

ESTABLISHMENT PROJECT GUIDANCE AND ACTION ITEMS FOR INITIAL 90-DAY REVIEW

Background

Establishment Projects shall enhance staff capacity and training for the overall purpose of increasing the quality of services and increase the quality and quantity of competitive, integrated employment outcomes to VR applicants or eligible individuals.

Overview and purpose for initial 90 day review

In April 2017, the Rehabilitation Services Administration (RSA) conducted an onsite visit to review Vocational Rehabilitation Services and Supported Employment Services Programs. One program area scheduled to receive technical assistance during the review was the Establishment Projects. **In light of the technical assistance received, the Bureau of Rehabilitation Services (BRS) and the Family and Social Services Administration (FSSA) Audit Services Department, is conducting an initial 90-day review regarding your April - June claim reimbursements as well as the system in place to track the required measureable objectives of the project.**

Items to be reviewed during initial 90-day review

The below provides a listing of the review areas for your April - June claim reimbursements and the required documentation that must be submitted to Audit Services for the initial 90-day review. Please note the below list is not exhaustive and additional documentation may be requested in order for BRS and FSSA Audit Services to complete their review.

Review areas and required documentation to be submitted

- Required 21.3% Non-Federal Match
 - Describe the source of and provide support for the 21.3% non-federal match.
 - (This may include internal financial statements or audited/reviewed financial statements) Also, provide verification that it is not derived from a federal source, VR monthly billing, Ticket to work funds or in-kind contributions and not being used to match another federal grant.

- Staffing Costs
 - Provide job descriptions of staff charged to the Project to support that staff expenses were applied in accordance with the federal matching requirements outlined in 34 CFR Part 361.5 (Attachment 1).
 - Provide payroll register/pay stubs to support salary amounts claimed for newly-hired and existing staff (whose roles have been expanded). Also, provide support for fringe benefits included with amounts claimed.
 - Provide documentation for newly-hired staff such as an offer letter or other HR records to document start date.
 - Provide documentation for staff whose roles have been expanded such as internal allocation percentages or other HR records or evidence of promotion to a supervisory position.
 - Provide listing of staffing prior to commencement of the Establishment project (3/1/2017).
 - Provide support for supervisory time allocated to the Establishment project versus other programs (ie. Pre Employment Transition Services or BDDS Services.)
 - Complete and return the Staffing Report worksheet that is included as an attachment to the Notification Email. (Include caseload for period from **June 1, 2017** through **August 31, 2017**).
 - Several Case samples of consumers listed on the Staffing Report worksheet will be selected to assist in reviewing the percentage of time charged to the project. This may consist of reviewing case notes, Chronos logs, and documentation verifying the number of hours listed on the Staffing Report worksheet.

- Training costs

Training costs should be a result of an enhanced cost or added position, and not something customarily provided prior to the establishment project, such as Employment Specialist Training through the Indiana Institute on Disability and Community.

- Submit supporting documentation for claimed training expenses (i.e. registration fees, invoices, and travel expenses (if any) etc.) to verify the costs claimed.
- Submit attendance records or certificates to document course attendance.
- Complete and return the Training spreadsheet that is included in the Notification email to detail the foundational skills training hours claimed by eligible staff.

MEASURABLE OBJECTIVES

- Submit documentation verifying the provider is tracking the measurable objectives required through the project, which are as follows:
 - Average number of days to initiate new VR referrals;
 - Number of individuals in supported employment;
 - Average number of hours spent on supported employment services or on-the-job supports short term, per person;
 - Increase in the number of placements in competitive employment outcomes;
 - Increase in the number of individuals who retain employment at least 90 days following stabilization;
 - Increase in the average hours worked per week for individuals in competitive, integrated employment; and
 - Increase in the average pay for individuals in competitive, integrated employment.
- Several Case samples of consumers as listed in the Staffing Report worksheet will be selected to assist in reviewing the above metrics.

Deadline to Submit

The requested documents must be submitted to **Matt Deimling** at matt.deimling@fssa.IN.gov by two weeks from this email. (12/19/17).

Next Steps

Upon receipt of the documents FSSA Audit Services and BRS will review the documentation and request several case samples within one week.

ATTACHMENT 1

34 Code of Federal Regulations 361.5

(16) *Establishment, development, or improvement of a public or nonprofit community rehabilitation program* means—

(I) The establishment of a facility for a public or nonprofit community rehabilitation program, as defined in paragraph (c)(17) of this section, to provide vocational rehabilitation services to applicants or eligible individuals;

(ii) Staffing, if necessary to establish, develop, or improve a public or nonprofit community rehabilitation program for the purpose of providing vocational rehabilitation services to applicants or eligible individuals, for a maximum period of four years, with Federal financial participation available at the applicable matching rate for the following levels of staffing costs:

(A) 100 percent of staffing costs for the first year;

(B) 75 percent of staffing costs for the second year;

(C) 60 percent of staffing costs for the third year; and

(D) 45 percent of staffing costs for the fourth year; and

(iii) Other expenditures and activities related to the establishment, development, or improvement of a public or nonprofit community rehabilitation program that are necessary to make the program functional or increase its effectiveness in providing vocational rehabilitation services to applicants or eligible individuals, but are not ongoing operating expenses of the program.