

EXHIBIT 1A

SCOPE OF WORK AMENDMENT

Establishment, Development or Improvement of Non-Profit Community Rehabilitation Programs (Establishment Projects)

PROJECT SCOPE

Establishment Project funds will be used to increase and improve staff capacity and training to assist Vocational Rehabilitation (VR) applicants or eligible individuals to achieve competitive, integrated employment outcomes. Establishment Project funds will increase the Contractor's capacity to provide quality employment services. Employment services include Discovery services, job readiness training, outcome-based employment services, supported employment services, on-the-job supports short-term, and job search/job placement assistance.

PERIOD OF PERFORMANCE

The services outlined in the contract and scope of work are expected to last for up to a two (2) year period, with a two (2) year renewal period at the discretion of the state. This timeframe is subject to change. A Contractor who fails to meet objectives in years 1-2 of the contract will be required to demonstrate corrective action prior to the contract being renewed for years 3-4. The period of performance shall begin April 1, 2017.

PARTICIPANTS

The employment services provided through Establishment Projects must be delivered only to VR applicants or individuals who have been determined eligible to receive VR services (participants). Students receiving pre-employment transition services who are not VR applicants or eligible individuals, are not participants as defined in this contract. Allowable VR services provided through Establishment Projects are defined in detail in the VR Manual of Employment Services. Staffing expenses claimed must only be for staff time spent in the provision of employment services to VR applicants or eligible individuals, or for staff time used to mentor or train staff regarding the provision of employment services to VR applicants or eligible individuals. Staff time spent providing any employment services to individuals who are not VR applicants or eligible individuals is not an allowable expense under this contract.

ELIGIBILITY

The Bureau of Rehabilitation Services (BRS) has verified the Contractor meets the definition of a non-profit Community Rehabilitation Provider, as defined in 34 Code of Federal Regulations 361.5(c)(17).

BUDGET

The source of the Contractor's match funds must be non-federal and not used to match any other federal grant. The Contractor is required to verify the source of match funds at the time of contract award and upon request. Specific allowable costs are limited to costs of **staffing** to increase capacity to carry out employment services to VR applicants or eligible individuals, and costs to improve and expand **training** for employment services staff. It is the Contractor's responsibility to track the staffing and training budget amounts available within the specific contract period (see Exhibit 2).

The amount of available VR federal funds for Establishment Projects is subject to change and will be reevaluated annually as necessary. The State accepts no obligation for costs incurred by the Contractor prior to April 1, 2017.

STAFFING COMPONENT

Funding will be utilized to increase the Contractor's capacity to provide VR employment services, including supported employment services, to applicants or eligible individuals, including those with the most significant disabilities.

Allowable Staffing Costs

Allowable staffing costs include staff salaries and fringe benefits for direct VR employment service staff (i.e. employment consultants, job coaches), and staff who provide mentoring or training to direct VR employment services staff, for provision of employment services to VR applicants or eligible individuals. Staffing costs must be associated with the provision of VR employment services as outlined in the VR Manual of Employment Services. Since the purpose of the Establishment Projects is to increase staff capacity, reimbursable staffing costs shall only include staffing costs that result from increasing staff capacity (i.e. hiring new staff, expanding staff roles, increasing staff from part-time to full-time, and related). Allowable Establishment Project costs shall not include time spent on existing responsibilities (i.e. employment services staff hired prior to effective date of this contract, who have no change in job responsibilities. If partial change in job responsibilities, only the portion of time spent on new responsibilities in line with contractual requirements and aimed at increasing capacity, are allowable Establishment Project costs).

Employment Services Supervisory staff who directly oversee employment services staff **may only charge** staffing costs towards the Establishment Project if the specific job responsibilities are new or enhanced **AND** are in direct correlation with providing coaching, mentoring, one-on-one guidance or counseling, or training directly to employment services staff. Please refer below for examples on the *potential* types of staffing structures:

- **Newly-hired** Employment Consultant: a newly-hired Employment Consultant (EC) builds a caseload of 15 Vocational Rehabilitation (VR) consumers who are in various phases of the discovery or VR employment services process, and the EC has an additional 5 consumers s/he is supporting in extended services through the Bureau of Developmental Disability Services (BDDS) funding who are **NOT** currently VR consumers. The newly-hired EC may **only** charge time to the Establishment Project when providing services to the 15 VR consumers.
- **Existing** Employment Consultant: an existing EC spends 100% of his/her time on a caseload of 30 VR consumers who are in various phases of the discovery or VR employment services process. Through the Establishment Project, it is determined that this individual will **reduce** his/her caseload **by 25% AND enhance** his/her job responsibilities by 25% to take on a "Team Lead" role by specifically providing training and mentoring to newly-hired ECs. The individual may only charge up to the 25% of staffing costs towards the Establishment Project for the time spent on the new/enhanced job responsibilities, as applicable.
- **Supervisor who directly oversees employment services staff:** an existing EC reduces his/her caseload and enhances his/her role by 50%, as a result of a promotion to provide coaching and guidance to newly-hired and existing ECs. The supervisor provides coaching to a newly-hired EC on how to complete a Discovery Profile (DP) as well as how to make the profile meaningful for the VR client. The supervisor may charge his/her time spent providing coaching to the newly-hired EC (up to the designated 50%), as the promotion resulted in a new/enhanced role **AND** is directly tied with providing one of the allowable activities (coaching) **AND** did not result in any administrative responsibilities being performed.

Lastly, when an **allowable** employment services staff member receives an **allowable** training (i.e. a newly-hired Employment Consultant receives coaching by a supervisor on how to complete an Employment Support and Retention Plan; job shadows a seasoned Employment Consultant at the VR client's worksite; attends the Employment Specialist Training, etc.), the time spent receiving the allowable training must be charged to the staffing budget, at the specific percentage breakout designated for the individual's new or enhanced role through the Establishment Project.

Allowable Staffing Ratios

New direct service staff must only be hired to meet an overall average caseload ratio ranging from 1:10-1:20, across the employment services unit, depending on the level of needs of VR applicants or eligible individuals served. New direct service staff must not be hired if the population of VR applicants or eligible individuals served across the employment services unit does not warrant the staffing increase. Furthermore, if additional direct service staff are hired, and the population served later decreases, the Contractor must re-evaluate the forecasted staffing needs.

Additionally, one to three new or enhanced staff providing coaching, mentoring, one-on-one guidance or counseling, or training directly to employment services staff may be charged to the Establishment Project, depending on the number of direct employment services staff, as follows:

- Agencies with six or less direct employment staff may charge a maximum of one (1) staff providing coaching, mentoring, one-on-one guidance or counseling, or training;
- Agencies with seven to fourteen direct employment staff may charge a maximum of two (2) staff providing coaching, mentoring, one-on-one guidance or counseling, or training;
- Agencies with fifteen or more direct employment staff may charge a maximum of three (3) staff providing coaching, mentoring, one-on-one guidance or counseling, or training.

The Contractor will be required to submit staffing ratios on a quarterly basis for BRS to review (template to be provided by BRS). See below section on Quarterly Narrative and Metric Report. At any time during the period of performance, BRS may request for the Contractor to submit justification regarding the forecasted staffing needs, and if BRS identifies that the need for the added staff is not aligned with allowable staffing ratios, BRS will reduce or reject staffing expenses submitted for reimbursement as appropriate, and will also review previously submitted claims and supporting documentation to identify if a pay back is necessary. Revisions made to the projected staffing budget for years 3 and 4 will be reflected in the contract at the time of contract renewal.

Unallowable Staffing Costs

Recruiting expenses, as a result of hiring must not be charged to Establishment Projects funds. In addition, travel, equipment, supplies, cell phones, utilities, leasing, and other administrative costs (including administrative or support staff, and supervisory or other executive level staff who directly oversee employment service staff but are not new or enhanced roles, and do not provide coaching, mentoring, one-on-one guidance or counseling, or training) must not be charged to Establishment Projects funds. In addition, membership fees and subscriptions are unallowable costs and may not be charged to the project. Time spent by staff on activities other than those specifically described under 'Allowable Staffing Costs' may not be charged to the project.

Staffing position prior to the Establishment Project: If an existing position becomes vacant, the Contractor may not charge the staffing costs of a new hire or internal transfer to the Establishment Project, as this does not result in a **new** or **enhanced** cost for the Contractor. However, if the allowable staff member's role is enhanced through the project, then the percentage of time of the new/enhanced responsibilities may be charged to the project.

Staffing – 21.3% Non-Federal Match

The Contractor must provide the non-federal match of 21.3% outlined in the 'Percent of Total Staff Costs Available for Federal and Match Funds' column below. The 'Additional Contractor Share (not available to match)' column outlines the percentage of staffing costs that are not available to be matched, and are not part of the Establishment Project budget. The Contractor must not use funds from VR fee-for service billing, Ticket to Work funds, in-kind contributions, or any source of federal dollars to meet the 21.3% match.

	Percent of Total Staff Costs Available for Federal and Match Funds*	Additional Contractor Share (not available to match)
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Year 1	100% (78.7% VR/ 21.3% Contractor share)	0%
Year 2	75% (78.7% VR/ 21.3% Contractor share)	25%
Year 3	60% (78.7% VR/ 21.3% Contractor share)	40%
Year 4	45% (78.7% VR/ 21.3% Contractor share)	55%
<p>*The Federal share of funds is 78.7%. Non-federal match share, provided by the Contractor, is 21.3%. The 21.3% non-federal share must be deposited into a designated state VR account.</p>		

TRAINING COMPONENT

Training shall be person-centered, strength-based, and focused on individuals with disabilities’ employable strengths. Training must align with a philosophy that individuals with disabilities can obtain competitive integrated employment with the right supports and services. The training must assist employment service staff to develop foundational competencies in, at minimum, the following areas:

- Discovery (e.g., job shadows, situational assessments, informational interviews, etc.);
- Identification of appropriate employment goals;
- Identification of appropriate job coaching techniques and supports for the job-seeker (i.e., teaching strategies, assistive technology, job supports, worksite assessment, etc.);
- Job development and job placement;
- Supported employment;
- Identification and development of natural supports; and
- Other identified needs and best practices.

Training may include classroom-based training, as well as hands-on training. The Contractor must implement training strategies that develop or expand internal training programs that build on other established trainings funded by VR that, at minimum, ensure staff appropriately apply supports and techniques with ongoing coaching and mentoring of the Contractor’s staff.

Allowable Training Costs

The development or expansion of the Contractor’s training necessary to increase its effectiveness in providing VR employment services, including supported employment, to applicants or eligible individuals, is an allowable Establishment Project cost. Training costs must be associated with improving the provision of employment services as outlined in the VR Manual of Employment Services.

Allowable training costs, for both direct service staff (i.e. employment consultants, job coaches), and staff who directly mentor or train direct employment services staff, include the following:

- **Training fees – registration;
- Certifications related to Employment Services professional and related testing fees to acquire Employment Services certifications, as appropriate;
- **Travel costs associated with in-state training* and out-of-state training that has met prior approval requirements, and in line with state travel policies and procedures;
- Training materials;
- Curriculum development;
- **Facility rental fee to host a group training with one or more providers (quotes should be obtained to identify the least costly location and shortest distance traveled by attendees);
- **Day-rate charged by a consultant or trainer to provide in-house training; and
- Other related training costs not identified above require prior approval from BRS.

*To meet the definition of ‘in-state’ training, a conference or classroom/facility-based training must occur within the State of Indiana and, subsequently, result in allowable in-state travel expenses.

****Participant Support Cost:** requires BRS to seek prior approval from the Rehabilitation Services Administration (RSA). The Contractor must submit a request to BRS, prior to incurring an expense, and provide specific information regarding the training expense (i.e. details of the training, agenda, registration cost, breakout of individual costs, overall anticipated expense, etc.). BRS will provide the Contractor with specific guidance upon contract execution, as applicable, regarding Participant Support Costs to ensure pre-approval requirements are met. The Contractor shall adhere to RSA requirements on Participant Support Costs.

In addition, Exhibit 3 shall serve as a resource guide for Establishment Project training. Any in-state trainings not aligned with the categories listed on Exhibit 3 must be submitted for BRS approval a minimum of sixty (60) days in advance to establishmentproject@fssa.in.gov. The request must include the dates of training, a copy of the agenda (if the training provider hasn't posted one yet, the training dates and logistics need to be included in the request), the name and position title of the attendee(s), the purpose of the training; the anticipated overall expense, and the objectives to be achieved as a result of attending the training. Failure to obtain prior approval for attending an in-state training not listed on Exhibit 3 may result in unallowable expenses. It is the Contractor's responsibility to contact BRS if there is concern as to whether a specific expense may be encumbered and charged to the Establishment Project.

Unallowable Training Costs

Training costs must be associated with improving the provision of employment services as outlined in the VR Manual of Employment Services; any expenses incurred from trainings not meeting this criteria may not be approved by BRS and shall be the responsibility of the Contractor. Any training costs incurred by **non-employment** service staff shall be the responsibility of the Contractor.

Additional unallowable training costs for both direct service staff (i.e. employment consultants, job coaches), and staff who directly mentor or train direct employment services staff include the following:

- Providing payment or fee-for-service prior to allowable staff attending the specific training, with the exception of a registration fee;
- Mileage not directly correlated with an allowable training;
- Out-of-state conferences;
- Failure to obtain prior approval for a training as described in Exhibit 3;
- "Paid training time" of employment services staff who do not charge a pre-determined percentage (partial or full) to the Establishment Project (see Allowable Staffing Costs); and
- Failure to obtain prior approval from BRS for a Participant Support Cost (see Allowable Training Costs).

Training – 21.3% Non-Federal Match

The Contractor is responsible for providing the non-federal match share of 21.3% for **each** year of the Establishment Project. The Contractor must not use funds from VR fee-for-service billing, Ticket to Work funds, in-kind contributions, or any source of federal dollars to meet the 21.3% match.

SUBMISSION OF THE 21.3% NON-FEDERAL MATCH AND REIMBURSEMENT PROCESS

The Contractor is responsible for depositing the staffing and training non-federal share of expenses into a designated state VR account, either as an EFT/ACH or as a wire transfer. Mailing in a check is not an acceptable payment method for the project. Any fee associated with initiating an EFT/ACH or wire transfer is solely at the bank institution's discretion and is not determined by the State. Payment of the bank fee is the responsibility of the Contractor.

Monthly claims for each month must be submitted to establishmentproject@fssa.in.gov by the 10th of the following month (i.e. March expenses must be submitted by April 10th). *If monthly expenses are not submitted by the 10th of the following month, the Contractor must wait and submit two separate claims the next month (i.e. March and April expenses must be submitted by May 10th).* BRS will subsequently send an invoice to bill the Contractor between the 15th and 18th of the month for the 21.3% share, at which point the Contractor must deposit the non-federal share by the 20th of the month. It is important to note that the

Contractor must **NOT** deposit the non-federal match prior to receiving the invoice, as BRS might make specific reductions upon reviewing the supporting documentation submitted with the claim, which may impact the 21.3% provider share to be invoiced. The Contractor's claim will be rejected if the non-federal share is not deposited by the 20th of the month. Reimbursement is typically provided within 35 days upon receipt of the claim.

In addition, the Contractor will be required to submit staffing information (template to be provided by BRS) including employment services staff that were hired prior to the Establishment Project implementation and associated staffing costs, as well as staff hired with Establishment Project funds and associated staffing costs. These monthly staffing reports will be used by BRS to verify that only allowable staff and percentages of costs are billed.

MEASURABLE OBJECTIVES AND OUTCOMES

The Contractor is responsible for achieving the following objectives during the period of performance:

- 1) The Contractor will develop and submit a staff training plan (template to be provided by BRS) within four (4) months of contract execution for all employment services staff (newly-hired direct services staff, and new or enhanced staff providing mentoring, training and related), that includes, at minimum, the following:
 - The first year of the individual's employment should be reflected as a 'new hire' on the staff training plan. Subsequent years of employment should be reflected on the staff training plan as seasoned, supervisory and other, as applicable.
 - Training on foundational skills including, at minimum, the provision of supported employment services, purposeful discovery activities, and additional areas outlined above.
 - At minimum, twenty-five (25) hours of foundational skills training must be completed during the first year of hire, and ten (10) hours annually thereafter for all employment services staff carrying out VR employment services. Foundational skills training consists of 'hands-on' and other applied practice training strategies. Training provided exclusively through webinar, conference, web-based modules, or lecture-style training is not considered to meet the requirement for foundational training as defined in this contract.
 - Progress toward achievement of required foundational training will be evaluated through review of quarterly data submitted by the Contractor (see Tracking and Reporting).
 - Training on developing high quality employment support and retention plans, discovery profiles, and job readiness training plans.
 - Training on job placement strategies for individuals, including those with the most significant disabilities, customized employment, appropriate employer engagement and etiquette while providing on-site supports, accommodations, and related.
 - Development or enhancement of the Contractor's internal coaching and mentoring model to provide necessary technical assistance to staff in order to ensure the fidelity of the trainings.
 - Specific details regarding how training will occur and who will provide the training.
- 2) Services are initiated face-to-face within ten (10) business days of receipt of initial referral from VR by end of year 1.
 - Improvement in timeliness for initiation of services will be evaluated through review of quarterly data submitted by contractor (see Tracking and Reporting). Contractor performance

at the end of year 1 of the contract is expected to reflect a timeframe of 10 business days or less for initiating services.

- 3) Increased provision of supported employment services or on-the-job supports short-term, as measured by the following:
 - a. At least a 30% increase in the number of individuals receiving supported employment or on-the-job supports short-term by end of year 2;
 - b. At least a 30% increase in the amount or duration of supported employment or on-the-job supports short-term that consumers receive by end of year 2.
 - ***The Contractor is required to track and report to BRS on both of these measures.*** Increased provision of supported employment services will be evaluated using year 1/quarter 1 baseline data. Performance will be evaluated through review of quarterly data submitted by the Contractor (see Tracking and Reporting). Contractor performance at the end of year 2 of the contract is expected to reflect an increase in at least one (1) of the specific measures outlined under 3a. – 3b.
 - BRS will provide new measures for years 3 and 4 to be met by the Contractor. The set measures will be determined by reviewing baseline metrics, outcomes reported in years 1 and 2 of the project, and Contractor feedback obtained through various means, such as webinars and surveys. These measures will be outlined in the contract at the time of contract renewal.
- 4) Increase in the quality and quantity of competitive, integrated employment outcomes, for individuals receiving employment services, including those with the most significant disabilities, by end of year 2, as measured by the following:
 - a. Increase in the number of placements in competitive integrated employment outcomes;
 - b. Increase in the number of individuals who retain employment at least 90 days following stabilization;
 - c. Increase in the average hours worked per week for individuals in competitive, integrated employment; and
 - d. Increase in the average pay for individuals in competitive, integrated employment.
 - ***The Contractor is required to track and report to BRS on all of these measures.*** Quality and quantity of competitive, integrated employment outcomes will be evaluated using year 1/quarter 1 baseline data. Performance will be evaluated through review of quarterly data submitted by the Contractor (see Tracking and Reporting). Contractor performance at the end of year 2 of the contract is expected to reflect an increase in two (2) or more of the specific measures outlined under 4a. – 4d.

If the Contractor fails to meet any performance expectations as described above, by the end of year 2 of the contract period, the Contractor will be placed on a corrective action plan. The Contractor and BRS will jointly identify specific corrective action steps and timelines that the Contractor must meet in order to improve performance.

Enhancement of Metrics for Contract Renewal

To ensure the Contractor continues to elevate its performance with providing quality employment services to VR applicants or eligible individuals, BRS will re-evaluate measures for years 3 and 4 to be met by the Contractor. The set measures will be determined by reviewing baseline metrics, outcomes reported in years 1 and 2 of the project, and Contractor feedback obtained through various means, such as webinars and surveys. These measures will be outlined in the contract at the time of contract renewal.

TRACKING AND REPORTING

At a minimum, the Contractor is required to collect and report the following metrics to BRS on a quarterly basis to assist in the evaluation of VR employment services and competitive, integrated employment outcomes (specific objectives are subject to change):

- The number of foundational training hours completed.
- The average number of days to initiative new VR referrals.
- The number of individuals in supported employment.
- The 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, integrated 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.
- *Increase in the average pay for individuals in competitive, integrated employment.
- *The number of training hours staff have received, including foundational skills training.

*Additional metrics will be defined in the contract renewal for years 3 and 4. These measures will be outlined in the contract at the time of contract renewal.

For tracking and reporting, BRS will provide templates to the Contractor and set specific deadlines for submitting (i.e. monthly, quarterly).

BRS OVERSIGHT AND MONITORING

BRS will closely monitor the Contractor to ensure compliance with federal law by reviewing the source of match and reviewing expenses to verify that only allowable activities are reimbursed. Monitoring will include, but is not limited to, reviewing monthly claim reimbursement submissions, quarterly narrative and metrics reports, and conducting 90-day desk reviews, onsite visits, and contract audits. The parameters and expectations for each are outlined below; however, the process and templates are subject-to-change.

- Monthly Claims Audit - Review of Claim Reimbursement Packet

When submitting a monthly claim reimbursement packet, the Contractor must provide the following documents by the 10th of the month, following the billing month:

- A Claim Reimbursement Form must be completed separately for **each** month of expenses being claimed. Only the specific amounts being claimed for the **single** month should be listed on the form.
- Each Claim Reimbursement Form must be accompanied by a Staffing Costs Template and a Training Costs Template, as applicable (templates to be provided by BRS). Monthly staffing and training expenses may **not** be combined on the templates.
 - Staffing Template: the name, position title, total hours, and monthly staffing costs (salary and fringe) must be listed for each new/enhanced direct service staff charging time to the project. As the total monthly staffing costs listed should **only** reflect the hours spent by the allowable staff member on VR cases or other allowable project components, the Contractor must certify that the total amount listed for each individual is accurately reflected and that time spent on other responsibilities or non-VR clients was **not** calculated in the total amount. Any missing entries on the staffing template will result in a reduction/denial of the claim. In addition to identifying the number of hours spent on the Establishment Project of each allowable new/enhanced staff, the Contractor will also be required to provide a list of direct employment service staff not charged to the

project. This information will enable BRS to ensure that only allowable staff time is charged, including only new and enhanced staff.

- Training template: the name and position title must be listed for each attendee, as well as the total expense. In addition, a detailed description of the specific expense must be provided in order for BRS to determine if the training resulted in allowable costs. Failure to include a detailed description of the training expense, or any other fields on the training template, will result in the claim being reduced/denied.
- A Travel Voucher and supporting receipts must be submitted for each attendee, if the specific training resulted in travel expenses. Missing entries or incorrect information on the travel voucher will result in a reduction/denial of the claim.

Following the 10th of the month, the Contractor's claim will be reviewed by BRS within five (5) business days to ensure all necessary documentation was submitted by the deadline and properly completed. Any mismatch of totals on the claim reimbursement form and supporting documentation will result in a claim being reduced or rejected. BRS will closely review claims and all required supporting documentation to ensure that only allowable expenses are included. The inclusion of any unallowable expenses will result in the claim being reduced/denied.

- 90-Day Desk Audit

BRS and the Family and Social Services Administration (FSSA) Audit Services Department shall conduct an initial 90-day desk audit to review the Contractor's first three (3) rounds of claims submitted to ensure only allowable expenses were reimbursed. Additional review areas will include the system in place to track the required measurable objectives of the project.

The 90-day desk audit will begin after August 1, 2017, or when the Contractor submits at least three claims that are approved by BRS. Upon notification of the scheduled audit, the Contractor will receive instructions, various staffing and training templates to be completed, and a Monitoring Guide. The Contractor will have two weeks to provide responses and supporting documentation to BRS and the FSSA Audit Services Department.

During or after completion of the desk audit, based on findings or expected findings, BRS and the FSSA Audit Services department may determine that an onsite visit will also be conducted. In this scenario, the Contractor will be given advance notice (minimum of two weeks) in order to prepare for the visit.

The Contractor is responsible for providing responses/supporting documentation for the following items:

Non-Federal Match Submitted During the Audit Period:

- 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).
- The Contractor must provide verification that the source 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 Submitted During the Audit Period:

- Provide job descriptions of staff charged to the Establishment Project to support that staff expenses were applied in accordance with the federal matching requirements outlined in 34 CFR Part 361.5.
- 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 the claimed staffing costs.

- 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 an enhanced position.
- Provide listing of staffing prior to commencement of the Establishment Project.
- Provide support for supervisory or other staff providing coaching, mentoring, one-on-one guidance or counseling, or training directly to employment services staff allocated to the Establishment Project versus other programs (ie. Pre Employment Transition Services or the Bureau of Developmental Disabilities Services) to ensure that staff time was charged only for the provision of employment services to VR applicants or eligible individuals.
- Complete and return the Staffing Report Worksheet (refer to Chart A below; template to be provided by BRS) to identify the following information for **all** Employment Services (ES) staff who provide employment services to VR applicants or those eligible **and** charge FULL or PARTIAL time to the Establishment Project:
 - o Chart A must be completed per ES staff. The caseload listed must represent the specific timeframe identified for the audit period (i.e. the first three (3) claims submitted for reimbursement).
 - o Chart A does not need to be completed for a direct supervisor or other staff who **only** charged time to the project for providing coaching, mentoring, one-on-one guidance or counseling, or training directly to employment services staff. However, the worksheet does need to be completed for these staff if they charged time to the project as a result of providing direct services for a VR caseload (i.e. due to an ES staff leave of absence or high volume caseload).
 - o Note: several Case samples of consumers listed on the Staffing Report worksheet may be selected by BRS and the FSSA Audit Services department, which may consist of reviewing case notes, Chronos logs, and other documentation to assist with verifying the number of hours listed on the Staffing Report worksheet.

CHART A – STAFFING REPORT WORKSHEET

Instructions: Complete the below information for all Employment Services (ES) staff who provide employment services to VR applicants or those eligible and charge FULL or PARTIAL time to the Establishment Project. **Complete one worksheet per ES staff.** Note: Do not complete the worksheet for a direct supervisor who only charges supervisory time to the project. However, do complete the worksheet for a direct supervisor who charged time to the project as a result of providing direct services for a VR caseload (i.e. due to an ES staff leave of absence or high volume caseload).

Employee Name #1	List if new hire or enhanced role through project	List % of staff time charged to project	List the name of all VR individuals on caseload and put Non-VR in for all non-VR individuals on caseload	List total # of billable hours

Training Costs Submitted During the Audit Period:

Training costs must be a result of an enhanced cost or added position, and not a training customarily provided prior to the Establishment Project. The Contractor must:

- Submit supporting documentation for claimed training expenses (i.e. registration fees, invoices, and travel expenses, if applicable) to verify the costs claimed.
- Submit attendance records or certificates to document course attendance.

- Complete and return the Training Worksheet (Chart B; template to be provided by BRS) to identify the foundational skills training hours claimed by eligible staff, if applicable.

CHART B – ESTABLISHMENT PROJECT TRAINING WORKSHEET

Instructions: Below is a summary of the specific trainings submitted as expenses for the past quarter. Please complete the remaining columns to identify if the training was a result of an enhanced cost or an added position, and not a training that was customarily provided prior to the Establishment Project (i.e. Provider historically had 5 employment service staff and customarily sent all staff to Employment Specialist Training through the Indiana Institute on Disability and Community. The cost of this training for the 5 existing positions may not be charged to the project, but the cost of this training for the 2 added positions is allowable). Also identify if the training hours were counted towards the minimum number of foundational skills training to be achieved, per year, by new and existing employment services staff.

Name of Employee	Training Title Listed on Claim Documentation	Identify if the specific training was customarily provided prior to the establishment project. (List Y or N)	Identify if the training expense was specifically for an <u>added position</u> or <u>enhanced cost</u> . (List either Added or Enhanced , as applicable)	List the number of foundational skills training hours earned, as a result of the training, if applicable (If none, list 0).

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, integrated 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 by BRS and the FSSA Audit Services department to assist in reviewing the above metrics.

Exit Conference and Final Report

For a desk audit, an exit conference call will be scheduled within thirty (30) days from the Contractor’s submission due date to address any findings or areas of concern, as well as answer any questions. When an onsite visit is conducted, the FSSA Audit Services department will conduct an exit meeting on the final day of the audit to address any findings or areas of concern, as well as answer any questions.

Following the exit conference call/meeting, the FSSA Audit Services department will provide the Contractor with a Final Report to document the findings and areas of concern. The report will also provide instructions for the Contractor to provide BRS and the FSSA Audit Services department with a corrective action plan, if applicable, within a week from receipt of the Final Report. If it is identified that the Contractor received reimbursement for an unallowable expense, the Contractor must submit payment within thirty (30) days of the issue date of the Final Notice. Further instructions regarding the payback procedures will be included with the Final Notice. Based on the specific findings, onsite visits may be scheduled to provide technical assistance and follow-up on progress regarding the corrective action plan.

- Quarterly Narrative and Metric Reporting
The Contractor is required to submit quarterly narrative and metric reports to BRS to provide:
 1. Updates on staffing and training strategies, challenges, and notable activities;
 2. Quarterly performance data;
 3. Progress toward completing required foundational skills training;
 4. Staffing ratios; and
 5. Other applicable information.

BRS will review quarterly reports to evaluate the Contractor's progress towards meeting performance objectives, evaluate adherence to staff ratio requirements for hiring of staff, identify best practices, and identify any corrective measures that need to be implemented.

- Contract Audit

FSSA will conduct a thorough contract audit within 18 months of completion of the desk review. At minimum, all requirements identified in the contract, including the measurable objectives and review areas outlined for the 90-day desk audit (see BRS Oversight and Monitoring), will be applicable to this audit. If it is identified that the Contractor has not satisfactorily completed all corrective action items identified through prior monitoring, or taken considerate steps to be in compliance, further corrective action will be required. If corrective action is not made, including payback of any unallowable expenses, contract termination will be considered by BRS.

SUSTAINABILITY

The Establishment Project period shall not exceed four (4) years. Throughout the project period, the Contractor must work toward sustainability of the increased staffing capacity and development or enhancement of staff training achieved through this project. Any expectations for experiencing increased referrals from VR is not an adequate sustainability strategy. The Contractor must take a proactive approach to identify and implement strategies that lead to sustainability in order to continue to meet and exceed the objectives achieved during the Establishment Project period, such as an increase in the quality and quantity of competitive, integrated employment outcomes, for individuals receiving employment services, including those with the most significant disabilities.

At the end of year 2, and in conjunction with submission of the 4th quarter narrative and metrics report, the Contractor will be required to submit an updated sustainability plan to identify staffing and training strategies for years 3 and 4, as well as provide data regarding the current number of VR cases assigned per staff member to support the *need* for hiring and/or sustaining additional staff in year 3 and/or 4 of the Establishment Project, if applicable. The template for reporting the sustainability plan and subsequent data will be provided by BRS.

Exhibit 3

Establishment Project In-State Training Resource Guide

The below list provides examples regarding unallowable training; allowable in-state training but doesn't count towards the foundational skills training hours; and allowable in-state training AND meets the criteria for foundational skills training. The Contractor shall contact BRS with any questions or if additional clarification is needed prior to encumbering expenses towards the Establishment Project.

Unallowable	Allowable training (but does NOT meet foundational skills training requirements)	Allowable AND meets foundational training requirements for Employment Services Staff
Organization orientation to review agency policies and procedures, learn about agency mission, etc.	In-house 'New Employment Specialist Orientation' to discuss learning objectives, such as job development, discovery, and coaching	New Employment Specialist shadows a Seasoned Employment Specialist to observe the seasoned Employment Specialist meeting with the VR client (i.e. providing supports on the job, conducting a situational assessment, meeting with VR client to develop vocational themes)
Human Resources Training, i.e. sexual harassment, supervisory training, etc.	Classroom-based training on Job Development, supported employment, discovery or other employment service topics, provided through IIDC or other organizations (Note, if there is a hands-on component to the training, the number of hours engaged in the hands-on component may be counted toward foundational hours)	New Employment Specialist receives coaching from supervisor or seasoned Employment Specialist on how to complete a Discovery Profile (DP) AND discusses how to make the profile meaningful for the VR client. Coaching session should include opportunity for trainee to complete the DP.
Unallowable staff, such as Administrative or Clerical, attending employment services training	Benefits Information Network (BIN) Training or Re-Certification for new staff	New or seasoned Employment Specialist receives mentoring from Supervisor or other subject matter expert, on how to accurately complete an Employment Support & Retention Plan (ESRP), AND expands upon the training to discuss how to make the plan meaningful for the VR client. Mentoring session should include opportunity for trainee to complete the ESRP.
Training not specific to provision of VR employment services, e.g. CPR, use of agency software or computer systems, etc.	Employment Specialist Training through IIDC for new staff (Note, there is a hands-on component to the training, and BRS will determine annually the number of hours that may be counted toward foundational hours)	3-day intensive/interactive Hands in Autism Workshop for new or seasoned employment specialist or supervisor. (Note that only the time on site for the 3-day session may count toward foundational hours. The completion of web-based modules prior to the session do not meet criteria for foundational hours.)

<p>Any supervisory training not specific to employment services, i.e. staff evaluation, progressive discipline, etc.</p>	<p>INARF Conference or IN-APSE conference (a portion of sessions at these conferences may meet foundational skills training criteria of the project, to be determined by BRS on an annual basis)</p>	<p>New Employment Specialist discusses Natural Supports with VR client, with coaching, technical assistance, or mentoring from the direct supervisor or a seasoned Employment Specialist.</p>
<p>Training funded by CRP prior to establishment project, including BIN or Employment Specialist Training, for staff who are not funded through establishment project</p>	<p>The Foundations to Job Development Marketing through IIDC</p>	<p>New Employment Specialist observes regular bi-weekly meeting between seasoned Employment Specialist and VR client, AND, following the meeting, the new Employment Specialist completes a Discovery Profile to be reviewed by the seasoned Employment Specialist for technical assistance, mentoring, and coaching.</p>
<p>Out-of-State Conference, such as the National Employment Network Association or the National APSE Conference</p>	<p>Web-based training on Job Development, supported employment, discovery or other employment service topics, including online modules completed in preparation for training with Hands in Autism, IIDC, and other organizations</p>	<p>Seasoned Employment Specialist receives mentoring from supervisor or a co-worker skilled in job readiness training, to develop JRTP and identify meaningful strategies to provide job readiness training to VR client, as applicable, to the client's needs</p>
<p>Out-of-State Training that does <u>not</u> provide any element of foundational skills training</p>		<p>*With prior approval from BRS, out-of-state training that offers employment services-related content not readily available in the state, that provides opportunity for hands-on, interactive learning, e.g. attending a workshop in Chicago focused on supported employment techniques for individuals with severe mental illness, including hands-on practice, mentoring, and observational activities.</p>

Requesting to attend a training not listed on this guide must be submitted to establishmentproject@fssa.in.gov a minimum of 60 days in advance. The request must include the dates of training, a copy of the agenda (if the training provider hasn't posted one yet, the training dates and logistics need to be included in the request), the name and position title of the attendee(s), the purpose of the training, the anticipated overall expense, and the objectives to be achieved as a result of attending the training.

*Requires prior approval from BRS, following the Prior Approval process outlined above.