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>>TRINA LEE: If everyone can take their seats we can get started. So I heard rumor that the weather is supposed to be up to 92 degrees today. We will do our best to get through this session and next so we will not be in the way of that beautiful day. Good morning we are here today to talk about federal regulations and supported employment. It is my honor to preside over today's session and on our panel we have Suzanne Mitchell, who is the technical chief assistance and Craig, and it is my pleasure to turn it over to the panel. I do have a couple of questions that were submitted ahead of time.

>>SUZANNE MITCHELL: First of all I would like to say thank you to all of you for your very kind attention to all of these many presentations that we have been bringing to you and for your questions. We will continue to use your questions and comments to help inform our guidance and technical assistance as we go forward in the implementation of WIOA. I would encourage you based on any information you have heard, if you have remaining questions contact your state liaisons and ‑‑ about anything. No question is not a good question so if you do have questions we do want to encourage you to contact your state liaisons and follow up with us. So today we're going to talk about the supported employment, the state supported employment services program. The new regulations related to that program. Supported employment is competitive integrated employment including customized employment or employment in an integrated setting in which an individual is working on a short‑term basis toward competitive integrated employment and employment that is individualize and had consistent with the individual with the most significant disabilities unique strengths, abilities, interest and informed choice.

Usually it includes the need for ongoing support and services for the individual in order to continue in employment.

What does the supported employment program ‑‑ who does it serve? It serves individual with the most significant disabilities, including youth for whom competitive integrated employment has not historically occurred or for whom competitive integrate employment has been intermittent and also for individuals who need intensive supported employment services and extended services as needed in order to perform the work that is required because of the nature and severity of their disability. There are authorized activities in the Act for supported employment and interpreters let me know if I'm going too fast based on what I've seen in previous presentations. The State uses funds allotted under the program to provide employment services as defined in Section 739 and 361.5C54. Most of the definitions reeled to supported employment are found in 34CFR361 in the definition section. It also ‑‑ these funds are used to provide extended services in accordance with the requirements in Section 604B of the Act and 363.4A2 to youth with the most significant disabilities for a period of time not to exceed four years or until such time that a youth no longer meets the definition of a youth with a disability. That is a new provision.

Nothing in the Act prohibits a state from providing supported employment services or to provide discrete post employment services using funds under Title I as well as those funds under the supported employment. We will talk about the changes made by WIOA. This includes extending the time for supported employment services from 18 months to 24 months and it requires that it be competitive integrated employment or in an integrated setting in which the individual is working on a short‑term basis toward competitive integrate employment and of course that is a new provision. It requires availability of supported employment funds and or VR funds to be ‑‑ to provide extended services to youth with the most significant disabilities. Also under the new act and regulations there is a requirement for a reservation of 50% of supported employment funds of the allotment to be used for youth requiring services including extended services for those youth and additionally there is a requirement that there be a 10% match for that 50% and Craig will be talking about these requirements in more detail later on in the presentation.

Additionally, the new requirement also ‑‑ new requirements also include a reduction from the previous 5% allowable costs for administrative costs to now 2.5%. This was done to obviously provide more opportunity to provide direct services of supported employment to the individuals who are receiving them. There is an extended time frame as I mentioned previously for the provision of supported employment services. That time frame has, again, been extended from 18 months to 24 months and under certain circumstances if the need exists it can be extended further for an individual to receive supported employment services. There also is a new emphasis on competitive integrated employment and the short‑term basis so we're going to talk about that. Supported employment is now required to be in competitive integrated employment or employment in an integrated setting in which an individual is working on a short‑term basis toward competitive integrated employment. The short‑term basis means an individual with a most significant disability who's supported employment is in an integrated setting and they don't satisfy the criteria of competitive integrated employment as defined in the Section and they are considered to be working on a short‑term basis toward competitive integrated employment as long as the individual can reasonably see achieving competitive integrated employment. That's an important point to remember when they enter the short‑term basis we would anticipate that they would achieve competitive integrated employment at the end of the short‑term basis.

The short‑term basis must within six months the individual must achieve the supported employment outcome or in limited circumstances that period may be extended to 12 months from the achievement of the supported employment outcome and if a longer period is needed that can be based on the individual's needs as well.

The short‑term basis period and the additional ‑‑ the six to 12 months of the short‑term basis period are available for the individual after they have completed up to 24 months of supported employment services unless of course a longer period is needed for the individual, and the individual has achieved a supported employment outcome meaning that the individual is stable in the supported employment placement for a minimum period of 90 days following the transition to extended services.

So at this point the individual has achieved a supported employment outcome in accordance with the criteria set forth and we are going to talk more about that later on.

Congress intended for the short‑term basis to be a way to minimize and limit the time in which an individual might be making sub‑minimum wage employment. So it was a way to stress that all individuals can and should be achieving competitive integrated employment and the short‑term basis places a limitation on the amount of time that that individual would be receiving sub‑minimum wage employment. It also sets out the expectation that they will move into competitive integrated employment.

There is a provision for extended services for youth with the most significant disabilities and under WIOA, DSU's may use the supported employment program or VR funds to provide extended services to individuals and only to youth with the most significant disabilities. Again, the extended services cannot be provided to individuals other than youth. Previous to this provision VR agency were not allowed to supply funds for extended services in any event and were required to try to locate another provider of those extended services. Section 604B2 of the act as amended mandates that the VR agency make available extended services for youth with the most significant disabilities for a period not to exceed four years.

This would be for four years or until the time that a youth no longer meets the definition of youth with a disability, which is 24 years of age and younger.

Extended services for youth may be longer ‑‑ I'm sorry, a youth may no longer be eligible to receive extended services provided by the VR agency with funds allotted under the supported employment program or the VR program if the youth does not meet the age definitions as I stated previously, has received services for up to four years or has transitioned to services provided by another provider.

We're going to now turn to the fiscal requirements and I'm going to turn it over to Chris/Craig.

>>CRAIG MCMANUS: Thanks, Suzanne. Now we're going to talk about the supported reserve and expenditure requirement for youth with significant disabilities from a fiscal perspective. As you know the state must reserve and expend 50% of its federal allotment for the provision of supported employment services including extended services to youth with the most significant disabilities. Similar to the preemployment transition services requirements the amount to be reserved and expended is affected by any adjustments to the state's allotment that occurred during the year of appropriation and that could include any increases or decrease that impact the allotment ‑‑ during the reallotment process. While there aren't many states that participate in the process it does happen occasionally. If a state does either relinquish or receive additional funds through the reallotment process that is going to ‑‑ or the state still will be obligated to reserve 50% of the state's allotment based upon that increased or decreased amount for that fiscal year of appropriation.

Similarly any reduction to the state's supported allotment that would occur after the year of appropriation, either through deobligation or the grant close‑out process will not reduce the 50% reserve requirement that is expended, of course, calculated based upon where the state's allotment is at the end of the year of appropriation.

Now, the requirement to reserve and expend for the provision of supported employment services including extended services to youth with the most significant disabilities is a state requirement. So when there are two state VR agencies in a particular state the reservation of funds requirement for the provision of those supported employment services a state matter that must be resolve or addressed at the state level. So RSA encourages states to work together to ensure that they meet the reservation requirement.

Let's shift gears and talk about the match requirement under the reserve for supported employment. So the state as Suzanne mentioned earlier the state must provide a match of at least 10% in nonfederal expenditures for the total amount with the half of the allotment that is provided including those extended services to youth with the most significant disability, found at 36323 of supported employment regulations. Sips the required nonfederal share is only applicable to the 50% of funds that are reserved for youth with the most significant disabilities, those expenditures must also be spent on supported employment services, including those extended services to youth with the most significant disabilities.

So as a reminder this is different than how the preemployment transition services reserve is required to be matched in which that nonfederal share may be spent on any allowable VR service that's permit under the VR program. Additionally, one other point we wanted to make clear is that the 10% nonfederal share requirement is applicable only to that 50% reserve of supported employment services to you. So that means if the state so chooses to expend above its requirement for supported employment services including extended services to youth they are not required to match above the 50%.

A little more on the match requirement. A state must match that 50% reserve of supported employment funds including extended services to youth with the most significant disabilities by September 30th, of the year of appropriation. That would allow them to fully extend those funds or permit them to carry over any unobligated balance of reserve funds into the succeeding federal fiscal year for obligation and expenditure for that year. Of course any of the funds that are carried over into the succeeding federal fiscal year must have been matched by September 30th and they also must be ‑‑ the federal funds in the succeeding fiscal year must be spent on supported employment services including extended services to youth with the most significant disabilities. That may sound like common sense, we have gotten a few questions that in the carryover year if not all reserve funds had been spent could they spend them on things other than to youth with the most significant disabilities. So despite the ability to use VR funds for provision of supported employment services, the supported employment nonfederal share must be tracked and accounted for in the supported employment program to make sure that the requirements necessary for the expenditure of the federal supported employment funds required to be reserved and expended for the provision of supported employment services to youth with the most significant disabilities can be done. Okay, Suzanne mentioned the reduction to the administrative cost limitation from 5% down to 2.5%. Again, states may not use more than 2.5% of their supported employment allotment for administrative services and states may use vocational rehabilitation funds to pay for any supported employment administrative costs that would exceed the 2.5%. However, we want to remind folks that those costs would not count toward the supported employment reserve, the 50% reserve for youth with the most significant disabilities. Okay. Related to when payment for supported employment services begins. Because supported employment funds are meant to be used to support and maintain an individual with the most significant disability in employment, the provision of supported employment services may not be provided prior to an individual being placed into an employment position which would require supported employment services. All federal expenditures for an individual that would occur prior to that supported employment placement must be provided for with vocational rehabilitation funds. So any nonfederal funds that are expended on vocational rehabilitation services provided to an individual who is a youth with the most significant disability prior to his or her placement into a supported employment position do not qualify as supported employment services and may not be counted as nonfederal share for the provision of federal supported employment services and the 50% reserve.

Let's talk about SF‑425. VR agencies must ensure that the cost of placement services are not charged to nor reported as supported employment expenditures on the supported employment SF‑425 report. This means that any unobligated federal supported employment funds that are carried over into fiscal year 2017 including reserve funds that must be matched by September 30th of 2016 may only be reported on the supported employment SF‑425 as expenditures for on going support services provided after that individual is placed into supported employment. I'm going to turn it back over to Suzanne to talk about supported employment outcomes.

>>SUZANNE MITCHELL: Okay, I think before I begin that one of the things I will point out to you in terms of the expenditure of supported employment funds, again, as Craig said supported employment would be provided once an individual has been placed up to 24 months or longer if the circumstances warrant that and if an individual at the employment outcome enters into the short‑term basis the only services under supported employment services that would be provided would be to a youth who is being provided extended service by the VR program. Any other services, VR services such as counselling or follow‑along of that individual in the short‑term basis period would be provided with VR funds. Title I funds. Just wanted to bring that to your attention as well.

I know we have received some questions about that. We do anticipate with the short‑term basis I will also say, that given the data that we have on supported employment and competitive integrated employment, from our 2015 data around 98% of those individuals who were place in supported employment were placed at a competitive wage so while Congress allowed for the short‑term basis period, it is very unlikely, given the additional amount of time that is allowed for the provision of supported employment services and extensions where needed that an individual would need to enter into the short‑term basis, period, and our 2015 data really supports that both in terms of the length of time in which supported employment services were provided as well as the number of individuals who actually entered at competitive wages into supported employment.

We fully anticipate that while it's there for you to use, that it's something that you probably won't be using too much. So let me talk a little bit about employment outcomes and supported employment. We revised the regulations to provide for explanations and clarification of when someone obtained an employment outcome and when their service record might be closed. So in 363.53, we talk about the transition to extended services and 363.54 we talk about the employment outcome and when it's taken. Then in 363.55 we talk about when the service record may be closed. Because of the introduction of the short‑term basis and the extension of the services, for supported ‑‑ the time for supported employment services, those ‑‑ the introduction of those two things impacted the time of the employment outcome versus the time of the closure of the service record. So let's talk about when an employment outcome is achieved, okay? So first the individual must have completed supported employment services which, again, may be received for up to 24 months or longer, if needed by the consumer, and any other VR services that are listed on the IPE need not be completed at the time of the employment outcome and, again, we are looking at the short‑term basis particularly with that. So if an individual is working on a short‑term basis they can continue to receive VR services. Secondly, the individual has to have transitioned to extended services provided by the VR agency or another provider, again, only for youth provided by the VR agency. Third, the individual has maintained employment and achieved stability for a minimum of 90 days after transitioning to extended services. I'm going to emphasize that minimum. If it looks like that individual needs additional time that is a place where you can make adjustments in terms of the employment outcome and finally the employment must be individualized and customized with the individual's strengths, abilities, interest and informed choice. Now, closure of the service record. The service record of an individual who has received employment outcome will be closed in accord witness with 36355 as I indicated and it's going to depend whether it's a youth receiving extended services or someone who is entering on a short‑term basis, period. I've got examples to walk you through because in our regional meeting it became confuse to go folks and we wanted to clarify as much as we could. We will go through some examples of when an individual would achieve an employment outcome and when their service record would be closed. In example 1 Bob has been placed in a job in an competitive integrated employment that is inconsistent with his strengths, abilities and informed choice and he has completed up to 24 months of competitive integrated employment. He has transitioned to services provided by a provider other than the VR agency and has been stable for a minimum of 90 days after transitioning to extended services. Has Bob achieved a supported outcome? Yes, the service record can be closed as long as the requirements have also been satisfied. So that is when you're used to, typically with supported employment in the past.

In another example consider if Bob happens to be a youth in this scenario and happens to be receiving extended services from the VR agency. He's completed what we just talk about but he is a youth and receiving extended services from the VR agency has he achieved a supported employment outcome? Yes, he has. County record be closed? No because Bob is continuing to receive extended services from the VR agency. Once he is no longer receiving extended services his case can be closed as long as he satisfies the requirements for the closure of the service record.

In our next example, Bob has been placed in a job, in an integrated setting at a sub‑minimum wage. That is individualized and customized for him, consistent with his strengths, abilities and informed choice, has completed up to 24 months of supported employment services, he has transitioned to extended services provided by a provider other than the VR agency, and has been stable for a minimum of 90 days after transitioning to those extended services and he is receiving VR services while he is working on a short‑term basis toward competitive integrated employment. Has he achieved a supported employment outcome? Yes, he has. County service record be closed at the time of that supported employment outcome? No because Bob is continuing to receive VR services touring the short‑term basis from the VR agency with funds under Title I the VR program funds. When can the service record be closed? The service record can be closed when Bob achieves competitive integrated employment within the short‑term basis period when he has satisfied the case for closure and say no longer receiving any vocational rehabilitation services provided by the VR agency with Title I funds. If Bob doesn't achieve competitive integrated employment during the short‑term basis his service record must be closed and he is no longer eligible to receive services.

In example 4 Bob is a youth placed in a job in an integrated setting, sub‑minimum wage that is individualized and customized for them that is consistent with his strengths, abilities, interests and informed choice, he has completed up to 24 months of supported employment services has transitioned to extended services provided by the VR agency and has been stable for a minimum of 90 days after transition to go those extended services and he is receiving VR services under Title I program funds while working toward competitive integrated employment.

You can see you need a road map for these.
(Laughter.)

Has he achieved a supported employment outcome? Yes. County service record be closed at the time of the supported employment outcome? No because Bob is continuing to receive extended services funded under the supported employment or the VR program and VR services during the short‑term basis with Title I funds. When can the service record be closed? The service record can be closed when Bob achieves competitive integrated employment within the short‑term basis period and say no longer receiving vocational rehabilitation services provided by the VR agency with funds under Title I and is no longer eligible to receive extended services provided by the VR agency with supported employment or VR funds because he has, anybody got a guess? He may have aged out, no longer a youth? Okay.

He's satisfied requirements for case closure. If he's no longer receiving ‑‑ let's go back to that because I want your answer on that. He would no longer be eligible to receive extended services if he is no longer ‑‑ if he no longer meets the definition of a youth or if he transitions to a different extended service provider. Or he no longer needs them.

So the service record in this case can be closed as long as he meets the requirements for the case closure that are included in 36156.

Now, the service record must be closed if Bob does not achieve competitive integrated employment within the short‑term basis period and in such a case extended services should be coordinated with another extended service provider because he is in that case after the short‑term basis no longer eligible to receive services from the VR program. So that includes, even though he might be eligible for up to four years of extended services if he does not achieve competitive integrated employment within the short‑term basis period he is no longer eligible.

In summary, I guess the best way to summarize this is to say that the service record can be closed and the supported employment outcome taken at the same time unless an individual with a most significant disability is either receiving VR services during the short‑term basis period and or in the case of a youth receiving extended services funded by the supported employment or VR program funds. Let me point out one other thing that came up as a question to us in the course of the regulations process. The question was asked, does the VR agency have to provide extended services to youth who have not been made eligible or are not receiving services under an IPE in the VR program and the answer is no. The individual must be eligible for the VR program and receiving services under an IPE in order to be eligible down the road for extended services. Question?

>>TRINA LEE: All right, first of all, I think we need to give a round of applause to our panel. Thank you very much.
(Applause.)

>>TRINA LEE: We did have three questions submitted and thankfully each of these questions were answered multiple times in the presentation which is kind of exciting. So we would like to open it up to the floor if individuals have specific questions or need clarification from the information that's been presented? Here is your opportunity! Here comes a question.

>> AUDIENCE MEMBER: Hello, thank you for the presentation, very informative but I have a question as it relates to informed choice.

If a youth and the team decide that extended services may not be needed, do they have to have extended services?

>>SUZANNE MITCHELL: That's a good question. Those services, all services under the supported employment program should be determined on an individual case‑by‑case basis as to what is needed to support that individual.

>> AUDIENCE MEMBER: Thank you. Just a second question. For our fiscal representative here thank you for the information. I want to make sure that I'm clear: Most states I think have specific IPEs for supported employment but am I to understand that we can't count the supported employment grant until the actual job so anything to get that person ‑‑ the services, that has to be the VR general and only once I have a job can I then look at those funds for ‑‑ or recognize that under the SE grant is that correct?

>>CRAIG MCMANUS: Yes good question and I appreciate the opportunity to clarify. Any of the activities that would occur up until the supported employment placement occurs must be paid for with vocational rehabilitation funds. If the SF‑425, in that slide before we were making the distinction if in the past you happened to be charging any of those services prior to the supported employment placement to the supported employment grant after October 1, 2016, meaning your semiannual report coming up March, 2017, any carryover federal fiscal year supported employment funds and any new federal fiscal year 2017 supported employment must be sure that those funds are only reported for those on going support services that occurred after the supported employment placement. Of course any of the vocational rehabilitation activities prior to the placement could show up on the SF‑425 for the VR program.

>>SUZANNE MITCHELL: If I can add to that as well to help explain why that is the case, I believe it's ‑‑ and Craig you can correct me if I'm wrong, I believe it's 606B7D that is the provision that talks about supported employment funds are not to subpoena plant VR funds is that correct?

>>CRAIG MCMANUS: It could be, you may have more faith in that for this Rehabilitation Act, but it's in there.

>>SUZANNE MITCHELL: I think the other piece ‑‑ and I'm not a geek as much as my colleagues for the regs, but you can find support for that interpretation not only because it just makes sense because it's talking about supported employment services which implies in plain language it's at the time of the employment and the individual in a position, the placement in a position, but also, you know, if you look at the definition of supported employment services it refers to ongoing support services and if you go to the definition of ongoing support services you will see clearly these are services that are provided once an individual is placed in employment.

>>TRINA LEE: Another question? Not yet? It's ready for the next person.

>> AUDIENCE MEMBER: I'm a worker bee in Arkansas who is trying to implement 511 and supported employment and whatever else goes along with that, the sub‑minimum wage, CPR stuff and I'm confused so I'm not sure I can ask this question right but in the short‑term basis, integrated employment, an individual ‑‑ I guess I need an example of that, because when I heard about Section 511 it seems to contradict some things in regards to what I've heard from ODEP folks, national expert folks if a CRP owns, operates or leases it, and it's sub‑minimum wage it's not integrated, so kind of like thrift stores would not be integrated but then when I hear the supported employment stuff it's like is that a short‑term basis that they could go to the thrift store and get paid minimum wage? I don't know, if somebody could give me an example of short‑term basis and integrated employment I may be the only one that doesn't get that?

>>SUZANNE MITCHELL: Sure, believe me we have all been confused by it, so first of all the biggest thing to remember is that supported employment must occur in an integrated setting and Carol talked about, you know, integrated settings in her presentation. You should refer to that in terms of determining whether it's an integrated setting. That being said, if an individual is making a sub‑minimum wage in an integrated setting, that can only be during the short‑term basis period. Incidentally if that ‑‑ and it has to be with the anticipation that the individual will achieve competitive wages at the end of that short‑term basis or during the short‑term basis period but you have to remember it needs to occur in an integrated setting and you have to go back to the definition of integrated employment and employment in and out come and the details that Carol provided about that. So that's an important consideration. Obviously supported employment is a definition and working on an integrated basis, a person that goes to work for Wal‑Mart, for example, and at the time that they go into that job Wal‑Mart happens to have a Section 14C certificate that allows them to pay sub‑minimum wage, that individual could during the short‑term basis period or during the time that they were placed on the job actually earn the sub‑minimum wage with the expectation that they would achieve a competitive wage either prior to entering the short‑term basis or during the short‑term basis so that's the difference. The complication here is that 14C entity and the individual would also need to comply with the requirements under Section 511 so, again, the easiest way, the best way to handle this is to simply work with the individual and place them in a job and do not consider taking an supported employment must until they have been provided their supported employment services for up to 24 months or longer and they have achieved competitive wages in an integrated setting. That way they would not necessarily need to go into the short‑term basis.

>> AUDIENCE MEMBER: I have a follow‑up, this is Nanna with Idaho. In Idaho most of our 14Cs if not all are CRPs. What I'm hearing is if they placed an individual into a store setting, say, Wal‑Mart, Shopco and they are the employer of record but they're work at Shopco or another store like that, they're not the ‑‑ they're the employer at that point and they're a CRP which is their point is individuals with disabilities is the purpose of their business. Is that allowable? We don't look at it that way. We typically look at it as Wal‑Mart would hire at minimum wage or better or the prevailing wage for that position and then we would support them that way. The reason it's important for me to ask is that this same CRP could also become benefited if they end up going into work services.

>>SUZANNE MITCHELL: So let me see if I understand this. So you're saying the CRP may be instrumental in placing the individual at Wal‑Mart?

>> AUDIENCE MEMBER: Yes so the way our CRPs work is some of them are VR providers as well as the 14C holders and also provide work services as well so they do service provision on both sides of the house, if you will.

>>SUZANNE MITCHELL: Okay.

>> AUDIENCE MEMBER: So, for example, in the scenario you're describing if they were the CRP provider that placed them in Wal‑Mart they would have to actually be the employer of record in order to pay sub‑minimum wage is what I heard from you.

>>SUZANNE MITCHELL: Yes, if they were going to pay sub‑minimum wage yes, sir they would have to be the employer holding Section 14C certificates. If, indeed, they are the employer of record. Now, if you are ‑‑ and what you're describing is a little complex, let me see if I can untangle it a bit. If one side of the CRP is involved in placing competitive integrated employment, for example, and the employer of record would be where they are placed, there is nothing wrong it with that in supported employment or any competitive integrated employment. If you are a CRP who maybe has a subcontract with providing workers to an activity that pays sub‑minimum wage, that would probably occur on the side of the house that exists for the purpose of employing people with disabilities if the employer of record happens to be the CRP. Does that make sense?

>> AUDIENCE MEMBER: I think the complexity around it is that we're so small it's all the same individual people that oversee both sides of the house for our CRPs so it's one in the same entities. But you did clarify the point for me which was they still have to be a 14C holder in order to pay sub minimum wage and that was the part I couldn't get past in terms of the community part so that makes sense around that part of it but it is complex when you have 511 requirements as well as VR requirements around making sure that they don't have a vested interest financially for the outcome for that individual if they are not successful in VR. Thank you.

>>SUZANNE MITCHELL: Okay. Thank you.

>>TRINA LEE: Shelly?

>> AUDIENCE MEMBER: Good morning. I have a couple of questions. Maybe this is obvious to a lot of people but I can't understand the distinction between supported employment where the services don't occur until someone becomes employed and extended services. It's important because extended services are prohibited from being provided to adults. What is the difference between supported employment services and extended services, that's my first question.

>>SUZANNE MITCHELL: That's a good question because extended services are really or the of a subset of supported employment services that are available only to youth. So extended services could be follow‑along services, extended services are those services once an individual has received the employment outcome that are maybe necessary to help maintain that individual in the job. Supported employment services are those services that support the individual prior to the employment outcome that help them to achieve that employment outcome. There is a definition of extended services in the Act and I would recommend you look at that and there is a definition of supported employment services. That may clarify. If it doesn't contact us and we will rye to help you clarify more.

>> AUDIENCE MEMBER: Maybe that leads to my second question of the employment outcome and the importance of claiming an employment outcome when the case is still open. It's not going to show up on the performance measures and we're talking about creating decision trees so our staff can sort through this and I was wondering the importance of taking that step. Is it because extended services would then begin if you changed the outcome?

>>SUZANNE MITCHELL: Yes and I would say for the purposes of the performance measures you would only apply this at exit from the program.

>> AUDIENCE MEMBER: Right.

>>SUZANNE MITCHELL: So, again, it is complicated. It's because of the introduction of the short‑term basis because we do have in the definition of employment outcome that it could be supported employment in an integrated setting on a short‑term basis working toward competitive integrated employment. So it's contained in the definition of employment outcome. It is tricky, just try to remember that in terms of the employment outcome and the performance measures that becomes important only at exit.

>> CRAIG McMANUS: And just to add, I think as you're alluding to, while requirements are met to take the supported employment outcome particularly with youth if they are receiving extended services provide by the DSU the case has to be open so they can continue to receive those so that's the decoupling or taking the supported of the employment outcome out of the service record.

>> AUDIENCE MEMBER: Question about the definition of supported employment services, sorry to beat a dead horse but if you placed a person in a work experience that lasted for many months and the goal was ‑‑ it was an integrated setting and the goal was to move them to competitive integrated employment at some point and they had been identified as such, their IPE was checked off, all of services in that work‑based learning experience because it's really employment assuming that they're getting paid something could be counted as supported employment dollars is that correct? Supported employment dollars could be used with that?

>>SUZANNE MITCHELL: No the work‑based learning experience would occur prior to the placement of the individual in employment and interestingly though that you point that out because if it is a youth or student with a disability it could be applied toward the preemployment transition services reserve right, Craig?

>>CRAIG MCMANUS: Right and that is a presupported placement activity that's going to be paid for with VR funds if it is for a workplace experience and for a student with a disability because it's occurring prior to preemployment transition, sounds like it could be used for the preemployment transition reserve purposes.

>> AUDIENCE MEMBER: Let me rephrase the terminology. That was part of the problem. There are many work experience or work opportunity programs that pay individuals sub‑minimum wage for an extended period of time who's goal is to move them from that environment into a competitive integrated employment type of work. A lot of that process is used as an assessment period for the individual or work adjustment period or whatever you want to call it but it is for all practical purposes employment but it's just over a longer ‑‑ it's kind of an assessment but a longer period of time. Is the key here that we're still doing the assessment activity in that process and that's why you wouldn't be able to charge it to supported employment? Is that the point?

>>SUZANNE MITCHELL: Yes.

>> AUDIENCE MEMBER: That's what I figured, thank you.

>>TRINA LEE: Final call for questions, we're actually ahead of schedule which is exciting! Here we go.

>> AUDIENCE MEMBER: Scott from Maryland I have a question for Chris.
(Laughter.)

On the match piece for supported employment, can that also be used for maintenance of effort under VR?

>>CRAIG MCMANUS: No, it cannot.

>>TRINA LEE: I think we owe our panelists another round of applause for all those tough questions!
(Applause.)

Thank you so much. We did receive some extremely valuable information and it's nice to be able to open things up and people to ask questions on the tops of their minds. We're going to break for 15 minutes, let's see if we can get ourselves out of here early so enjoy your 15‑minute break.

(Coffee break.)