



The South Carolina Vocational Rehabilitation Department welcomes the opportunity to provide comments on the Required Elements for Submission of the Unified or Combined State Plan and Plan Modifications under the Workforce Innovation and Opportunity Act as revised 12/9/2015 (OMB Control Number 1205-0522).

Attachment I (pg. 41 – 44): SCVRD appreciates the added flexibility extended with regard to “baseline” measures. This acknowledges the need to collect adequate data with which to establish proposed performance levels. Although the proposed levels are not final and only serve to start the negotiation process, we recommend that the flexibility to establish a baseline be extended to additional measures. This would best be determined by the individual state programs that could provide documentation of the availability (or lack thereof) of adequate data. Given the wide variability in the state plans that have been published for public comment thus far, it would seem that this latitude would further improve the negotiation process. It is unclear what methodology was used for determining each program’s set of measures that can be “baseline” measures.

Section III (a) (2) (F) requires a description of state strategies to engage education and training partners. Consideration and further guidance is requested as to the potential impact of reporting requirements for the Eligible Training Provider List (ETPL) under Title I programs as it relates to the other core WIOA programs. For instance, if the ETPL becomes more limited due to enhanced reporting requirements, the states will need to plan for potential programmatic impact on the other core WIOA programs approved vendor lists.

Section III (b) (5) requires a description of guidelines for determining equitable and stable methods of funding infrastructure. SCVRD recommend, as it appears in the final sentence referring to state plan modification in 2018, that this description be accepted as a general framework until such time as policy guidance is issued to define “infrastructure” and the definitions associated with the cap on infrastructure costs for VR programs.

The Vocational Rehabilitation (VR) portion of the Unified or Combined State Plan requirements is largely consistent with past structure of state plan requirements, and this is appreciated. The newly defined “pre-employment transition services” (PETS) are in keeping with the mission of the public VR program and specific funding for this purpose is programmatically important. However, additional guidance on the fiscal reporting and data elements that will be utilized to determine what is expended under the PETS funding set-aside is needed. This will also require adequate time for systems and fiscal reporting changes to be made to ensure the correct identifying data is collected. Furthermore, latitude is requested in the reporting provided until such additional guidance is issued. An adequate period of time to implement changes to the 911 data collection requirements, once finalized, will also be needed.

Neal Getsinger, Commissioner

The South Carolina Vocational Rehabilitation Department prepares and assists eligible South Carolinians with disabilities to achieve and maintain competitive employment

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