



VR SPENDING STRATEGIES

This document will address ways to spend vocational rehabilitation (VR) funds more thoughtfully so that agencies do not find themselves in the position of having to relinquish money during the reallocation process, or, even worse, having to return funds to the United States Treasury at the end of the period of performance. These suggestions are presented for your thoughtful consideration as you examine your budget to determine how best to disburse your VR funds. VR serves a dual customer: business and the individuals with disabilities that come through our door for service. The needs of business and the needs of individuals with disabilities for VR services are great. Given the unacceptably high unemployment rate of individuals with disabilities, as the only national program whose express purpose is to assist individuals with disabilities to achieve competitive integrated employment, VR agencies should make every effort to use every dollar of the \$3.7 billion allotted for this program.

Services for Individuals with Disabilities

In accordance with 34 C.F.R. § 361.50(a), the VR agency must develop and maintain written policies covering the nature and scope of each of the VR services specified in 34 C.F.R. § 361.48 and the criteria under which each service is provided. The policies must ensure that the provision of services is based on the rehabilitation needs of each individual as identified in the individualized plan for employment and is consistent with informed choice. The written policies may not establish any arbitrary limits on the nature and scope of VR services to be provided to the individual to achieve an employment outcome. For those agencies that have not fully spent their VR dollars, reviewing service policies to be certain that they are not overly restrictive can be very helpful. What might have been reasonable ten, fifteen, or even twenty years ago when the agency's service policies were developed may no longer be reasonable and may not reflect today's economic realities.

Specific examples of policies that may provide the opportunity to support more customers and spend the VR dollars are identified below but can include any policy the SVRA has implemented. It is worth reminding agencies that significant policy changes require input from the Statewide Rehabilitation Council (SRC) including the Client Assistance Program which is inclusive of the SRC.

This content was developed by the VRTAC-QM, a project funded under #H264J200002 of the U.S. Department of Education (Department). The information contained herein does not necessarily reflect the position or policy of the Department and no official endorsement should be inferred.

- **Order of Selection**
 - [34 CFR § 361.36](#)
Opening OOS categories will expand the availability of Vocational Rehabilitation services to increase our customer participation rates. OOS changes will require State Plan updates and SRC input. For specific regulatory guidance, see:
 - [Order of Selection \(OOS\) | VRTAC-QM](#)

- **Financial Participation**
 - [34 C.F.R. § 361.54](#)
SVRAs are not required to implement a Financial Needs test for participants. If you have a financial needs test within your policy and procedures, consider adjusting the thresholds or removing the requirement completely.
 - [Financial Need | VRTAC-QM](#)

- **Use of the Notice of Interpretation (NOI) and opportunities within for eligible students with a disability receiving Pre-Employment Transition Services (Pre-ETS)**
 - SVRAs should take advantage of the expanded authority outlined in the NOI to ensure all possible expenditures are tracked to the 15% reserve requirements.
 - For example, students with disabilities that are determined eligible under an approved IPE may need certain VR services to fully benefit from Pre-Employment Transitions Services such as transportation, rehabilitation technology, and more. See the [Notice of Interpretation \(NOI\)](#) for more information.
 - Additional resources are available by clicking on [VR Program Fiscal Management | VRTAC-QM](#) and scrolling to Management of the Pre-Employment Transition Services Reservation of Funds topic area.

- **Post-Secondary Training Support**
 - SVRAs that have restricted rates or arbitrary time limits for Post-Secondary training may consider adjusting the level of support, including out-of-state training options.
 - Consider addressing current policies that may prohibit VR support and offer more “trial semesters” with support services, rather than over-assessing and ruling people out of services.

This content was developed by the VRTAC-QM, a project funded under #H264J200002 of the U.S. Department of Education (Department). The information contained herein does not necessarily reflect the position or policy of the Department and no official endorsement should be inferred.

- **Provider Rate Adjustments**

When was the last time you reviewed your rates? In accordance with 34 C.F.R. § 361.50(c), SVRAs have a responsibility to establish reasonable rates, supported by documentation, for vocational rehabilitation services. Rates should be reviewed routinely to account for necessary adjustments. Consider inflation as a factor when reviewing current rates.

- [Rate Setting Methodology Guide](#)

- **New Program Development**

- Individual Placement and Support (IPS)
 - [What is IPS? – The IPS Employment Center \(ipsworks.org\)](#)
- Customized Employment
 - [Customized Employment Training Series - Technical Assistance Center for Quality Employment \(tacqe.com\)](#)
- [Project Search](#)
- Apprenticeship or pre-apprenticeship partnerships
- Innovative Pre-Employment Transition Programs and Engagement Activities
 - Create apps and games as a mechanism to support and supplement programming
 - Use technology such as virtual reality to deliver services
 - Use youth-friendly mediums such as comic book style to engage students with disabilities
 - [Massachusetts Commission for the Blind Quest for Independence](#)
 - Scaffold services to enable students who participate in services to become peer mentors as a work-based learning experience
 - Establish Youth Advisory Councils who can offer insights into program development for students with disabilities
 - Youth Ambassador Programs
 - Develop podcasts by students for students with disabilities
- Summer Youth Programs (Pre-ETS)
 - Youth Leadership Forum
 - Pre-ETS Camps
 - Partnerships with State and local workforce boards to provide work-based learning experiences
 - [Texas Summer Earn and Learn](#)

This content was developed by the VRTAC-QM, a project funded under #H264J200002 of the U.S. Department of Education (Department). The information contained herein does not necessarily reflect the position or policy of the Department and no official endorsement should be inferred.

- Partner with State and local governments to offer work experiences
 - Develop job shadowing, informational interviewing, and work experiences for careers available within the VR program
- **New Partnerships**

SVRAs partner with a variety of organizations to provide quality services to all individuals with disabilities. Creating new partnerships may not only dedicate additional VR dollars, but also create greater outcomes for our customers.

 - Juvenile Justice
 - Community Mental Health
 - Integrated Resource Team Model
 - [Integrated Resource Teams - Project E3](#)
- **Work Incentive Counseling (Benefits Counseling)**
 - Review current practices and consider expanding work incentive counseling services.
 - [Work Incentives Planning and Assistance](#)
 - Listen to a podcast with one SVRA on the innovative strategies they are implementing.
 - [Manager Minute, brought to you by the VR Technical Assistance Center for Quality Management: Work Incentives Counseling - Finding the incentive to engage in work incentives counseling with Virginia DARS! \(libsyn.com\)](#)
- **Agency practices**
 - Make sure you are actively managing your authorizations. This includes timely cancelations and corrections of authorization. Also, look at timely billing by vendors. Dollars can be tied up a long time if that is not managed, leaving you with a big chunk to spend at year end.

Outreach and Marketing

The Uniform Administrative Requirement, [2 CFR Part 200](#), provides guidance on marketing and outreach for purposes of the VR program. SVRAs must ensure the cost-principles within 2 CFR Part 200 are applied consistently, including allocability if outreach or marketing benefits more than one program. You cannot use VR dollars to support lobbying of legislators, but you can use them to educate legislators.

- PSA, Media Marketing, Outreach Materials
- App Development (specifically for youth and students)

This content was developed by the VRTAC-QM, a project funded under #H264J200002 of the U.S. Department of Education (Department). The information contained herein does not necessarily reflect the position or policy of the Department and no official endorsement should be inferred.

- Hiring a communications director to assist with internal and external messaging

SVRA Employee Recruitment and Retention

SVRAs are experiencing a high volume of vacancies and difficulty filling the positions with qualified applicants or maintaining current employees. The following strategies may assist an agency with employee recruitment and retention and are allowable within Federal regulations. It is important to understand your state personnel policies and laws as you consider any strategy.

- Investment in Salary Increases
- Additional FTE positions
 - However, If you are not allowed new FTEs, explore contracting for specific positions. This would include temporary, part-time or time-limited positions. Consideration should be given to recent retirees who may have the knowledge to assist without training upfront.
- Staff Development/Training
 - This includes growing your own CRC-Master's degree rehab counselors by implementing tuition assistance or developing an emerging leaders program for your middle managers.
- Offer paid internship opportunities
- Pay for relocation costs
- Sign-on bonus/retention bonus
- Contract for stay interviews, employee engagement surveys
- Organizational restructuring to meet demands, including dedicated caseloads for specific populations, additional administrative support for data entry, etc.

Administrative

SVRAs have an opportunity to utilize funds toward administrative needs. As with any expenditures, costs must be allowable and follow the Federal laws, including the Uniform Grant Guidance, as well as State laws. In addition, states should request Prior Approval for applicable purchases. Examples of Administrative purchases may include:

- Technology Refresh
- Electronic Signature Software
- Electronic Application Software
- Case Management System Enhancements/replacement
- SARA (Self-Automated Rehabilitation Assistant) technology
- Mobile technology for staff, i.e. cell phones, laptops, tablets

This content was developed by the VRTAC-QM, a project funded under #H264J200002 of the U.S. Department of Education (Department). The information contained herein does not necessarily reflect the position or policy of the Department and no official endorsement should be inferred.

- Contract for conducting the Comprehensive Statewide Needs Assessment
- Learning Management System
- Rate Study
- Facility and Capital Improvements
- Fiscal Analysis through Contract
- Contract with an outside entity to update both fiscal and program policies and procedures
- Return on Investment Analysis Contract

This content was developed by the VRTAC-QM, a project funded under #H264J200002 of the U.S. Department of Education (Department). The information contained herein does not necessarily reflect the position or policy of the Department and no official endorsement should be inferred.