



September 2018

VOCATIONAL REHABILITATION

Additional Federal Information Could Help States Serve Employers and Find Jobs for People with Disabilities

GAO Highlights

Highlights of [GAO-18-577](#), a report to the Ranking Member, Committee on Health, Education, Labor, and Pensions, U.S. Senate

Why GAO Did This Study

The VR program, administered by Education and state VR agencies, helps people with disabilities obtain employment. In 2014, WIOA made changes to the VR program, increasing its focus on serving employers, promoting career advancement as part of the broader goal of mainstream employment, and coordinating with other workforce programs. GAO was asked to review the VR program under WIOA.

This report examines (1) the steps VR agencies have taken under WIOA to work with employers and place individuals in mainstream employment, and the extent Education has addressed any challenges; (2) how VR agencies have coordinated with other workforce programs and the extent federal agencies have addressed any challenges; and (3) how federal agencies have measured state VR agencies' efforts to serve employers. GAO surveyed all 79 VR agencies (74 responded); conducted three discussion groups with 36 state VR officials and four with 29 employers that worked with VR; interviewed VR and other workforce officials in three states, selected for geographic dispersion, among other factors; and reviewed relevant federal laws, regulations, and guidance.

What GAO Recommends

GAO is making seven recommendations, including improving information on career advancement and partnerships, and aligning performance measures with activities. DOL agreed, while Education neither agreed nor disagreed with the recommendations, but said it will consider taking steps in response.

View [GAO-18-577](#). For more information, contact Elizabeth H. Curda at (202) 512-7215 or curdae@gao.gov.

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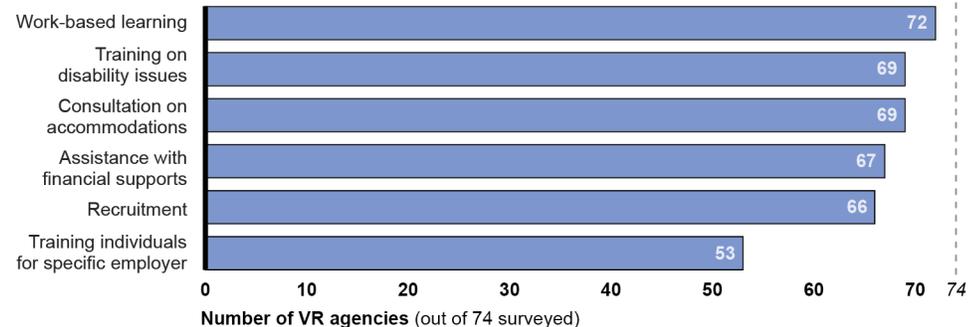
VOCATIONAL REHABILITATION

Additional Federal Information Could Help States Serve Employers and Find Jobs for People with Disabilities

What GAO Found

State vocational rehabilitation (VR) agencies reported expanding services for employers in order to promote hiring individuals with disabilities in mainstream employment (where they are integrated with employees without disabilities and earn competitive wages), but the Department of Education (Education) has not fully addressed related challenges. Most VR agencies in GAO's survey reported providing specific employer services under the Workforce Innovation and Opportunity Act (WIOA) (see figure). However, many agencies reported challenges meeting employers' needs and promoting mainstream employment. For example, some did not fully understand when they are allowed to help employed individuals with career advancement. Education has provided related guidance, including disseminating information at conferences. However, officials at two of three VR agencies GAO spoke with said more information would be helpful. Increasing access to this information may help more VR agencies understand when they have the option of using VR funds for such services.

Types of Employer Services Provided by Most State Vocational Rehabilitation Agencies



Source: GAO survey of vocational rehabilitation (VR) agencies. | GAO-18-577

Most VR agencies GAO surveyed reported increasing coordination with other workforce agencies, but some gaps exist in federal guidance intended to enhance coordination. Employers GAO spoke with cited challenges navigating workforce programs, yet few agencies reported documenting roles and responsibilities of the agencies they partner with to work with employers. While Education and the Department of Labor (DOL) have provided some related technical assistance, they have not provided examples of documentation of roles and responsibilities. GAO's prior work has found that such documentation can help improve coordination by clarifying who does what in a partnership.

Education and DOL are piloting three measures of the effectiveness of workforce programs in serving employers: employer penetration (i.e., percentage of employers receiving a service), retention with the same employer, and repeat business customers. However, some VR agencies cited concerns with piloted measures, such as the employer penetration measure not being sufficiently linked to VR core program activities. Taking such concerns into account when finalizing performance measures may result in performance metrics and targets that encourage VR agencies to more effectively serve employers.

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Abbreviations

ADA	Americans with Disabilities Act of 1990
AJC	American Job Center
CSAVR	Council of State Administrators of Vocational Rehabilitation
DOL	Department of Labor
Education	Department of Education
IPE	Individualized Plan for Employment
ITSC	Information Technology Support Center
MOU	Memorandum of Understanding
NCSAB	National Council of State Agencies for the Blind
RSA	Rehabilitation Services Administration
VR	Vocational Rehabilitation
WIOA	Workforce Innovation and Opportunity Act

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September 6, 2018

The Honorable Patty Murray
Ranking Member
Committee on Health, Education, Labor, and Pensions
United States Senate

Dear Senator Murray:

People with disabilities, including physical, mental, or emotional conditions, often face significant employment challenges. According to the U.S. Bureau of Labor Statistics, in 2016 the average unemployment rate for people with disabilities who are able to work was 10.5 percent, compared to 4.6 percent for those without disabilities.¹ The vocational rehabilitation (VR) program provides services that, among other things, help people with disabilities obtain employment, including counseling and training. In fiscal year 2017, federal funding for the VR program was over \$3 billion. The Department of Education (Education) oversees this funding and generally distributes it as grants to the state agencies that administer the VR program.

Studies have found that some employers are reluctant to hire people with disabilities, due, for example, to their perceptions about the costs of accommodations or the work capacity of people with disabilities. Studies have also found that many individuals with significant disabilities have been employed in sheltered workshops, where they are segregated from other employees and may be paid less than minimum wage.² The Workforce Innovation and Opportunity Act (WIOA), enacted in 2014, made changes to a range of workforce programs, including changes to the VR program that promote mainstream employment for people with

¹ The survey used to determine these unemployment rates defines disability as being deaf, being blind, or having difficulty with various tasks due to a physical, mental, or emotional condition.

² According to one recent study, many people in sheltered workshops—center-based, group work settings for people with significant disabilities—are paid sub-minimum wage. According to this study, as of 2016 over 200,000 individuals with significant disabilities were paid under minimum wage as authorized by federal law. Advisory Committee on Increasing Competitive Integrated Employment for Individuals with Disabilities, *Final Report* (Sept. 15, 2016).

disabilities.³ For example, WIOA authorized state VR agencies to provide services to employers such as outreach and technical assistance; emphasized the goal of placing VR clients in mainstream employment, where they have competitive wages and are integrated with employees without disabilities; and required Education and the Department of Labor (DOL) to develop one or more performance measures assessing how well VR and certain other workforce programs serve employers. WIOA also encourages collaboration between VR and other workforce programs.

You asked us to examine how VR agencies have engaged employers and collaborated with other workforce programs since the enactment of WIOA. This report examines (1) the steps VR agencies have taken under WIOA to work with employers and place individuals in mainstream employment, and the extent to which Education has helped them address any challenges; (2) how VR agencies have coordinated with other workforce programs to effectively serve individual clients and employers, and the extent to which federal agencies have addressed any challenges; and (3) the extent to which Education and DOL have measured VR agencies' efforts to serve employers under WIOA.

To address all three objectives, we used the following methodologies. We reviewed relevant federal laws, regulations, and guidance and technical assistance documents. We surveyed all 79 VR agencies across the country and analyzed responses from 74 agencies.⁴ We convened discussion groups with VR agency officials at a national conference, and conducted more in-depth interviews with VR and other workforce program officials in three states. We selected the three states for in-depth interviews to obtain a mix with respect to geographic location, the proportion of the state population in urban versus rural areas, and where the VR agency is situated within the state government, among other factors.⁵ We convened discussion groups in three states with employers that have worked with the VR program, which we recruited with the help

³ WIOA set competitive integrated employment as one goal for VR program participants. In this report, we will generally use the term mainstream employment to refer to competitive integrated employment.

⁴ In presenting our survey results, we refer to number of agencies responding and did not generalize our findings. Nevertheless, because the responding agencies covered a very large proportion of VR agencies, we concluded that the results would not be materially different if the responses from the missing five agencies had also been captured.

⁵ The three states selected for in-depth interviews were Alabama, Arizona, and Maryland. See appendix I for more information on how these states were selected.

of VR officials.⁶ We applied criteria previously identified by GAO, including standards for internal control in the federal government, and key practices for training, effective interagency collaboration, and performance measurement. For further details on our objectives, scope, and methodology, see appendix I.⁷

We conducted this performance audit from July 2017 to September 2018 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

The VR program is authorized under the Rehabilitation Act of 1973, as amended.⁸ The VR program provides states with allotments of funds, which are determined according to a formula that considers each state's population, average per capita income, the base amount of VR funds from 1978, and other factors. States are required to contribute by generally matching 21.3 percent of the total VR program expenditures (federal plus non-federal); the federal government's share of the total expenditures is generally 78.7 percent.

At the federal level, the VR program is administered by the Rehabilitation Services Administration (RSA), a component of the Office of Special Education and Rehabilitative Services within Education. At the state level, each state has the option of designating a single state agency to serve all VR clients, or designating one agency to serve VR clients who are blind and a separate agency to serve all remaining VR clients. Across the 50 states, the District of Columbia, and five U.S. territories, 33 states or territories opted for a single agency, and 23 states or territories opted for separate agencies. Therefore, in total, there are 79 VR agencies: 33

⁶ We held discussion groups with employers in Alabama, California, and Pennsylvania.

⁷ We also obtained and reviewed data from Education on referrals of VR clients from other workforce programs and co-enrollments in other workforce programs. We decided not to report these data because they are self-reported by clients and state VR agencies we spoke with said that clients may not have known who was referring them or what other programs they were enrolled in, thus potentially leading to under-reporting.

⁸ See Pub. L. No. 93-112, 87 Stat. 355, codified as amended at 29 U.S.C. § 701 et seq.

combined agencies that serve all VR clients, 23 agencies that serve VR clients who are blind, and 23 general agencies that serve VR clients who are not blind.

One goal of the VR program is to maximize opportunities for individuals with disabilities for competitive integrated employment (i.e., mainstream employment). This is generally defined by statute as employment that, among other criteria, (a) pays at least minimum wage, and at least the customary wage paid by the employer for similar work performed by employees without disabilities; (b) is in a location where the employee with a disability interacts with people who do not have disabilities to the same extent as other employees who are in comparable positions; and (c) that presents opportunities for advancement that are similar to those for employees without disabilities who have similar positions.

To be eligible for VR services, an individual must generally (a) have an impairment that constitutes a substantial impediment to employment, (b) be able to benefit in terms of an employment outcome from VR services, and (c) require VR services to prepare for, secure, retain, advance in, or regain employment. If a VR agency determines that it does not have the resources to serve all eligible individuals in a fiscal year, it must develop an order of selection, in which eligible individuals with the most significant disabilities are prioritized for services and other individuals may be placed on a waiting list.

Before providing any services, the VR agency works with the individual to develop a customized Individualized Plan for Employment (IPE), which spells out, among other things, an employment outcome consistent with the general goal of mainstream employment; the services that are needed to achieve the employment outcome; and timeframes for achieving the employment outcome.⁹ The services that VR agencies may provide include career counseling; job placement assistance; training, along with supplies or other services to support training; and assistance with job retention. The VR agency closes a client's case when the client achieves an employment outcome, or when a determination is made that the client will not achieve the outcome specified in the IPE.

⁹ An employment outcome could also be self-employment or supported employment, in which the individual receives services on a temporary basis such as supplementary assessments, a job trainer at the work site, or social skills training to help him or her retain employment.

Key Changes under WIOA

Title IV of WIOA made changes to the VR grants program when WIOA was enacted in July 2014. On August 19, 2016, Education promulgated final regulations related to the VR provisions of WIOA, and Education and DOL promulgated final regulations affecting the broader workforce system. The law included several provisions that change how VR agencies are expected to work with employers and coordinate with other workforce programs.¹⁰ Specifically:

Services for employers: WIOA authorized VR agencies to use VR grant funds to provide several services to employers that have hired or are interested in hiring people with disabilities. These include providing training and technical assistance regarding the employment of people with disabilities, including training on disability awareness and expanded authority for training regarding the requirements of the Americans with Disabilities Act of 1990 (ADA)¹¹; working with employers to recruit, train, and provide work-based experiences to people with disabilities; providing consultation regarding workplace accommodations and assistive technology; and facilitating the use of financial supports for hiring and accommodating people with disabilities.¹² Prior to the enactment of WIOA, VR agencies were authorized to provide a more limited range of services to employers, including providing information on compliance with some requirements of the ADA and on VR services.¹³

Job retention: WIOA provided new flexibility for VR agencies to help individuals retain their jobs, including individuals with less significant disabilities who might not normally be prioritized for services. Under WIOA, when a VR agency is under an order of selection—that is, must

¹⁰ WIOA also made other changes affecting the VR program, such as requiring that at least 15 percent of VR funds be used for pre-employment transition services, but our report focuses on changes related to how VR agencies work with employers and other workforce programs.

¹¹ The ADA provides standards addressing discrimination against individuals with disabilities, and helps ensure that the federal government plays a central role in enforcing these standards, among other things. These standards cover areas such as employment, public services, and public accommodations.

¹² According to an official from the Council of State Administrators of Vocational Rehabilitation (CSAVR), financial supports for hiring people with disabilities include tax incentives.

¹³ WIOA authorized VR agencies to provide training and technical assistance on all of the requirements of the ADA related to the employment of individuals with disabilities.

prioritize services to certain individuals because the agency lacks the resources to serve all eligible individuals—it may elect to assist individuals who need specific services or equipment to retain employment, even if these individuals would not otherwise receive services under the state’s order of selection.

Career advancement: WIOA put heightened emphasis on helping VR clients advance in their careers in two ways. First, according to Education, WIOA clarified that individuals may qualify for VR services if they need VR services to advance in their careers. Second, WIOA established a definition of competitive integrated employment that includes career advancement opportunities. Prior to the enactment of WIOA, one of the employment outcomes in the VR program was competitive employment in the integrated labor market, but there was no criterion related to advancement opportunities.

Coordination with other workforce programs: WIOA specified that VR is one of six core programs in the workforce system. The other programs are Title I Adult, Title I Dislocated Worker, Title I Youth, Wagner-Peyser Employment Services, and Adult Education and Family Literacy (see app. II for further information). Moreover, for a state to receive allotments under each core program, WIOA requires the governor to submit either a unified state plan or combined state plan for all of the core programs.¹⁴ These plans outline a 4-year strategy and describe the workforce needs in the state and how the core programs under WIOA will be administered and aligned or coordinated. For example, one way that the workforce programs may coordinate is by blending or braiding funds—that is, accessing or coordinating multiple sources of funding—which may produce greater strength, efficiency, or effectiveness in support of a common activity or project than the use of any single funding stream.¹⁵

¹⁴ A combined state plan includes the WIOA core programs as well as at least one other partner program, as opposed to the unified state plan, which applies to the core programs only.

¹⁵ U.S. Department of Health and Human Services, Administration for Children and Families, Office of Child Care, *Layering or Blending and Braiding Multiple Funding Streams*, date accessed: May 9, 2018, <https://childcareta.acf.hhs.gov/systemsbuilding/systems-guides/financing-strategically/maximizing-impact-public-funding/blending-braiding-funding>. In braiding strategies, funding streams remain visible and expenditures are tracked by funding source, whereas with blending, funds are wrapped into a common pool and expenditures are not tracked by funding source. According to Education, blending of funds is constrained by factors including federal guidance that grant funds be used only for allowable program costs.

Measuring performance in serving employers: WIOA required Education and DOL after consultation with state agencies and others¹⁶ to develop and establish one or more performance indicators for “effectiveness in serving employers.”¹⁷ These indicators are shared across the six core WIOA programs. For the other five core program performance indicators established by WIOA, the states and the Secretaries of Education and Labor negotiate a combined target performance level for each state, starting from the performance targets included in the unified state plans. The federal agencies have not yet issued guidance on how the target performance level for effectiveness in serving employers will be negotiated.

Workforce System

Under federal law—both before and after enactment of WIOA—states and local areas are required to bring together a number of federally funded employment and training programs into a comprehensive network of partners, now called the American Job Center (AJC) network. An AJC is a physical location where clients—including job seekers with and without disabilities and employers seeking employees—can access the programs, services, and activities of the various workforce partners. States also must establish workforce development boards at the state and local levels. At the state-level, these boards are responsible for assisting the governor in developing and improving the statewide workforce system, and at the local level, they are responsible for serving as the strategic leader and convener of local workforce system stakeholders. WIOA requires the local board to develop and enter into a Memorandum of Understanding (MOU) between the local board and the workforce programs at the AJC concerning the operation of the AJC delivery system in a local area.

Guidance and Technical Assistance

DOL’s Employment and Training Administration— the entity within DOL responsible for providing national oversight of the workforce investment

¹⁶ For example, WIOA requires consultation with representatives of business and industry, employees, and researchers.

¹⁷ WIOA established six primary indicators of performance for the core programs, which are generally as follows: employment rate in the 2nd quarter after exiting the program, employment rate in the 4th quarter after exiting the program, median earnings in the 2nd quarter after exiting the program, credential attainment rate within 1 year of exiting the program, measurable skill gains, and effectiveness in serving employers. Pub. L. No. 113-128, § 116(b), 128 Stat. 1425, 1471.

system—and Education’s RSA and Office of Career, Technical, and Adult Education have provided various types of guidance and technical assistance to state agencies to help implement WIOA. After WIOA increased the emphasis on services for employers and collaboration across the workforce development system, Education and DOL issued technical assistance circulars and joint guidance on these priorities. Education and DOL also provide technical assistance directly to state agencies through conference presentations, regional meetings, webinars, and websites.

In addition, Education conducts annual reviews and periodic on-site monitoring of state VR programs. Education also created several grant-funded technical assistance centers to help VR agencies implement WIOA. These technical assistance centers are largely staffed by academics and provide a range of assistance such as conference presentations, newsletters, and more intensive assistance to individual states. In particular, one of the technical assistance centers—the Job-Driven Vocational Rehabilitation Technical Assistance Center—focuses on providing assistance related to employer engagement and employer supports. Another technical assistance center—the Workforce Innovation Technical Assistance Center—provides assistance focused on helping integrate VR into the workforce system.

AbilityOne Program

Under the AbilityOne program, people who are blind or have other severe disabilities are employed to provide products and services to federal agencies.¹⁸ The program typically provides products such as office supplies and military apparel, and services such as janitorial, landscaping, and document destruction. Federal agencies that need the products and services on the AbilityOne Program Procurement List are required to buy them from AbilityOne authorized nonprofit agencies employing people who are blind or have severe disabilities. The AbilityOne program is administered by the U.S. AbilityOne Commission, which oversees a network of nonprofit agencies. The U.S. AbilityOne Commission establishes program rules and regulations, determines what products and services the program provides, and sets prices for these products and services.

¹⁸ See 41 U.S.C. § 8501 et seq.

The U.S. AbilityOne Commission authorized two central nonprofit agencies—SourceAmerica and National Industries for the Blind—to facilitate the distribution, by direct allocation, subcontract, or any other means, of orders of the federal government for products and services on the procurement list among qualified nonprofit agencies. By statute, the program requires that at least 75 percent of a nonprofit agency’s total direct labor hours during the fiscal year be carried out by people who are blind or have severe disabilities. As of 2018, over 500 nonprofit agencies across the country participate in the AbilityOne program and train and employ people with disabilities to provide products and services to federal agencies. According to data provided by the U.S. AbilityOne Commission, in fiscal year 2016 the program employed 46,161 people.

VR Agencies Have Reported Expanding Employer Services, but Education Has Not Fully Addressed Challenges Related to Employer Needs and Mainstream Employment

Most VR Agencies Reported Enhancing a Range of Employer Services

Most state VR agencies reported in our survey that they have enhanced their services for employers under WIOA. Fifty of the 74 agencies that responded to our survey reported they have enhanced services in some way, including 36 that increased both the overall level of services to employers and provided services in a more formal, well-defined way; 11 that increased the overall level of services; and 3 that provided services in a more formal, well-defined way. Also, most VR agencies (61 of 74) reported that they have staff members dedicated to working with employers, and about a third of these agencies (22 of 61) reported that they increased the number of staff dedicated to serving employers under WIOA. Survey responses also revealed that fewer VR agencies that serve only people who are blind or visually impaired (12 of 21, or 57 percent) have staff dedicated to working with employers, compared to VR

agencies that only serve the general disability population (22 of 23, or 96 percent) or those that serve all VR clients (27 of 30, or 90 percent). Officials from the National Council of State Agencies for the Blind (NCSAB) told us that due to their small size, VR agencies serving the blind population often have staff perform multiple functions and therefore typically do not have staff who specialize in working with employers. When asked whether agencies for the blind therefore face challenges in working with employers, NCSAB officials said that VR agencies for the blind may coordinate with general VR agencies on employer engagement, and that more agencies for the blind are developing their own employer specialists.

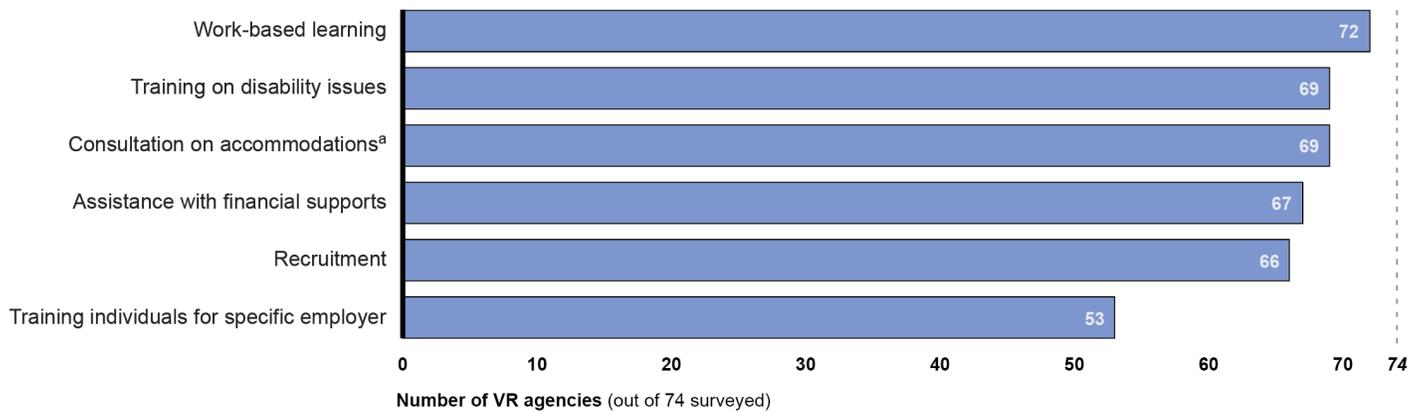
VR agency officials we spoke with in discussion groups and interviews echoed our survey results, indicating they are either taking substantial new steps to work with employers, or expanding services that they were already providing. For example, a VR official in one discussion group said that they have historically focused on serving individual clients with disabilities, and are now trying to develop expertise in serving employers as well. Meanwhile, officials at one VR agency that has worked with employers for many years told us that they expanded the number of staff who focus on working with employers from one to eight, and are putting more emphasis on educating employers about the ADA and reasonable accommodations, which they see as a priority area in WIOA.¹⁹

In addition to reporting that they enhanced employer services, the majority of VR agencies reported in our survey that they provide various employer services authorized by WIOA (see fig.1).²⁰

¹⁹ The ADA generally requires an employer to provide reasonable accommodations to an employee or job applicant with a disability, unless doing so would cause undue hardship. According to the Equal Employment Opportunity Commission, in general, a reasonable accommodation is any change in the work environment that helps a person with a disability apply for or perform a job. This could include, for example, making a workplace wheelchair accessible or providing an interpreter for someone who is hearing impaired.

²⁰ Our findings are consistent with those of another survey conducted shortly after the enactment of WIOA. That survey found that 59 of 66 responding VR agencies served employers as customers, and the top five most commonly provided services for employers included accommodations, training on disability issues, assistance with financial supports, and recruitment. Kelly Haines, et al., *Vocational Rehabilitation and Business Relations: Preliminary Indicators of State VR Agency Capacity*, Journal of Vocational Rehabilitation 48 (2018).

Figure 1: Number of State VR Agencies that Reported Providing Selected Services Authorized by the Workforce Innovation and Opportunity Act to Employers



Source: GAO survey of vocational rehabilitation (VR) agencies. | GAO-18-577

Note: The survey question was: “Does your agency currently provide any of the following services to employers either formally (e.g., as a distinct or well-defined program) or informally (e.g., by individual counselors in the course of their routine duties)?” Seventy-four VR agencies answered this question.

^a According to the Equal Employment Opportunity Commission, a reasonable accommodation, in general, is any change in the work environment that helps a person with a disability apply for or perform a job.

VR agency officials we spoke with cited several specific aspects of how they work with employers as being especially effective:

- VR agency officials in two of our three discussion groups said that establishing a relationship with an employer is important, and officials in one discussion group said that this is important specifically so that employers will contact the VR agency when an employee needs help with keeping his or her job.
- Officials we interviewed in another VR agency said that work-based learning such as apprenticeships is especially useful in connecting employers and people with disabilities, because it provides on-the-job experience and is often in in-demand occupations.
- And in one of our discussion groups, an official from a different VR agency said that it is valuable to understand an employer’s specific skill needs and pre-screen job candidates before referring them to ensure a good match.

Employers we spoke with echoed these comments about how VR services are useful. For example, employers in two of four discussion groups said that VR agencies’ efforts to maintain relationships have been helpful, employers in two discussion groups emphasized the value of

receiving pre-screened job candidates from VR agencies, and employers in one discussion group said that paid work experience—in which VR pays a portion of an employee’s wages for a period of time—has been a helpful and low-cost way to try out a job candidate with disabilities.

In addition to the above services to employers, almost all VR agencies (72 of 74) reported that they help employers keep their employees by providing job retention assistance to individuals with disabilities. Fewer agencies reported that they are acting on new flexibility under WIOA to provide job retention services to individuals who would not otherwise qualify under the state’s order of selection. (As noted previously, a VR agency develops an order of selection, which prioritizes services to individuals with the most significant disabilities, when it lacks resources to serve all eligible individuals.) Specifically, of the 30 VR agencies that reported being on an order of selection at the time of our survey, about half (14) reported that they have elected to provide job retention services to individuals who would not otherwise be prioritized for VR services under the order of selection. Officials we interviewed at one VR agency said that they opted not to provide job retention services to individuals outside their order of selection because of the need to prioritize services to people with the most significant disabilities.

VR Agencies Reported Challenges with Meeting Employer Needs and Promoting Mainstream Employment, Which Education Has Not Fully Addressed

VR agencies we surveyed and interviewed, and employers we interviewed said that they have experienced several challenges, such as those related to VR agencies’ training for employers, ability to quickly meet employers’ needs (i.e., working at the speed of business), and marketing. Other challenges are related to VR agencies’ ability to promote mainstream employment for their clients, including in the area of career advancement. However, Education has not consistently addressed these challenges through the information and assistance it provides.

Training for Employers

Employers expressed concerns about the in-person format VR agencies use to provide training on disability issues. Employers in three of four discussion groups said that it can be difficult to get front-line supervisors together at one time to attend in-person trainings offered by VR agencies, and it would be helpful to have more flexible, on-demand training options. For example, several employers in one discussion group said that it would be useful to have online training options that their front-line managers can take individually at their convenience. Similarly, employers in another discussion group said it is hard to schedule training each time a new person enters a supervisory position, so it would be useful to have on-demand options such as pre-recorded videos. Officials we interviewed

at the three VR agencies told us that they do not provide on-demand or online trainings for employers. An official at one of these agencies said that they provide only in-person trainings because they believe this format is more effective in building a relationship with the employer and promoting the hiring of people with disabilities.

While Education has provided technical assistance to VR agencies on training employers, it does not provide assistance related to the format of this training. Officials from the Job-Driven Vocational Rehabilitation Technical Assistance Center told us that the center has provided intensive technical assistance to VR agencies on the importance of educating employers about hiring and working with people with disabilities. This center also offers VR agencies information on disability awareness and the ADA to help VR agencies educate employers about these issues. However, while the center has posted some videos on its website that discuss VR success stories in working with employers, center officials said that they have not developed online training or multimedia presentations for employers. Education officials said that while they see potential value in on-demand and online training for some employers, they have not directed the technical assistance centers to provide assistance to VR agencies on using these training formats because they have not heard about this issue from VR agencies or employers.²¹

We have previously reported that agencies should consider providing trainees with the flexibility to choose among different training delivery methods (such as web-based and instructor-led) while leveraging resources in the most efficient way possible.²² Further, standards for internal control in the federal government state that federal agency management should communicate quality information so that external parties, including other government entities, can help the entity achieve its objectives and address related risks.²³ VR agencies are authorized to provide training to employers on disability issues, which is one way to achieve one of the program's objectives of promoting employment for

²¹ Education also said that information for employers on hiring people with disabilities is available from other sources—such as the Americans with Disabilities Act Knowledge Translation Center—in alternative formats that include videos.

²² GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, [GAO-04-546G](#) (Washington, D.C.: March 2004).

²³ GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

Working at the Speed of
Business

people with disabilities. By providing information to VR agencies on how to deliver training to employers in formats, such as on-demand videos, that best meet employers' needs, Education, through its technical assistance centers, may improve VR agencies' ability to customize training for individual employers, reach a broader range of front-line supervisors, and thereby better achieve program objectives. While in-person training may help with developing relationships with employers, alternative training formats such as on-demand videos could supplement—not replace—in-person training. Moreover, VR agency officials we interviewed also mentioned other ways to cultivate such relationships, such as regular communication with employers that may include sharing articles on disability issues, or providing services an employer needs such as accessibility assessments.

VR agency officials and employers said that VR agencies sometimes face challenges meeting employers' hiring and other needs in a timely manner. On our survey, 45 of 74 VR agencies reported that quickly meeting employers' needs is moderately, very, or extremely difficult.²⁴ Similarly, VR agency officials in one of three discussion groups said that it can be challenging meeting employers' needs given the agency's limited resources, citing, for example, the extensive staff time required to evaluate an employment site's accessibility. Officials we interviewed at one VR agency also noted that it can be difficult to meet employers' immediate need for a certain number of qualified job candidates, due, for example, to the time it takes to prepare VR clients for specific jobs. Employers expressed similar concerns. Employers in one of four discussion groups said that VR does not always provide enough qualified job candidates to meet their needs, and employers in another discussion group said that job candidates referred by VR are not always good matches for their hiring needs.

Officials at Education's technical assistance centers said that they have provided information and technical assistance to VR agencies to help them address these challenges. For example, they have worked with VR agencies on developing new approaches to engaging employers, with a focus on understanding employers' needs and coordinating within the VR agency to quickly refer job candidates that meet these needs, if such are available. They have also provided documents with examples of how VR

²⁴ The survey asked about difficulty with "meeting the demands of businesses (e.g., speed of services to businesses, fitting into the work schedules of businesses)."

agencies can collaborate with employers, such as “What is Business Engagement?,” which identifies sectors of the economy with high demand for workers and describes strategies for building relationships with employers and meeting their needs. Technical assistance officials said that the centers have also facilitated sharing of promising practices among VR agencies and encouraged VR agencies to use an online tool designed to connect employers with job seekers with disabilities. Officials we interviewed at the three VR agencies said that they have used or plan to use the online recruitment tool, and one also commented that sharing of best practices among the states has been helpful.

Outreach to Employers

VR agencies and employers cited challenges with ensuring employers are aware of the services available from the VR program. Thirty-one of the 74 VR agencies that responded to our survey reported that marketing VR services to employers is moderately, very, or extremely difficult, and VR agency officials in two of three discussion groups said that marketing and awareness of VR among employers is a challenge. Officials we interviewed in all three VR agencies provided examples of challenges related to outreach, such as limited resources to conduct outreach, reluctance on the part of some employers to hire people with disabilities, and turnover among VR staff which makes it difficult to maintain relationships with employers. At the same time, employers in three of four discussion groups said that VR agencies need to do more marketing to get the word out about their services.

Representatives from the Job-Driven Vocational Rehabilitation Technical Assistance Center have taken several steps to help VR agencies inform employers about their services. Among other things, they provided a toolkit with resources that VR agencies can draw on when developing their outreach efforts, including information on using social media in marketing; and established a marketing affinity group to help VR agencies share tips and ideas and form cross-state partnerships. Officials we interviewed from two VR agencies either told us they have found the outreach materials provided by the technical assistance centers useful or did not indicate the need for any additional assistance in this area.

Career Advancement

VR agencies and employers cited issues with implementing WIOA’s heightened emphasis on career advancement for VR clients. VR agency officials in two of three discussion groups said that it has been a cultural shift for VR staff to focus on career advancement, and not solely on job placement. In our survey, 41 of 74 VR agencies reported that it was moderately, very, or extremely difficult to find jobs in which employees with disabilities have similar advancement opportunities as those without

disabilities, which is a goal established by WIOA. In addition, some VR agencies have been reluctant to provide career advancement services to VR clients who are already employed, which could include training for an advanced degree. For example, officials we interviewed at one VR agency said there is some confusion about whether VR clients who are employed can qualify for additional VR services for advancement. They explained that, under the statutory eligibility criteria, an individual's disability must constitute a substantial impediment to employment—and some agency officials believe that someone who is already employed cannot have a disability that is a substantial impediment to employment. Officials we interviewed at the other two VR agencies said that their agencies typically do not provide advancement services to people who are employed because their resources are limited, and they prioritize services to people who are not yet employed. Meanwhile, employers in two of four discussion groups said that they would like more assistance from VR agencies with promoting career advancement for their employees with disabilities, and employers in one of the other two groups were not aware that VR could provide such assistance.²⁵

Education and one of its technical assistance centers have provided information to states on how to promote career advancement. Officials from the Workforce Innovation Technical Assistance Center said that they have provided intensive assistance to states on The Career Index Plus, an online career information system.²⁶ They also have provided assistance on developing career pathways that combine training and work experience, including for people with disabilities. Furthermore, Education officials said that they provided information to VR agencies at three conferences from November 2017 to March 2018, to address states' needs for clarification about when VR clients may be provided career advancement services. In their presentations, Education officials explained that the VR program is intended to help individuals achieve employment that is appropriate for their skills and preferences, and is not limited to just entry-level jobs; that VR services may include graduate level education if needed for advancement in a current job or into a new

²⁵ In our fourth employer discussion group, one employer said it would be helpful for the VR program to provide more assistance with career advancement, but this opinion did not emerge as a consistent theme across multiple discussion group participants.

²⁶ According to technical assistance center officials, The Career Index Plus includes information on careers such as job projections, licenses and certification requirements, and related occupations for career advancement planning.

job; and that an individual's employment and education should not be factors in determining VR eligibility.

However, Education may not have fully addressed states' information needs. Officials we interviewed from two of three VR agencies told us between December 2017 and March 2018 that additional information on providing career advancement services to employed individuals would be helpful. Furthermore, one respondent to our survey wrote that many states are unable to attend conferences, and suggested that information should be disseminated more widely. Education officials said that they were not aware of widespread confusion among VR agencies or the need for more assistance on these issues, and therefore had no plans to disseminate further information. Education officials also acknowledged that they were not aware that some VR agencies have opted not to serve employed individuals because they are on an order of selection.

Standards for internal control in the federal government state that federal agency management should communicate quality information to external parties including government entities, such as through written documents or meetings, so that these parties can help the entity achieve its objectives and address related risks.²⁷ One aspect of providing quality information is ensuring that this information is accessible. While promoting career advancement for individuals with disabilities is emphasized by WIOA, our review suggests that VR agencies may lack sufficient access to information on the circumstances in which they can provide advancement services to employed individuals with disabilities, including when resources are constrained. In turn, VR agencies may not realize they have the option to assist this population in developing their full career potential.

AbilityOne Program

VR agencies have historically been a significant source of referrals to the nonprofit agencies that operate the AbilityOne program, according to officials from the U.S. AbilityOne Commission. However, WIOA emphasizes mainstream employment and Education's regulations and guidance under WIOA provide further details about how VR agencies may refer clients to AbilityOne jobs. While federal law states that VR participants should exercise informed choice over their individual employment goals, WIOA specifies that mainstream—i.e., competitive

²⁷ [GAO-14-704G](#).

and integrated—employment is a goal of the VR program.²⁸ Education’s regulations implementing WIOA further specify that with respect to an employment outcome, an integrated setting is generally one typically found in the community, and where individuals with disabilities interact with other employees without disabilities “within the particular work unit” to the same extent that comparable employees without disabilities do. In its responses to frequently asked questions, Education further explains that a work unit may refer to all employees in a particular job category or to a group of employees working together to accomplish tasks.

In guidance to state VR agencies, Education also provides some direction as to how VR agencies should apply this criterion. In the preamble to its VR regulations, as well as in responses to frequently asked questions, Education emphasizes that VR agencies must apply this regulatory criterion to each employment setting on a case-by-case basis to determine if it qualifies as integrated. However, the preamble and Education’s responses to frequently asked questions also state that jobs supported by the AbilityOne program generally do not meet the criterion of being typically found in the community, and therefore generally do not qualify as integrated settings.

Some stakeholders told us the AbilityOne program can provide integrated settings for some people with disabilities, while others expressed concerns that the program generally does not promote mainstream employment. Officials from the U.S. AbilityOne Commission told us that certain AbilityOne positions—especially service jobs such as janitorial—can offer a setting where people with disabilities are integrated with people who do not have disabilities. For example, janitors in a federal building working under an AbilityOne contract might be spread out across the building, working alongside other building staff without disabilities. In contrast, a report by the Advisory Committee on Increasing Competitive Integrated Employment for Individuals with Disabilities states that the AbilityOne program is not consistent with the goal of increasing mainstream employment, and recommended that Congress amend the AbilityOne program’s authorizing statute to promote greater integration of people with disabilities into mainstream employment settings. Furthermore, representatives we interviewed from two disability

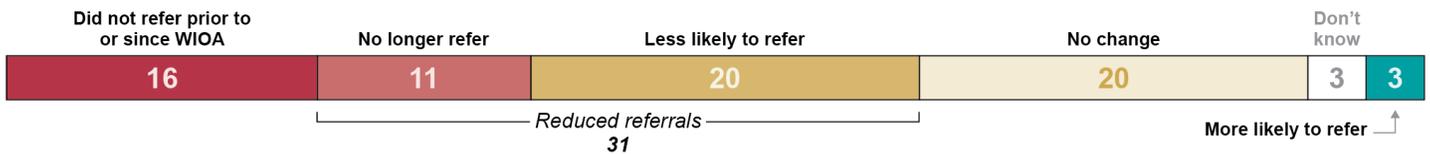
²⁸ Under federal law, VR participants are to be active and full participants in the VR process, making meaningful and informed choices over, among other things, the selection of employment outcomes for the individuals, services needed to achieve the outcomes, entities providing such services, and the methods used to secure such services.

organizations said that there is general support in the disability community for moving away from the types of segregated work settings often provided through AbilityOne and toward more mainstream employment.

Many VR agencies have reduced their referrals of clients to the nonprofit agencies participating in the AbilityOne program since the enactment of WIOA, according to our survey; and a number of state VR officials told us in interviews and discussion groups that in their view Education's regulations or guidance indicate that AbilityOne jobs should not be seen as mainstream employment. At a national level, 31 of 74 VR agencies responding to our survey reported that they have either decreased or completely ceased referrals to the AbilityOne program under WIOA (see fig. 2).²⁹ Officials we interviewed at three VR agencies said they are less likely to actively refer clients to AbilityOne because there is uncertainty about whether it qualifies as mainstream employment, which affects whether it can be considered a successful employment outcome under WIOA. Officials in two of these three states—as well as state VR agency officials in all three of our discussion groups—noted their view that Education's regulations or guidance discourage them from treating AbilityOne jobs as mainstream employment. For example, VR officials we interviewed in one state said that, in their view, AbilityOne jobs do not qualify as mainstream. They explained that while employees with disabilities in these jobs may interact with employees without disabilities who are doing other types of work at the same work site, they tend to be in work crews or settings where they work directly only with other employees with disabilities. They said this is not consistent with the work unit provision in the regulations, which they interpret as requiring that for a work setting to qualify as integrated, employees with disabilities must work directly with and do the exact same type of work as employees without disabilities. At the same time, officials we interviewed at all three state VR agencies said that they do not dissuade VR clients from entering the AbilityOne program, if that is their choice.

²⁹ The survey question was: "Since the passage of WIOA, is your agency more or less likely to refer clients to AbilityOne positions?" Our survey did not ask why VR agencies may have changed their rate of referrals to AbilityOne. Therefore, we cannot infer from the survey responses whether (a) VR agencies are assessing AbilityOne jobs on a case-by-case basis to determine if they are integrated, as called for by Education's guidance; or (b) VR agencies are—consistent with federal law—referring clients to AbilityOne jobs when that is their choice, even if the VR agency does not consider the job to be mainstream employment.

Figure 2: Number of VR Agencies That Have Changed Their Referrals to AbilityOne Authorized Nonprofit Agencies under WIOA



Source: GAO survey of vocational rehabilitation (VR) agencies. | GAO-18-577

WIOA = Workforce Innovation and Opportunity Act

Note: The survey question was: “Since the passage of WIOA, is your agency more or less likely to refer clients to AbilityOne positions?” Seventy-three agencies answered this question. Our survey did not ask why VR agencies may have changed their rate of referrals to AbilityOne. Therefore, we cannot infer from the survey responses whether (a) VR agencies are assessing AbilityOne jobs on a case-by-case basis to determine if they are integrated, as called for by Education’s guidance; or (b) VR agencies are—consistent with federal law—referring clients to AbilityOne jobs when that is their choice, even if the VR agency does not consider the job to be mainstream employment.

Our survey and discussion groups with state VR agencies indicate that agencies struggle to find good jobs outside of AbilityOne for some individuals. In our survey, 33 of 74 VR agencies reported that it was moderately, very, or extremely difficult to find jobs in integrated settings—an aspect of mainstream employment—for clients who would otherwise be good candidates for AbilityOne. Among this group, more than half of the agencies serving the blind population (12 of 21, or 57 percent) reported that this was moderately to extremely challenging, compared to smaller proportions of general agencies (8 of 23, or 35 percent) and combined agencies (13 of 30, or 43 percent). Officials from NCSAB told us that many blind VR customers have chosen to work in AbilityOne settings because these individuals tend to face challenges with discrimination or inaccessible software in the mainstream labor market. In addition, officials in two of three discussion groups said the reduction in referrals to AbilityOne has been challenging because AbilityOne jobs often pay good wages.³⁰ For example, one official said that the VR

³⁰ According to data provided by the U.S. AbilityOne Commission, during fiscal year 2016 the average wage for AbilityOne positions managed by National Industries for the Blind was \$11.17 per hour, and the average wage for AbilityOne positions managed by SourceAmerica was \$13.28 per hour. U.S. AbilityOne Commission officials also said that some individuals in AbilityOne jobs are paid sub-minimum wages as authorized by federal law, but that data on this number were not available.

agency now places clients in jobs where they are more integrated with people without disabilities but earn less.

While a number of VR agencies told us that they have reduced their referrals to the AbilityOne program as a result of Education's regulations and guidance, our discussion groups and interviews with officials also suggest that VR agencies may have interpreted Education's guidance related to the case-by-case review in different ways. On one hand, VR agency officials in two of three discussion groups told us that they assess AbilityOne employment settings on a case-by-case basis to determine if they qualify as mainstream employment under WIOA and Education's regulations. Officials we interviewed at one VR agency told us that some AbilityOne positions qualify as mainstream employment. On the other hand, VR officials representing several agencies told us—either in discussion groups or in our interviews—that Education's regulations or guidance preclude AbilityOne from qualifying as mainstream employment or that the guidance is not clear on the matter. Also, VR agency officials in one of our three discussion groups said that given their limited resources, it is difficult to assess each AbilityOne position to determine if it qualifies as integrated.

Education officials said that when they have become aware of VR agencies deciding that no AbilityOne jobs qualify as mainstream employment, they provided technical assistance to these agencies about the need to assess these jobs on a case-by-case basis. Education officials said that they are reviewing the agency's regulations and non-regulatory guidance overall in response to an executive order, but otherwise had no specific plans to provide additional or clarifying information to VR agencies.³¹

Standards for internal control in the federal government state that federal agency management should communicate quality information so that external parties can help the entity achieve its objectives and address related risks.³² One aspect of providing quality information is ensuring that it is complete. The fact that state VR agencies said they have different interpretations of the information provided by Education on integrated

³¹ Executive Order 13777, issued on February 24, 2017, requires each agency to set up a Regulatory Reform Task Force to review its existing regulations and make recommendations for their repeal, modification, or replacement.

³² [GAO-14-704G](#).

employment settings suggests this information may not be sufficiently complete or high-quality. Without more complete information from Education on whether or how to assess AbilityOne jobs to determine if they qualify as integrated, VR agencies may continue to interpret the information provided by Education in different ways, which could potentially undermine the program's mission of placing individuals with disabilities in mainstream employment.

VR Agencies Have Increased Coordination, but Federal Agencies Have Not Fully Addressed Challenges Related to Clarifying Roles and Data Sharing

Many VR Agencies Reported Increased Coordination under WIOA

Most VR agencies reported in our survey that they have increased their overall level of coordination with workforce partners—to serve both individuals and employers—under WIOA. Sixty-nine of the 74 VR agencies that responded to our survey reported that their overall level of coordination has increased since the enactment of WIOA; specifically, 61 increased both the overall level of coordination and conducted that coordination in a more formal, well-defined way; 7 increased the overall level of coordination but did not increase the formality of the coordination; and 1 increased the overall level of coordination but reduced the formality of it.³³

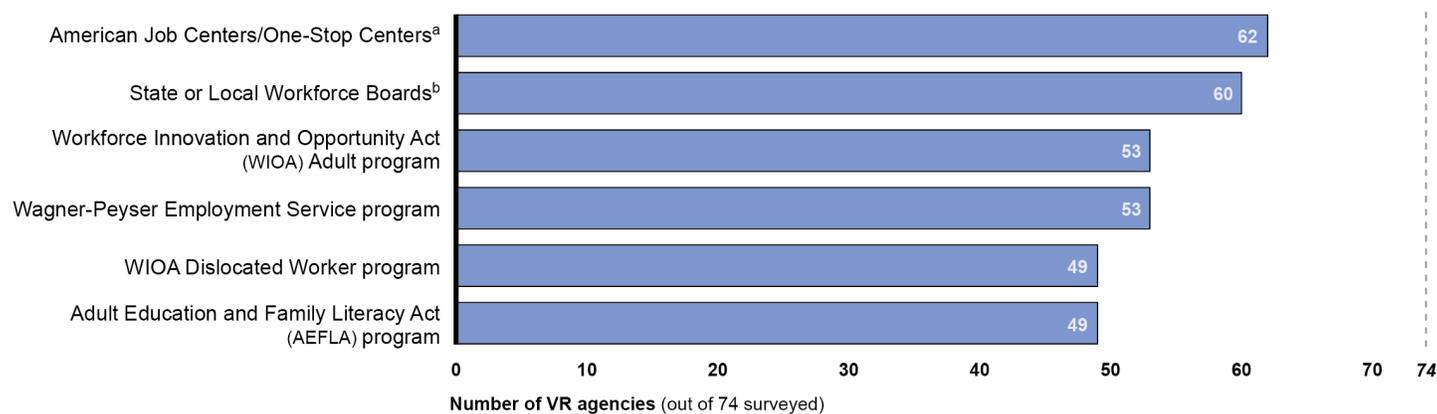
In all three states with which we conducted in-depth interviews, state VR agencies and labor officials described overall enhanced coordination under WIOA, reflecting greater integration of VR into the workforce

³³ However, the state did not provide comments on how they increased the level of coordination while reducing the formality of it.

system. One state VR agency official explained that WIOA has pushed VR agencies to think more about what the other workforce programs are doing and how VR services can be integrated with them, resulting in, for example, a successful joint labor-VR career fair for people with disabilities. Another state VR official noted her state conducted 12 different sets of negotiations to develop an MOU. Through that process, the agencies have developed a better understanding of their partners' needs and what services they might be able to take advantage of.

Most VR agencies reported in our survey that they coordinate with various workforce programs and entities under WIOA, most frequently with AJCs and workforce boards (see fig. 3).

Figure 3: Number of State VR Agencies That Reported Coordinating with Other Workforce Programs and Entities



Source: GAO survey of vocational rehabilitation (VR) agencies. | GAO-18-577

Notes: The survey question was: "Which of the following workforce partners does your agency currently coordinate with...in order to help VR clients obtain or maintain employment? This coordination could be done as part of a formal, well-defined program or informally, e.g., by individual counselors as the need arises." The number of agencies that responded for each sub-question was: American Job Centers (73); State or Local Workforce Boards (73); WIOA Adult program (72); Wagner-Peyser Employment Service program (72); WIOA Dislocated Worker program (71); AEFLA Program (73).

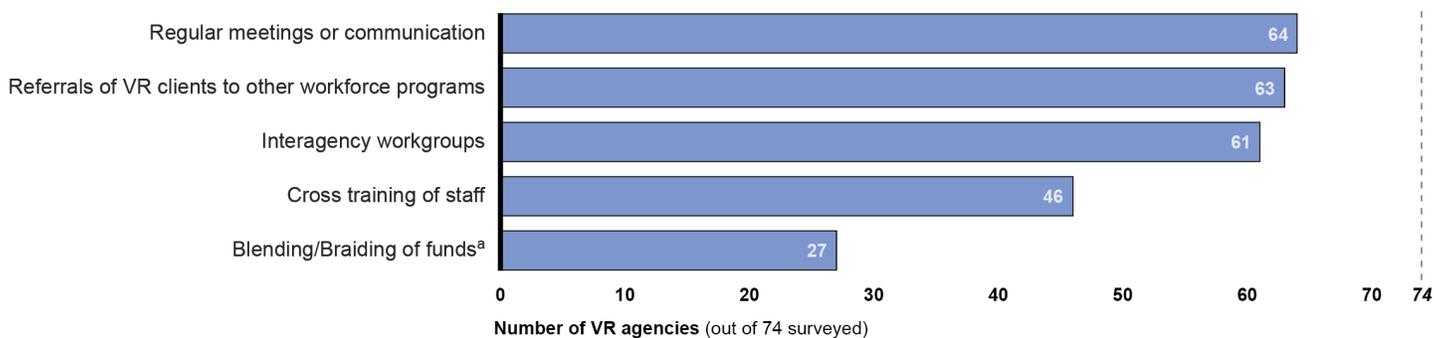
^a American Job Centers (AJCs) are the physical locations where clients can access the programs, services, and activities of the various workforce partners. They were formerly called One-Stop Centers and re-branded as AJCs in 2016.

^b States must establish workforce development boards at the state and local levels. At the state-level, these boards are responsible for assisting the governor in developing and improving the statewide workforce system, and at the local level, they are responsible for serving as the strategic leader and convener of local workforce system stakeholders.

In our survey, VR agencies also reported coordinating with workforce programs through regular communication, interagency workgroups, cross referrals and, to a lesser extent, cross-training and blending/braiding of

funds (see fig. 4). Based on our review, we determined that these coordination practices being carried out by workforce programs are consistent with best practices previously identified by GAO—practices that include bridging organizational culture, identifying participants, and identifying resources to support the interagency collaboration.³⁴

Figure 4: Number of State VR Agencies That Reported Conducting Various Coordination Activities



Source: GAO survey of vocational rehabilitation (VR) agencies. | GAO-18-577

Notes: The survey question was: “In which of the following ways does your agency currently coordinate with other workforce partners (such as American Job Centers/One-Stop Centers, State or local workforce boards, WIOA Adult, WIOA Dislocated Worker, Wagner-Peyser Employment Service Program) on engaging with employers and/or helping clients obtain and retain employment? This coordination could be done as part of a formal, well-defined program or informally, e.g., by individual counselors as the need arises.” The number of agencies that responded for each sub-question was: Regular meetings or communication (73); Cross referrals (74); Interagency workgroups (73); Cross training of staff (74); Blending/Braiding of funds (71).

^a One way that the workforce programs may coordinate is by blending or braiding funds—that is, accessing or coordinating multiple sources of funding—which may produce greater strength, efficiency, or effectiveness in support of a common activity or project than the use of any single funding stream.

In our in-depth interviews, VR and other state officials provided additional details about these reported activities, as follows:

- *Regular meetings or communication* - One state VR agency official we interviewed said that the agency holds mandatory monthly meetings to collaborate across programs on working with employers.

³⁴ GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, GAO-12-1022 (Washington, D.C.: September 2012). The key features of interagency collaboration include outcomes and accountability, bridging organizational culture, leadership, clarity of roles and responsibilities, participants, resources, and written guidance and agreements. We describe in this section how each of these practices is or is not reflected in the coordination we found across workforce programs, except outcomes and accountability, which is described in the next section.

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- *Cross referrals* - In one state, VR staff told us that there are a couple of cross referrals between the workforce programs per week. For example, AJC staff send individuals with disabilities to VR staff, and VR staff meet with those individuals in the AJC office.
 - *Interagency workgroups* - At one AJC, officials said that they use task forces or workgroups that bring together workforce programs and other entities, such as nonprofits and staffing agencies, to discuss client needs, skills, and job availability. Having such interagency communication helps ensure that participants are included and engaged in the interagency collaboration.
 - *Cross training staff* - VR agency officials in one state said that their state has held quarterly trainings for all employer relations staff at different workforce development agencies, which included information on disability issues such as the ADA and appropriate ways for employers to interact with employees with disabilities. These officials noted that this training has helped employer relations staff from other programs at the AJCs conduct outreach to employers regarding disability issues and hiring people with disabilities. Cross training can enable agencies to bridge organizational culture, because they become familiar with the terminology and services of other programs.³⁵
 - *Leveraging multiple funding streams to serve clients* - While fewer states reported leveraging multiple funding streams in our survey than other coordination activities, all three of the states where we conducted in-depth interviews reported doing so. For example, in one state, a VR agency official told us about a program in which her agency placed clients in internships, while the clients received a living stipend from a state department of labor grant program. When asked why multiple funding streams were not leveraged more, one official said that their state has been focused on implementing the mandatory provisions of WIOA up until this point; another official noted that it is better to keep funds separate and helpful to have funds designated for people with disabilities rather than mixing funds.

³⁵ [GAO-12-1022](#).

Few VR Agencies Reported Documenting Clear Roles and Sharing Data, and Gaps Exist in Federal Assistance

Documenting Roles and Responsibilities

Few state VR agencies reported documenting roles and responsibilities among workforce program staff with respect to working with employers, which may have contributed to challenges with serving employers. Establishing and documenting clear roles and responsibilities is a key consideration for implementing collaboration mechanisms, according to prior GAO work.³⁶ In our survey, fewer than half of VR agencies (28 of 73) reported establishing clear roles and responsibilities for VR staff and for the other workforce program staff with respect to working with employers.³⁷ Only 15 of 73 state VR agencies reported that they had written documentation of those roles. Forty-one of 73 state VR agencies reported that documenting clear roles and responsibilities is a work in progress.

We also found that several local MOUs between local boards and VR and other WIOA programs that are required under WIOA did not document roles and responsibilities for serving employers. We reviewed one MOU for each of the three states with which we conducted in-depth interviews. According to state officials, these MOUs are typical of those used across all local areas in their states. While the local area MOUs we reviewed encourage greater collaboration across workforce programs and describe specific procedures for cross referrals and cost sharing, they do not

³⁶ [GAO-12-1022](#).

³⁷ None of the agencies that serve only blind or visually impaired individuals reported that they document roles and responsibilities with other workforce programs for serving employers. However, NCSAB officials told us that things have evolved since the time that we administered the survey, and that agencies that serve the blind increasingly are reporting being invited to establish and document those roles.

delineate roles and responsibilities for the employer-facing staff of the various workforce programs to collaborate on working with employers.³⁸

One possible negative effect of not having clear, documented roles and responsibilities is the potential for duplicative services provided to employers. VR agencies in our survey reported that they experienced challenges finding single points of contact for employers, with 46 of 73 VR agencies reporting that it is moderately to extremely difficult to do so. In our in-depth interviews, all three states cited the importance of coordination to serve employers. Officials from two states said that their agencies are issuing guidance to help local areas in this regard; officials from the third state said that their agency is developing a client management system to document a single point of contact for businesses, and thereby lessen duplication of efforts. Furthermore, one state VR official told us that without written documentation of roles and responsibilities, she was unsure whether she and the other WIOA program staff would be on the same page to efficiently and effectively address the employment needs of an employer moving to the state.

Employers we spoke with also cited challenges. Employers in one of our employer discussion groups said they were unsure how to navigate the disparate information they received from different workforce programs on the hiring of people with disabilities. Another employer reported that it is not clear that the various agencies working on disability employment are communicating and coordinating effectively.

Education and DOL have provided some technical assistance to states on how to coordinate to serve employers, but have not provided specific examples of how to document roles and responsibilities for coordination across workforce programs in local MOUs. In November 2017, DOL convened a cohort to discuss how to coordinate business services across workforce partners, and in June 2018, made available a webinar to all workforce partners on progress cohort states have made and challenges to integrated business service delivery. DOL noted in training materials for the cohort that roles and responsibilities related to working with employers should be understood and embraced by all partners. However, the template MOUs that Education and DOL made available to the states

³⁸ For example, one AJC official described a delineation of roles whereby VR staff would inform AJC staff about a possible employment opportunity for a VR client, and the AJC staff would reach out to the employer on behalf of that client. The handoff would then be discussed at a regular partner meeting to avoid duplicative outreach.

and local areas do not suggest or include sample language for documenting the roles and responsibilities of each workforce program in serving employers. Having documentation of roles would ensure that responsibilities are clearly delineated and would help prevent duplicative or haphazard outreach to employers.

WIOA specifically requires local boards to include information about cross referrals in their MOUs, but it does not require documentation of roles and responsibilities to serve employers. DOL and Education officials explained that these relationships need to develop over time and stated that they did not think documentation should be required. However, our prior work has found that such documentation helps ensure that coordination can continue even with staff turnover, and may also help the programs articulate a common outcome, leading to more effective collaboration.³⁹ Documentation may also facilitate more effective leadership in instances such as these where leadership is shared, because local areas may be able to more clearly establish which entity/staff person should take charge in which instances. Fifty-three state VR agencies in our survey reported that it would be helpful to have additional assistance on coordinating with other workforce partners on providing services for employers. Without examples of how to document roles and responsibilities, states may continue to struggle to do this.

Data sharing or integration

Relatively few state VR agencies in our survey reported sharing or integrating data, which our prior work has found contributes to the overall resources available to support an interagency collaboration.⁴⁰ Fewer than a third (20 of 73) of responding state VR agencies reported sharing data, while more than half (47) reported that data sharing was a work in progress. A much smaller proportion (11 of 73) of responding state VR agencies reported integrating data.⁴¹

³⁹ GAO, *Workforce Innovation and Opportunity Act: Federal Agencies' Collaboration Generally Reflected Leading Practices, But Could Be Enhanced*, [GAO-18-171](#) (Washington, D.C.: February 2018) and [GAO-12-1022](#).

⁴⁰ For the purposes of this report, we refer to "data sharing" as sharing of data sets across different programs' systems, and we refer to "data integration" where states are collecting data across programs into one system.

⁴¹ Officials we interviewed from one AJC said that their state is in the process of setting up a universal referral system whereby all the AJC partners can view client case notes in a joint database.

According to one VR official, different data systems across programs make it difficult to coordinate assistance and could result in duplicative effort. A labor official in another state mentioned that the state's VR program would like to access the job postings listed in the AJC system, but the different state agencies have legacy computer systems that do not easily communicate with each other. Further, officials from some state VR agencies, one state labor department, and one AJC cited challenges to data integration and sharing specifically related to confidentiality. For example, one state VR agency explained that in order to share information about a client between two programs, each program must get the client to sign a waiver. The officials stated that waivers are difficult to develop because they are legally binding documents, meaning that lawyers for the partner organizations have to be involved.

DOL and Education officials told us that they are aware that data sharing and integration are a challenge for states and cited efforts to address this challenge. They noted that DOL funds the National Association of State Workforce Agencies' WIOA Information Technology Support Center (WIOA ITSC), which federal and state representatives from WIOA partner programs advise. The Center helps states develop IT systems related to sharing data, integrated service delivery, shared case management, and performance accountability processes. An initiative by a sister organization, the Unemployment Insurance ITSC, is a software suite, Workforce Connect, to help states implement WIOA by integrating Unemployment Insurance, Wagner-Peyser, and workforce IT systems so that they "speak" to each other. According to the Workforce Connect web site, the suite allows for easy expansion of the modules to new partners in the workforce system, such as adult basic education and VR. The website states that the software suite has been piloted in three states. DOL and Education officials also said that concerns about confidentiality could be addressed in the state-level MOUs that govern the data sharing and potentially in the confidentiality releases that individuals sign. One of Education's VR-focused technical assistance centers has provided a data sharing toolkit and models of how some states are beginning to approach sharing of data. The technical assistance centers told us that, while this is a challenging issue, they expect states to make a lot of progress in the years to come and that they intend to share this progress with other states.

Education and DOL Have Taken Steps to Measure the Workforce System's Effectiveness in Serving Employers, but Some State Agencies Cited Concerns

In a notice of final rulemaking, Education and DOL proposed a pilot to test three performance measures for assessing the effectiveness of WIOA programs in serving employers.⁴² Based on feedback from town halls, workgroups, and comments submitted in response to the notice of proposed rulemaking, Education and DOL selected the proposed measures for further testing. The three proposed performance measures are:⁴³ (1) *Employer Penetration*—percentage of employers using core WIOA program services out of all employers in the state; (2) *Retention with the Same Employer*—the percentage of participants who are employed with the same employer in the second and fourth quarters after exiting the program; and (3) *Repeat Business Customer*—the percentage of employers who have used WIOA program services more than once in the last 3 years.⁴⁴

Education and DOL are piloting and will evaluate these performance measures to learn more about their validity and reliability.⁴⁵ For this nationwide pilot, each state must collect data on two of the three performance measures and report these data annually as a shared outcome across all of the state's core WIOA programs.⁴⁶ Education and DOL explained that having the effectiveness in serving employers performance measures be shared outcomes—meaning that the results from each program are aggregated for the state—will help ensure states and local areas make coordinated efforts to serve employers, because

⁴² In this report, we use the term “performance measures” to mean either “indicators for performance” referenced in WIOA or “approaches” referenced in the preamble to the agencies’ regulations.

⁴³ For more information on the three proposed performance measures, see DOL, ETA, *Training and Employment Guidance Letter WIOA NO. 10-16, Change 1- Operating Guidance for WIOA* and Education, RSA, *Technical Assistance Circular 17-01*.

⁴⁴ According to a DOL webinar, the Repeat Business Customer proposed performance measure will eventually build into a 3-year cohort. The first year with reportable outcomes, Program Year 2017 (July 2017-June 2018), will be based on repeat business customers for only 1 year. Program Year 2018 will be based on repeat business customers for 2 years. Program Year 2019 and all subsequent years will be based on 3 years’ worth of data.

⁴⁵ According to Education and DOL officials, the pilot will run from July 2016 to 2020.

⁴⁶ As part of the RSA-911 data submitted to Education, VR agencies report whether the client had the same employer during the second quarter and fourth quarter after exit. This data is submitted quarterly and can be used to inform the Retention with the Same Employer performance measure.

they are being evaluated as such. According to the agencies, due to the lag in data needed for two of three performance measures—Retention with the Same Employer and Repeat Business Customer—states did not report on the three measures as part of their annual WIOA report for program year 2016 (July 2016 to June 2017).⁴⁷ According to DOL officials, states will begin reporting pilot outcomes on the three performance measures in October 2018 for program year 2017.

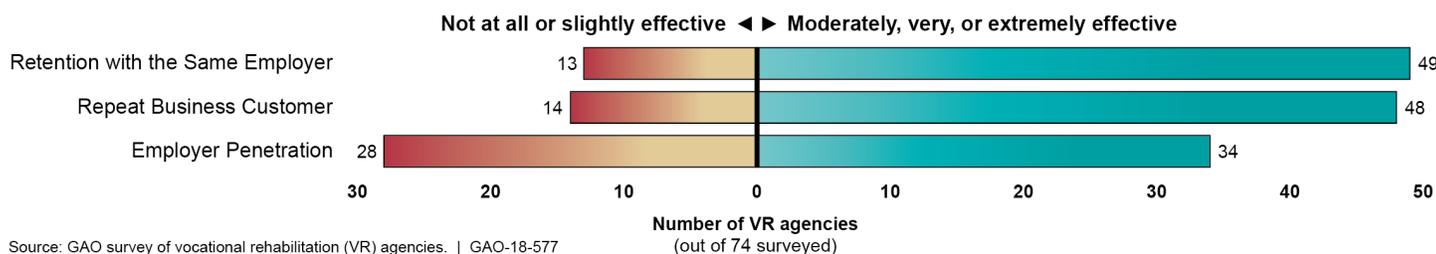
Education and DOL also encouraged states to develop and report on their own “effectiveness in serving employers” performance measures, in addition to reporting on two of the three proposed performance measures, and several states opted to do so. Six of the 74 VR agencies that responded to our survey reported that they are currently developing their own performance measures. For example, one of the six states reported in the survey that it is working with a statistician and gathering input from the business community to develop its own measure of effectiveness in serving employers. In a subsequent communication, an official from this state explained that the state chose to create its own measure to assess the effectiveness of services to employers regardless of the number of services or how often those services were provided. According to this state’s survey responses, the state’s performance measure aims to assess the correlation between the services provided to the employers and the specific business needs that were satisfactorily met.

During the pilot, DOL is funding a 3-year study to evaluate the feasibility and efficacy of the three performance measures and any additional measures proposed by the states. The evaluation, which began in fall 2017, includes a survey of state WIOA administrators, interviews and focus groups with eight states, and a survey of and interviews with select employers. Education and DOL officials said that they will use the results of the survey and interviews, which will run through 2020, to determine if they will choose one performance measure or a suite of measures to assess effectiveness in serving employers. When the evaluation concludes, Education and DOL plan to propose revisions to the current joint regulation to implement their chosen performance measure(s).

⁴⁷ According to Education and DOL officials, data for both of these measures were not available in time for the October 2017 reporting deadline because, by definition, the Retention with the Same Employer performance measure is calculated from data reflecting a 1-year period (of individuals employed with the same employer after exiting the VR program) and Repeat Business Customer performance measure is calculated from data reflecting a 3-year period (of employers using WIOA services more than once).

In our survey, VR agencies reported varying perspectives on Education and DOL’s three proposed performance measures. Of the 62 VR agencies that rated their perspective of the expected effectiveness of the three performance measures, over three fourths rated the Retention with the Same Employer and Repeat Business Customer performance measures as moderately, very, or extremely effective. Just over half of the responding VR agencies (34 out of 62) rated the Employer Penetration rate as moderately, very, or extremely effective (see fig. 5).

Figure 5: Expected Effectiveness of the Three Proposed Performance Measures, as Reported by VR Agencies



Source: GAO survey of vocational rehabilitation (VR) agencies. | GAO-18-577

Note: The survey question was: “How effective do you think the following proposed performance measures, if implemented, will be in assessing your state agency’s performance in serving employers?” This figure is based on responses from 62 agencies. The other 12 agencies either did not answer the question or responded “don’t know.”

Some VR officials cited ways in which the proposed measures may be effective in assessing performance in serving employers. For example, according to one survey respondent, the Retention with the Same Employer measure is effective because it indicates successful placements and the mutual satisfaction of the employer and employee. Another survey respondent said that the Repeat Business Customer measure is the most effective way to measure services to employers because it means that the initial services worked well if employers are returning to use a service again.

However, some state officials expressed specific concerns about the three proposed measures.⁴⁸ These concerns raise questions about whether the three performance measures, depending on how they are implemented, would fully reflect several attributes of successful

⁴⁸ Because the proposed performance measures are under review by the federal agencies, we are reporting on concerns states shared with us, and we did not independently assess the quality of the performance measures or related guidance.

performance measures we previously identified, including clarity, coverage of core program activities, and contextual information.⁴⁹

Clarity

Our prior work has found that successful performance measures are clearly stated and the terms used to calculate the measure have consistent definitions. However, VR agency officials we interviewed in all three states indicated that federal guidance on the proposed performance measures generally lacks clarity because what counts as an employer service is ambiguous. This ambiguity affects the reliability of both the Employer Penetration and Repeat Business Customer proposed performance measures, which rely on states counting the number of employers who are considered to have received a service. Officials we interviewed in one state said that what is meant by or included in terms related to employer service differs not just between Title IV of WIOA, which made changes to the VR program, and other parts of WIOA, but across the 79 VR agencies, such that different VR agencies use terms in different ways.⁵⁰ In addition, officials in one of the three states said the subjectivity of when to count employer services may make the proposed Repeat Business Customer and Employer Penetration performance measures more susceptible to data manipulation or error.

Our survey results and interviews suggest that related guidance provided to agencies to-date did not help ensure clarity of these measures. In general, most VR agencies reported in our survey (63 of 74) that additional guidance or technical assistance on the effectiveness in serving employers performance measures would be useful. An official we interviewed in another state said that the state did not receive enough details or specifics provided in what employer services to count towards calculating the performance measures. Officials we interviewed from the third state said that they asked DOL for additional guidance on what services should count toward the proposed Employer Penetration

⁴⁹ GAO, *IRS Needs to Further Refine Its Tax Filing Season Performance Measures*, [GAO-03-143](#) (Washington, D.C.: November 22, 2002) and GAO, *DHS Could Better Define How It Plans to Meet Its State and Local Mission and Improve Performance Accountability*, [GAO-11-223](#) (Washington, D.C.: December 16, 2010). These three attributes (clarity, core program activities, and contextual information) are among others identified in [GAO-03-143](#) and [GAO-11-223](#). [GAO-03-143](#) identifies key attributes of successful performance measures and [GAO-11-223](#) identifies key attributes associated with results-oriented management. We developed these attributes based on our previously established criteria from our past work on managing for results.

⁵⁰ The officials mentioned, for example, that the term “worker recruitment” may mean slightly different things under VR versus under other parts of WIOA.

performance measure. While DOL indicated that it was unaware of any confusion with the definition of services for employers, DOL's evaluation of the performance measures will review how different state VR agencies and programs define employer services.⁵¹ DOL and Education do not currently plan to issue additional guidance before the evaluation is completed in 2020. However, this official said that DOL would be willing to provide technical assistance if such confusion exists.

Because the proposed performance measures are shared measures that will be aggregated across the core programs, it is especially important to be clear about what is counted as an employer service. Inconsistency in how core WIOA programs and different levels of government interpret terms related to services to employers could result in confusing or misleading outcomes and may not provide an accurate picture of performance for state and federal officials.

Core Program Activities

We previously reported that successful performance measures cover core program activities. However, some states expressed concerns that the proposed performance measures may not sufficiently cover the VR program's core activities. WIOA emphasizes VR agencies' ability to provide education, training, and other services to employers. VR agencies focus on establishing long-term relationships with employers with the goal of placing VR clients with those employers over an extended period of time. One state VR agency official told us that because of barriers to employment facing people with disabilities, these long-term relationships with employers are especially important.⁵² In two of the three discussion groups, VR agency officials said that the proposed Employer Penetration performance measure emphasizes the quantity of interactions with employers, which does not necessarily reflect the efforts of VR agencies, which tend to focus on high-quality relationships with fewer employers. In addition, in one of the three discussion groups, VR agency officials said that the proposed performance measures do not adequately capture VR agencies' outreach efforts to employers. One state VR agency official we interviewed noted that placing individuals with disabilities into the right job

⁵¹ The Statement of Work for the DOL-funded evaluation stated that DOL seeks information about how states, local areas, and federal agencies define "services to employers" and how employer services differ across core WIOA programs, within and across locations and government entities.

⁵² As noted previously, studies have found that, relative to those without disabilities, people with disabilities may face barriers to employment because of employer perceptions and the cost of accommodations.

may take months or sometimes years due to the need to find and mold the job to that person's capabilities. In contrast, this official noted that the other WIOA programs may not have the same challenges and may more easily mold the person into a given job.

Since these performance measures are being piloted as shared measures across the core WIOA programs, including VR, it may be challenging to align all of the core WIOA programs' core program activities with the proposed performance measures. However, to the extent that the proposed performance measures do not sufficiently capture or reflect core VR program activities, they may not fully incentivize activities that are consistent with the VR program's mission.

Contextual Information

We previously reported that performance reporting systems should include contextual or explanatory information to, for example, help clarify aspects of performance that are difficult to quantify. However, some states cited concerns that the proposed performance measures may not account for factors that are outside of VR agencies' control. For example, some states suggested that the performance measures may not account for the business environment. Specifically, VR agency officials in all three discussion groups stated the concern that the proposed Repeat Business Customer performance measure may not reflect the effectiveness of VR agencies' performance because they tend to also serve a lot of small companies that may not need services often. According to VR officials in one state, two-thirds of VR clients' job placements are with small companies because they tend to be more flexible about adapting jobs to VR client's abilities. Meanwhile, a VR official in one discussion group stated that the other WIOA programs would not be as concerned as VR agencies about the effect of small companies on the proposed Repeat Business Customer performance measure because the other WIOA programs serve larger companies that have greater potential for mass hiring.

WIOA also requires that Education and DOL establish an objective statistical model for adjusting performance goals for WIOA programs that factor in economic conditions, such as unemployment rates and job losses or gains, and participant characteristics, including work history,

educational attainment, and disability status.⁵³ While WIOA specifies that the statistical adjustment model will factor in economic conditions such as the unemployment rate in the state, it does not specify that the model reflect the proportion of small businesses in the state. Officials we interviewed in two of three state VR agencies said that incorporating data on the percentage of small businesses in a state into the statistical adjustment model would be helpful in establishing the proposed Repeat Business Customer performance measure.⁵⁴ In finalizing performance measures, if Education and DOL consider factors outside of VR agencies' control (such as the percentage of small businesses in the state), the federal agencies may be better able to fully assess a VR agency's performance, or distinguish it from uncontrollable factors that contribute to a particular result.

Conclusions

WIOA has spurred VR agencies to focus more on working with employers and placing clients in mainstream employment. Still, VR agencies face challenges to fully realizing these priorities, and Education has a role to play in helping VR agencies address those challenges. For example, according to employers, VR agencies are challenged to meet their needs for on-demand training. With further assistance from Education on alternative training formats, VR agencies may identify more opportunities to educate front-line managers on disability issues and thereby change perceptions of people with disabilities and promote hiring and retention. VR agencies also reported confusion or inconsistent approaches in the areas of promoting career advancement and mainstream employment. To the extent that Education provides greater access to information about when career advancement services may be provided to employed individuals, VR agencies may better understand the discretion they have

⁵³ According to DOL's Training and Employment Guidance Letter 09-17, before the start of each program year, the Secretaries of Labor and Education negotiate with each state to establish a target level of performance for each of the six indicators for that state. The negotiated levels of performance are revised at the end of each year using a statistical adjustment model. According to DOL, the model is a key factor to be used to arrive at agreement on the negotiated state performance levels. The initial statistical adjustment model was developed based on data reported against the Workforce Investment Act of 1998 (WIA) performance measures, which are used as a proxy for WIOA data. The statistical adjustment model will be updated and refined as WIOA outcome data become available.

⁵⁴ An official in the third state agency told us the usefulness of incorporating this factor in the statistical model would depend on several factors, such as how small business is defined (i.e., how many employees).

to help individuals with disabilities move up the career ladder. In addition, with more complete information from Education about when and how to assess employment settings to determine if they are integrated, VR agencies may be more likely to pursue consistent approaches in this area, including potentially identifying more AbilityOne jobs that are integrated, consistent with federal law and regulations.

Likewise, Education and DOL have roles to play in further enhancing collaboration between VR and other workforce programs, and in addressing VR concerns related to assessing how the workforce system serves employers. Unless Education and DOL provide sample language for states and local areas on how to document roles and responsibilities for serving employers, workforce programs may not independently build such language into their written agreements, thereby limiting their ability to take a coordinated approach. This can result in frustration on the part of employers and wasted time on the part of workforce staff, and in the worst cases, jeopardize the public workforce system's valuable relationship with employers and the potential for placement of clients. Also, by taking into account state VR agencies' concerns when finalizing the performance measures for effectiveness in serving employers, Education and DOL are more likely to implement measures that: have clear definitions that help ensure data reliability; are linked to core VR program activities, which could incentivize activities that support the VR program's population and mission; and reflect key contextual factors outside of VR agency control, thereby ensuring clearer performance data and realistic performance targets.

Recommendations for Executive Action

We are making seven recommendations; five are to Education and two are to DOL. Specifically:

The Commissioner of Education's Rehabilitation Services Administration should work with state VR agencies to determine whether and what additional information and assistance VR agencies may find helpful regarding on-demand training, such as online videos, to employers on disability issues. (Recommendation 1)

The Commissioner of Education's Rehabilitation Services Administration should work with state VR agencies to determine how to most effectively disseminate information about the circumstances in which individuals who are employed may be eligible for career advancement services. (Recommendation 2)

The Commissioner of Education's Rehabilitation Services Administration should work with state VR agencies to develop more complete information on when and how VR agencies should assess employment settings, including settings supported by the AbilityOne program, to determine if they meet the definition of competitive integrated employment. (Recommendation 3)

The Commissioner of Education's Rehabilitation Services Administration should encourage local areas to clarify and document the roles and responsibilities of partner agencies in working with employers and provide sample language of how local areas may document roles and responsibilities in their MOUs. (Recommendation 4)

The Commissioner of Education's Rehabilitation Services Administration should, in setting the employer performance measurement approaches with DOL after the pilot is concluded, take into account VR agencies' concerns and key attributes of successful performance measures, including clarity in what is meant by employer services, coverage of the VR agencies' core program activities, and consideration of factors outside of VR agencies' control. (Recommendation 5)

The Assistant Secretary of DOL's Employment and Training Administration should encourage local areas to clarify and document the roles and responsibilities of partner agencies in working with employers and provide sample language of how local areas may document roles and responsibilities in their MOUs. (Recommendation 6)

The Assistant Secretary of DOL's Employment and Training Administration should, in setting the employer performance measurement approaches with Education after the pilot is concluded, take into account VR agencies' concerns and key attributes of successful performance measures, including clarity in what is meant by employer services, coverage of the VR agencies' core program activities, and consideration of factors outside of VR agencies' control. (Recommendation 7)

Agency Comments and Our Evaluation

We provided a draft of this report to Education and DOL for their review and comment, and provided relevant excerpts to the U.S. AbilityOne Commission. See appendix III for Education’s comments and appendix IV for DOL’s comments.

For the five recommendations aimed at Education, Education neither agreed nor disagreed. In its comments, Education emphasized that state VR agencies have the primary responsibility for determining how best to meet employers’ needs, promote mainstream employment, and collaborate with other workforce programs in their states. We agree that it is appropriate for the state VR agencies to develop policies and approaches in all of these areas to fit the needs of their individual and employer clients. At the same time, Education acknowledged that it can play a role in helping state agencies and noted that it will take or consider taking additional steps to assist state agencies in each area where we made recommendations. Specifically:

- With regard to recommendation 1, Education recognized the importance of providing information and technical assistance to state VR agencies to help them serve employers, while stressing that it is a state matter how to best meet the training needs of employers. Education suggested that the recommendation emphasize the need to work with states to determine what information they would find helpful, and we clarified the recommendation accordingly.
- With regard to recommendation 2, Education recognized the importance of expanding career advancement opportunities for individuals with disabilities in accordance with the Rehabilitation Act as amended by WIOA. At the same time, Education said it is up to states to determine how to most effectively disseminate information about their services. Education noted it will continue to work with state VR agencies to determine what additional information may be necessary about the circumstances in which individuals who are employed may be eligible for career advancement services.
- With regard to recommendation 3, Education said that it is a state matter to determine whether an employment location qualifies as an “integrated setting” for the purpose of the VR program, and that it is not Education’s role to inform states as to when and how to make such determinations. Nevertheless, Education said it will continue to work with the states to determine if additional information would help them assess employment locations.

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- With regard to recommendation 4, Education said it believes that state workforce development agencies are in the best position to lead employer engagement efforts, but will continue to collaborate with other federal partners to provide technical assistance to states in this area, including examples of state- and local-level collaboration on employer engagement.
 - With regard to recommendation 5, Education said it will work with DOL to ensure that state VR agencies' concerns are considered when the performance measure for effectiveness in serving employers is finalized.

After Education provided its formal response, the Assistant Secretary, Office of Special Education and Rehabilitative Services, clarified in an e-mail that the agency disagreed with recommendations 1, 2, and 3; neither agreed nor disagreed with recommendation 4; and agreed with recommendation 5.

DOL agreed with recommendations 6 and 7. For recommendation 6, DOL said that local workforce boards and one-stop partners are in the best position to lead employer engagement, but that it will collaborate with federal partners in providing related technical assistance. For recommendation 7, DOL said it will coordinate with Education to ensure state VR agencies' concerns are considered in defining the performance measure.

In addition, Education, DOL, and the U.S. AbilityOne Commission provided technical comments, which we incorporated as appropriate.

As agreed with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies of this report to the appropriate congressional committees, the Secretary of the Department of Education, the Secretary of the Department of Labor, the Executive Director of the U.S. AbilityOne Commission, and other interested parties. In addition, this report will be available at no charge on GAO's website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact Elizabeth H. Curda at (202) 512-7215 or curdae@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff members who made key contributions to this report are listed in appendix V.

Sincerely yours,



Elizabeth H. Curda, Director
Education, Workforce, and Income Security Issues

Appendix I: Objectives, Scope, and Methodology

This report examines (1) the steps vocational rehabilitation (VR) agencies have taken under the Workforce Innovation and Opportunity Act (WIOA) to work with employers and place individuals in mainstream employment, and the extent to which the Department of Education (Education) has helped them address any challenges; (2) how VR agencies have coordinated with other workforce programs to effectively serve individual clients and employers, and the extent to which federal agencies have addressed any challenges; and (3) the extent to which Education and the Department of Labor (DOL) have measured VR agencies' efforts to serve employers under WIOA.

We took the following steps to address all three objectives. We reviewed pertinent federal laws and regulations. We reviewed guidance disseminated by Education and DOL, such as on the definition of competitive integrated employment, data matching across WIOA programs for performance reporting, and WIOA unified and combined state plans, as well as technical assistance documents generated by the technical assistance centers, such as toolkits on the memorandum of understanding with the local workforce development board and on data sharing agreements. We interviewed officials from Education, including the Rehabilitation Services Administration; DOL, including the Employment and Training Administration; technical assistance centers; the Council of State Administrators of Vocational Rehabilitation (CSAVR); the National Council of State Agencies for the Blind; the National Association of Workforce Boards; the U.S. AbilityOne Commission; SourceAmerica; National Industries for the Blind; National Council on Independent Living; and Respect Ability. To further understand how VR agencies are promoting mainstream employment, we obtained and reviewed data from the U.S. AbilityOne Commission, including the number of individuals in AbilityOne employment during fiscal year 2016 and their average wages. We assessed the reliability of these data by interviewing U.S. AbilityOne Commission officials, and found the data to be sufficiently reliable for our reporting purposes.

Survey of VR Agencies

To address all three objectives, we administered a web-based survey questionnaire to the directors of all 79 state VR agencies. Data collection began in October 2017 and ended in December 2017. We made follow-up email and telephone contacts throughout this period to encourage response. We received 74 survey responses (94 percent of the population), which describe the steps those agencies have taken to provide services to employers as well as the challenges they report facing. The survey, for example, asked how services to employers

changed since the enactment of WIOA and ways VR agencies are coordinating with the other WIOA programs. We also asked about the degree of difficulty they have experienced in potentially challenging areas, such as meeting the demands of businesses and coordinating with the other WIOA programs on contacting businesses. To reduce the overall survey burden on these respondents, we also asked questions to inform a related GAO engagement on pre-employment transition services for youth.

We took steps to minimize the potential errors that the practical difficulties of conducting any survey may introduce. Because we selected the entire population of VR agencies into our survey, our estimates are not subject to sampling error. Nonresponse error can result when a survey fails to capture information from all cases sampled, or in this case, the population. Nonresponse reduces the precision of estimates due to the smaller number of observations, and can introduce bias if those not responding, in the aggregate, would have given materially different answers to a question compared to those who did respond. The known characteristics of the five agencies that did not respond indicate that they are smaller, on average, than those who did respond, in terms of their eligible service populations, numbers served, and grant totals. These three characteristics may or may not be related to the nature of agency answers to some questions. However, the nonresponding agencies did not materially differ from responding agencies across the fourth known characteristic—the percentage of their state populations in urban areas. In addition, the totals for each of the first three characteristics—service populations, numbers served, and grant amounts—across the five nonresponding agencies comprised less than one percent of the totals for the population, suggesting a lower possibility of material error in our results from nonresponse of these five smaller agencies. We conducted pretests of the draft questionnaire with three agencies in the population and made revisions to reduce the possibility of measurement error from differences in how questions were interpreted and the sources of information available to respondents. A second, independent analyst checked the accuracy of all computer analyses to minimize the likelihood of errors in data processing.

Discussion Groups with VR Agencies

To address all three objectives, we conducted discussion groups during a national, CSAVR-sponsored conference of VR agencies in November 2017 in Greenville, South Carolina. To recruit participants, we worked with CSAVR to invite VR agencies to our discussion groups. CSAVR included an invitation to our discussion groups in an e-mail sent to all VR

agencies before the conference, and encouraged participation during opening remarks at the conference. We also solicited participants through our survey of VR agencies. We conducted follow up calls to survey respondents who indicated an interest in participating in the discussion groups to further encourage participation. Since discussion groups took place in person at the conference, participants did not include VR agencies that did not attend the conference.

We conducted three discussion groups with 9 to 15 participants per group. Discussion group participants consisted of 36 VR agency directors or their designees from 24 separate VR agencies. The questions for the discussion groups included topics on states' experiences in working with employers, coordination with the WIOA workforce programs, technical assistance and guidance from the federal agencies, and perspectives on the performance measures. GAO facilitators conducted the discussion groups.

Interviews with VR and Other Workforce Program Officials in Select States

To address all three objectives, we conducted in-depth phone interviews (and in-person interviews when possible) with state VR agency officials and state labor department officials from three states: Alabama, Arizona, and Maryland. We selected these three states to obtain a mix in terms of the following criteria: state agency organization (the state agency that houses the VR agency), size of the client population using the number of clients that the VR agency served in fiscal year 2014, the percentage of the population living in an urbanized area in the state, whether the state had been recommended to us or not in preliminary interviews as having well developed employer services or collaborative practices across workforce partners, and geographic diversity using DOL's regional office areas (see table 1).

Table 1: States Selected for Site Visits or Interviews

State	State agency organization	Number of clients served	Percentage of the population living in an urbanized area ^a	Recommended in preliminary interviews	Geographic diversity
Alabama	Department of Rehabilitation Services	6,653	48.7%	Yes	Region 3—Atlanta
Arizona	Department of Economic Security	2,481	80.1%	No	Region 6—San Francisco
Maryland	State Department of Education	4,307	83.5%	Yes	Region 2—Philadelphia

Source: GAO analysis. | GAO-18-577

^a These are 2010 data from the U.S. Census Bureau.

We also interviewed officials at American Job Centers (AJC) in at least one local area in each state. We chose local areas to obtain a mix in the percentage of the population with a disability, percentage of the population in an urbanized area, and labor force participation rate. Based on these criteria, we selected AJC sites from the three states: Demopolis Career Center and Fayette Career Center (Alabama), Coconino Career Center (Arizona), and WorkSource Montgomery (Maryland) (see table 2).

Table 2: Local Areas Selected for Site Visits or Interviews

County and state in which American Job Center is located	American Job Center	Percentage of the population with a disability ^a	Percentage of the population living in an urbanized area ^b	Percentage of the population in the labor force ^a
Fayette and Marengo Counties, Alabama	Fayette Career Center and Demopolis Career Center	23.7%–27.5%	0.0%	48.2%–49.8%
Coconino County, Arizona	Coconino Career Center	11.5%	53.5%	63.9%
Montgomery County, Maryland	WorkSource Montgomery	7.9%	97.1%	71.8%

Source: GAO analysis. | GAO-18-577

^a The source of these data are American Community Survey 5-Year Estimates 2012–2016.

^b These are 2010 data from the U.S. Census Bureau.

Interview question topics included states’ efforts to provide services to employers since the enactment of WIOA, VR agencies and the other WIOA programs efforts to coordinate services to individuals and employers, and perspectives on the effectiveness of the performance

measures. Since we interviewed officials in only three states, we cannot conclude that their experiences are representative of those nationwide.

Discussion Groups with Employers

To address objectives one and two and understand employers' perspective on the VR program, we conducted discussion groups with employers that have had some interaction with the VR program. We held four discussion groups: one each in Birmingham, Alabama, and King of Prussia, Pennsylvania, and two in Oakland, California. We spoke with representatives of 29 employers total across the three sites: 10 in Alabama, 5 in Pennsylvania, and 14 in California.¹ We spoke with private and public sector employers. Our discussion questions for employers covered topics including how employers became aware of VR services, why employers chose to use VR services, what VR services were used, and how well VR services met employers' needs.

Our discussions were held in conjunction with employer outreach events conducted by CSAVR. As part of each event, we recruited employers for our discussion groups with the help of the state VR agency. In Alabama, according to a state official, the VR agency invited 50 employers that were at least aware of the VR program to participate in the CSAVR event; 20 employers accepted the invitation; and among these the 10 employers that had a working relationship with the VR agency were invited to participate in the GAO discussion group. In Pennsylvania, according to state officials, about 60 employer representatives were invited to participate in the GAO discussion group, including all members of a business group active in disability issues and all employer representatives registered to attend the employer outreach event; the employer representatives who chose to speak with GAO had all worked with the VR agency in some way. In California, according to a state official, the VR agency invited to the event all employers that had worked with VR and were within reasonable traveling distance of Oakland; and the GAO discussion groups included all employers who accepted the invitation and participated in the event. The results of our discussion groups cannot be generalized to employers more broadly.

¹ In California, some employers had representatives in both of the discussion groups we held.

Criteria Applied

To assess Education's efforts to address VR agencies' challenges with meeting employer needs and promoting mainstream employment, we applied standards for internal control in the federal government.² Specifically, we applied principle 15 related to communicating with external parties. In addition, we relied on a guide for assessing federal agencies' training and development efforts that we previously developed, particularly the criteria related to how agencies compare the merits of different mechanisms for delivering training.³

To assess coordination among VR agencies and other workforce programs, we applied key considerations for implementing interagency collaborative mechanisms that we have previously identified.⁴ In our prior work, we identified seven features of effective interagency collaboration, and in this report we describe the extent to which collaboration among workforce programs exhibits these features.

Finally, in examining state VR agencies' concerns with pilot performance measures for effectiveness in serving employers, we considered how these concerns related to key attributes of effective performance measures that we have previously identified.⁵ In our prior work we have identified more than 10 such attributes, and in this work we tied agencies' concerns to three attributes related to clarity, core program activities, and contextual information.

² GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

³ GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, [GAO-04-546G](#) (Washington, D.C.: March 2004).

⁴ GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: Sept. 27, 2012).

⁵ GAO, *Information Sharing: DHS Could Better Define How It Plans to Meet Its State and Local Mission and Improve Performance Accountability*, [GAO-11-223](#) (Washington, D.C.: Dec. 16, 2010). GAO, *Tax Administration: IRS Needs to Further Refine Its Tax Filing Season Performance Measures*, [GAO-03-143](#) (Washington, D.C.: Nov. 22, 2002).

Appendix II: The Workforce System

Table 3 describes the six WIOA core programs administered by DOL and Education.

Table 3: Workforce Innovation and Opportunity Act (WIOA) Core Programs

Administered by Department of Labor (DOL)^a	
Title I Adult	Provides training and services, such as occupational skills training, career counseling, and job searches, to adults ages 18 or older (recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient receive priority for certain services)
Title I Dislocated Worker	Provides the same services as the Title I Adult program for those who, generally, among other criteria, anticipate or have been terminated or laid-off or who were self-employed
Title I Youth	Provides various services, including educational supports, occupational skills training, counseling, and paid and unpaid work experiences, generally to low-income youth who are facing one or more barriers to employment
Wagner-Peyser Employment Services	Provides employment services, including job searches and placement assistance, and referrals to employers (veterans receive priority for certain services and individuals with disabilities, migrant and seasonal farmworkers, ex-offenders, and several other populations receive specialized services)
Administered by Department of Education (Education)^b	
Adult Education and Family Literacy Act	Generally assists adults (and youth age 16 and older who are not enrolled or required to be enrolled in secondary school) in becoming literate or achieving proficiency in English, obtaining the knowledge and skills necessary for employment and self-sufficiency and to assist in their children's educational development, and completing a secondary school education
State Vocational Rehabilitation Services	Provides services such as counseling, job training, and job search assistance, related to the employment of people with disabilities

Source: [GAO-16-287](#) and GAO analysis of federal law and agency information | [GAO-18-577](#)

^a DOL's Employment and Training Administration (ETA) administers these programs and oversees their implementation, which is carried out by state workforce agencies and local workforce development boards. The local board selects the entities that will operate American Job Centers (formerly called one-stop centers) to provide services.

^b Education's Office of Career, Technical, and Adult Education (OCTAE) provides grants to states, which in turn distribute most of the federal funds to local adult education providers. The local provider network includes local educational agencies, community colleges, community-based organizations, and volunteer literacy organizations. Education's Rehabilitation Services Administration (RSA) provides grants to states to administer the Vocational Rehabilitation program. Many states have separate agencies serving blind or visually impaired individuals in addition to agencies that serve all other individuals with disabilities. In addition, states vary in terms of the organizational positioning of the program, with the program being housed in education, workforce, social service, or disability program agencies, or elsewhere.

Appendix III: Comments from the Department of Education



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES

JUL 19 2018

THE ASSISTANT SECRETARY

Elizabeth H. Curda
Director
Education, Workforce and
Income Security Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Curda:

I am writing in response to the recommendations made in the U.S. Government Accountability Office (GAO) draft report, "Vocational Rehabilitation: Additional Federal Information Could Help States Serve Employers and Find Jobs for People with Disabilities" (GAO-18-577). We appreciate the opportunity to comment on the draft report on behalf of the U.S. Department of Education (Department).

Vocational rehabilitation (VR) has historically been a client-centered program and process. As GAO notes, the Workforce Innovation and Opportunity Act (WIOA) included changes to the Rehabilitation Act of 1973 (Rehabilitation Act) increasing the focus on employers and services to employers to facilitate the achievement of competitive integrated employment by individuals with disabilities. We appreciate GAO's review of the employer aspects of the vocational rehabilitation process, and related issues of employment settings, career advancement and program performance measures under WIOA.

The draft report includes seven recommendations; five made to the Department and two to the U.S. Department of Labor. We are providing our responses to the five recommendations made to the Department. We note that the two recommendations made to the Department of Labor are similar and complementary to the fourth and fifth recommendations made to the Department of Education, and we intend to work cooperatively with the Department of Labor in resolving them.

Recommendation 1: *The Commissioner of Education's Rehabilitation Services Administration should provide information and assistance to VR agencies to help them offer on-demand training, such as online videos, to employers on disability issues.*

Response: The Department recognizes the importance of providing information and technical assistance to State VR agencies to help them work effectively with employers. However, the Department believes strongly that it is a State matter as to how VR agencies can best meet the training and technical assistance needs of employers in their States, whether it be on-demand or in-person. To that end, the Department's Rehabilitation Services Administration (RSA) suggests that this recommendation be revised to read: *The Commissioner of Education's Rehabilitation Services Administration should work with State VR agencies to determine whether and what*

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information and assistance VR agencies may find helpful regarding offering on-demand training, such as online videos, to employers on disability issues.

Furthermore, we note that RSA has provided training and technical assistance to the State VR agencies regarding their responsibilities under the Rehabilitation Act, as amended by WIOA, to work with and provide technical assistance to employers, particularly those interested in hiring individuals with disabilities. In so doing, RSA funded the Job Driven Vocational Rehabilitation Technical Assistance Center, now in its no-cost extension year, to provide such technical assistance. The Department will work with State VR agencies to assess their technical assistance and training needs on disability issues for employers.

Recommendation 2: *The Commissioner of Education's Rehabilitation Services Administration should work with state VR agencies to determine how to most effectively disseminate information about the circumstances in which individuals who are employed may be eligible for career advancement services.*

Response: The Department recognizes the importance of expanding career advancement opportunities for individuals with disabilities in accordance with the Rehabilitation Act as amended by WIOA. The preamble to the VR regulations published at 81 FR 55630, 55672 and 55677 (August 19, 2016) discusses eligibility for the VR program for the purpose of career advancement and the availability of VR services, such as advanced training, to assist eligible individuals to advance in their employment. These concepts also were discussed at several national meetings (e.g., meetings of the Council of State Administrators of Vocational Rehabilitation). However, it is important to note that nothing in the Rehabilitation Act, prior to the amendments made by WIOA, prohibited VR agencies from determining an individual's eligibility on the basis of his or her desire to advance in employment. It is the Department's longstanding position that an individual with a disability is eligible for VR services if he or she requires VR services to advance in employment. The Department will continue to work with State VR agencies to determine if additional information may be necessary about the circumstances in which individuals who are employed may be eligible for career advancement services. The Department believes strongly that it is a State matter for VR agencies to determine how to most effectively disseminate information about the services they provide.

Recommendation 3: *The Commissioner of Education's Rehabilitation Services Administration should work with state VR agencies to develop more complete information on when and how VR agencies should assess employment settings, including settings supported by the AbilityOne program, to determine if they meet the definition of competitive integrated employment.*

Response: The Department has made it clear for many years, including in the preamble to the Final Regulations published at 81 FR 55630, that determinations of whether an employment location would be considered an "integrated setting," for purposes of the VR program, is a matter of State determination. We do not believe it is the Department's role to inform the States as to when and how to make such determinations. The VR agencies are privy to all facts of any given employment location and are in the best position to make such decisions whenever questions arise. However, the Department will continue to work with State VR agencies to determine if further information is needed regarding when and how State VR agencies should assess

employment settings to determine whether such settings meet the definition of competitive integrated employment.

Recommendation 4: *The Commissioner of Education's Rehabilitation Services Administration should encourage local areas to clarify and document the roles and responsibilities of partner agencies in working with employers and provide sample language of how local areas may document roles and responsibilities in their MOUs.*

Response: The Department believes that State workforce development agencies, as one-stop partners who collaborate with local workforce development boards and chief elected officials, are in the best position to lead employer engagement at the local level. The conceptual framework for WIOA is structured around local control and flexibility. The Department's RSA, in partnership with the Department of Labor's Employment and Training Administration and the Department's Office of Career, Technical and Adult Education, has provided extensive joint guidance and technical assistance to local areas related to the one-stop service delivery system, including a Sample MOU Toolkit. RSA will continue to collaborate with its Federal partners in delivering technical assistance that reinforces the role of State and local partners, including examples of how other State and local partners have collaborated on employer engagement given the flexibility that WIOA provides.

Recommendation 5: *The Commissioner of Education's Rehabilitation Services Administration should, in setting the employer performance measurement approaches with DOL after the pilot is concluded, take into account VR agencies' concerns and key attributes of successful performance measures, including clarity in what is meant by employer services, coverage of the VR agencies' core program activities, and consideration of factors outside of VR agencies' control.*

Response: The Department will coordinate with the Department of Labor's Employment and Training Administration to ensure that State VR agencies' concerns are considered in determining the performance measures regarding the "Effectiveness in Serving Employers" performance measure. The determination also will be informed by the results of the evaluation of this performance measure, scheduled to be available in 2020.

The Department appreciates the opportunity to review the draft report and comment on the recommendations. We also are enclosing technical comments for your consideration.

Sincerely,



Johnny W. Collett

Enclosure

Appendix IV: Comments from the Department of Labor

U.S. Department of Labor

Employment and Training Administration
200 Constitution Avenue, N.W.
Washington, D.C. 20210



Elizabeth Curda
Director
Education, Workforce, and Income Security Issues
U.S. Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548

Dear Ms. Curda:

Thank you for the opportunity to review and comment on the Government Accountability Office's (GAO) draft report titled, *Vocational Rehabilitation: Additional Federal Information Could Help States Serve Employers and Find Jobs for People with Disabilities* (GAO-18-577, job code 102179). We understand that GAO performed this work pursuant to its authority under 31 U.S.C. 717 after receiving a request from Ranking Member Patty Murray of the Senate Committee on Health, Education, Labor, and Pensions.

The Department of Labor (Department) appreciates GAO's work to provide information and to document the progress made and the remaining challenges in implementing the Workforce Innovation and Opportunity Act (WIOA).

The Department has worked closely with the Department of Education (ED) for several years to identify our grantees' greatest needs and to jointly develop and disseminate technical assistance and guidance as necessary. The Department will continue to work with ED to consider how best to support integrated business services at the local level, through flexibilities and technical assistance. The Department agrees with both recommendations from GAO, 6 and 7, which were targeted toward the Department of Labor.

The Department agrees with GAO Recommendation 6, that the Employment and Training Administration (ETA) should encourage local areas to clarify and document the roles and responsibilities of partner agencies in their Memoranda of Understanding. However, it recognizes that local workforce development boards and local one-stop partners are in the best position to lead employer engagement at the local level. The Department, in partnership with the Department of Education, has provided extensive joint guidance and technical assistance to local areas related to the one-stop service delivery system, including a Sample MOU Toolkit. The Department will continue to collaborate with its Federal partners in delivering technical assistance that reinforces that WIOA provides flexibility in how states and local partners engage employers. This includes examples of how other state and local partners have collaborated on employer engagement.

Regarding the *Effectiveness in Serving Employers* performance measure definition, the Department concurs with GAO Recommendation 7. The Department will coordinate with Education's Rehabilitation Services Administration (RSA) to ensure that Vocational Rehabilitation (VR) agencies' concerns are considered in defining this performance measure.

The determination of the definition also will be informed by the results of the evaluation of this performance measure, due in 2020.

Thank you for the opportunity to respond.

Sincerely,



Rosemary Lahasky
Acting Assistant Secretary for Employment and Training
U.S. Department of Labor

Appendix V: GAO Contact and Staff Acknowledgements

GAO Contact

Elizabeth H. Curda, (202) 512-7215 or CurdaE@gao.gov

Staff Acknowledgements

In addition to the contact named above, Michele Grgich (Assistant Director); Lorin Obler (Analyst-In-Charge); Laurie Chin; Holly Dye; and Srinidhi Vijaykumar made key contributions to this report. Also contributing to this report were James Bennett, Shannon Finnegan, Alex Galuten, Lauren Gilbertson, Ben Licht, Sheila McCoy, Sam Portnow, Carl Ramirez, Monica Savoy, Almeta Spencer, and Alexandra Squitieri.

Related GAO Products

Workforce Innovation and Opportunity Act: Federal Agencies' Collaboration Generally Reflected Leading Practices, but Could Be Enhanced. [GAO-18-171](#). Washington, D.C.: February 8, 2018.

Workforce Innovation and Opportunity Act: Selected States' Planning Approaches for Serving Job Seekers and Employers. [GAO-17-31](#). Washington, D.C.: November 15, 2016.

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Workforce Investment Act: Local Areas Face Challenges Helping Employers Fill Some Types of Skilled Jobs. [GAO-14-19](#). Washington, D.C.: December 2, 2013.

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