

Plenty with 20:

The Top 20 Tips for Acclimating New Administrators to VR

If you are new to Vocational Rehabilitation (VR) and have just landed a job in a leadership position, here are the top 20 things to know.

1

Understand your agency's structure -- General, Combined, Blind.

A state may choose to have a Combined VR program, which serves all individuals with disabilities in the state, or, in accordance with the Rehabilitation Act of 1973, may elect to establish a separate agency to serve the Blind and have both a General and a Blind agency. Currently, there are a total of 78 programs that cover the States, the District of Columbia, and the U.S. Territories and Commonwealths, which include Puerto Rico, Guam, American Samoa, the U.S. Virgin Islands, and the Northern Mariana Islands. Familiarize yourself with your State's VR program configuration and learn the history that supports it.

Additionally, agencies may be situated as a Designated State Unit (DSU) within a larger Designated State Agency (DSA). For example, the VR agency could be a division within the State's Labor Department, or the agency could be its own DSA. It is always helpful to understand the history behind your program's organizational structure. Regardless of where you are situated, the DSU must retain administrative control of the VR program.

There are two important sources of sub-regulatory guidance that can further inform you about this important topic.

- [Technical Assistance Circular \(TAC\) 12-03 Organizational Structure and Non-Delegable Responsibilities of the Designated State Unit for the Vocational Rehabilitation Program](#)
- [TAC 13-02 Reorganization of the Designated State Agency and the Designated State Unit for the Vocational Rehabilitation Program](#)

To-Dos For You:

- Find out if your agency's program is General, Blind, or Combined.
- If in a State with two VR agencies, reach out to the other Director.
- Find out your organizational structure and its history. Are you a Designated State Agency, a Designated State Unit, or an Independent Commission?
- Read the TACs.

2

Understand the Federal Administration of the VR program.

Rehabilitation Services Administration (RSA)

Organizational Structure: RSA is located within the Office of Special Education and Rehabilitative Services (OSERS) in the United States Department of Education (ED). RSA is led by a Commissioner, appointed by the President, and confirmed by the Senate. There are two major divisions within RSA that house specific program units.

- 1. Training and Services Programs Division:** This group monitors discretionary grants and provides technical assistance, conducts discretionary grant competitions and processes grant awards, oversees the administration of and coordinates arbitrations for the Randolph-Sheppard program, collects, reviews, and analyzes program and grantee data, and works with grantees to develop program performance measures used to evaluate and monitor grantees.

Additionally, it oversees the American Indian Vocational Rehabilitation Services (AIVRS).

There are two units that carry out this work:

- i. Training Programs Unit
 - Rehabilitation training
 - Demonstration and Training programs
- ii. Service Programs Unit
 - AIVRS
 - Randolph Sheppard Vending Facility Program

- 2. State Monitoring and Program Improvement Division:** This group administers the five formula grant programs authorized under the Rehabilitation Act, ensures consistency with Federal requirements, and helps States implement programs designed to improve results for individuals with disabilities.

There are four units that carry out this work:

- i. Fiscal Unit
- ii. Data Collection and Analysis Unit
- iii. Technical Assistance Unit
- iv. VR Program Unit

Each state is assigned a team that consists of staff from each of the four units listed above. You will primarily work with a [State Liaison and a Financial Management Specialist](#).

Monitoring: RSA monitors your program on a periodic basis to ensure compliance with Federal regulations. Get familiar with the [Federal Fiscal Year \(FFY\) 2021 Monitoring and Technical Assistance Guide](#) to understand current focus areas and the scope of monitoring. Periodic on-site monitoring is required in Section 107 of the Rehabilitation Act. RSA looks at program and fiscal performance typically over the three most recently completed program and fiscal years, so it is important to always work on the active management of your program and conformance with the law. You can access previous RSA monitoring reports here: [Monitoring and Technical Assistance Reports](#).

To-Dos For You:

- Identify the RSA State Liaison and Financial Management Specialist for your agency and save their contact information.
- Read your agency's last monitoring report, making note of any improvements expected. Identify improvements that have been made since your agency's last report.
- Familiarize yourself with any corrective action plans resulting from recent monitoring reviews.

3

Be "in the know" -- you can't lead effectively if you don't know what you're leading.

Sign up for email updates from RSA. Information and updates are disseminated to the states through RSA's email listserv. Sign up for the various email lists from your Federal partner: [RSA email sign-up](#).

Bookmark [RSA's website](#). This will take you to the Federal partner's website. There are many valuable resources here, including the [VR Program Reference Guide](#).

To-Dos For You:

- Sign up for RSA email updates.
- Bookmark the RSA website.

4

Be intellectually curious.

Don't be afraid to ask questions and gain an understanding of all things related to your organization. This is not a sign of weakness; rather, it's a sign of interest and willingness to learn, making note of areas worthy of attention. Learn from others, stay curious, and actively seek information.

To-Dos For You:

- Identify the subject-matter experts who have a rich history of VR.
- Get to know the various technical assistance centers available to you and their purpose.
- Tap into your assigned RSA liaisons. They desire an active relationship with your state.
- Google is your friend.

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Learn about the history of VR.

History of VR: According to Parker and Szymanski, 1998, "The future of development of the profession is, however, rooted in the foundation of the past. Thus, to the extent that professionals are unfamiliar with the history and philosophical foundation of rehabilitation counseling, they are unprepared to deal with its future challenges." In other words, you don't know where you're going unless you know where you're coming from.

The Smith-Fess Act of 1920 is considered the beginning of the public rehabilitation program for persons with disabilities. Funds were provided for vocational guidance, training, occupation adjustment, prosthetics, and placement services.

[The Randolph-Sheppard Act of 1936](#) provided the opportunity for persons who were blind to be licensed to operate vending stands in federal buildings.

The Vocational Rehabilitation Amendments of 1943 expanded services to include physical restoration and also required states to submit a written state plan to the federal government. In addition, provisions were expanded.

[The Vocational Rehabilitation Act Amendments of 1954](#) made major changes to financing provisions. Funding to state VR agencies was determined by a formula that considered state population and per capita income. Extension and improvement project grants were added as were research and demonstration grants. Provision was also made for training grants for VR agency staff.

The Vocational Rehabilitation Act Amendments of 1965 expanded services to reach a broader population including, but not limited to, persons with a substance abuse history and those with socially handicapping conditions. Economic need was eliminated.

In 1973, the name of the legislation changed from the Vocational Rehabilitation Act to the Rehabilitation Act. A priority to serve persons with severe disabilities was mandated. Affirmative Action programs were established in Title V, Sections 501, 502, 503, and 504. The establishment of the Individual Written Rehabilitation Program (IWRP), now commonly known as the Individualized Plan for Employment (IPE), was a major step to ensure the involvement of the consumer in developing a rehabilitation plan of action.

The Rehabilitation Act Amendments of 1978 responded to consumer concerns for added involvement by the establishment of independent living centers. A focus on peer counseling and guidance emerged.

The Rehabilitation Act Amendments of 1986 enhanced support for rehabilitation engineering, with clear definitions for rehabilitation engineering services. In addition, support for special projects and demonstrations in supported employment was established.

The Americans with Disabilities Act of 1990 became law, and it provided comprehensive civil rights protection for people with disabilities. Closely modeled after the Civil Rights Act and Section 504, the law was the most sweeping disability rights legislation in American history. The Act mandated that local, State, and Federal governments and programs be accessible and that employers with more than 15 employees make "reasonable accommodations" for workers with disabilities, making it illegal to discriminate against otherwise qualified workers with disabilities.

The 1992 Amendments to the Rehabilitation Act clearly outlined the intent for Congress to ensure consumer choice in career opportunities, with competitive employment as the desired outcome.

The 1998 Amendments to the Rehabilitation Act contained provisions to simplify certain aspects of the vocational rehabilitation process for consumers. This included the presumptive eligibility for individuals with disabilities receiving Supplemental Security Income (SSI) or Social Security Disability Income (SSDI). In addition, the simplification included the use of existing, current documentation for eligibility determinations and Individualized Plan for Employment (IPE) development. The Amendments expand consumer choice, require that individuals with disabilities are to be served not only by the VR program but also through the workforce investment system, and require information and referral services for individuals determined ineligible or assigned to a lower priority category within an Order of Selection.

The [2002 Help America Vote Act](#) became law in the U.S., and it required voting "systems" to be accessible for those with disabilities, including special assistance for Blind or otherwise visually impaired voters.

[The Americans with Disabilities Act \(ADA\) Amendments of 2008](#) became law and broadened the scope of who is considered disabled under the law. When considering whether a person is disabled, the law required that people ignore the beneficial effects of any mitigating measures (except ordinary eyeglasses and contact lenses) a person uses. Furthermore, when considering whether a person is substantially limited in a major life activity, which would make them disabled under the law, the law required the consideration of bodily functions as well as other major life activities.

Additional Americans with Disabilities Act rules came into effect in 2011. The rules expanded accessibility requirements for recreational facilities such as swimming pools, golf courses, exercise clubs, and boating facilities. The rules also clearly defined "service animal" as any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, and intellectual or other mental disability.

[The Workforce Innovation and Opportunity Act \(WIOA\)](#) was signed into law on July 22, 2014. WIOA is designed to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy.

[The State Vocational Rehabilitation Services Program - The First 100 Years](#) presentation by RSA outlines a historical overview of the VR program.

To-Dos For You:

- Communicate the history of VR throughout your organization.



Learn about the State Rehabilitation Council (SRC).

The SRC collaborates with the VR agency in administering the VR program. In partnership with the VR agency, the SRC carries out a variety of important functions. Visit [State Rehabilitation Council](#) for complete information.

To-Dos For You:

- Read the linked information.
- Find out the list of SRC members for your agency and meet with the chair. Get to know all the members and the contributions they bring to the SRC.

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Familiarize yourself with the Training and Technical Assistance Centers.

RSA has various training and technical assistance centers (TAC) and demonstration projects that are here to help you and your partners in providing VR and other services to individuals with disabilities. Each technical assistance center focuses its efforts on a specific set of topics designed to provide universal, targeted, and intensive technical assistance for improving services to individuals with disabilities to maximize their employment, independence, and integration into the community and the competitive labor market. More information about these options can be found on [RSA's website](#).

To-dos For You:

- Bookmark the TA Centers' websites so you can access them quickly and easily.

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Understand that your agency is part of a larger network.

The [Workforce Innovation and Opportunity Act \(WIOA\)](#) outlines the core partners. With WIOA, the public VR program is one partner among six core partners. The core partners include the following:

- WIOA Title I: Adult, Dislocated Workers, and Youth programs administered by the Department of Labor (DOL)
- WIOA Title II: Adult Education and Family Literacy program administered by the Education Department (ED)
- WIOA Title III: Employment Services program, under the Wagner-Peyser Act, administered by DOL
- Title IV - State Vocational Rehabilitation Services program administered by ED

Additionally, there are WIOA partner programs or optional programs:

- Health and Human Services (HHS)-administered: Temporary Assistance for Needy Families (TANF), Community Services Block Grant
- ED-administered: Career and Technical Education programs, authorized under the Carl D. Perkins Career and Technical Education Act of 2006
- USDA-administered: Employment and Training program, and Work programs under the Supplemental Nutrition Assistance Program (SNAP)
- DOL-administered: Trade Adjustment Assistance for Workers program, Jobs for Veterans State Grants programs, Unemployment Insurance programs, Senior Community Service Employment program, and Reintegration of Ex-Offenders
- Housing and Urban Development (HUD)-administered: Employment and Training activities carried out by the Department of Housing and Urban Development

To-Dos For You:

- Get a list of the core partners with the key contact information.
- Set up a meeting with each of the core partners to learn more about their programs.
- Participate in the State and Local Workforce Development Boards.

9

Read your State Plan and understand the difference between the Unified and Combined State Plan.

Under WIOA, the governor of each state may elect to submit either a Unified Plan or Combined Plan to the Secretary of the U.S. Department of Labor (DOL). The Plan should outline the State's four-year strategy for its workforce development system.

- A Unified Plan includes the six WIOA core programs.
- A Combined Plan includes the six WIOA core programs and at least one Combined State Plan partner program.
- [WIOA State Plan Portal](#)

To-Dos For You:

- Find out what type of State Plan you have.
- Read your State Plan and familiarize yourself with the goals and strategies.
- Review the VR services portion of the Unified or Combined State Plan.

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The VR program juggles multiple annual cycles.

The funding is provided under a Federal Fiscal Year (FFY), performance is tracked by Program Year (PY), and your State's State Fiscal Year might add a third layer if different than the previous cycles.

Your program is funded on an FFY basis, which runs October 1-September 30.

This differs from the Federal PY, which runs July 1-June 30 for the collection and reporting of WIOA performance data.

In addition, many states have a State fiscal year that runs from July 1-June 30, with some exceptions. For example, New York begins its State fiscal year on April 1; Texas begins on September 1; Alabama and Michigan begin on October 1.

To-Dos For You:

- Find out the dates for your State fiscal year.

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Know your money.

Your State's VR program is funded through a **Formula Grant** (often referred to as **Section 110 grant funds**). The Federal appropriation, of which your grant award is a part, generally increases annually based on the Consumer Price Index for all Urban Consumers percentage. However, the final appropriation amount can be impacted by Congressional actions.

Over \$3 billion is appropriated to the public VR program each FFY.

Please review the [VR Program Fiscal Management under Grant Award Issuance](#) information on the VRTAC-QM website.

It is important to get a sense of your budget, how the spending flows, the reports you can access, and your financial position.

To-Dos For You:

- Find out the total amount of your Federal Grant Award(s).
- Talk with the State's fiscal staff about the budget, budget reporting, and your current financial position. Set up a time to meet regularly with your team to track your financial position in alignment with the organization's goals and priorities.

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The VR program has a State share/cost matching requirement.

The federal share is **78.7%**, and you must provide a State match of **21.3%** of total program expenditures (Federal and State shares).

RSA has a [match calculator](#) that will help you calculate both the non-Federal share based on the grant award amount and the maximum amount of Federal funds potentially available based on the non-Federal share amount.

For more information, check out the [VRTAC-QM VR Program Fiscal Management](#) and scroll down to Match/Cost Sharing.

To-Dos For You:

- Speak with fiscal staff about your agency's sources of match.
- Learn the history of how these match sources came into existence and any special considerations around sustainability.

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Do NOT transfer Federal award funds between General and Blind Agencies without talking to RSA first.

If you are in a state with both a General and Blind agency and you wish to transfer funds between the programs, **YOU MUST** make a formal request with RSA to transfer funds. **DO NOT** use internal accounting adjustments to transfer funds between the two programs.

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Learn what regulations apply to the VR Program.

There are both program regulations and fiscal regulations. One way to learn and grow is to highlight and review regulatory sections as they come up in the course of doing your work.

Please visit <https://www.vrtac-qm.org/laws-regulations-rsa-policies>.

Here, you will find dedicated pages for [Legislation](#), [WIOA Regulations](#), [VR Program-Specific Regulations](#), [RSA Sub-Regulatory Guidance](#), [Fiscal & Other Federal Guidance](#), and [Rehabilitation Services Administration](#).

When there is a discrepancy between the Uniform Grant Guidance and the Federal regulations for the VR, Supported Employment (SE), and Independent Living (IL) programs, as outlined specifically in [397](#), the federal program regulations supersede [2 C.F.R. part 200-Uniform Grant Guidance](#).

Know your own state rules and regulations. Sometimes they conflict with federal regulations. Seek clarification when this occurs and know your options. Contact your RSA state liaison and financial management specialist with questions for clarification.

To-Dos For You:

- Bookmark these regulations/statutes.
- Read the regulations/statutes.

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Learn the lingo.

As with any industry, there are a lot of acronyms. This [list of acronyms](#) can help you navigate conversations and resources.

To-Dos For You:

- Download the acronym list and keep it as a desk reference.

Learn disability etiquette.

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There are several resources that can help with this topic.

- [Forbes: It's Time For A Reimagining of Disability Etiquette](#)
- [JAN-Disability Etiquette](#)
- [NDNRC-Disability Etiquette Fact Sheet](#)
- [Etiquette: Interacting with People with Disabilities YouTube Video](#)

To-Dos For You:

- Read/watch the resources referenced.

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There are five "non-delegable" responsibilities for VR.

[34 CFR 361.13\(c\)\(2\)](#) lays out the functions that must be reserved solely to the staff of the Designated State Unit (DSU) and those functions may not be delegated to any other agency or individual. At a minimum, these "non-delegable" responsibilities relate to decisions affecting the following:

- Eligibility, the nature, and scope of services and the provision of those services;
- The determination that individuals have achieved employment outcomes;
- Policy formulation and implementation;
- The allocation and expenditure of VR funds; and
- The participation of the DSU in the one-stop delivery system in accordance with Title I.

This is important for you to know and understand. Sometimes, the larger DSA takes an action or oversteps regarding the allocation and expenditure of funds and takes that out of the decision-making for the DSU. By understanding, you can speak up and inform others about the regulatory requirements.

To-Dos For You:

- Read [TAC 12-03](#).

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Get into the data.

The VR program has both required performance metrics and metrics you will want to review to understand the effectiveness and efficiency of the services provided. At its most effective, data should inform policy and procedure. Additionally, you should be constantly questioning the data's validity as much of this information is reported on a Federal level and is used to tell your agency's story. You should be mindful of erroneous and anomalous data as this may impact goals, strategies, funding, and overall performance. Ask questions to gain understanding and continuously learn, grow, and improve. The following is a list of tools and resources that will help you better understand reporting requirements and maximize data validity:

- [Performance Reporting Tools & Resources](#)
- [WIOA Annual Report Data, Technical Assistance Circular \(TAC\) 19-01: Guidance for Jointly Reported Data Validation](#)
- [TAC-17-01: Guidance for WIOA Performance Accountability](#)

Consider how financial data relates to program data and how analytics across both lines inform you and the management of your organizational position. Does it reflect adopted strategies and priorities, and, if not, what information does it offer? Data, reporting, and analytics is an area where VR organizations tend to silo, and yet, great opportunities exist in coordination. Successful coordination is dependent on both sides gaining an understanding of one another.

To-Dos For You:

- Ask your agency data specialist for the RSA-generated Quarterly Data Dashboards and review them for understanding.
- Ask your agency financial and program data specialists for any internal/ad hoc reports and queries that are generated to analyze performance and financial position, and review them for understanding.
- Speak with your agency data specialists about comparisons between expenditures and performance measures (e.g., where the agency has training expenditures, are there associated measurable skill gains and credentials?).
- Consider performance measures/outcomes in comparison to the goals of the State Plan.
- If you are in a state with both a General and Blind agency, meet with the other VR agency's director to discuss joint WIOA performance accountability measures. (Conduct discussions about State requirements about match, maintenance of effort, pre-employment transition services reserve requirements, etc.)
- Meet with WIOA partner directors to discuss WIOA performance measures and data collection/sharing activities.

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Follow the reporting requirements.

There are many reports required that cover different aspects of the grants' management. For all the reports and dates required for submission, download [RSA Formula Grant Programs: Federal Reports and Deadlines](#). Personalize this for your agency and the staff assigned to complete the various reports.

To-Dos For You:

- Meet with your agency financial and data specialists to discuss/understand reporting requirements and deadlines.
- Download the report and find out who does the reporting for each area.
- Schedule a recurring meeting with your agency data specialist to discuss and address reporting errors and anomalies.

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Participate in training and find a buddy.

Participate in national associations. the Council of State Administrators of Vocational Rehabilitation ([CSAVR](#)) and National Council of State Agencies for the Blind ([NCSAB](#)), as applicable. Both groups are membership organizations that have various committees and training that can be of benefit to you. This includes the CSAVR Leadership Forum.

These organizations are composed of people who were new to VR at one time or another. Connect with others to find that colleague to go to with questions.

Additionally, the National Rehabilitation Leadership Institute offers the opportunity for leaders in the public program of vocational rehabilitation to enrich their knowledge, skills, and understanding to meet the constantly changing needs and expectations of their consumers, employees, employers, and community partners. For more information, visit [NRLI](#).

To-Dos For You:

- Sign up for the next CSAVR Leadership Forum.
- Check out the NRLI website.
- Reach out to the associations and see how you can get connected with a buddy.
- Get your buddy's contact information.
- Ask your buddy about their top three recommendations for a new VR administrator.