

**Fiscal Year 2007 Monitoring Report
on the Vocational Rehabilitation and
Independent Living Programs in the
State of Maryland**



**U.S. Department of Education
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Executive Summary

The Rehabilitation Services Administration (RSA) reviewed the performance of the following programs of the Rehabilitation Act of 1973, as amended (the Act) in the state of Maryland (MD):

- the Vocational Rehabilitation (VR) program, established under Title I;
- the Supported Employment (SE) program, established under Title VI, Part B;
- the Independent Living (IL) programs, authorized under Title VII, Part B; and
- the Independent Living Services Program for Older Individuals Who Are Blind (OIB), established under Title VII, Chapter 2.

In MD the Division of Rehabilitation Services (DORS) is the designated state unit (DSU) for providing services under all four programs to all eligible individuals in MD.

RSA's review began in the fall of 2006 and ended in the summer of 2007. During this time, RSA's MD state team:

- gathered and reviewed information regarding each programs performance;
- identified a wide range of VR and IL stakeholders and invited them to provide input into the review process;
- conducted two on-site visits, and held multiple discussions with state agency staff, State Rehabilitation Council (SRC) members, Statewide Independent Living Council (SILC) members, and stakeholders to share information, identify promising practices and areas for improvement;
- provided technical assistance (TA);
- worked with DORS and stakeholders to develop objectives, strategies, and evaluation methods to address performance and compliance issues; and
- identified the TA that RSA would provide to help improve program performance.

As a result of the review, RSA:

- identified performance issues;
- developed performance objectives and strategies related to selected issues with DORS and IL stakeholders;
- identified the TA that it would provide to assist the agency to achieve the goals identified as a result of the review; and
- identified potential issues for further review.

RSA found DORS to be a well-organized state VR agency with management and staff dedicated to providing the best VR services they can. DORS has well-developed collaborative relationships with other state agencies serving individuals with disabilities and providing employment services. The SRC is involved in policy-making, performance reviews, and strategic planning.

MD stakeholders regard DORS as a responsible fiscal steward with the funds the agency receives to provide services and truly believe that the best and most important improvement that can be made is increased funding.

DORS QA system for the VR and SE programs is well developed and follows a continuous improvement model. RSA's review indicates that improvements can be made in soliciting and incorporating consumer feedback focused on continuous improvement as well as satisfaction with services.

DORS challenges in the VR and SE programs lie in assisting its consumers to achieve employment outcomes with pay comparable to the state average hourly wage and in improving service delivery to provide for timely and meaningful staff interaction with consumers to plan and receive services as well as to maintain working relationships that promote the achievement of a quality employment outcome.

DORS, the SILC and IL partners face challenges in developing their partnership to identify and implement a common vision for IL service delivery in Maryland. The SILC, with nearly an entire new membership, is challenged to become a council whose members are informed planners and decision-makers for IL services, consistent with federal requirements. An improved partnership based on a common vision between the SILC, DORS and MD CILs will bring a new quality of service, collaboration and coordination.

RSA, DORS, and their stakeholders developed strategies for the VR and SE programs to achieve:

- average hourly earnings of \$12 by September 30, 2010.
- increased time to provide quality service delivery to consumers.
- increased numbers of individuals with most significant disabilities served by DORS who
- are members of minority populations in Maryland.
- appropriate application of state match in the year in which it is expended.

RSA, DORS, the MD SILC and CILs developed strategies to:

- maintain a legally constituted and fully functioning SILC in Maryland at all times.
- enhance and strengthen collaboration in the development and evaluation of the Maryland state plan for independent living.
- enhance employment, independence and self-sufficiency of individuals with significant disabilities in Maryland by facilitating collaboration between CILs and DORS.
- develop and implement a Quality Assurance (QA) System for the IL program.

RSA, DORS and the CILs agreed to identify and implement strategies for managing the costs of expensive assistive technology in the OIB program.

Introduction

Section 107 of the Act requires the Commissioner of the Rehabilitation Services Administration (RSA) to conduct annual reviews and periodic on-site monitoring of programs authorized under Title I of the Act to determine whether a state VR agency is complying substantially with the provisions of its State Plan under Section 101 of the Act and with the evaluation standards and performance indicators established under Section 106. In addition, the Commissioner must assess the degree to which VR agencies are complying with the assurances made in the Supplement for Supported Employment under Title VI of the Act and must determine whether programs offered under Title VII of the Act are substantially complying with their respective state plan assurances and program requirements.

In order to fulfill its monitoring responsibilities, RSA:

- reviews the state agency's performance in assisting eligible individuals with disabilities to achieve high-quality employment and independent living outcomes;
- develops, jointly with the state agency, performance and compliance goals as well as strategies to achieve those goals; and
- provides TA to the state agency in order to improve its performance, meet its goals, and fulfill its state plan assurances.

Scope of the Review

RSA reviewed the performance of the following programs of the Act:

- the VR program, established under Title I;
- the SE program, established under Title VI, Part B;
- the IL programs, authorized under Title VII, Part B; and
- the OIB program, established under Title VII, Chapter 2.

In addition, RSA also reviewed DORS' progress on the agency's Continuous Improvement Plan (CIP) that was established as a result of findings from RSA's FY 2004 Section 107 monitoring review.

DORS Administration of the VR, SE, IL, and OIB Programs

DORS is a division within the Maryland State Department of Education (MSDE), the designated state agency. DORS is comprised of the Office of Field Services (OFS), the Office for Blindness and Vision Services (OBVS), the Workforce Technology Center (WTC), the Disability Determination Service, and DORS Administration. DORS is the DSU for providing vocational rehabilitation services to all eligible individuals in MD. The OFS and the OBVS also provide

selected IL services directly to consumers. OBVS provides OIB program services.

The MD SRC is comprised of 24 members, 13 of whom are individuals with disabilities and four of whom represent African-American and Asian minority populations. Through SRC membership, the perspectives of business and industry, community rehabilitation programs, education, consumer disability organizations, state government, and consumer advocates provide the consumer voice in its partnership with DORS to plan and administer the VR and SE programs in MD. One SRC committee is an advisory committee for OBVS.

The MD SILC is comprised of 10 members, nine of whom are individuals with disabilities and three of whom represent minority populations. Through SILC membership, the perspectives of centers for independent living (CILs), state government, consumer organizations and consumer advocates provide the consumer voice as a partner with DORS in planning, coordinating and monitoring the provision of title VII, Chapter 1 IL services in MD.

DORS is designated by the Governor of MD to administer the Client Assistance Program, providing assistance to applicants for and consumers of VR, SE, IL and OIB services.

This report describes RSA's review of DORS regarding the four federal programs listed above, provides information on the agency's performance, identifies promising practices, identifies performance issues, and identifies the related goals, strategies, and TA that RSA will provide to DORS to address each of the issues identified during the review.

Appreciation

RSA wishes to express appreciation to the representatives of the MSDE and DORS, the SRC, the SILC, and the stakeholders who assisted the RSA monitoring team in the review of DORS.

Chapter 1: RSA's Review Process

Data Used During the Review

RSA's review of DORS began in the fall of 2006 and ended in the summer of 2007. RSA's data collections are finalized and available at different times throughout the year. During this review, RSA and the state agency used the most recent data that was available from the fiscal year (FY) 2005 and FY 2006 collections. As a result, this report cites data from FY 2005 and FY 2006.

Review Process Activities

During the review process RSA's MD state team:

- gathered and reviewed information regarding DORS' performance;
- identified a wide range of VR and IL stakeholders and invited them to provide input into the review process;
- conducted on-site visits and held multiple discussions with state agency staff, SRC members, SILC members, and stakeholders to share information, identify promising practices and areas for improvement;
- provided TA to DORS;
- worked with DORS and IL stakeholders to develop objectives, strategies, and evaluation methods to address performance issues;
- identified potential issues for further review; and
- identified the TA that RSA would provide to help DORS improve its performance.

RSA developed performance goals and objectives with DORS and IL stakeholders to support the following goal in the MSDE Strategic Plan (2005): DORS will promote the employment and independent living of people with disabilities through its rehabilitation programs (Goal 2). The goal was adapted for clarity in the monitoring process to the following:

- To promote and enhance high-quality employment outcomes for individuals with the most significant disabilities in Maryland through the vocational rehabilitation program.
- To promote and enhance quality independent living outcomes for individuals with disabilities in Maryland through independent living programs, including the older blind program.

RSA MD State Team Review Participants

Members of RSA's MD state team included representatives from each of RSA's State Monitoring and Program Improvement Division's (SMPID's) five functional units. The RSA MD state team was led by RSA's state liaison to MD,

Janette Shell, and the following RSA MD team members: Jeffrey Clopein (VR unit); Joseph Doney (TA unit); Felipe Lulli (IL unit); Joe Pepin (data unit); Jacqueline Stuckey (fiscal unit) and William Bethel (fiscal unit).

Information Gathering

During FY 2007, RSA began its review of DORS by analyzing information including, but not limited to, RSA's various data collections, DORS' VR and IL state plans, and the SRC's Annual Report. After completing its internal review, the RSA team carried out the following information gathering activities with DORS and stakeholders in order to gain a greater understanding of DORS' strengths and challenges:

- conducted four teleconferences or videoconferences and three meetings with the DORS management;
- held teleconferences with three SRC members and visited one SRC meeting on May 10, 2007;
- conducted one teleconference with stakeholders on February 6, 2007;
- attended two public hearings on the state plan for title I and title VIB, Part B programs; under the Act: March 20 in Baltimore and March 27 in Easton;
- conducted five interviews with advocacy and consumer organizations;
- solicited and reviewed written comments from MD stakeholders; and
- conducted nine one or two day on-site monitoring visits with DORS, the MD SILC or the executive directors of MD CILs: March 30, April 19, April 30, May 9, May 11, May 15, June 8, June 20 and 21, and July 9, 2007.

Chapter 2: Vocational Rehabilitation and Supported Employment Programs

Program Organization

DORS provides VR and SE services through each of its 24 district offices, staffed by 132 OFS and 11 OBVS VR counselors at the time of the review. Of the 132 OFS VR counselors, nine have caseloads dedicated to serving deaf or hard-of-hearing individuals, 25 have caseloads dedicated to transitioning youth, and 12 have caseloads dedicated to serving individuals with severe and persistent mental illness. VR services are also provided through the WTC by a total staff of 130 including VR counselors, teachers, rehabilitation engineers, assistive technology (AT) experts and medical support staff.

DORS has been unable to serve all individuals with disabilities eligible for the VR and SE programs in MD since 1991, when it implemented an order of selection for services (OOS) as required under the Act. DORS has experienced decreasing federal and state funding in recent years and, therefore, funding has not kept pace with inflation. This, along with an increasing demand for services has resulted in the closure of all three OOS categories in July of 2007. Currently, DORS is only able to serve individuals with the most significant disabilities (priority category 1) on a waiting list basis.

Table 1 provides fiscal and program data for FY 2002 through FY 2006. These data provide an overview of the VR program's costs, outcomes, and efficiency. The table identifies the amount of funds used by the agency, the number of individuals who applied, and the number who received services. It also provides information about the quality of the agency's employment outcomes and its transition services.

Table 1
DORS VR and SE Program Highlights: FY 2002 - 2005

Performance Measures by Year: MD-C

MARYLAND	2002	2003	2004	2005	2006
Total funds used	\$51,709,315	\$51,873,132	\$52,261,783	\$52,608,730	\$53,687,002
Individuals served during year	10,873	10,262	11,491	12,735	13,543
Applicants	11,253	11,188	12,138	11,445	10,980
Closed after receiving services	3,823	3,766	3,952	4,146	4,448
Closed with employment outcomes	2,972	2,897	2,962	3,005	3,082
Employment outcomes without supports in an integrated setting	2,661	2,608	2,647	2,731	2,783
Average cost per individual served	\$4,755.75	\$5,054.88	\$4,548.06	\$4,131.03	\$3,964.19
Average cost per employment outcome	\$17,398.83	\$17,905.81	\$17,644.09	\$17,507.06	\$17,419.53
Employment outcomes per \$million spent	57.48	55.85	56.68	57.12	57.41
Competitive employment outcomes per \$million spent	55.66	53.48	54.93	55.14	55.15
Average hourly earnings for paid employment outcomes	\$9.28	\$9.44	\$9.29	\$9.44	\$10.08
Average state hourly earnings	\$18.93	\$19.57	\$20.17	\$21.13	\$21.99
Average hours worked per week for paid employment outcomes	32.29	32.43	31.53	31.42	31.38
Percent of transition age served to total served	22.94	24.08	25.00	24.51	25.65
Employment rate for transition age served	80.84	82.47	80.77	76.08	76.07
Average time between application and closure (in months) for individuals with successful paid employment outcomes	21.80	21.00	21.10	21.00	22.00
Average number of individuals served per total staff	21.49	20.16	24.14	26.26	27.87

Provision of TA to the VR and SE Programs During the Review Process

RSA provided TA to DORS in a number of VR and SE program areas during the review process. RSA:

- verified the agency's RSA-911 case record data for FY 2004, FY 2005, and FY 2006;
- reviewed the agency's case management system;
- provided a letter of clarification to the MSDE regarding the purpose of monitoring and selection of states for monitoring in FY 2007;
- provided specific contact information for officials within the Veteran's Administration for the purpose of hiring and coordination of services;
- provided information on federal career fairs and other hiring opportunities; and
- suggested strategies for improved response or cycle time at referral and application.

Data Verification

RSA reviewed 15 service records each for individuals served in FY 2004, 2005 and 2006 to determine the accuracy of data DORS reported on the RSA-911 data collection instrument. The verification activity resulted in RSA-911 data accuracy ratings of 94.44 percent for FY 2004 and 95.87 percent for FY 2005 and for FY 2006. DORS performance on RSA-911 data reporting is excellent and is considered one of the agency's strengths.

Promising VR and SE Practices Identified by DORS and Stakeholders During the Review Process

RSA's review process solicited input from DORS and stakeholders about promising practices. The following promising practices were identified:

1. Transitioning Youth

DORS was commended for its outreach to youth with disabilities, funding of services for eligible youth while they are still in high school, and its positive relationships with partners in providing services and leveraging resources to serve transitioning students with disabilities. DORS has executed interagency agreements with four local school districts in order to ensure that students have the necessary accommodations to transition from high school. These agreements establish that DORS will purchase assistive technology for eligible transitioning students with significant disabilities and that the school will train the student in the use of that technology.

2. Establishing OBVS

Stakeholders also commended DORS for establishing the Office for Blindness and Vision Services. Stakeholders indicated that service delivery to this population has improved through this office as compared to services provided by DORS through its general program.

3. Evidence Based Practice SE (EBPSE)

Evidence Based Practice SE has contributed to placement rates of 60 – 70 percent for individuals with severe and persistent mental illness. This service model has had a positive impact on the attitudes and beliefs of VR counselors regarding job readiness as a prerequisite to placement. Counselors providing services through this delivery model are providing leadership to other counselors by demonstrating success.

VR and SE Issues Identified by DORS and Stakeholders During the Review Process

RSA's review process solicited input from DORS and stakeholders about VR and SE performance and compliance issues. Stakeholders identified issues in the following areas.

1. Funding and Use of Available Resources.

- A large number of stakeholders in Maryland share the opinion that DORS could best improve by having additional state and federal funding to support its VR and IL programs.
- DORS has experienced decreases in federal and state funding, increased demand for services, and state mandated programs without additional staffing.
- The Order of Selection for services (OOS) provides significant complications in serving transitioning youth with disabilities, particularly those with significant disabilities (priority category 2), since DORS currently is able to serve only the most significantly disabled (priority category 1) on a waiting list basis.
- WTC, one of eight comprehensive rehabilitation centers in the country, provides job and IL skills training, medical rehabilitation, vocational assessment, driver's training and assistive technology services. Stakeholders asked if this is the best use of the available staff and monetary resources and whether it might be effective to provide these services in local communities through a variety of resources. Others wondered if the WTC could generate additional income for DORS through its programs and facility.

- One commenter suggested that DORS, as a whole, could realize cost and time savings by automating its systems for authorizing, billing and paying for purchased services.

2. Workload/Caseload Issues.

- VR Counselor caseloads are high and cause concern for some stakeholders regarding the amount of time a counselor has available to actually provide VR counseling, which impacts the quality of service and the achievement of employment outcomes.
- timely response to communication from consumers and partners, the wait time for initiating services as part of the individualized plan for employment, and timely response to referrals, among others.

3. Job Placement and Employment.

- There is general agreement among the stakeholders who provided input to RSA that increased employment outcomes are needed.
- Increased preparation for and placement in professional and technical careers was identified by several stakeholders as the key to increased employment outcomes as well as increased average hourly earnings, benefits and other hallmarks of high quality, meaningful employment.
- The federal government is a major employer in MD that should be tapped for employment opportunities for DORS consumers.
- Two consumers who are deaf provided written comments to RSA indicating that the job placement services provided to them did not meet their needs and have not resulted in employment.
- One stakeholder suggested that DORS and RSA consider web-based solutions that structure self-directed job search activities as well as facilitate communication between consumers and DORS staff.

Following compilation and discussion with DORS about the issues, RSA worked with DORS to address as many of these issues as possible either directly or by consolidating the issue into a broader issue area.

VR and SE Performance Issues, Goals, Strategies, and TA

RSA and DORS agreed on the following performance goal, objectives and strategies to achieve these objectives, and technical assistance that RSA would provide to assist DORS achieve each objective. These objectives and strategies will be considered for inclusion in DORS' FY 2008 state plan and if they are

included, progress on achieving these goals will be reported in DORS' FY 2009 annual state plan submission.

Goal I: To promote and enhance high-quality employment outcomes for individuals with the most significant disabilities in Maryland through the vocational rehabilitation program.

1. Average hourly earnings for DORS consumers

Issue: Historically, DORS has not met Indicator 1.5 of evaluation standard 1, the ratio of average hourly wages earned by DORS consumers to the state average hourly wage rate. One factor in this performance is MD's high state average wage rate. In FY 2005, the average hourly wage earned by DORS consumers was \$9.51 and the state average hourly wage was \$21.13. The average hourly wage rate earned by DORS consumers in FY 2006 was \$10.12. Despite incremental and steady annual increases in average hourly earnings of DORS consumers, the state average hourly wage for all workers in MD has also steadily increased and maintained a substantial earnings gap. Program data for FY 2005 indicate that DORS' consumers achieving competitive employment outcomes earned approximately 3 percent lower per hour than the national average for general and combined agencies (see Table 7 in the Appendix).

DORS notes that the EBPSE service model has had a negative impact on the average weekly earnings of individuals in this program, as most individuals work a limited number of hours and increase those work hours in a very gradual schedule. This in turn impacts the overall average hourly and weekly earnings for all DORS consumers achieving an employment outcome.

Stakeholders felt that increased preparation for and placement in professional and technical careers was the key to increased employment outcomes as well as increased average hourly earnings, benefits and other hallmarks of high quality, meaningful employment. Stakeholders identified the federal government as a major employer in MD that should be tapped for employment opportunities for DORS consumers.

Objective 1: DORS consumers will achieve average hourly earnings of \$12 by September 30, 2010

Strategies:

- DORS will set and pursue annual performance targets for average hourly wages earned by consumers.
- DORS will assist consumers in pursuing professional, technical, and managerial careers in demand in MD.

- DORS will assist consumers in securing employment with federal agencies within commuting distance from their homes.
- DORS will inform its staff, community rehabilitation programs, referral sources and other community partners regarding its mission to increase employment options and average hourly wages.
- DORS will collaborate with community rehabilitation programs, CILs and other community partners to align their services in support of this mission.

Evaluation:

1. DORS will evaluate progress towards targeted benchmarks:

FY 2008 \$10.73

FY 2009 \$11.36

FY 2010 \$12.00

Baseline: \$10.10 FY 2006

2. Annual increase in Performance Indicator 1.6 from a baseline of 70.48 in FY 2006. Performance Indicator 1.6 measures the change between the percentage of individuals at application whose primary source of support is earnings and the percentage of individuals at closure whose primary source of support is earnings.

3. Annual increase in the percentage of employment outcomes in professional, managerial, and technical positions. Baseline: 14.4 percent FY 2006. NOTE: The baseline is established using Dictionary of Occupational Title (DOT) Codes beginning with "0" and "1" for employment outcomes achieved and reported to RSA on the RSA-911 for FY 2006. The federal government is transitioning from using the DOT code to using Standard Occupational Classification (SOC) codes for data reporting and collection beginning in FY 2007. RSA will identify a mechanism that will provide performance measurement on this criteria using the SOC codes.

TA:

- RSA will assist DORS in securing contacts within federal agencies that are charged with the responsibility for increasing the numbers of individuals with disabilities employed in federal government.
- RSA will assist DORS in establishing and developing working relationships with these federal agency contacts leading to employment of DORS consumers.

- RSA will explore avenues for connecting DORS with federal contractors for the purpose of hiring DORS consumers and assisting contractors in meeting federal requirements for minority hiring.

2. Employment Outcomes

Issue: DORS and a large number of stakeholders in MD indicated that the agency could improve services and service outcomes by having additional federal and state resources to support the VR and IL programs. DORS funding has not kept pace with inflation and the agency has experienced decreases in federal and state resources. Due to increasing demands for services from consumers combined with rising costs of doing business, DORS initiated an OOS in 1991 and has remained on an OOS in fiscal year 2007. In July 2007, DORS closed all three categories under the OOS and began placing the most significantly disabled consumers on a waiting list.

Stakeholders in MD noted that DORS VR counselor caseloads are high and time spent with consumers has decreased. They identified concerns with timely communication from professional staff and long wait times for service initiation. Currently, VR counselors in the OFS have an average caseload size of 140 – 150. VR counselors in the OBVS have an average caseload size of 80. Secretarial support positions are staffed at a ratio of 2.5 for 8 VR counselors in the OFS and a ratio of .5 for 2 VR counselors in OBVS. DORS also obtains the services of interns from MD universities and volunteer office staff whenever possible to expand service delivery capacity. A state initiative in the area of acquired brain injury has provided funding to DORS, but not staff to provide enhanced services. VR counselors who provide IL services told RSA staff that their IL workload was often highly time-intensive and that they were interested in working more closely with the CILs to better utilize limited human and financial resources.

Based on these factors, RSA reviewed DORS' allocation of staff resources, staffing patterns, staff work roles, business processes, and referral networks.

Objective 2: DORS staff will have increased time to provide quality service delivery to consumers.

Strategies:

- DORS will educate all referral sources on the need to refer only individuals interested in obtaining and maintaining employment.
- DORS will target outreach efforts to individuals with most significant disabilities.
- DORS will evaluate staffing patterns, work roles, and business processes to determine improvements in service delivery that reduce response time

to consumer contacts/requests and facilitate progress throughout the rehabilitation process.

- DORS will utilize benefits planning services early in the rehabilitation process to facilitate consumer informed choice regarding achievement of an employment outcome.
- DORS and the MD SRC will review and revise as appropriate its QA System to further develop its consumer satisfaction survey and to also collect consumer feedback that is focused on continuous improvement and identifies unmet consumer needs. DORS and the MD SRC will develop additional methods to obtain consumer satisfaction information.

Evaluation:

1. Using its service record review process, DORS will collect data and establish performance baselines by August 1, 2008 on:
 - the cycle time (in number of days) for: application, eligibility, service plan initiation, employment;
 - delays or gaps in service such as time lapse between request for service and initiation of service; and
 - frequency of DORS staff direct engagement with the consumer.
2. By September 30, 2008 DORS will establish targets for improved timeliness of services using the baseline data.

TA:

- RSA will provide TA to evaluate staffing patterns, work roles and business processes to improve service delivery.
- RSA will explore and identify avenues for increasing the availability of benefits planning services in MD, such as to approach the Social Security Administration regarding increased funding for WIPA services and increased access to SSA - sponsored training on benefits planning.
- RSA will explore and identify opportunities within its own programs for increasing the availability of WIPA services, such as training through TA centers for VR and IL, development of a curriculum leading to certification in benefits planning through the in-service training or long-term training programs for VR, and dedicated funding for CILs to develop and provide benefits planning assistance.

3. Minority Access to Services

Issue: DORS requested assistance from RSA to improve access to services for individuals with disabilities from minority populations, particularly the Hispanic and Asian populations in MD. While DORS is meeting Evaluation Standard 2, Indicator 2.1 measuring minority access to services, it is doing so by a small margin (0.799 in FY 2005 and 0.842 in FY 2006) compared to the required performance level of 0.80. DORS has identified individuals with limited English proficiency as an underserved population in the state plan for VR and SE services and has identified strategies to reach and serve those individuals.

Objective 3: To increase the numbers of individuals with most significant disabilities served by DORS who are members of minority populations in MD.

Strategies:

- DORS will identify, secure and implement effective outreach strategies and supporting resources with the assistance of community partners with strong associations to minority populations.
- Resources for interpreters, translation of VR materials, cultural awareness, and serving individuals with limited English proficiency will be identified and compiled for use by consumers and DORS.

Evaluation:

- Increase percentage of closed service records for minority consumers in target groups of Hispanic and Asian. Baseline: FY 2005 Hispanic served (4.11%); Asian served (3.41%). Percent closed equals percent closed with employment plus percent closed without employment after receiving services.
- Increase in Indicator 2.1 from the FY 2006 performance level of 0.842. Indicator 2.1 is the service rate for all individuals with disabilities from minority backgrounds as a ratio to the service rate for all non-minority individuals with disabilities.

TA: RSA will identify and provide to DORS effective outreach strategies, techniques and resources used by state VR agencies and other organizations.

VR and SE Issues for Further Review

RSA plans on conducting further review of the WTC. In light of DORS funding limitations and implementation of OOS, several stakeholders provided comments or questions related to the use of available resources and the WTC. The WTC, one of eight comprehensive rehabilitation centers in the country, provides job and independent living skills training, medical rehabilitation, vocational assessment, driver's training and assistive technology services. Stakeholders asked if the

centralized operation of the WTC is the best use of the available staff and monetary resources and whether it might be effective to provide these services in local communities through a variety of resources. Others wondered if the WTC could generate additional income for DORS through its programs and facility.

RSA is planning a study of all comprehensive rehabilitation centers operated by state VR agencies in FY 2008 that will provide information about the concerns and comments raised by MD stakeholders. The RSA MD team determined that the results of this study should be used to evaluate the WTC in terms of effective use of DORS limited resources.

Chapter 3: Fiscal Review of the VR Program

RSA reviewed DORS's fiscal management of the VR program. During the review process RSA provided technical assistance to the state agency to improve its fiscal management and identified areas for improvement. RSA reviewed the general effectiveness of the agency's cost and financial controls, internal processes for the expenditure of funds, use of appropriate accounting practices, and financial management systems.

The data in the following table, taken from fiscal reports submitted by the state agencies, speak to the overall fiscal performance of the agency. The data related to matching requirements are taken from the fourth quarter of the respective fiscal year's SF-269 report. The maintenance of effort (MOE) requirement data are taken from the final SF-269 report of the fiscal year (two years prior to the fiscal year to which it is compared). Fiscal data related to administration, total expenditures, and administrative cost percentage are taken from the RSA-2.

Table 2
Fiscal Data for DORS for FY 2002 through FY 2006
Maryland (C)

Fiscal Year	2002	2003	2004	2005	2006
Grant Amount	36,606,668	37,534,773	38,305,525	37,912,602	39,360,338
Required Match	9,907,523	10,158,712	10,367,315	10,260,971	10,652,798
Federal Expenditures	36,606,668	37,534,773	38,305,525	37,912,602	39,360,338
Actual Match	11,429,374	11,562,530	11,732,913	11,581,201	12,076,924
Over (Under) Match	1,521,851	1,403,818	1,365,598	1,320,230	1,424,126
Carryover	0	0	0	0	0
Program Income	3,028,186	2,189,427	1,582,405	2,475,244	1,776,762
Maintenance of Effort (MOE)	11,232,254	11,232,281	11,287,394	11,547,094	11,697,854
Administrative Costs	7,436,882	6,795,195	6,813,454	6,702,582	6,533,642
Total Expenditures	51,709,315	51,873,132	52,261,783	52,608,730	53,687,002
Percent Admin Costs to Total Expenditures	14.38%	13.10%	13.04%	12.74%	12.17%

Explanations Applicable to the Fiscal Profile Table 2

Grant Amount: The amounts shown represent the final award for each fiscal year, and reflect any adjustments for MOE penalties, reductions for grant funds voluntarily relinquished through the reallocation process, or additional grant funds received through the reallocation process.

Match (Non-Federal Expenditures): The non-Federal share of expenditures in the Basic Support Program, other than for the construction of a facility related to a community rehabilitation program, was established in the 1992 Amendments to the Rehabilitation Act at 21.3 percent. As such, a *minimum* of 21.3 percent of the total allowable program costs charged to each year's grant must come from non-Federal expenditures from allowable sources as defined in program and administrative regulations governing the VR Program. (34 CFR 361.60(a) and (b); 34 CFR 80.24)

In reviewing compliance with this requirement, RSA examined the appropriateness of the sources of funds used as match in the VR Program, the amount of funds used as match from appropriate sources, and the projected amount of state appropriated funds available for match in each federal fiscal year. The accuracy of expenditure information previously reported in financial and program reports submitted to RSA was also reviewed.

Carryover: Federal funds appropriated for a fiscal year remain available for obligation in the succeeding fiscal year only to the extent that the VR agency met the matching requirement for those federal funds by September 30 of the year of appropriation. (34 CFR 361.64(b)) Either expending or obligating the non-federal share of program expenditures by this deadline may meet this carryover requirement.

In reviewing compliance with the carryover requirement, RSA examined documentation supporting expenditure and unliquidated obligation information previously reported to RSA to substantiate the extent to which the state was entitled to use any federal funds remaining at the end of the fiscal year for which the funds were appropriated.

Program Income: Program income means gross income received by the state that is directly generated by an activity supported under a federal grant program. Sources of state VR program income include, but are not limited to, payments from the Social Security Administration for rehabilitating Social Security beneficiaries, payments received from workers' compensation funds, fees for services to defray part or all of the costs of services provided to particular individuals, and income generated by a state-operated community rehabilitation program. Program income earned (received) in one fiscal year can be carried over and obligated in the following fiscal year regardless of whether the agency carries over federal grant funds. Grantees may also transfer program income received from the Social Security Administration for rehabilitating Social Security beneficiaries to other formula programs funded under the Act to expand services under these programs.

In reviewing program income, RSA analyzed the total amount (as compared to the total percentage of income earned by all VR agencies and comparable/like VR agencies), sources, and use of generated income.

Maintenance of Effort (MOE): The 1992 Amendments revised the requirements in section 111(a)(2)(B)(ii) of the Act with respect to maintenance of effort provisions. Effective Federal FY 1993 and each Federal fiscal year thereafter, the maintenance of effort level is based on state expenditures under the title I State plan from non-federal sources for the federal fiscal year two years earlier. States must meet this prior year expenditure level to avoid monetary sanctions outlined in 34 CFR 361.62(a)(1). The match and maintenance of effort requirements are two separate requirements. Each must be met by the state.

In reviewing compliance with this requirement, RSA examined documentation supporting fiscal year-end and final non-federal expenditures previously reported for each grant year.

Administrative Costs: Administrative costs means expenditures incurred in the performance of administrative functions including expenses related to program planning, development, monitoring and evaluation. More detail related to expenditures that should be classified as administrative costs is found in VR Program regulations at 34 CFR 361.5(b)(2).

Provision of TA to the VR and SE Programs During the Review Process

RSA provided TA to DORS in a number of fiscal areas during the review process. RSA:

- provided an overview of each requirement and reviewed with financial staff RSA's assessment of the agency's compliance with specific financial requirements – match, maintenance of effort (MOE), carryover, reallotment, program income, liquidation of outstanding obligations and grant closeout;
- discussed time distribution, cash management procedures and the sources and sufficiency of matching funds;
- provided clarification of the OMB Circular A-87 semi-annual certification requirement with respect to VR staff;
- discussed the need to appropriately charge only administration costs to administration and it was determined that non-administrative staff and costs were included in administrative line items;
- reviewed procurement procedures and provided DORS suggestions to ensure that they are appropriately protected from errors and omissions of their contractors; and
- discussed accurate reporting of state match on the SF-269.

Fiscal Compliance Issues, Goals, Strategies, Methods of Evaluation, and T A

1. Reporting of Matching Funds

Issue: RSA reviewed data on state matching funds for FY 2004 through FY 2007. The computation, application, and sources of the state match have not been accurate for FY 2004 through FY 2006. State appropriations have continually exceeded the required match and have been 100 percent of the state match. However, the levels of such match at the second quarter of FY 2007 appeared to be greatly decreased from that in the previous four fiscal years, as reported by DORS on the SF-269s. RSA asked DORS why the expenditure levels of state appropriations is significantly lower at the first and second quarters of FY 2007 when compared with the same time frame in FYs 2004, 2005, and 2006. DORS indicated that in the past they had been reporting state match based on the state fiscal year, which does not coincide with federal fiscal year. DORS said they recognized this discrepancy and that reporting state match based on the federal fiscal year in 2007 resulted in the decrease.

Table 3 DORS Expenditure Levels of State Match

<u>Fiscal Year</u>	<u>December 31</u>	<u>March 31</u>
2004	\$7,129,211	\$10,260,880
2005	\$7,651,821	\$10,494,859
2006	\$8,390,506	\$10,494,859
2007	\$6,037,265	\$ 7,638,565

Goal I: To promote and enhance high-quality employment outcomes for individuals with the most significant disabilities in Maryland through the vocational rehabilitation program.

Fiscal (F) Objective 1: To appropriately apply state match in the year in which it is expended.

Strategy: DORS will review and revise the last five years to correctly apply state match to the appropriate years.

Evaluation: After DORS revises the fourth quarter and the final SF-269 reports for the last five years, RSA will review these reports to ensure that the adjustments have no impact on DORS MOE and required match for the last 5 years.

TA: RSA is prepared to offer any assistance to DORS in their adjustment of their reports and the resulting analysis to determine any changes in the reported match that would affect DORS' required annual match or MOE.

Fiscal Issues for Further Review

1. The CRP Agreement & Services

The DORS CRP Agreement specifies payment arrangements for consumers who are “no shows”, in whole or in part, for services planned and authorized by DORS. The agreement specifies flat fees as opposed to pro-rated fees based on the time the consumer participated in the service. RSA is concerned that these payment arrangements may be an audit issue as well as a drain on reduced program funds. The area of contract administration is important because 34% of all DORS funds expended are for purchased services. RSA will join DORS in further review of these arrangements.

2. Administrative Costs

Although the administrative costs have declined slightly from FY 2002 to FY 2005, the DORS administrative costs have consistently remained two percent to four percent higher than the national average for combined VR agencies. In FY 2005, DORS administrative costs were 12.74 percent as compared to 10.55 percent for all combined agencies.

DORS staff stated that they are including some support staff (i.e. janitorial staff) salaries within the administrative costs, which may not be appropriate, which results in inflating the administrative costs for the program. DORS staff stated they plan to reallocate those non-administrative staff costs from the administrative cost line in the fiscal reports. A further review of the charges to administrative costs is indicated to determine if there are other costs that may be more appropriately charged to non-administrative costs.

Chapter 4: IL Program

Program Organization

DORS provides IL services in MD directly through its own state-administered program and indirectly through its financial support to four CILs, utilizing a combination of Part B federal funds and state funds. DORS also allocates Part B and state funds to the SILC. As recipients of Part B and state funds, the SILC and the CILs are subject to periodic program and fiscal reviews by DORS.

Table 4 Sources and Amounts of Funding (FY 2006)

	<u>Amounts of Funding</u>
Part B Funds	314,745
Older Blind	558,836
Other Federal Funds	72,506
State Funds	949,401
Local Government	0
Private/Other Funds	0
Total	1,895,488

Provision of TA to the IL Program During the Review Process

RSA provided TA to DORS in a number of IL program areas during the review process. RSA provided TA regarding:

- SILC membership and composition requirements;
- DORS and MD SILC roles and responsibilities;
- State Plan for Independent Living (SPIL) development; and
- Quality assurance (QA) system for CILs.

At the start of the review RSA found that the SILC was not fully constituted in accordance with the Act because the SILC members' terms had expired and had not been reappointed by the governor. The review team immediately informed DORS and the SILC that RSA could not accept or approve MD's SPIL if the SILC were not fully constituted. With TA, the required SILC appointments were secured and the SPIL was duly submitted by DORS and a fully constituted SILC

The IL partners needed TA regarding: SPIL goals and objectives; outreach to unserved and underserved areas; input from CILs, Client Assistance Program and the public; assessing IL needs statewide; the SPIL financial table and SILC resource plan; and the plan for evaluating the implementation of the SPIL.

DORS requested RSA's TA in developing a QA system for CILs. In response, RSA obtained and shared with DORS, the SILC and the CILs documentation related to the Michigan IL program's comprehensive QA system.

IL Issues Identified by DORS and Stakeholders During the Review Process

RSA's review process solicited input from DORS and stakeholders about IL performance issues. The following issues were identified:

- CIL directors expressed interest in working more closely with DORS and the SILC in the development of the SPIL and towards the achievement of mutual goals such as youth transition and employment; and
- DORS expressed the need to assure the quality, consistency and timeliness of services provided by the CILs it funds through Part B and state matching funds, and requested RSA assistance in developing a QA system for CILs.

Following compilation of this list, RSA worked with DORS and IL stakeholders to address as many of these issues as possible either directly or by consolidating the issue into a broader issue area.

IL Performance Issues, Goals, Strategies, and TA

As a result of the review, RSA, DORS, the MD SILC and IL stakeholders agreed on the following IL performance goal, objectives, strategies to achieve those objectives, and TA that RSA would provide to assist the partners to achieve each objective.

Goal II: To promote and enhance quality independent living outcomes for individuals with disabilities in Maryland through independent living programs, including the older blind program.

1. SILC Appointments and Improved Functioning

Issue: The RSA team reviewed: SILC policy and public information materials, analyzed SILC activities outlined in the FY 2005-2007 SPIL, and spoke with SILC members and staff. From these activities, RSA concluded that the SILC was not fully exercising its leadership role in Maryland due to an inaccurate understanding of the SILC statutory duties and the SILC members' reliance on the SILC executive director. Also, DORS program and fiscal reviews of the SILC had identified issues related to SILC membership, SILC meetings, SPIL activities, fiscal management and controls, and completion of council responsibilities.

Objective 1: To maintain a legally constituted and fully functioning SILC in MD at all times.

Strategies:

- Develop and activate by September 4, 2007 a SILC capacity-building plan focused on the fulfillment of SILC duties, responsibilities and other requirements.
- Review and/or revise MD SILC by-laws, policies, procedures and promotional materials to facilitate fulfillment of the SILC's responsibilities by December 31, 2007.
- Establish and maintain a regular schedule of SILC meetings by October 20, 2007.
- Create SILC awareness of national IL organizations, conferences and major initiatives by October 20, 2007.
- Establish or clarify roles and responsibilities of SILC members and staff by November 20, 2007.
- Establish mechanisms for supervising and evaluating SILC staff by November 20, 2007.
- Establish nominating mechanisms for SILC membership by October 15, 2007.
- Establish a tracking mechanism to ensure fulfillment of SILC composition requirements by October 15, 2007.

Evaluation: Completion of plan on or before December 31, 2007.

TA: RSA will provide training and TA. TA will also be sought from locally available resources for non- profits.

2. SPIL development, implementation and evaluation

Issue: Some IL partners expressed concern about the pace of developing the FY 2008 – 2010 MD SPIL. RSA found that the SILC executive director acted with minimal involvement by the SILC members, DORS staff and CIL directors in the development of the SPIL. Through RSA TA during the SPIL development process, the SILC, DORS and CIL representatives started to work in a more collaborative manner and produced a much-improved SPIL. The IL partners have agreed to build upon this collaborative model to develop a comprehensive plan for evaluating the FY 2008-2010 SPIL and for developing future SPILs.

Objective 2: DORS, the MD SILC, and the MD CILs will enhance and strengthen collaboration in the development and evaluation of the Maryland SPIL.

Strategies:

- The MD IL partners will collaboratively determine evaluation methods and a schedule for evaluating the implementation of the MD SPIL for FY 2008-2010 and beyond.
- The MD IL partners will collaboratively design a structure and process for developing, approving, submitting and implementing the MD SPIL for FY 2011 – 2013 and beyond.

Evaluation:

Completion and adoption of the methods and process for monitoring the implementation of the FY 2008-2010 SPIL on or before March 30, 2008.

Completion and adoption of structure and process for developing, approving submitting and implementing the FY 2011 – 2013 SPIL on or before September 30, 2008.

TA: RSA will provide TA to provide MD with specific activities or options to accomplish enhanced and strengthened collaboration.

3. Quality IL and employment outcomes.

Issue: Through conversations with DORS and the CIL staff, RSA identified potential for increased collaboration between the VR and IL programs in MD. While some DORS VR counselors and CILs staff were already pursuing goals and activities in such areas of common interest as youth transition and employment, others did not collaborate. Collaboration and cross-referrals were taking place between certain CILs and DORS field offices. VR counselors told RSA staff that their IL workload was often highly time-intensive and that they were interested in working more closely with the CILs to better utilize limited human and financial resources. Increased collaboration between VR and CIL staff was limited by a lack of dialogue between the two groups and an insufficient knowledge about each other's programs.

Objective 3: Enhance employment, independence and self-sufficiency of individuals with significant disabilities in MD by facilitating collaboration between CILs and DORS.

Strategies:

- Assure that current DORS and CAP brochures are available at CILs and that local CIL brochures are available in DORS offices.
- CILs consider referral of consumers to DORS for services, as appropriate, including: employment services, assistive technology services, and

services for older individuals who are blind.

- DORS consider referral of consumers to CILs for services, as appropriate, including: housing, transportation, peer to peer travel training, peer mentoring, accessing personal assistance services (training providers), benefits planning (WIPAs), AgrAbility, nursing home transition, IL skills training, advocacy, and accessibility/discrimination assistance.
- Include description of CIL network and services in QRT (DORS new counselor training), to be presented by a CIL representative.
- CILs and/or the MD Association of Centers for Independent Living consider submitting a paper for a breakout session of the MD Rehabilitation Association/DORS annual training conference.
- DORS offer WTC as a venue for a one-day annual CIL conference, including information and training for board members and current topic areas of interest.
- Enhance information about the CILs on the DORS website.
- CILs with websites consider including a link to DORS website.
- Establish a workgroup among DORS, the SILC and CILs to explore the possibility of new collaborative efforts such as cross-training opportunities, strengthening VR and IL service provision to transitioning youth, benefits planning, and transfer of funds and service provision for IL services provided by DORS to CILs.

Evaluation:

- Ongoing – Indicate in CIL quarterly reports to DORS that brochures are available.
- Informal information sharing among the IL partners.
- Informal information sharing among the IL partners.
- Completion of incorporation of IL services description in QRT.
- Decision and communication regarding CIL conference to DORS/MRA by September 30, 2008.
- Decision and communication by CILs re: conference space to DORS by September 30, 2008.
- Completion of enhancement of IL information on the DORS website.

- Creation of a link for interested CILS on the DORS website.
- Establishment of the exploratory workgroup by October 1, 2007.
- Identification and agreement on opportunities to pursue and conclusion of group by March 30, 2008.

TA: The MD IL partners will request technical assistance from RSA if needed and may consider additional opportunities in the areas of pre-vocational skills training, AT alternatives and transition from institutions.

4. QA System

Issue: DORS currently conducts periodic program and fiscal reviews of the CILs that receive title VII, Part B funds and state funds. DORS intends to develop a QA system for CILs in order to ensure quality, consistency and timeliness of services. In discussing QA, RSA has emphasized the importance of addressing the CIL's capacity-building needs, developing a common understanding of what constitutes a quality IL outcome, and collaboration among the IL partners to create a QA system that reflects a common vision and mission.

Objective 4: The MD IL partners will collaborate to develop and implement a QA System for the IL program.

Strategies:

- Design and implement a QA system for IL services;
- Adopt uniform definitions for the evaluation criteria and terms in assessing IL objectives and outcomes, including for example, the definition of the IL program's "success rate" in objective 2.2.2, section III of the MSDE Strategic Plan; and
- Structure, implement and coordinate monitoring of the implementation of the MD SPIL.

Evaluation:

- Design and implementation of the major components of the new QA system, including the vision and values statement(s), by September 30, 2008.
- Demonstrate use of measurable terms and definitions of terms in IL objectives and evaluation criteria

TA: RSA will provide definition, clarification and TA to the MD IL partners on standards for IL service providers, consumer satisfaction surveys, conducting a

state IL needs assessment, assessment and plan for IL staff development, review of CIL operation and performance, and other aspects of QA as needed.

Chapter 5: OIB Program

Program Organization

DORS provides IL services to older individuals who are blind in Maryland directly through OBVS and through two sub-contractors: Easter Seals and Blind Industries and Services of Maryland. OBVS provides OIB services directly through eight of nine and one-half FTE staff positions for the program. DORS OIB funding of \$620,929 in federal and state match is supplemented by \$318,776 of in-kind contributions.

OIB Issues Identified by DORS and Stakeholders During the Review Process

RSA’s review process solicited input from DORS and stakeholders about OIB performance and compliance issues. DORS cited the skyrocketing costs of AT as the OIB program’s greatest challenge. An aging “baby boomer” generation is increasing demand for services, including AT, and demand for the latest technology.

OIB Performance Issues, Goals, Strategies, and TA

As a result of the review, RSA and DORS agreed on the following OIB performance goal, strategies to achieve the goal, and TA that RSA would provide to assist DORS to achieve the goal.

1. AT cost management

Issue: DORS reported that the OIB program has evolved from assistance with low-cost aids, devices and skills development to the provision of high tech, high cost AT products that are difficult to support given the size of the federal grant. According to the FY 2006 Annual Performance (7-OB) Report, nearly 75 percent of DORS expenditures under the OIB program are for adaptive aids, devices or equipment. Table 5 provides data for DORS AT expenditures from FY 2003 – FY 2006.

Table 5 DORS OIB Expenditures for AT by FY from 7-OB reports				
FY	<u>2003</u>	<u>2004</u>	<u>2005</u>	<u>2006</u>
Total OIB Funds	493,443	589,187	626,740	620,929
Total AT Expenditures (\$)	71,973	340,859	390,399	468,604
Percent spent on AT	14.6	57.8	68	75
Consumers receiving AT	573	1026	741	859
Average AT cost per consumer (\$)	125.61	332.22	526.85	545.53
Percent increase in average AT cost from prior FY	—	164	58.6	3.5
In-kind contributions	257,134	286,924	324,479	318,776

For FY 2006, the average cost per consumer receiving adaptive aids, devices or equipment was \$545.53 compared to \$526.85 in FY 2005. From FY 2003 to FY 2006, individuals receiving AT services increased by 50 percent. Total expenditures for AT services during the same period rose by 60.4 percent and the average cost per consumer receiving AT services more than tripled.

OIB Objective 1: Identify and implement strategies for managing the costs of expensive AT in the OIB program.

Strategies:

- Continue and focus DORS –Maryland Technology Assistance Program (MD-TAP) discussions with the specific purpose of identifying AT cost management strategies and solutions.
- Provide MD-TAP training to CIL staff, Rehabilitation Teachers and VR counselors regarding low-cost AT alternatives, AT resources and cost-management practices.
- Collaboration by DORS, SILC and CILS and MD-TAP to identify, share and distribute community resources for AT, such as businesses that donate computers as they are replaced.

Evaluation:

- Demonstrate identification of low cost AT strategies and solutions by September 30, 2008.
- Demonstrate CIL staff participation in training by September 30, 2008.
- Develop a method of identifying local AT resources and coordinating distribution of that AT to individuals with disabilities in Maryland by September 30, 2008.

TA: RSA will provide TA to the MD IL/AT partners upon request.

Chapter 6: Progress on Issues Raised in Previous Reviews

As a result of the RSA review conducted with DORS in FY 2003-2004, the agency developed a Continuous Improvement Plan (CIP). A summary of the progress on the DORS CIP is described below.

CIP

Through the implementation of its CIP, DORS has successfully resolved compliance findings related to the following topics:

- Written Agreements with public Institutions of Higher Education;
- Services Provided Contributed to the Employment Outcome; and
- Employment Outcome Achieved is Consistent with the Employment Outcome identified in the IPE.

DORS has not successfully resolved compliance findings related to the following topics and continues to work toward their resolution.

1. Presumptive Eligibility for SSDI Beneficiaries and SSI Recipients: DORS has employed policy directives, manual updates, training, supervisory review and service record quality reviews to focus and improve its performance in presuming the eligibility of individuals who are SSDI beneficiaries and/or SSI recipients.

Status: DORS has improved its performance from 61% compliance in FY 2004 to 73.8% as of May 2007. This process will continue until DORS meets or exceeds 90% compliance.

Chapter 7: Summary Conclusion

RSA found DORS to be a well-organized state VR agency with management and staff dedicated to providing the best VR services they can. DORS has well-developed collaborative relationships with other state agencies serving individuals with disabilities and providing employment services. The SRC is involved in policy-making, performance reviews, and strategic planning.

MD stakeholders regard DORS as a responsible fiscal steward with the funds the agency receives to provide services and truly believe that the best and most important improvement that can be made is increased funding.

DORS QA system for the VR and SE programs is well developed and follows a continuous improvement model. RSA's review indicates that improvements can be made in soliciting and incorporating consumer feedback focused on continuous improvement as well as satisfaction with services.

DORS challenges in the VR and SE programs lie in assisting its consumers to achieve employment outcomes with pay comparable to the state average hourly wage and in improving service delivery to provide for timely and meaningful staff interaction with consumers to plan and receive services as well as to maintain working relationships that promote the achievement of a quality employment outcome.

DORS, the SILC and IL partners face challenges in developing their partnership to identify and implement a common vision for IL service delivery in Maryland. The SILC, with nearly an entire new membership, is challenged to become a council whose members are informed planners and decision-makers for IL services, consistent with federal requirements. An improved partnership based on a common vision between the SILC, DORS and MD CILs will bring a new quality of service, collaboration and coordination.

Table 6 summarizes the results of RSA's review.

Table 6 - RSA Review Results Summary

<u>Goal Areas</u>	<u>Strategies</u>	<u>Evaluation</u>	<u>Technical Assistance Needs</u>
<p>Maryland DORS</p> <p>I. Goal: To promote and enhance high-quality employment outcomes for individuals with the most significant disabilities in Maryland through the vocational rehabilitation program.</p> <p>VR Objective 1: DORS consumers will achieve average hourly earnings of \$12 by September 30, 2010.</p>	<p>DORS will set and pursue annual performance targets for average hourly wages earned by consumers.</p> <p>DORS will assist consumers in pursuing professional, technical and managerial careers in demand in Maryland.</p> <p>DORS will assist consumers in securing employment with federal agencies within commuting distance from their homes.</p> <p>DORS will inform its staff, community rehabilitation programs, referral sources and other community partners regarding its mission to increase employment options and average hourly wages.</p>	<p>FY 2008 \$10.73 FY 2009 \$11.36 FY 2010 \$12.00 Baseline: \$10.12 FY 2006 and Annual increase in Performance Indicator 1.6 from a baseline of 70.48 in FY 2006.</p> <p>Annual increase in the percentage of employment outcomes in professional, managerial, and technical positions. Baseline: 14.4%.</p>	<p>RSA will assist DORS in securing contacts within federal agencies who are charged with the responsibility for increasing the numbers of individuals with disabilities employed in federal government.</p> <p>RSA will assist DORS in establishing and developing working relationships with these federal agency contacts leading to employment of DORS consumers.</p> <p>RSA will explore avenues for connecting DORS with federal contractors for the purpose of hiring DORS consumers and assisting contractors in meeting federal requirements for minority hiring.</p>

Table 6 - RSA Review Results Summary

<u>Goal Areas</u>	<u>Strategies</u>	<u>Evaluation</u>	<u>Technical Assistance Needs</u>
<p>Maryland DORS</p> <p>VR Objective 2: DORS staff will have increased time to provide quality service delivery to consumers.</p>	<p>DORS will collaborate with community rehabilitation programs, centers for independent living and other community partners to align their services in support of this mission.</p> <p>DORS will educate all referral sources on the need to refer only individuals interested in obtaining and maintaining employment.</p> <p>DORS will target outreach efforts to individuals with most significant disabilities.</p> <p>DORS will evaluate staffing patterns, work roles, and business processes to determine improvements in service delivery that reduce response time to consumer contacts/requests and facilitate progress throughout the rehabilitation process.</p> <p>DORS will utilize benefits planning services early in the rehabilitation process to facilitate</p>	<p>1. Using its service record review process, DORS will collect data and establish performance baselines by August 1, 2008 on: the cycle time (in number of days) for application, eligibility, service plan initiation, employment; delays or gaps in service such as time lapse between request for service and initiation of service; frequency of DORS staff direct engagement with the consumer.</p> <p>2. By September 30, 2008 DORS will establish targets for improved timeliness of services using the baseline data</p>	<p>RSA will identify a mechanism to collect data on percentage of professional, technical and managerial employment outcomes attained during the transition from use of DOT codes to SOC codes.</p> <p>RSA will provide technical assistance directly, or through contracts, to evaluate staffing patterns, work roles and business processes to improve service delivery.</p> <p>RSA will explore and identify avenues for increasing the availability of benefits planning services in Maryland, such as:</p> <p>RSA will approach the Social Security Administration regarding increased funding for WIPA services and increased access to SSA - sponsored training on benefits planning</p> <p>RSA will explore and identify opportunities within its own</p>

Table 6 - RSA Review Results Summary

<u>Goal Areas</u>	<u>Strategies</u>	<u>Evaluation</u>	<u>Technical Assistance Needs</u>
<p>Maryland DORS</p> <p>VR Objective 3: To increase the numbers of individuals with most significant disabilities served by DORS who are members of minority populations in Maryland.</p>	<p>consumer informed choice regarding achievement of an employment outcome.</p> <p>DORS and the MD SRC will review and revise as appropriate its QA System to further develop its consumer satisfaction survey to also collect consumer feedback that is focused on continuous improvement and identifies unmet consumer needs. DORS and the MD SRC will develop additional methods to obtain consumer satisfaction information.</p> <p>DORS will identify, secure and implement effective outreach strategies and supporting resources with the assistance of community partners having strong associations to minority populations. Identification of resources for interpreters, translation of VR materials, cultural awareness, serving individuals with limited English proficiency, etc. will be compiled for use by consumers and VR</p>	<p>Increase percentage of closed service records for minority consumers in target groups of Hispanic and Asian. Baseline: FY 2005* Hispanic served 4.11% Asian served 3.41% *Percent closed = percent closed with employment plus percent closed without employment after receiving services.</p>	<p>programs for increasing the availability of WIPA services, such as training through technical assistance centers for VR and IL, development of a curriculum leading to certification in benefits planning through the in-service training or long-term training programs for VR, and dedicated funding for centers for independent living to develop and provide benefits planning assistance.</p> <p>RSA will identify and provide to DORS effective outreach strategies, techniques and resources used by VR agencies and other organizations.</p>

Table 6 - RSA Review Results Summary

<u>Goal Areas</u>	<u>Strategies</u>	<u>Evaluation</u>	<u>Technical Assistance Needs</u>
<p>Maryland DORS</p> <p>F Objective 1: To appropriately apply State Match in the year in which it is expended.</p>	<p>DORS will review and revise the last five years to correctly apply state match to the appropriate years.</p>	<p>After DORS revises the fourth quarter and the final SF-269 reports for the last five years, RSA will review these reports to ensure that the adjustments have no impact on their MOE and required match for the last 5 years</p>	<p>RSA is prepared to offer any assistance to DORS in the adjustment of their reports and the resulting analysis to determine if any changes in the reported match will affect DORS' required annual match or MOE.</p>

Table 6 - RSA Review Results Summary

<u>Goal Areas</u>	<u>Strategies</u>	<u>Evaluation</u>	<u>Technical Assistance Needs</u>
<p>Maryland DORS</p> <p>II. Goal: To promote and enhance quality independent living outcomes for individuals with disabilities in Maryland through independent living programs, including the older blind program.</p> <p>II. Objective 1: To maintain a legally constituted and fully functioning SILC in Maryland at all times.</p>	<p>Develop and implement a SILC capacity-building plan focused on fulfillment of SILC duties, responsibilities, and other requirements:</p> <p>Review and/or revise MD SILC by-laws, policies, procedures and promotional materials to facilitate fulfillment of the SILC's responsibilities</p> <p>Establish and maintain a regular schedule of SILC meetings</p> <p>Awareness of national IL organizations, conferences and major initiatives</p> <p>Establish or clarify roles and responsibilities of SILC staff</p>	<p>Development and activation of plan on or before September 4, 2007</p> <p>Adoption by December 31, 2007</p> <p>Completion by October 20, 2007</p> <p>Completion by October 20, 2007</p> <p>Completion by November 20, 2007</p>	<p>RSA will provide training and technical assistance. Technical assistance will also be sought from locally available resources for non- profits</p>

Table 6 - RSA Review Results Summary

<u>Goal Areas</u>	<u>Strategies</u>	<u>Evaluation</u>	<u>Technical Assistance Needs</u>
<p>Maryland DORS</p> <p>IL Objective 2: DORS, the Maryland SILC, and the Maryland centers for independent living, will enhance and strengthen collaboration in the development and evaluation of the Maryland state plan for independent living.</p>	<p>Establish mechanisms for supervising and evaluating SILC staff</p> <p>Establish nominating mechanisms for SILC membership</p> <p>Establish a tracking mechanism to ensure fulfillment of SILC composition requirements</p> <p>The MD IL partners will collaboratively determine evaluation methods and a schedule for evaluating the implementation of the MD SPIL for FY 2008-2010 and beyond.</p> <p>The Maryland IL partners will collaboratively design a structure and process for developing, approving submitting and implementing the Maryland SPIL for FY 2011 – 2013 and beyond.</p>	<p>Completion by November 20, 2007</p> <p>Completion by October 15, 2007</p> <p>Completion by October 15, 2007</p> <p>Methods and process completion and adoption on or before March 30, 2008</p> <p>Completion and adoption on or before September 30, 2008</p>	<p>RSA will provide technical assistance to Maryland regarding specific activities or options to accomplish enhanced and strengthened collaboration.</p>

Table 6 - RSA Review Results Summary

<u>Goal Areas</u>	<u>Strategies</u>	<u>Evaluation</u>	<u>Technical Assistance Needs</u>
<p>Maryland DORS</p> <p>IL Objective 3: Enhance employment, independence and self-sufficiency of individuals with significant disabilities in Maryland by facilitating collaboration between Centers for Independent Living and the Division of Rehabilitation Services.</p>	<p>Assure that current DORS and CAP brochures are available at CILs and that local CIL brochures are available in DORS offices.</p> <p>CILs consider referral of consumers to DORS for services, as appropriate, including: Employment services, assistive technology services, services for older individuals who are blind</p> <p>DORS consider referral of consumers to CILs for services, as appropriate, including: Housing, Transportation, Peer to peer travel training, Peer mentoring, Accessing personal assistance services (training providers), Benefits Planning (WIPAs), AgrAbility, Nursing home transition, Independent Living skills training, Advocacy, Accessibility/discrimination assistance</p>	<p>Noting availability in CIL quarterly reports to DORS</p> <p>Informal information sharing among IL partners</p> <p>Informal information sharing among IL partners</p>	<p>RSA will provide technical assistance to Maryland with specific activities or options to accomplish enhanced and strengthened collaboration.</p>

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<u>Goal Areas</u>	<u>Strategies</u>	<u>Evaluation</u>	<u>Technical Assistance Needs</u>
Maryland DORS	<p>Include description of CIL network and services in QRT (DORS new counselor training), to be presented by a CIL representative.</p> <p>CILs and/or MACIL consider submitting a paper for a breakout session of the Maryland Rehabilitation Association/DORS annual training conference.</p> <p>DORS offer WTC as a venue for a one-day annual CIL conference, including information and training for board members and current topic areas of interest.</p> <p>Enhance information about the Centers for Independent Living on the DORS website.</p> <p>CILS with websites consider including a link to DORS website.</p> <p>Establish a workgroup among DORS, the SILC and CILs to explore the possibility of new collaborative efforts such as cross-training opportunities,</p>	<p>Completion</p> <p>Decision and communication to DORS/MRA by September 30, 2008</p> <p>Decision and communication by CILs to DORS by September 30, 2008.</p> <p>Completion</p> <p>Creation of a link on the website</p> <p>Establishment of Workgroup by October 1, 2007.</p> <p>Identification and agreement on opportunities to pursue and</p>	<p>The MD IL partners will request technical assistance from RSA if needed and may also consider opportunities in the areas of pre-vocational</p>

Table 6 - RSA Review Results Summary

<u>Goal Areas</u>	<u>Strategies</u>	<u>Evaluation</u>	<u>Technical Assistance Needs</u>
<p>Maryland DORS</p> <p>IL Objective 4: The MD IL partners will collaborate to develop and implement a Quality Assurance (QA) System for the IL program.</p>	<p>strengthening VR and IL service provision to transitioning youth, benefits planning, and transfer of funds and service provision for IL services provided by DORS to CILs.</p> <p>Use of measurable terms in all plan objectives and evaluation criteria. For example, definition of “success rate” in the IL program as used in objective 2.2.2, section III of the MSDESP.</p> <p>In collaboration with Maryland IL partners, design and implement a QA system for IL services.</p> <p>In collaboration with Maryland IL partners, structure, implement and coordinate monitoring of the implementation of the Maryland SPIL</p>	<p>conclusion of group by March 30, 2008.</p> <p>Demonstrate use of measurable terms and definitions of terms in IL objectives and evaluation criteria</p> <p>Design of QA system, including identification of component(s), vision and values statement(s) and implementation plan by September 30, 2008.</p>	<p>skills training, AT alternatives and transition from institutions</p> <p>RSA will provide definition, clarification and technical assistance to the MD IL partners on standards for IL service providers, consumer satisfaction surveys, conducting a state IL needs assessment, assessment and plan for IL staff development, review of CIL operation and performance, and other aspects of quality assurance as needed.</p>

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<u>Goal Areas</u>	<u>Strategies</u>	<u>Evaluation</u>	<u>Technical Assistance Needs</u>
<p>Maryland DORS</p> <p>OIB Objective 1: Identify and implement strategies for managing the costs of expensive assistive technology in the OIB program.</p>	<p>Continue and focus DORS – Maryland Technology Assistance Program (MD-TAP) discussions with the specific purpose of identifying AT cost management strategies and solutions.</p> <p>Provide MD- TAP training to CIL staff, RT and VR counselors regarding low-cost AT alternatives, AT resources and cost-management practices.</p> <p>Collaboration by DORS, SILC and CILS and MD-TAP to identify, share and distribute community resources for assistive technology, such as businesses that donate computers.</p>	<p>Demonstrate identification of low cost AT strategies and solutions by September 30, 2008.</p> <p>Demonstrate CIL staff participation in training by September 30, 2008</p> <p>Develop a method of identifying local AT resources and coordinating distribution of that AT to individuals with disabilities in Maryland by September 30, 2008</p>	<p>RSA will provide technical assistance to the MD IL/AT partners upon request.</p>

Appendix
Table 7
FY 2005 Program Highlights Compared to National Averages

Agency Agency Abbreviation	MD (C) DORS	National Average
<u>FY 2005 Program Highlights</u>		
Total funds used	\$52,608,730	--
Employment outcomes per \$million spent	57	62
Competitive employment outcomes per \$million spent	55	60
Employment outcomes without supports in an integrated setting	90.9%	86.6%
Applicants	11,445	11,808
Individuals served	12,735	17,038
Closed after receiving services	4,146	6,178
Closed with employment outcomes	3,005	3,564
Percent of transition age served to total served	24.5%	26.4%
Employment rate for transition age served	76.1%	59.5%
Average hourly earnings for paid employment outcomes	\$9.44	\$9.74
Average state hourly earnings	\$21.13	\$18.64
Average hours worked per week for paid employment outcomes	31.4	32.7
Average cost per employment outcome	\$17,507	\$20,879
Average time between application and closure (in months) for individuals with successful paid employment outcomes	20.8	24.1
Average cost per individual served	\$4,131	\$3,996
Average number of individuals served per staff	26.3	42.2
Average number of employment outcomes per staff	6.2	9
On Order of Selection	Yes	--
Number of individuals on waiting list	23	1,853

Please take a moment to participate in a survey about RSA's performance on the FY 2007 monitoring of Vocational Rehabilitation agencies.

Visit <http://www.ed.gov/rschstat/eval/rehab/107-reports/2007/survey.html>