system.
- Select student referral record for VR.
- Select options
- Select view contact note on drop down
- Select Add
- Select Contact Method and select method from the drop down (i.e. plan amendment, telephone, school visit and etc.)
- New Drop Down - Select appropriate coordinated activities from the drop down box. (Job exploration, work-based learning and etc.)
- Select contact hours and enter number of hours and minutes. (i.e. direct preparation, no-direct, and travel)
- Input notes outlining student's interaction, services, and follow-up.
- Save content.

The VR District Administrator during case reviews and monthly reviews will review the time designated for coordinated activities from VICR to obtain number of hours spent providing services and interactions with students and other reports that provide a picture of the individual cases and caseload. Process used to track and account for counselor time spent providing coordinated activities separately from other VR activities.

The process used to track and account for counselor time spent providing VR Services are entered in VICR to document VR Services and staff time. The staff will enter notes in the VICR system to record student activity, student interaction, and services provided. The VICR system has service codes tied to the contact logs. Staff are required to enter staff time spent providing services and all interaction with students.

The procedure for staff documenting student services and interactions in VICR are as follows:

- Search for appropriate student name in the system.
- Select student referral record for VR.
- Select options
- Select view contact note on drop down
- Select Add
- Select Contact Method and select method from the drop down (i.e. plan amendment, telephone, school visit and etc.)
- Select appropriate VR services from the drop down box.

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- Select contact hours and enter number of hours and minutes. (i.e. direct preparation, no-direct, and travel)
- Input notes outlining student's interaction, services, and follow-up.
- Save content.

Counselors shall track and account for time spent providing pre-employment transition services vs. VR services by querying reports to determine the activities and the number of hours spent with a consumers or coordinating services for a Pre-ETS or Transition Student.

### Glossary of Terms

Definitions for Pre-ETS related Terms

Alternate Diploma defines an alternative means of obtaining educational qualifications, other than the traditional means of gaining access to or completing the required study to obtain the educational qualifications.

Competitive Integrated Employment means full or part-time work at minimum wage or higher, with wages and benefits similar to those without disabilities performing the same work, and fully integrated with coworkers without disabilities.

Coordination activities are necessary for arranging and providing pre-employment transition services. However, coordination activities are more akin to the related activities performed by vocational rehabilitation counselors and other vocational rehabilitation personnel during the course of providing pre-employment transition services rather than the services themselves. Coordination activities are:

- Attending individualized education program meetings for students with disabilities, when invited;
- Working with the local workforce development boards, one-stop centers, and employers to develop work opportunities for students with disabilities, including internships, summer employment and other employment opportunities available throughout the school year, and apprenticeships;
- Working with schools to ensure the implementation of transition activities for students who either are in the eighth grade, or who are 14-years of age, (whichever occurs first), as stipulated in the Delaware Individuals with Disabilities Education Act (IDEA) Regulations to coordinate and ensure the provision of pre-employment transition services;

When invited, attending person-centered planning meetings for individuals receiving services under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.);

Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education is provided in a group setting may include information on course offerings, career options, the types of academic and occupational training needed to succeed in the workplace, and postsecondary opportunities associated with career fields or pathways.

Direct Services/Required Activities (as outlined in 34 CFR 361.48(a) (2)) are:

Job exploration counseling;

Work-based learning experiences, which may include in-school, after school, or community-based opportunities;

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Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at IHEs;

Workplace readiness training to develop social skills and independent living; and

Instruction in self-advocacy, including peer mentoring.

Extended services refers to ongoing support services and other appropriate services that are needed to support and maintain an individual with a most significant disability in supported employment and that are provided by a State agency, a private nonprofit organization, employer, or any other appropriate resource.

Job Exploration Counseling is counseling in a classroom or community setting and include information regarding in-demand industry sectors and occupations, as well as non-traditional employment, labor market composition, administration of vocational interest inventories, and identification of career pathways of interest to the students. Job exploration counseling provided on an individual basis might be provided in school or the community and include discussion of the student's vocational interest inventory results, in-demand occupations, career pathways, and local labor market information that applies to those particular interests.

Potentially Eligible" means all students with disabilities who satisfy the definition in 34CFR361.5(c)(51), regardless of whether they have applied, and been determined eligible, for the services.

Pre-employment transition services (Pre-ETS) refers to the required and authorized activities specified in detail in final §361.48(a), which are the only services permitted. Pre-employment transition services are provided in collaboration with state and local education agencies to students with disabilities who need those services to achieve competitive integrated employment, and are eligible or potentially eligible for VR services.

Secondary School is a school intermediate between elementary school and college and usually offering general, technical, vocational, or college-preparatory courses.

Self-Advocacy is provided in a group setting which may include generalized classroom lessons in which students learn about their rights, responsibilities, and how to request accommodations or services and supports needed during the transition from secondary to postsecondary education and employment.

Supported employment refers to service provisions wherein people with disabilities are assisted with obtaining and maintaining [employment](#) at fair competitive wages.

Student with a disability is defined as the following:

- Is in an educational program; and
- Meets certain age requirements; and
- Is eligible for and receiving special education or related services under IDEA; or
- Is an individual with a disability for purposes of section 504 of the Act.

Transition Services are a coordinated set of activities for a student with a disability that are designed to be within a results-oriented process that facilitates movement from the school to post-school activities, including post-secondary education; vocational education/rehabilitation; integrated employment (including supported employment); continuing and adult

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education; adult services; independent living; or community participation. The coordinated set of activities must be based on the individual student's needs, taking into account the student's strengths.

Work-Based Learning Experiences in a group setting may include coordinating a school-based program of job training and informational interviews to research employers, work-site tours to learn about necessary job skills, job shadowing, or mentoring opportunities in the community. Work-based learning experiences on an individual basis could include work experiences to explore the student's area of interest through paid and unpaid internships, apprenticeships (not including pre-apprenticeships and Registered Apprenticeships), short-term employment, or on-the-job (OJT) trainings located in the community.

Workplace Readiness Training is programming to develop social skills and independent living, such as communication and interpersonal skills, financial literacy, orientation and mobility skills, job-seeking skills, understanding employer expectations for punctuality and performance, as well as other "soft" skills necessary for employment. These services may include instruction, as well as opportunities to acquire and apply knowledge. These services may be provided in a generalized manner in a classroom setting or be tailored to an individual's needs in a training program provided in an educational or community setting.

Youth with a disability is defined as the following:

- An individual with a disability;
- Not younger than 14 years of age; and
- Not older than 24 years of age.

There is no requirement that a "youth with a disability" be participating in an education program.

The age range for a "youth with a disability" is typically broader than that for a "student with a disability."



# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

### Programmatic Policy 2: RSA Vocational Rehabilitation Bioptics

Applies to (check all that apply):

<input type="checkbox"/> Vocational Rehabilitation – Administration
<input type="checkbox"/> Vocational Rehabilitation – Staff
<input type="checkbox"/> Fiscal - Administration
<input type="checkbox"/> Fiscal – Staff
<input type="checkbox"/> Other Staff (please specify)
<input type="checkbox"/> Additional Comments

Bioptics, which describes a pair of vision-enhancement lenses, are lenses that magnify between two and four times, and are used to improve distance vision for those with significantly impaired eyesight. They can either be a combination of head-mounted eyeglasses (termed the "carrier") and binoculars, or be designed to attach to existing eye glasses. Some use monoculars which have small telescopes mounted on, in, or behind their regular lenses, so that they can look through either the regular lens or the telescope. In Delaware, the use of Bioptics are permitted for driving and to pass the licensure test provided the following requirements are met:

- Visual Acuity: Unrestricted license: 20/40 in the better eye, with or without corrective lenses.
- Restricted license: 20/50. Beyond 20/50 driving privileges are denied.
- Visual Field: No requirements.
- Bioptic Systems are treated by each case as long as the applicant passes all the driving tests.

The Division for the Visually Impaired shall provide a Bioptic Telescopic Device under the following circumstances:

- (i) It has been determined to be a vocational rehabilitation need, and;
- (ii) It is an integral part of an approved IPE.

An assessment of driving alternatives must be considered and documented in the progress review notes, inputted into VICR, and must include:

- (i) An Optometrist's report stating that the individual's best corrected visual acuity using the recommended telescopic device is within the guidelines described above in Delaware requirements.
- (i) The consumer's current mode of transportation.
- (ii) The reasonableness of using other modes of transportation or solutions such as:
  - (a) Taxicabs;

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- (b) Car Pools;
- (c) Paid Co-Workers, Volunteers or Attendants; and
- (d) Para-Transit, or accessible public transit or other community services.

After a Bioptic Telescopic Device is dispensed, the consumer must provide the Division for the Visually Impaired with the following documentation to be entered into VICR and the consumer's case file:

- (i) Access to the use of a registered vehicle (delete)
- (ii) The report from the prescribing Optometrist as proof the individual meets the requirements for licensure
- (iii) A copy of the consumer's driver's license for the case file.

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# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

### Programmatic Policy 3: RSA Vocational Rehabilitation Consumer Appointment Cancellation

Applies to (check all that apply):

<input type="checkbox"/> Vocational Rehabilitation – Administration
<input type="checkbox"/> Vocational Rehabilitation – Staff
<input type="checkbox"/> Fiscal - Administration
<input type="checkbox"/> Fiscal – Staff
<input type="checkbox"/> Other Staff (please specify)
<input type="checkbox"/> Additional Comments

#### **Purpose**

To develop a uniform procedure for the cancellation of consumer appointments for services with the Division for the Visually Impaired’s (DVI) Vocational Rehabilitation (VR) Unit.

#### **Scope**

Once a consumer has been referred for VR services and has been deemed eligible for such services, and an appointment(s) have been established between the VR consumer and their VR Counselor, it is the VR consumer’s responsibility to maintain said appointment(s) for the receipt of services.

#### **Policy**

While it is understood that emergencies and other unforeseen circumstances may arise, the protocol for the consumer to follow is if a consumer finds that they must cancel their appointment, notification either by phone or e-mail must be provided to the VR staff member with which they had their appointment within 24-hours.

The protocols for cancelling scheduled appointments are as follows:

- The consumer is required to contact their Vocational Rehabilitation Counselor no later than 72-hours prior to their appointment to cancel appointments with vendors; i.e., medical appointments.
- The consumer is required to contact the vendor and their Vocational Rehabilitation Counselor immediately for all emergency situations; i.e., hospitalization, death in immediate family, contagious illness, for cancellation of an appointment.
- The consumer will be required to remit payment after two cancellations for emergencies and/or 72-hour notice situations.

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If a consumer cancels their appointment(s) for three (3) consecutive occurrences, or does not show up for or keep their appointment(s) without advanced notification for three (3) consecutive occurrences, the following procedure shall be followed and adhered to:

- **First Occurrence:** The VR Counselor shall contact the consumer by telephone to re-schedule the appointment and follow-up with a letter reminding the consumer of the appointment and the Division's appointment cancellation policy.
- **Second Occurrence:** The VR Counselor shall contact the consumer by telephone to re-schedule the appointment and follow-up with a letter reminding the consumer of the appointment and the Division's appointment cancellation policy, as well as reminding the consumer that should a third occurrence occur, their case shall be closed out for a period of 90-days, at which time, they would be able to re-apply for services.
- **Third and Final Occurrence:** The VR Counselor shall inform the consumer in writing via hard-mail that their case shall be closed out in ten (10) business days from the date of the letter for a period of 90-days, at which time, they would be eligible to re-apply for services.

#### **VR Counselor Responsibilities**

It is the responsibility of the assigned VR Counselor or other VR staff member to ensure this Policy is reviewed with and explained to the consumer at the time of the initial meeting with the consumer.

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

### Programmatic Policy 4: RSA Vocational Rehabilitation Informed Choice

Applies to (check all that apply):

<input type="checkbox"/> Vocational Rehabilitation – Administration
<input type="checkbox"/> Vocational Rehabilitation – Staff
<input type="checkbox"/> Fiscal - Administration
<input type="checkbox"/> Fiscal – Staff
<input type="checkbox"/> Other Staff (please specify)
<input type="checkbox"/> Additional Comments

#### Informed Choice

Per the Department of Education Rehabilitation Services Administration Technical Assistance Circular TAC-98-01; dated November 3, 1997; informed choice is the process by which individuals participating in the VR program make decisions about their vocational goals, the services and service providers that are necessary to reach those goals, and how those services will be procured.

§ 361.52 - Informed choice.

Each State Plan must insure that applicants and eligible individuals or, as appropriate, their legal representatives are provided information and support services to assist applicants and eligible individuals in exercising informed choice throughout the rehabilitation process consistent with the provisions of section 102(d) of the Rehabilitation Act and the requirements of 34-CFR §§361.5(c)(9)(ii) and 361.5(c)(32)(ii).

The Division for the Visually Impaired (DVI) must, in consultation with its State Vocational Rehabilitation Advisory Council (VRAC), develop and implement written policies that enable an applicant or eligible individual to exercise informed choice throughout the vocational rehabilitation process.

Informed choice for consumers consists of the following questions and definitions:

#### What is Informed Choice?

Informed choice is the process of choosing from options based on accurate information and knowledge. These options are developed by a partnership consisting of the consumer and the Counselor that will empower the consumer to make decisions resulting in a successful vocational rehabilitation outcome.

#### What are my Counselor's responsibilities in Informed Choice?

To provide you with sufficient information about your options so you can make choices for yourself to assist you in making decisions if you need help.

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### What are my responsibilities in Informed Choice?

To discuss with your Counselor your interests, preferences, experience, education, and goals so that your Counselor can assist you in exploring and selecting goals and services you want to have in your rehabilitation program.

To work with your Counselor in developing options and gathering information.

To make decisions and take actions based on the information you and your Counselor have developed together.

The policies set-forth by DVI in consultation with the VRAC provide for the following:

(1) The DVI Vocational Rehabilitation (VR) Counselor shall inform each applicant and eligible individual (including students with disabilities who are making the transition from programs under the responsibility of the DVI Educational Unit to programs under the responsibility of the DVI VR Unit), through appropriate modes of communication, about the availability of and opportunities to exercise informed choice, including the availability of support services for individuals with cognitive or other disabilities who require assistance in exercising informed choice throughout the VR process;

(2) Assisting applicants and eligible individuals in exercising informed choice in decisions related to the provision of assessment services;

(3) Following the DVI procurement policies and methods that facilitate the provision of VR services and that afford eligible individuals meaningful choices among the methods used to procure VR services;

(4) Assisting eligible individuals or, as appropriate, the individual's legal representatives in acquiring information that enables them to exercise informed choice in the development of their Individual Plan for Employment (IPE) with respect to the selection of the:

(i) Employment outcome;

(ii) Specific VR services needed to achieve the employment outcome;

(iii) Entity that will provide the services;

(iv) Employment setting and the settings in which the services will be provided;

(v) Methods available for procuring the services; and

(vi) Ensuring that the availability and scope of informed choice is consistent with the obligations of DVI.

In assisting an applicant and eligible individual in exercising informed choice during the assessment for determining eligibility and VR needs and during development of the IPE, the DVI VR Unit must provide the individual or the individual's legal representative, or assist the individual or the individual's legal representative, in acquiring information necessary to make an informed choice about the specific VR services, including the providers of those services, that are needed to achieve the individual's employment outcome. This information must include, at a minimum, information relating to the:

(1) Cost, accessibility, and duration of potential services;

(2) Consumer satisfaction with those services to the extent that information relating to consumer satisfaction is available;

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- (3) Qualifications of potential service providers;
- (4) Types of services offered by the potential providers;
- (5) Degree to which services are provided in integrated settings; and
- (6) Outcomes achieved by individuals working with service providers, to the extent that such information is available.

In providing or assisting the individual or the individual's legal representative in acquiring the information outlined in this policy, the DVI VR Unit may use, but is not limited to, the following methods or sources of information:

- (1) Lists of services and service providers;
- (2) Periodic consumer satisfaction surveys and reports;
- (3) Referrals to other consumers (with consent of consumer), consumer groups, or the specific DVI Advisory Councils, or other State Disability focused Advisory Councils;
- (4) Relevant accreditation, certification, or other information relating to the qualifications of service providers; and,
- (5) Opportunities for individuals to visit or experience various work and service provider settings.

The DVI VR Counselor shall enhance the informed choice process by providing guidance to the consumer in making decisions and supporting the consumer in putting decisions into action. The VR Counselor may utilize the following strategies to enhance informed choice by consumers:

- (1) Get to know the individual's strengths, interests, abilities, priorities and resources;
- (2) Share information about DVI and other VR services; the occupational and labor market; service providers; and other DVI Unit services available;
- (3) Provide support, assistance and opportunities to visit service providers and gather experiential information necessary to develop the IPE;
- (4) Assist with identifying career goals and job opportunities of interest; and,
- (5) Maintain frequent and on-going communication.

Consumers are responsible for the choices they make while pursuing their vocational goals and for keeping the commitments necessary to benefit from services. As part of their involvement with DVI VR, they are expected to make choices that contribute to their career development and lead to achieving a vocational goal. Consumers should be encouraged to use the following strategies for self-determination throughout the VR process:

- (1) Gather information as necessary to get to know the services available both locally and state-wide;
- (2) Explore a variety of potential resources for gaining employment;
- (3) Communicate and meet frequently with the VR Counselor and other affiliated staff who are available to assist the consumer;
- (4) Ask questions about the services being provided; and,
- (5) Determine present and future options by taking an active role in developing the capabilities necessary for employment.

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The DVI VR Counselor shall provide support services for consumers who require assistance in exercising informed choice, such as individuals with cognitive or other disabilities. Such assistance may be obtained through family members or the consumer's legal representative, peer Counselors, advocates, or other venues as necessary. The Federal statutes do not provide for an obligation of payment by DVI or the DVI VR Unit for a specific service, provider, or any additional costs beyond what is allowable and within the VR Unit's current methodologies.

Decisions throughout the VR process must be consistent with the consumer's strengths, resources, priorities, concerns, abilities, capabilities, interests and informed choice. Staff and consumers incorporate the concept of partnership in every step of the rehabilitation process. Both staff and consumers bring strengths to this process.

Each consumer or consumer's representative will receive information about informed choice as well as their responsibilities and opportunities to participate in decision-making. This information is provided by Counselors. Information is provided through appropriate modes of communication based on the consumer's needs. Assistance is available for persons with cognitive or other disabilities as needed.

The Counselor will assist the consumer in accessing the information he or she needs to make an informed choice about services and providers of services. Choice in every aspect of service delivery is not open-ended; rather it is related to what is required, not simply desired, to reach the vocational goal and achieve employment. This information will include data related to cost, accessibility and the duration of services. Qualification of provider personnel, scope of available services, and the degree to which services are provided in integrated settings are also important components of informed choice.

Toward this VR program intent, the State Agency provides these individuals with tools necessary to make informed choices and decisions. Full responsibility for this availability and scope of informed choice has been delegated to the State Agency's qualified Vocational Rehabilitation Counselors.

In providing rehabilitation services to applicants or eligible individuals, it will be the responsibility of the Vocational Rehabilitation Counselor to inform the person that:

Through the consumer's appropriate mode of communication, he/she will be informed about the availability of and opportunities to exercise informed choice.

The consumer will be provided information and support services to assist him/her in exercising informed choice throughout the rehabilitation process.

The consumer's visual disability does not diminish in any way one's right to make choices.

The VR program's intent is to empower the consumer to use informed choice in making decisions about The consumer's employment, economic self-sufficiency, independence, and inclusion and integration into society.

In order to ensure the Counselor's maintain documented informed choice in the Visually Impaired Client Registry (VICR) throughout the VR process, documentation shall be entered as follows:

- Application and intake;
- Eligibility determination and order of selection as required;
- Provision of assessment services as required;



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- Comprehensive Assessment (CA) process and the development and implementation of the IPE;
- Services (including supported employment services), the service setting, the procurement of services, and service providers and/or suppliers; and;
- an employment outcome and desired setting.

Specifics concerning an employment outcome and the desired setting would be as follows:

1) The employment outcome shall be consistent with the individual's strengths, resources, priorities, concerns, abilities, capabilities, and interests.

2) VR Staff or VR Contractor may use various resources to assist individuals, and if applicable, their parent(s) or legal guardian(s), in exercising informed choice when selecting an employment outcome. These resources include, but are not limited to:

2.1 informational interview; 2.2 labor market information; 2.3 job shadowing; 2.4 community based assessment; and 2.5 work incentives counseling (benefit analysis).

3) VR Staff or VR Contractor, the individual, and, if applicable, his/her parent or legal guardian, shall discuss and document local labor market information which may yield the greatest opportunity for a successful employment outcome. This discussion shall include:

5) VR Staff or VR Contractor shall also offer the individual, and if applicable his/her parent or legal guardian, the opportunity to explore an alternate employment outcome that is appropriate and acceptable to all parties.

An Internal Audit is conducted twice throughout each Federal Program year either consisting of the first and third quarters or the second and fourth quarters of the program year, at which times, all Informed Choice documentation, flow, and status' shall be reviewed and documented.

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

### Programmatic Policy 5: RSA Vocational Rehabilitation Reasonable Accommodations

Applies to (check all that apply):

<input type="checkbox"/> Vocational Rehabilitation – Administration
<input type="checkbox"/> Vocational Rehabilitation – Staff
<input type="checkbox"/> Fiscal - Administration
<input type="checkbox"/> Fiscal – Staff
<input type="checkbox"/> Other Staff (please specify)
<input type="checkbox"/> Additional Comments

#### Purpose

To develop a uniform procedure for the reasonable accommodation and hardship during each stage of the process from application to closure for the Division for the Visually Impaired, Vocational Rehabilitation unit services.

#### Scope

To provide reasonable accommodation without posing undue hardship to provide services/or equipment that are necessary to achieve employment outcomes. An accommodation will be provided for duration to address temporarily barriers until a complete needs assessment is finalized.

In order for a consumer to successfully complete his/her VR Program, it may be necessary to provide Rehabilitation Technology Services to address barriers that affect the individuals' ability to perform in a work environment. Rehabilitation technology can include the application of technology, engineering methodologies or scientific principles to assist the consumer to meet the goals of his/her IPE.

AT Referral Required is needed to achieve the employment outcome, including, as appropriate—(aa) the provision of assistive technology devices and assistive technology services (including referrals described in section 103(a)(3) to the device reutilization programs and demonstrations described in subparagraphs (B) and (D) of section 4(e)(2) of the Assistive Technology Act of 1998 (29 U.S.C. 3003(e)(2)) through agreements developed under section 101(a)(11)(I).

Rehabilitation Technology Services must be authorized and is subject to the comparable benefit requirement. The basic criteria to consider when providing Rehabilitation Technology Services are:

- Must be necessary to identify, select and/or train on Assistive Technology aids and devices that meet the individualized needs of the individual.
- Must be necessary to address barriers that affect the individuals' ability to secure employment.
- Must be necessary to afford the individual the opportunity to make informed choices in the selection and acquisition of Assistive Technology aids and devices.

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## Vocational Rehabilitation Fiscal and Programmatic Policies

### Reasonable Accommodations

With regard to WIOA Regulations 29 CFR §38.4; Section 188 (e); aid, benefits, services, training, and employment; the Designated State Unit (DSU) must provide reasonable accommodations to qualified individuals with disabilities who are applicants, registrants, eligible applicants/registrants, participants, employees, or applicants for employment, unless providing the accommodation would cause undue hardship. Definitions of the terms “reasonable accommodation” and “undue hardship” are specified in 29 CFR § 38.4. Auxiliary Aids, Services, and Assistive Technology to afford individuals with disabilities an equal opportunity to participate in and enjoy the benefits of the WIOA Title I program or activity, a recipient must furnish appropriate auxiliary aids or services where necessary. In determining what type of auxiliary aid or service is appropriate and necessary, recipients must give primary consideration to the requests of the individual with a disability. Primary consideration means honoring the choice unless the agency can demonstrate that another equally effective means of communication is available, or that using the means chosen would result in a fundamental alteration in the service, program, activity, or undue financial and administrative burdens. A list of auxiliary aids and services can be found in 29 CFR § 38.4, Section 188 (e), and includes:

- (a) Qualified interpreters, note-takers, transcription services, written materials, telephone handset amplifiers, assistive listening systems, telephones compatible with hearing aids, closed caption decoders, open and closed captioning, telecommunications devices for deaf persons (TDDs/TTYs), videotext displays, or other effective means of making aurally delivered materials available to individuals with hearing impairments;

Acquisition or modification of equipment or devices and other similar services and actions:

- (b) The Designated State Unit (DSU) must not place a surcharge on a particular individual with a disability, or any group of individuals with disabilities, to cover the costs of measures associated with providing auxiliary aids, services, or assistive technology, that they are required to provide that individual or group with the nondiscriminatory treatment required by WIOA Title I. This obligation **does not require** a recipient to provide personal devices, such as wheelchairs; prescribed devices; such as prescription eyeglasses or hearing aids; or readers for personal use or study.

### Operational Procedures

During the Counselor’s assessment meeting with the consumer, the Counselor shall determine whether the consumer requires accommodations to perform employment functions within the scope of their employment desires and outcome perimeters. Generalized questions, such as, “Would you be able to perform the functions of employment with or without accommodations” would be presented so as not to violate HIPAA and other laws, and open the door to the consumer to volunteer what accommodations might be needed to support their given disability. The Counselor shall then explain what reasonable accommodations are, the Federal criteria established through the Americans with Disabilities Act for reasonable accommodations, an employer and employee’s obligations and rights within the scope of reasonable accommodations, information regarding the Federal laws for reasonable accommodations, and the employee’s, Counselor’s, and employer’s responsibilities throughout this practice.

The process for determining reasonable accommodation needs would be generated through generalized questions such as:

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1. Does the individual meet the definition of disability under the ADA? Yes / No
2. What are the individual's skills, experience, education, certifications?
3. What are the individual's functional limitations caused by their disability?
4. What are some potential accommodations based on the individual's functional limitations?
5. What are some potential options for employment?
6. Specific Job Name/Purpose:
7. Specific Job Qualifications (requisite skills, experience, education, other job-related requirements):

Following this, the Counselor and the consumer would then work together to determine any pre-employment aspects that would potentially fall within the reasonable accommodation scope.

- List any aspects of the pre-employment phase that may need modification, including testing, interview location, communication, etc.
- Record accommodation considerations for pre-employment aspects that may need to be modified.
- Determine essential functions and accommodation considerations required for initial and sustainable employment.

1. Have fundamental job tasks been identified by the employer? Yes / No
2. Do fundamental job tasks include quantity and quality requirements? Yes / No
3. Have behavioral requirements been identified? Yes / No

4. List fundamental job tasks

5. Include quantity & quality requirements

6. Identify behavioral requirements

7. Record accommodation considerations for those essential functions that are difficult for the individual to perform.

8. List any characteristics of the job site that may need modification for the individual to perform the essential functions of the job.

9. Record accommodation considerations for job site characteristics that may need to be modified.

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Once the stage has been reached where potential employment is possible, the Counselor and the consumer shall work together with the potential employer to determine the most feasible methodologies for moving forward. This may be accomplished through a determination of the following factors:

1. Has the individual requested an accommodation?
2. Have fundamental job tasks been identified by the employer?
3. Is medical documentation needed?
4. Is the employer suggesting an accommodation?
5. If so, does the accommodation seem to be appropriate and acceptable?
6. Is the employer claiming undue hardship for an accommodation?
7. Has information about tax incentives been shared with the employer?
8. Have outside resources been considered?
9. After consideration of a reasonable accommodation, will the applicant/employee be able to perform the essential functions with or without an accommodation?

During the consumer employment assessment phases, the Counselor shall determine the following:

1. Is the accommodation effective?
2. Have any changes occurred in ability, environment, or job duties?
3. Do additional accommodations need to be considered?
4. Is the current accommodation still required?

An Internal Audit is conducted twice throughout each Federal Program year either consisting of the first and third quarters or the second and fourth quarters of the program year, at which times, all Informed Choice documentation, flow, and status' shall be reviewed and documented.

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

### Programmatic Policy 6: RSA Vocational Rehabilitation VICR Ordering Process

Applies to (check all that apply):

<input type="checkbox"/> Vocational Rehabilitation – Administration
<input type="checkbox"/> Vocational Rehabilitation – Staff
<input type="checkbox"/> Fiscal - Administration
<input type="checkbox"/> Fiscal – Staff
<input type="checkbox"/> Other Staff (please specify)
<input type="checkbox"/> Additional Comments

- 1 Unit staff initiates the requisition within VICR. For low vision orders, examinations and eye glass orders from the CLVS must be processed separately from any other low vision devices (i.e.; only item on requisition should be the low vision examination or follow up examination or glasses). Glasses should include a quote from the CLVS office.
- 2 The staff person initiating the order must approve it to advance the order through the approval process. Approval path is as follows:
  - Unit Support Worker
  - Caseworker
  - Unit Manager
  - Fiscal
  - Division Director

The order can be initiated at any of the first three levels and will only require Division Director approval if over \$2,500, otherwise it will stop at the fiscal level. If computer related, then fiscal will share with the Division's Information System Support Specialist to obtain necessary approvals from IRM before sending to the vendor.
- 3 Once approved, click "options", click "req. detail", click "consumer requisition", click "cancel" for (do you want to save changes...) then print the "consumer order slip" onto yellow paper and forward to the next level for approval. Before going to fiscal for approval, the order slip must be verified that the item is not in DVI inventory (i.e.; low vision aids are checked), then forwarded to Fiscal for processing.
- 4 When approved at fiscal level and not requiring Division Director approval, a purchase order by vendor can be printed onto pink paper and verified against the consumer order slips for items that were pulled from stock so as not to reorder. If in inventory, the item is distributed to the caseworker and status changed to "delivered" on the consumer order slip. If computer related items, fiscal to pass along to the Division's Information System Support Specialist for IRM approval. When returned from IRM, can be sent to the vendor.

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- 5 When order is received from vendor, designated DVI staff will check in the order and process in VICR as being received. If complete order is received, follow the steps listed below:
  - a. Click "PO Search"
  - b. Enter PO Number from the vendor packing list or invoice
  - c. Click search
  - d. Double click on order after verifying that it is the correct vendor
  - e. Click "Update"
  - f. Click "Receive All"
  - g. Click "Save"
  - h. Print "Receiving Report" that is generated
  - i. Distribute items from receiving report to the listed "ship to" individual with the consumer's name listed on the item. (In the future, the system will generate an inventory numbered sticker that will be attached to the item before sending to the worker to deliver to the consumer.)
  - j. Send the copy of the "Receiving Report" to fiscal with the vendor's packing list or invoice.

When an invoice is received, verify the prices against the VICR PO in the system.

- 1 If there is no price difference, then the invoice is forwarded to fiscal with name and date and notation that the invoice is okay to pay. When paid, requisition status to be changed to "paid".
- 2 If there is a price difference, click on the VICR PO:
  - a single click on the line item whose price needs to be changed
  - b move cursor to the item price field in the upper right side
  - c enter the corrected price and click "save"continue steps a-c for each line item that has a price change

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

### Programmatic Policy 7: RSA Vocational Rehabilitation TAC 19-01/RSA-911

Applies to (check all that apply):

<input type="checkbox"/> Vocational Rehabilitation – Administration
<input type="checkbox"/> Vocational Rehabilitation – Staff
<input type="checkbox"/> Fiscal - Administration
<input type="checkbox"/> Fiscal – Staff
<input type="checkbox"/> Other Staff (please specify)
<input type="checkbox"/> Additional Comments

#### Scope

The Delaware Division for the Visually Impaired sets-forth the following policies, protocols, and procedures for the validation of jointly required performance data submitted under the Workforce Innovation and Opportunity Act (WIOA) through the submission of the Rehabilitation Services Administration (RSA) 911 Quarterly Reports and Federal Fiscal Year-End Final Reports as is outlined in Federal Technical Assistance Circular 19-01 (TAC-19-01) dated December 19, 2018.

#### Background

In accordance with TAC-19-01, each state is required to maintain policy/process procedures for data validation and correction thereof; annual validation of data training for Vocational Rehabilitation staff; monitoring protocols consistent with 2 CFR §200.328; a regular quarterly review of program data to ensure accuracy; documentation of incorrect or missing data and corrective action; and, a regular assessment of the data validation process itself.

The above required elements are currently being maintained through the following procedures:

- **Data Validation:** Accomplished through staff review of monthly RSA-911 data against the SF 425 information; review of the Visually Impaired Consumer Registry data against the hard-file data; ensurance that consumer statuses are properly coded and updated; and ensurance that all required forms and documentation are present throughout the consumer’s tenure with the Division. Missing or incorrect information are noted in the case-notes along with date of correction.
- **Data Validation Training:** This is currently included in quarterly staff meetings. In addition, this Policy shall also be incorporated into regularly scheduled staff trainings as well as new-hire training protocols. These regularly scheduled meetings and trainings shall encompass a staff sign-in sheet, Minutes taken and distributed of the meeting clearly outlining staff responsibilities, and follow-up at the next meeting or training to ensure documentation of responsibilities have been accomplished. Minutes and staff documentation within the Division’s electronic VICR system and consumer hard-files shall be included as part of the bi-annual Internal Auditing process.



## Division for the Visually Impaired

### Vocational Rehabilitation Fiscal and Programmatic Policies

- Since Internal Program Audits began last calendar year, Counselors are reviewing data elements and status of both their consumer's electronic VICR files as well as their hard-copy files and are more attentive to ensuring data is updated on a consistent and timely basis. The Internal Auditors are independent of all programs within the Division so they are conducted at times in an impartial and fair capacity.
- Internal Audits ensure that consumer information is updated in VICR as well as in the consumer's hard-copy file, and encompasses the following elements:

Demographics

Referral History

Medical Summary

Requisition Requests and Purchases

Medical History Data (Including Eye Doctor Appointments)

Prosthesis History

Functional Needs/Limitations

WIOA Demographic Data

Referral Notes

RSA Data which Provides the Status Codes, employment information, wage information, and goals, all on a quarterly basis as entered by the Counselors. The steps for how this is achieved is documented in a separate Procedure which the Counselors maintain and adhere to. Ensurance of this adherence is maintained through the bi-annual Internal Audit procedures.

- Following the conclusion of an Internal Audit, the Program's Unit Manager, the Division Director, and the Division Deputy Director, are provided a signed copy of the Internal Audit Report clearly indicating where deficiencies were noted throughout the Audit in both the Electronic VICR system and the hard-copy file for each consumer randomly Audited. A period of thirty (30) working days is provided for the Unit Manager to ensure all findings are addressed and return the Audit to the Auditors with explanations of corrections made, notations of how the issues noted will be permanently addressed, and signed and dated. Upon receipt, the Auditors will re-Audit the items noted for deficiencies to ensure the files are in compliance. If it is found that items have not been corrected, the Audit shall be then turned over to the Division Director and/or Division Deputy Director for further disposition.
- Monitoring Protocols: In accordance with 2 CFR §200.328, the Division's Vocational Rehabilitation Unit Counselor staff are responsible for oversight of the operations of the Federal award supported activities. Staff are responsible for monitoring their activities under Federal awards to assure compliance with applicable Federal requirements and performance expectations are being achieved; and if not, documentation and corrective action measurements are implemented.
- Review of Program Data: Vocational Rehabilitation Unit Counselor staff are responsible for quarterly reviews of each case-load assigned consumer's Visually Impaired Consumer Registry electronic data as well as each assigned consumer's hard-file documentation to ensure both are in accordance with each other; to ensure that all information is present, updated, and accurate; and if warranted; to correct any noted deficiencies therein. All documented corrections must be noted in the consumer's file with dates and action taken.
- Data Validation Assessment Process: During quarterly staff meetings, the Division's Vocational Rehabilitation District Administrator shall review the validation process with Counselor staff to determine areas for improvement

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

to the current protocol mechanisms. Recommended changes shall be documented in the meeting Minutes, and once tested for a period of 90-days; or until the next scheduled quarterly staff meeting; shall be reviewed, and if found to be applicable, shall be updated to the appropriate Policy.

### Policies/Protocols/Procedures

The following policies, protocols, and procedures shall be followed and adhered to by all Administrative Program Supervisors, Unit Managers, and Program staff whose programs function within Federal Regulations of RSA and WIOA.

### Policy

The chronological order of validation of data is as follows:

- The Division’s Vocational Rehabilitation District Administrator shall run the selected quarter’s RSA 911 Report as found in the Division’s Visually Impaired Consumer Registry (VICR) report as exemplified below.

Run RSA-911 file

Exit Run Clear

Reporting Year: 2019

Reporting Quarter: 2 You are running the RSA911 Report for the Time Period of 10/1/2019 Through 12/31/2019

Start Date: 10/ 1/19

End Date: 12/31/19

Location to Save File: Browse

- After the selected report period data has been run, the District Administrator shall send the report data electronically to the Department’s Division of Management Services, Information Resources Management Unit to have the data transposed into Excel format. The Information Resources Management Unit is responsible for providing assistance, documentation, and authorization for DHSS users to allow access to the various departmental and State-wide applications as well access to the State data network.
- Upon receiving the Excel formatted data from the Information Resources Management Unit, the District Administrator shall forward the Excel formatted information onto each of the Administrator’s Vocational

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

Rehabilitation Counselor staff members to review their assigned consumer's data against the RSA Federal Policy Directive RSA-16-04 to ensure there are no errors or missing information noted on the Federal RSA-911 report.

- The information reviewed for accuracy by the Counselor staff members shall encompass both general entry information as well as status detailed information as depicted below:

### 1. General Entry Information:

- Consumer MCI Data
- Consumer Demographics
- Referral History
- Medical Summary
- Requisition History

The screenshot displays a software application window with a menu bar at the top containing 'File', 'Options', 'VR Forms', 'Lib Data', 'OM Forms', 'Low Vision Forms', and 'Education Forms'. Below the menu bar is a toolbar with buttons for 'Exit', 'Mailing Address', 'View Medical Data', and 'Add Referral'. The main content area features a tabbed interface with tabs for 'Client MCI Data', 'DVI Client Demographics', 'Referral History', 'Medical Summary', and 'Requisition History'. The 'Client MCI Data' tab is selected, showing a form with various input fields. At the top of this form are two checkboxes: 'Override MCI' and 'Mailing Address Different Than Below'. The form fields include: MCI #, SSN, Last Name, First Name, Mid Initial, Suffix, Address 1, Address 2, Apt #, City, State, Zip Code, Home #, County, MCI Race, Gender, Marital, Death Date, Birthdate, and Age. At the bottom of the form, it displays 'Last Update: ANDREW KLOEPFER' and 'on 01/24/2019 08:23'.

- Once all of the above data has been verified and updated as warranted, Counselor staff members shall encompass the next set of general entry information by selecting the "View Medical Data" option as exemplified below:

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

File Options VR Forms LS Data OM Forms Low Vision Forms Education Forms

Exit Mailing Address View Medical Data Add Referral

Client MCI Data | DVI Client Demographics | Referral History | Medical Summary | Requisition History

Override MCI  Mailing Address Different Than Below

MCI #: [ ] SSN: [ ]

Last Name: [ ] First Name: [ ]

Mid Initial: [ ] Suffix: [ ]

Address 1: [ ]

Address 2: [ ]

Apt #: [ ] City: [ ]

State: [ ] Zip Code: [ ]

Home #: [ ] County: [ ]

MCI Race: [ ] Gender: [ ]

Marital: [ ] Death Date: [ ]

Birthdate: [ ] Age: [ ]

Last Update: ANDREW KLOEPFER on.01/24/2019 08:23

### 2. General Entry Information:

# Division for the Visually Impaired

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- Medical Visits
- Prosthesis/Appliance Information
- Diagnosis
- Functional Limitations

**File Options**

Exit View Visit Detail Release Docs

Medical Visits | Prosthesis/Appliance Information | Diagnosis | Functional Limitations

Eye Physician:  Date Last Seen:

Family Physician:  Date Last Seen:

Functional Vision:

**Medical Visit History:**

Physician Category	Date Seen	Unit	Facility

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### Vocational Rehabilitation Fiscal and Programmatic Policies

Once all of the generalized information has been assessed, updated, and verified, the Counselor will next select each consumer assigned to their case-load and open the “VR Forms” portion of VICR and ensure the following Statuses are accurate; and if not accurate; change the statuses to maintain accuracy.

- Status 00: Referrals. Ensure all initial referral information is accurate and complete.
- Status 02: Application for Services.
- Status 06: Trial Work Experiences/Extended Evaluation.
- Status 08: Closure Prior to Employment Planning.
- Status 12: Individualized Plan for Employment.
- Status 14: Counseling and Guidance.
- Status 16: Physical and Mental Restoration.
- Status 17: Secondary Education and Transition.
- Status 18: Training.
- Status 20: Ready for Employment.
- Status 22: Employment.
- Status 24: Service Interrupted.
- Status 26: Closed Rehabilitation.
- Status 28: Service Record Closed After IPE Has Been Initiated.
- Status:30: Service Record Closed Before IPE Has Been Initiated.
- Status 32: Post Employment Services.

The Policies for each of these Status Code entries including required documentation are found throughout this Policy Manual. For specific information on a particular Status Code, please refer to the Table of Contents contained herein.

#### Jointly Required Performance Data Submission

The Division’s Vocational Rehabilitation District Administrator and the Vocational Rehabilitation Unit Counselor staff shall meet twice-monthly to review case-load status, VICR status, and file-copy status of each consumer. Once all of the quarterly data and/or annual data has been verified and corrected, the District Administrator shall submit the data to the Delaware Department of Labor who in turn shall include the data in their portion of the RSA-911 Report and submit the entire reporting package to the Federal Rehabilitation Services Administration.

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

### Programmatic Policy 8: RSA Vocational Rehabilitation Conflict of Interest

Applies to (check all that apply):

<input type="checkbox"/> Vocational Rehabilitation – Administration
<input type="checkbox"/> Vocational Rehabilitation – Staff
<input type="checkbox"/> Fiscal - Administration
<input type="checkbox"/> Fiscal – Staff
<input type="checkbox"/> Other Staff (please specify)
<input type="checkbox"/> Additional Comments

#### Purpose

The Division for the Visually Impaired sets-forth this Policy to ensure conflict of interest and integrity to and for the Division is established, maintained, and adhered to by all employees, contractors, volunteers, and other such staff or entities.

#### Scope

All State of Delaware employees owe a duty of fidelity to the State’s holdings and its functions of provision of services to the citizens of Delaware. Employees must never place themselves in a position where their self-interest may conflict with this duty.

Any employee who breaches this policy is subject to disciplinary action within the guidelines of the State Merit Rules and other State of Delaware governing policies up to and including termination.

#### **Code of Conduct**

All employees of the Division; whether it be merit employees, casual/seasonal employees, temporary employees, or volunteers; as well as all contractors, sub-contractors, other capacity volunteers, and any other entity or individual who conducts business with the Division programs and personnel, are expected to comply with the following Code of Conduct:

- **Duty of Fidelity**

Employees owe a duty of loyalty and fidelity to the State of Delaware and the Division. Employees are expected to perform their duties on behalf of the Division faithfully, diligently, and to the best of their abilities.

- **Conflict of Interest**

Employees must never allow themselves to be placed in a position where their personal interests are in conflict (or could be in conflict) with the interests of the Division, Delaware Health and Social Services, or any other State of

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

Delaware Department or Division, or their employees thereof. If a suspected conflict of interest occurs, it shall initially be addressed at either the Division Director's or Deputy Director's level.

Employees must avoid any situation or activity that compromises, or may compromise, their judgement or ability to act in the best interest of the State. The State of Delaware Public Integrity Commission defines Conflict of Interest, under Delaware Gift Laws, as Restricted from accepting other employment, any compensation, gift, payment of expenses, or anything of value if it may result in: (1) impaired judgment; (2) preferential treatment; (3) decisions outside official channels; or (4) improper appearance, as per 29 Del. C. § 5806(b(1)). The Public Integrity Commission's Gift Laws may be found at the end of this document in Appendix A for reference.

The Public Integrity Commission Website may be found at <https://depic.delaware.gov/> For further clarification, their number is 302-739-2399.

- **Disclosure of Potential Conflicts**

Employees must promptly disclose to the Division Director or Deputy Director material information regarding any relationship, ownership, or business interest (outside of normal business operations), whether direct or indirect, that an employee or a member of his/her immediate family has with any person or entity that compromises the integrity or legality of the State of Delaware and its operations.

- **Protective Steps**

Upon disclosure of the information described above, the Division Director, Deputy Director, and other entities as deemed warranted by the Director such as the Department Secretary, the Attorney General's Office, or other such entities, shall take appropriate measures to protect against any actual or potential conflict of interest. Such steps may include:

1. Requiring the employee to refrain from being involved in any decisions made by the Division regarding its dealings with such person, business, or enterprise, or;
2. Requiring the employee to refrain from being involved in any dealings on behalf of the Division with such person, business or enterprise, or;
3. Requiring the employee to dispose of his/her interest in such business or enterprise if he/she wishes to remain in the Division's and/or the State of Delaware's employ.

- **Harm to Business or Reputation**

Employees must refrain from engaging in conduct that could adversely affect the Division's or the State of Delaware's business or reputation. Such conduct includes, but is not limited to:, the following

1. Publicly criticizing the Division, the State, and/or its management or its employees, or;
2. Engaging in criminal conduct or other behavior that could harm the Division and the State of Delaware's business or reputation.

- **Gifts or 'Kickbacks'**



# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

Employees must never accept any 'kickbacks' such as loans, gifts of any type, or personal payments of any kind from any person or business entity that has a business relationship in any format with the Division or State of Delaware as per the State of Delaware Public Integrity Commission Bulletins 004 and 005.

- **State Funds and Property**

Employees must be conscientious and scrupulous in their handling of State and Federal funds and property belonging to and within the purview of the State of Delaware and must always avoid any form of financial impropriety.

Employees must not use, or permit the use of, State and Federal property or resources for anything other than approved business and/or activities.

- **Confidential Information**

Confidential information (printed, electronic, or otherwise) relating to the Division, its programs, or the State of Delaware in general; whether it be past, present, future and contemplated assets, operations, products or services, industrial designs, inventions, production methods, marketing strategies and objectives, personnel, facilities, equipment, finances, policies, and business procedures, as well as any other such documentation, must never be disclosed to anyone other than those designated personnel within the Division or the State of Delaware who's job responsibilities encompass the need for access to such said documentation.

- **Disciplinary Action**

Upon the disclosure or discovery that any employee; of any capacity; contractor, volunteer, or otherwise entity related to the Division, the Department, or State of Delaware Government as a whole has violated the conflict of interest laws, ethics, regulations, statutes, or containments set-forth within this Policy, the Division Director, Deputy Director, and the Department's Labor Relations Unit, as well as other entities as deemed warranted by the Director such as the Department Secretary, the Attorney General's Office, or other such entities, shall take appropriate disciplinary measures up to and including termination from the Division and/or the State of Delaware as a whole.

# Division for the Visually Impaired

## Vocational Rehabilitation Fiscal and Programmatic Policies

	A	B	C	D	E	F
1	<b>FINANCIAL DISCLOSURE</b>	<b>CODE OF CONDUCT</b>	<b>LOBBYING STATUTE</b>	<b>CRIMINAL LAW</b>	<b>EXECUTIVE ORDER 1</b>	
2	Applies to: State "Public Officers" - All three branches and candidates for State office	Applies to: "State employees, officers and honorary officials" & local gov'ts that do not adopt their own Code	Applies to: Lobbyists who must report gifts to "State employees," members of the General Assembly and "State agencies"	Applies to: "Public Servants" - State & local employees & officers; judges; jurors, advisors or consultants for gov't functions; candidates	Applies to: Cabinet Secretaries, Division Directors or Equivalents, & Governor's Professional Staff	
3	29 Del. C. § 5812	29 Del. C. § 5802(4)	29 Del. C. § 5831	11 Del. C. § 1206 & § 1209(4)	Order No. 1	
4						
5						
6	<b>REQUIREMENT</b>	<b>REQUIREMENT</b>	<b>REQUIREMENT</b>	<b>REQUIREMENT</b>	<b>REQUIREMENT</b>	
7	Report "gifts" of more than \$250	Restricted from accepting other employment, any compensation, gift, payment of expenses, or any thing of value if it may result in: (1) impaired judgment; (2) preferential treatment; (3) decisions outside official channels; or (4) improper appearance	Requirement: List total expenditures on food, refreshment, entertainment, lodging, travel, recreation, gifts or contributions on employees or members of State agency and list recipient if expenditure is more than \$50 per day	Requirement: A public servant is guilty of receiving unlawful gratuities if the public servant solicits, accepts or agrees to accept a personal benefit for engaging in official duties which the public servant is required or authorized to perform, and for which the public servant is not entitled to special or additional compensation.	Identifies types of gifts from lobbyists that may or may not be accepted.	
8	29 Del. C. § 5813(e)	29 Del. C. § 5806(b(1))	29 Del. C. § 5806(b)	11 Del. C. § 1206	Order No. 1	
9						
10	A payment, subscription, advance, forbearance, rendering or deposit of money, services or anything of value unless consideration of equal or greater value is received.	No statutory definition of "gift." Commission uses plain and ordinary meaning for gift, but law also covers anything of monetary value.	No statutory definition of gift.	No statutory definition of gift.	"Gift" definition, Same as Financial Disclosure Law.	
11	Administrating Agency: Public Integrity; Can Refer to AG to Prosecute	Administrating Agency: Public Integrity	Administrating Agency: Public Integrity	Administrating Agency: Attorney General	Administrating Agency: Public Integrity	
12						
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17						
18						
19						

## Division for the Visually Impaired

### Vocational Rehabilitation Fiscal and Programmatic Policies

#### Programmatic Policy 9: Vocational Rehabilitation Distribution of Paratransit Tickets Process

Applies to (check all that apply):

<input type="checkbox"/> Vocational Rehabilitation – Administration
<input type="checkbox"/> Vocational Rehabilitation – Staff
<input type="checkbox"/> Fiscal - Administration
<input type="checkbox"/> Fiscal – Staff
<input type="checkbox"/> Other Staff (please specify)
<input type="checkbox"/> Additional Comments

To ensure the distribution of Consumer Paratransit Tickets are accounted for, the following protocols shall be followed:

- Paratransit Tickets must be provided to the Consumer on an in-person basis only.
- Consumers shall be notified by either their respective Counselors or the program’s Administrative Specialists to arrange an appointment time for either the Consumer to come to the Division’s New Castle County or Milford locations to retrieve their Tickets, or for their respective Counselors to meet with them at an agreed upon location.
- Tickets shall be provided on a monthly basis.
- The Consumer shall sign the Paratransit Ticket Receipt Form indicating the following:
  1. The amount of Tickets received.
  2. The monthly time-frame of usage for the Tickets.
  3. The events of usage for the Tickets (College, Training, Employment, etc.).
  4. The date of receipt of the Tickets.
- The Consumer shall be given a copy of the signed Form and it shall be the Consumer’s responsibility to ensure signatures are acquired from the proper individual at the event for which the Tickets were provided for; i.e.; College disabilities Coordinator/Support Services individual, Training Facilitator, Employer, etc.
- The Consumer shall then be required to return the signed Form to either the Counselor or the program’s Administrative Specialist the following month when the Ticket distribution to the Consumer is due. This shall ensure the Tickets provided are being utilized for the purposes they were provided for.

## Division for the Visually Impaired

### Vocational Rehabilitation Fiscal and Programmatic Policies

- Should the Consumer fail to return the completed signatory Form for any given month; either in person at the following month's appointment or by e-mail attachment or fax **prior to** the following month's appointment for the following month's Ticket release, Paratransit Tickets shall not be released to the Consumer until such Form is returned.
- It is the responsibility of the Consumer's respective Counselor to ensure the Consumer understands this Policy, the Forms, the distribution practice, and their responsibilities for acquiring Paratransit Tickets from and through the Division.

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