

Program Monitoring Readiness Prep Tool

Purpose

This tool is designed to help State Vocational Rehabilitation (VR) agencies prepare for Rehabilitation Services Administration (RSA) program and performance monitoring reviews. It provides practical guidance to assist agencies in understanding the methods and documentation that RSA uses to assess program performance, service delivery, data quality, fiscal compliance, and internal controls. It can serve as a companion to the State Monitoring and Program Improvement Division (SMPID) [**Monitoring and Technical Assistance Guide \(MTAG\)**](#) and a valuable resource for informed discussions with RSA about how the agency aligns policy and practice to improve outcomes for individuals with disabilities.

Monitoring Scope, Objectives, and Authorities

Review Period

RSA monitoring typically reviews:

- The current Federal Fiscal Year (FFY) and the three prior FFYs.
- The current Program Year (PY) and the three prior PYs.

If issues extend beyond the three prior FFYs or PYs, be prepared to provide documentation as requested.

Specific Programs Covered

- State Vocational Rehabilitation Services program (VR program) established under Title I of the Rehabilitation Act
- State Supported Employment Services program (Supported Employment program) authorized under Title VI of the Rehabilitation Act

Program Review Objectives

The SMPID review will assess your agency's program and performance infrastructure to ensure the following:

- **Continuous improvement in employment outcomes**, including competitive integrated employment and supported employment
- **Effective and high-quality service delivery**, including services to students and youth with disabilities
- **Sound financial management**, maximizing the use of Federal funds and resources

- **Compliance with statutory and regulatory requirements**, including policies, procedures, and internal controls
- **Data-driven decision-making**, supported by accurate reporting and performance analysis
- **Alignment of policy, practice, and outcomes**, ensuring systems support program goals

Primary Authorities Referenced During Monitoring

- **The Rehabilitation Act of 1973, as amended by title IV of WIOA**
- **34 C.F.R. Part 361 -- State Vocational Rehabilitation Services Program**
- **34 C.F.R. Part 363 -- State Supported Employment Services Program**
- **Section 116 of WIOA - Performance Accountability Measures**

Other Supporting Sources

- The Unified or Combined State Plan (VR Portion)
- The Comprehensive Statewide Needs Assessment (CSNA)
- RSA-911 Case Service Report
- Agency Data Tables

General Monitoring Preparation Tips

- Leadership should have a clear understanding of the agency's performance trends and should be able to explain them.
- Policies and procedures should be readily available and reflect current practice.
- RSA-911 summaries and internal performance dashboards should be current and accessible.
- The agency should be able to clearly explain how data are collected, validated, and applied.
- Staff should be able to articulate their roles and responsibilities for VR program administration.
- The agency should be prepared to discuss technical assistance and improvements.

Note to Remember: *RSA will evaluate the agency's compliance and performance during the period under review. If the agency was not in compliance during that period, RSA may still issue a finding even if the problem was corrected in a later year.*

Performance Analysis

VR Agency Profile

Documentation to Review

- Table 1 – VR Agency Profile
- WIOA performance indicator data
- Internal performance dashboards or trend reports
- Any summaries used for State Plan or CSNA development

What SMPID is Assessing

- Performance trends across recent program years and systemic factors that are potentially affecting outcomes
- Changes in applicants, participants, and employment outcomes
- Alignment between performance data and agency strategy

Self-Assessment Questions

- What are the key trends in our performance over the past 2–3 years?
- Have there been significant increases or decreases in applicants, participants, or employment outcomes? Why?
- How does our employment rate compare over time? What factors may be driving changes?
- What external or internal factors are influencing performance?
- How do we use performance data to inform decisions and strategy?
- Are there any issues with our case service management system that impact data quality and reporting?

Potential Red Flags

- Declining employment rate without clear strategy for improvement
- Significant drops in applicants or participants
- Data trends that leadership cannot explain
- Misalignment of data and agency priorities

VR Process: Engagement of Applicants and Eligible Individuals with Disabilities

Documentation to Review

- Data Tables:
 - Table 1 – VR Agency Profile
- Table 2 – Types of Exit
 - Table 3 – Reasons for Exit

- Table 7 – Students with Disabilities
- Policies and procedures:
 - Referral and application
 - Eligibility determination (60-day requirement)
 - Order of Selection process (if applicable)
 - IPE development (90-day requirement)
- Internal reports on timeframes and attrition
 - Case file documentation samples
 - Consumer Satisfaction Surveys and State Rehabilitation Council (SRC) Recommendations

What SMPID is Assessing

- Timely engagement of applicants and participants
- Individual progress through the VR process
- Attrition at key stages (application, eligibility, IPE)
- Alignment of policies and practices with timely service delivery
- Barriers to engagement and progression

Self-Assessment Questions

- Where do individuals exit the VR process, and why?
- Are we meeting the 60-day eligibility and 90-day IPE timelines?
- What trends exist in referrals and applications?
- Are individuals disengaging before eligibility or IPE? Why? What participant characteristics may impact engagement? Is this occurring at a greater extent in certain regions of the state? Why? Are there other mediating circumstances?
- What policies or practices may delay engagement or progress?
- How are we ensuring informed choice is documented and meaningful?
- How often do we review attrition data and make adjustments?
- What do consumer satisfaction surveys tell us about consumers' experience?

Potential Red Flags

- Large numbers of exits prior to IPE or employment
- Disproportionate share of exit types associated with non-completion or disengagement (e.g., unable to locate, no longer interested)
- Delays in eligibility or IPE timelines
- Declining referrals or applications
- Inconsistent practices across regions

Services and Service Delivery

Documentation to Review

- Data Tables:
 - Table 1 – VR Agency Profile
 - Table 4 – VR Service Provision
 - Table 5 – Measurable Skill Gains and Credentials
 - Table 7 – Students with Disabilities
 - Table 8 – Pre-ETS Service Provision
- Policies on:
 - Service provision
 - Rates of payment
 - Financial need/cost participation
 - Provider/vendor agreements and capacity data
- Internal service utilization reports

What SMPID is Assessing

- Timeliness and quality of services
- Alignment of services to employment outcomes
- Impact of policies on access, choice, and service delivery
- Adequacy of provider capacity
- The relationship among the characteristics of individuals served—including the type and significance of their disabilities—the services they receive, and their employment outcomes

Self-Assessment Questions

- Are services provided timely after IPE development?
- Do policies (rates, financial need, approvals) limit access or choice?
- Are there enough providers to meet demand statewide?
- What services are most commonly provided, and what outcomes do they yield?
- How do we evaluate provider performance and customer satisfaction?
- How do we align services with labor market demand?
- Are we providing extended services for youth, including the ongoing support services to maintain a job, such as job placement follow-up, counseling, and training?

Potential Red Flags

- Delays in service authorization or delivery
- Limited provider capacity (especially rural)
- Participant outcomes are not proportional to the cost or intensity of services provided
- Policies that may be limiting access

Quality of Employment Outcomes

Documentation to Review

- Data Tables:
 - Table 1 – VR Agency Profile
- Table 2 – Types of Exit
 - Table 3 – Reasons for Exit
 - Table 4 – Service Provision
 - Table 5 – MSG and Credentials
 - Table 6 – Employment Outcomes
- Wage, hours worked, and retention data
- Reports on career advancement and credential attainment

What SMPID is Assessing

- Quality of employment outcomes (not just closures)
- Wages, hours, and benefits
- Employment retention and advancement
- Outcomes for individuals with significant disabilities
- Alignment between services and quality outcomes

Self-Assessment Questions

- Are employment outcomes improving in quality (wages, hours, benefits)?
- Do individuals retain employment after exit?
- What strategies are we using to promote job retention?
- How do we support career advancement and credential attainment?
- What services or strategies are improving outcomes?
- How do outcomes vary, if at all, across the populations we serve?
- How do we support individuals to reduce reliance on public benefits?

Potential Red Flags

- Low wages or part-time outcomes
- Poor retention rates
- Limited credential attainment
- Misalignment between outcomes and labor market opportunities
- Low supported employment outcomes

Pre-Employment Transition Services and Transition Services (Pre-ETS)

Documentation to Review

- Appendix B and Appendix C
- Data Tables:
 - Table 4 – VR Service Provision
 - Table 7 – Students with Disabilities
 - Table 8 – Pre-ETS Service Provision
- Interagency agreement with state educational agencies (SEAs)/local educational agencies (LEAs)
- Policies and procedures for Pre-ETS
- Tracking of 15% reserve and expenditures
- Documentation of coordination activities
- Documentation of the provision of extended services for youth

What SMPID is Assessing

- Provision and reach of Pre-ETS
- Compliance with 15% reserve requirement
- Movement from potentially eligible to participant status
- Coordination with education partners
- Consistency of services statewide

Self-Assessment Questions

- Are we meeting the 15% reserve requirement? If not, why?
- How many students are receiving Pre-ETS, and what services?
- Are students transitioning from Pre-ETS into VR services?
- Are services available consistently across the state?
- How well do we coordinate with schools and partner agencies?
- Are we tracking and documenting Pre-ETS accurately?

- Is our interagency agreement with the SEA/LEA current and actively being implemented?
- Are we providing and documenting the required services (career counseling and information and referral) for youth who are known to be seeking subminimum wage employment and individuals who are employed at subminimum wage?

Potential Red Flags

- Not meeting 15% reserve requirement
- Low conversion from Pre-ETS to VR participants
- Inconsistent service delivery across regions
- Weak coordination with education partners

RSA-911 Data Reporting, Internal Controls, and Quality Assurance

Documentation to Review

- Policies and procedures related to internal controls necessary for the verification of RSA-911 data and quality assurance
- RSA-911 data validation processes
- QA review processes and findings
- Staff training materials on data reporting
- Case file documentation standards

What SMPID is Assessing

- Accuracy and reliability of RSA-911 data
- Effectiveness of internal controls (2 C.F.R. 200.303)
- Quality assurance processes
- Staff understanding and implementation of data requirements
- Ability to detect and correct errors

Self-Assessment Questions

- How do we validate the accuracy of RSA-911 data?
- Where are there recurring errors in our data? How are we addressing data quality?
- How are staff trained on documentation and reporting requirements?
- Do case files reflect reporting consistently and accurately?
- How do we use data to improve performance and decision-making?
- How well do our internal controls prevent errors and ensure compliance?
- Is our data validation/QA policy up to date? Are the procedures being implemented?

Potential Red Flags

- Data inconsistencies or frequent corrections
- Lack of documented QA processes
- Incomplete case files

Leadership Reflection Questions

- What do our data show about individuals' progress through the VR system and where they may disengage?
- Where are there gaps between our policies and actual practice?
- Are our resources and services aligned to achieve quality employment outcomes for participants?
- How well are we meeting program requirements? Where are we at risk for non-compliance? How do we use data to anticipate issues and make corrections? How does our data quality impact decision-making? What could we improve?
- What are the top 2-3 changes we need to make now to improve performance and outcomes?

Disclaimer

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