

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



**U.S. Department of Education
Office of Special Education and
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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 Vermont:

- 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 Vermont, the Division of Vocational Rehabilitation (DVR) and the Division for the Blind and Visually Impaired (DBVI) are responsible for the administration of the VR, SE and IL programs, with DBVI serving only individuals who are blind and visually impaired, and DVR providing services to all other individuals with disabilities. DSB is solely responsible for the administration of the OIB program.

RSA's review began in the fall of 2006 and ended in the summer of 2007. During this time, RSA's Vermont 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, SRC members, SILC members, and stakeholders to share information, and to identify promising practices and areas for improvement;
- provided technical assistance;
- worked with DVR and DBVI and stakeholders to develop goals, strategies, and evaluation methods to address performance and compliance issues; and
- identified the technical assistance that RSA would provide to help improve program performance.

As a result of the review, RSA:

- identified promising practices;
- identified performance and compliance issues;
- developed performance and compliance goals and strategies related to selected issues;
- identified the technical assistance that it would provide to assist the agency to achieve the goals identified as a result of the review;
- made recommendations to improve service delivery;

As a result of monitoring, DVR has agreed to the following goals related to the VR and SE programs:

- meet or exceed the required performance level for indicator 1.6;
- improve performance on Indicator 1.2;

- develop and implement an integrated quality assurance system;

DBVI has agreed to the following goals for the VR and SE programs:

- meet or exceed the required performance level for indicator 1.6;
- decrease the percentage of homemaker outcomes to eight percent above the national average by FY 2010
- increase the percentage of transitioning students served;
- develop and implement an integrated quality assurance system;

For the IL programs, DVR, DBVI, the SILC and IL stakeholders agreed that all members of the SILC will understand their roles and responsibilities and be empowered to serve as leaders in the IL movement in Vermont. Finally, for the OIB program, DBVI and IL stakeholders agreed that the agency in partnership with its grantee, the Vermont Association for the Blind and Visually Impaired, will increase the capacity of the OIB program to provide training in the use of Assistive Technology.

Introduction

Section 107 of the Rehabilitation Act of 1973, as amended, 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 SE under Title VI of the Act and the extent to which 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 technical assistance 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 authorized by the Act:

- the VR program, established under Title I;
- the 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 addition, RSA also reviewed DVR and DBVI's progress on their respective Corrective Action Plans, developed as a result of findings from RSA's FY 2004 Section 107 monitoring reviews.

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

The Agency of Human Services is the designated state agency (DSA) within which are located DVR and DBVI, the two designated state units for the VR, SE, and IL programs. DVR is responsible for managing the VR program for an individual with disabilities other than blindness and visual impairments, the oversight of the IL programs and the management of the SE

program, not only on behalf of its own consumers , but also individuals who are blind and visually impaired in collaboration with DBVI.

DBVI provides VR, SE and OIB program services to individuals who are blind and visually impaired.

For the four programs listed above, this report describes RSA’s review of DVR and DBVI, provides information on the agencies’ performance, identifies promising practices, identifies performance and compliance issues, and identifies the related goals, strategies, and technical assistance that RSA will provide to DVR and DBVI to address each of the issues identified during the review.

Appreciation

RSA wishes to express appreciation to the representatives of the DHA, DVR and DBVI, the State Rehabilitation Council (SRC), the Statewide Independent Living Council (SILC), and the stakeholders who assisted the RSA monitoring team in the review of DVR and DBVI.

Chapter 1: The Review Process

Data Used During the Review

RSA's review of DVR and DBVI 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 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, the Vermont state team:

- gathered and reviewed information regarding the performance of DVR and DBVI;
- 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, SRC members, SILC members, and stakeholders to share information, identify promising practices and areas for improvement;
- provided technical assistance to DVR and DBVI;
- worked with DVR and DBVI to develop goals, strategies, and evaluation methods to address performance and compliance issues;
- made recommendations to DVR and DBVI related to issues covered during the review;
- identified potential issues for further review; and
- identified the technical assistance that RSA will provide to help DVR and DBVI improve their performance.

Vermont State Team Review Participants

Members of the Vermont state team included representatives from each of RSA's five functional units within the State Monitoring and Program Improvement Division. The team was led by the state liaison for Vermont, Dave Wachter (VR Program unit), and: Charles Sadler (Technical Assistance Unit); Thomas Kelley (IL Unit); Yann-Yann Shieh (Data Collection and Analysis Unit); and Regina Luster (Fiscal Unit).

Information Gathering

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

- the RSA VT state liaison conducted a series of individual teleconferences with the DVR and DBVI management teams, as well as stakeholders;

- the state team conducted three teleconferences each with the DVR and DBVI management;
- the state team held one teleconference and one on-site meeting with stakeholders;
- the state team also held two teleconferences and two on-site meetings focused on the SRC and IL services, including the development of the Statewide Independent Living Council (SILC); and
- RSA conducted two on-site monitoring visits during the weeks of April 30 through May 4, 2007 and June 4 through June 7, 2007.

Chapter 2: Vocational Rehabilitation and Supported Employment Programs Administered by the Division of Vocational Rehabilitation

Program Organization

DVR administers the VR, SE and IL programs with a staff of 135 full-time equivalent employees, overseen by a senior management team comprised of the director, the field services manager, the employment services manager and the budget and policy manager. Six regional managers oversee 12 district offices. Services are provided by 35.8 general caseload counselors, four counselors for the deaf, 14 counselors for transitioning youths, 13 counselors assigned to the Reach Up Program, and ten benefit planning counselors. The agency also employs 21 human service aides, five full-time employment specialists, 11 placement specialists, two vocational evaluators and 11.5 staff who perform various administrative functions for the agency

Since FY 1999, DVR has operated under an order of selection (OOS), in accordance with Section 101(a)(5) of the Act, because it lacks the financial and/or staff resources to provide services to all individuals eligible for VR services. Presently, while the agency is serving all individuals with the most significant disabilities and with significant disabilities, individuals with non-significant disabilities are placed on a waiting list for services by date of application. As reported by the agency in its most recent VR State Plan submission, DVR forecasts that in FY 2008 it will continue to serve all individuals with the most significant disabilities and significant disabilities, and that all individuals determined eligible as non-significantly disabled will remain on a waiting list for services.

Table 1 includes fiscal and program data for fiscal years 2002 through 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.

As shown in Table 1 in FY 2006 DVR provided services to 5,535 individuals with disabilities, 1,452 of whom achieved employment outcomes. Of these 1,452 individuals, 1,277 achieved employment outcomes in integrated settings without supports. Individuals with gainful employment earned an average of \$9.95 per hour and worked an average of 29.11 hours per week.

Table 1
Vermont Division of Vocational Rehabilitation

Performance Measures by Year

| VERMONT | 2002 | 2003 | 2004 | 2005 | 2006 |
|---|--------------|--------------|--------------|--------------|--------------|
| Total funds used | \$12,309,209 | \$12,117,804 | \$13,181,514 | \$13,406,720 | \$13,716,877 |
| Individuals served during year | 4,369 | 5,439 | 5,515 | 5,573 | 5,535 |
| Applicants | 3,640 | 3,680 | 3,609 | 3,617 | 3,689 |
| Closed after receiving services | 1,854 | 2,187 | 2,206 | 2,349 | 2,423 |
| Closed with employment outcomes | 1,222 | 1,316 | 1,336 | 1,420 | 1,452 |
| Employment outcomes without supports in an integrated setting | 1,118 | 1,201 | 1,219 | 1,280 | 1,277 |
| Average cost per individual served | \$2,817.40 | \$2,227.95 | \$2,390.12 | \$2,405.66 | \$2,478.21 |
| Average cost per employment outcome | \$10,073.00 | \$9,208.06 | \$9,866.40 | \$9,441.35 | \$9,446.88 |
| Employment outcomes per \$million spent | 99.28 | 108.60 | 101.35 | 105.92 | 105.85 |
| Competitive employment outcomes per \$million spent | 97.24 | 107.12 | 99.46 | 103.01 | 103.45 |
| Average hourly earnings for paid employment outcomes | \$8.91 | \$9.09 | \$9.48 | \$9.75 | \$9.95 |
| Average state hourly earnings | \$14.92 | \$15.43 | \$15.90 | \$16.40 | \$16.93 |
| Average hours worked per week for paid employment outcomes | 28.48 | 28.33 | 29.38 | 29.17 | 29.11 |
| Percent of transition age served to total served | 20.23 | 21.49 | 24.93 | 24.44 | 24.27 |
| Employment rate for transition age served | 67.73 | 59.36 | 58.91 | 58.19 | 59.86 |
| Average time between application and closure (in months) for individuals with successful paid employment outcomes | 16.50 | 15.50 | 16.20 | 18.50 | 17.10 |
| Average number of individuals served per total staff | 44.58 | 54.39 | 53.03 | 54.64 | 54.80 |

The data shows that DVR's performance increased from FY 2002 to FY 2006 for the following measures: applicants, individuals served during year, cases closed after individuals are served, and cases closed with employment outcomes. The data also shows that the number of employment outcomes per million dollars spent and the number of competitive employment outcomes per million dollars spent increased every year from FY 2004 to FY 2006.

As shown in Table 1, DVR's average hourly earnings for paid employment outcomes have increased slightly since FY 2002. The percent of transition age served and the employment rate for transition age served has remained nearly unchanged since FY 2004.

Provision of Technical Assistance to the VR and SE Programs During the Review Process

RSA provided technical assistance to DVR 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;
- provided technical assistance to the agency on its case management system;
- provided training on how to use RSA's Management Information System;
- provided feedback on improving employment outcomes, particularly those for transition-aged youths;
- provided an overview of the quality assurance process and how it may be adapted by DVR;
- recommended two organizations for assistance with transportation, United We Ride, a Department of Transportation Program to assist communities in overcoming transportation barriers for people with disabilities and Community Transportation Association, an organization that advocates for improved transportation programs in rural communities;
- discussed how DVR might integrate its reporting mechanisms into an overall quality assurance system;
- assessed the agency's internal communications and recommended improvements;
- emphasized the important role agency leadership plays in clearly establishing quality employment as the goal of the VR program;
- provided feedback on the agency's programs for providing VR services to students with disabilities;
- convened a meeting with representatives from the Department of Labor, the Veterans Administration and DVR in order to establish mechanisms for improving service delivery to returning veterans; and
- emphasized the importance of interagency collaboration in service delivery to individuals currently receiving services under the Temporary Assistance for Needy Families (TANF) program, along with providers of services for individuals with mental illness, or who are intellectually & developmentally disabled.

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

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

1. The Reach Up (RU) Program

This program serves individuals receiving public support through the TANF program using a comprehensive- treatment model. This model combines group therapy, work skills enhancement, and work experience placements, gradually increasing work participation while individuals learn to overcome functional barriers. Local therapists provide group therapy designed to increase self-esteem, problem solving, coping strategies and communication skills. Individuals also participate in a work preparation group covering a wide array of “good worker” skills as well as job search techniques. Individuals begin their participation in the RU program by applying for SSI and SSDI benefits. Many of these individuals then apply for VR services. Participants in the RU program who pursue an employment goal perform to the same extent as those VR consumers who are not participating in the program.

2. Offenders Re-entry Program

DVR has designated VR counselors for each prison in the state to serve as a single point of contact for the Department of Corrections. These VR counselors work with personnel from Probation and Parole, Community Justice Centers, and other re-entry organizations as well as employers to assist offenders to find and retain employment. VR counselors often enter the correctional facilities to attend re-entry-planning meetings. If an offender is released to another district, the information is transferred to that district, and contact information is provided to the offender so he or she may pursue DVR services after release.

Some individuals within correctional facilities have significant disabilities that, without vocational rehabilitation, may prevent them from fully supporting themselves through employment. Because of this they are often held in prison longer than necessary until Social Security benefits can be initiated, or they are released with no viable means of support. Representatives from the Department of Corrections, DVR, and the Social Security Administration (SSA) developed an early application procedure to assist inmates in securing benefits prior to their release. The Vermont Department of Corrections provides a small grant to cover the cost of the early application procedure.

3. Jump on Board for Success (JOBS)

The JOBS program provides SE and intensive case management services for youth with significant emotional and/or behavioral disabilities. The program uses work as a means to reach this challenging population. DVR works in partnership with the Department of Justice, Department of Health/Division of Mental Health, and the Department of Children and Families in eleven sites around the state. In FY 2006, the JOBS program served 243 youths, of whom 176 became employed. In addition, of the JOBS participants without a High School Diploma or GED, 35 percent were helped by the programs to achieve one of these educational goals. Finally, JOBS program staff assisted 58 percent of participants to obtain stable housing.

4. Choice Project

DVR began the Consumer Choice Project in 1993, which experimented with ways to increase consumer empowerment in the public rehabilitation process. As a consequence of providing consumers with broader options for employment goals, a large number of participants chose self-employment as an employment goal. In the Choice Project, 27% of consumers who became successfully employed were closed as self-employed as compared to approximately 2.5% of consumers in the general VR program. The program significantly changed the way self-employment was viewed in VR by: 1) changing the VR policy to be more encouraging to consumers who wished to start their own businesses; 2) developing partners within local communities to provide training and technical assistance to individuals pursuing a self-employment goal; and 3) providing training to VR Counselors to increase their knowledge and comfort level with self-employment. VR Counselors were no longer required to accept or reject a business plan, but rather they partnered with business experts and micro business organizations to assist consumers in developing a viable business plan. In addition, individuals were encouraged to participate in establishing Individual Development Accounts (IDA's), and Business Resource Groups (BRG's) were developed to link new entrepreneurs in need of capital with a local bank that offered low-interest loans and financial planning assistance to group members.

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

RSA's review process solicited input from DVR and stakeholders about VR and SE performance and compliance issues. The following issues were identified:

- since FY 2001, the rehabilitation rate has declined from 71 percent to 60.5 percent. The agency attributes the decline in performance to serving more complicated caseloads such as individuals on TANF. In addition, the agency is serving greater numbers of offenders with significant disabilities and consumers with severe and persistent mental illness;
- meeting and exceeding the required performance level for Indicator 1.6; and
- improving and expanding the agency's quality assurance process.

Following compilation and discussion of the issues with DVR, RSA worked with the agency 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 Technical Assistance

RSA and DVR agreed on the following performance goals strategies to achieve those goals, and technical assistance that RSA will provide to assist DVR to achieve the goals. These goals and strategies will be considered for inclusion in DVR's FY 2009 state plan and if they are included,

progress on achieving these goals will be reported in DVR's FY 2010 annual state plan submission.

1. Performance on Indicator 1.6

Issues: With respect to general and combined agencies, Performance Indicator 1.6 requires that, for all individuals exiting the VR program in competitive employment, the difference between the percentage of individuals reporting their own income as their primary source of support at application to those who report their own income as their primary source of support at the time of case closure to be at least 53.0 (34 CFR 361.84(c)(1)(vi) and 361.86(b)(1)). DVR has not met the required performance level for this indicator since FY 2000 as shown in the appendix, table 6.

Goal: Meet or exceed the required performance level for Indicator 1.6.

Strategy: DVR has hired the former director of the Vermont Association for Business, Industry, and Rehabilitation (VABIR), as its new employment services manager. The primary responsibilities involved in this position are to network with the Vermont business community and to train DVR staff so they can improve their job development and placement skills.

Method of Evaluation: In FY 2008, DVR will be successful if it maintains its performance on Indicator 1.6 compared to FY 2007; in FY 2009, if it improves compared with FY 2008; and in FY 2010, if it improves compared with FY 2009.

Technical Assistance: RSA will assist DVR to network with those similarly situated agencies that have met or exceeded the required performance level for indicator 1.6.

2. Performance on Indicator 1.2

Issues: Indicator 1.2 measures the percentage of individuals exiting the VR program after receiving services who achieve employment outcomes. The minimum performance level required for general and combined agencies is 55.8% (34 CFR 361.84 (b)(1)(i) and 34 CFR 361.86 (1)(ii)). Since FY 2002, the agency's performance on Indicator 1.2 decreased from 66 percent to 60 percent in FY 2006, as shown in Table 7 in the appendix. The cause for this decreasing trend may be attributed, in part, to the characteristics of individuals served by DVR. By creating programs for individuals with significant disabilities who are receiving public assistance (TANF), or individuals reentering the community from the state prison system, DVR is serving complicated populations that require uniquely skilled counselors who are prepared to provide intensive case management.

Goal 2: Increase Performance on Indicator 1.2.

Strategies:

- The employment services manager will use his experience in job development and networking skills to increase the number of employers interested in hiring DVR consumers.
- VR counselors will increase their skills in job development and successful placement through targeted training from the employment services manager.

Method of Evaluation: In FY 2008, DVR will be successful if it maintains its performance on Performance Indicator 1.2 compared to FY 2007; in FY 2009, if it improves compared with FY 2008; and in FY 2010, if it improves compared with FY 2009.

Technical Assistance: RSA will work with DVR to further explore the reasons for the decrease in performance. RSA recommends DVR conduct team case reviews during FY 2008 on unsuccessful cases in order to identify consumer planning and readiness factors and agency processes that contribute to unsuccessful outcomes.

3. Expand Quality Assurance

Issue: The agency engages in quality assurance activities that focus on casework documentation and compliance. It does not focus on other areas that may affect the agency performance. By expanding its quality assurance system to review best practices from community rehabilitation programs, staff strengths and successes, and updated research from Dartmouth's Evidenced Based Practices project for supported employment, the agency may be able to improve its performance.

Goal: Develop and implement an integrated quality assurance system that enables DVR to fully utilize the data it collects, the results of its comprehensive state-wide needs assessment, its performance on the RSA evaluation standards and indicators, service record review findings, training activities and ongoing evaluative activities in improving agency management and the achievement of employment outcomes.

Strategy:

- development and implementation of a comprehensive quality assurance system that is tied into DVR strategic goals and objectives;
- continue development of an automated case management system; and
- development of measurable state plan objectives.

Method of Evaluation: RSA will consider the goal to be achieved when the specified strategies are completed.

Technical Assistance: RSA will identify quality assurance resources useful to states in the development of a quality assurance system.

Chapter 3: Fiscal Review of the Vocational Rehabilitation and Supported Employment Programs Administered by the DVR

RSA reviewed DVR'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 DVR for FY 2002 through FY 2006**

| Fiscal Year | Vermont (G) | | | | |
|--|--------------------|-------------|-------------|-------------|-------------|
| | 2002 | 2003 | 2004 | 2005 | 2006 |
| Grant Amount | 7,526,444 | 7,431,920 | 7,580,141 | 7,637,945 | 7,919,318 |
| Required Match | 2,037,017 | 2,011,435 | 2,051,550 | 2,067,195 | 2,143,348 |
| Federal Expenditures | 7,526,444 | 7,259,225 | 7,580,141 | 7,637,945 | 7,479,562 |
| Actual Match | 2,955,442 | 2,131,657 | 3,179,374 | 3,333,885 | 3,072,341 |
| Over (Under) Match | 918,425 | 120,222 | 1,127,824 | 1,266,690 | 928,993 |
| Carryover | 0 | 172,695 | 0 | 0 | 439,756 |
| Program Income | 1,533,508 | 2,379,515 | 1,947,772 | 2,044,461 | 2,760,157 |
| Maintenance of Effort (MOE) | 1,842,918 | 2,147,953 | 2,955,442 | 2,131,657 | 3,179,374 |
| | | | | | |
| Administrative Costs | 2,220,452 | 1,991,087 | 2,050,087 | 2,161,314 | 3,496,138 |
| Total Expenditures | 12,309,209 | 12,117,804 | 13,181,514 | 13,406,720 | 13,716,877 |
| Percent Admin Costs to Total Expenditures | 18.04% | 16.43% | 15.55% | 16.12% | 25.49% |

Explanations Applicable to the Fiscal Profile Table

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 Technical Assistance to the VR and SE Programs 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, reallocation, program income, liquidation of outstanding obligations and grant closeout.
- Reviewed with staff time distribution (including adherence to the OMB Circular A-87 semi-annual certification requirement), cash management procedures and the sources and sufficiency of matching funds.
- Reviewed with staff the reporting requirements for each program.
- Obtained, reviewed, entered and approved Financial Status Reports for all formula grant programs that were not previously entered into RSA's MIS.
- Reviewed the agency's revised strategies related to its administration of the state's Employee Assistance Program that resulted in a substantial increase in program income in FY 2006. This resulted in increased carryover dollars, which became available for use in FY 2007 for additional allowable program costs.
- Discussed requirements for transferring Supported Employment Program funds between the two VR agencies in Vermont. This is a state determination and funds that cannot be utilized by either VR agency can be transferred at any point within the two-year period available for the obligation of supported employment funds.
- Reviewed procurement procedures and accountability related to the agency's use of a fund to allow consumers to make purchases, not exceeding \$250, directly with their vendor of choice.

Summary of RSA's fiscal review: No fiscal performance or compliance issues were identified found during the review of DVR.

Chapter 4: Vocational Rehabilitation and Supported Employment Programs Administered by the Division for Blind and Visually Impaired

Program Organization

DBVI operates with a total of 13 full-time equivalent staff positions that cover the state. The division director leads the agency. The chief of field services supervises four counselors; one for each of the four regions and each counselor supervises a rehabilitation associate.

Table 1 includes fiscal and program data for fiscal years 2002 through 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.

As shown in the table, in FY 2006, DBVI provided services to 367 individuals with disabilities, 97 of whom achieved employment outcomes. Of these 97 individuals, 42 achieved employment outcomes in integrated settings without supports. Individuals with gainful employment earned an average of \$11.71 per hour and worked an average of 26.77 hours per week.

**Table 3
Vermont Division for the Blind and Visually Impaired
Performance Measures by Year**

| VERMONT | 2002 | 2003 | 2004 | 2005 | 2006 |
|---|-------------|-------------|-------------|-------------|-------------|
| Total funds used | \$1,222,188 | \$1,355,400 | \$1,335,447 | \$1,556,605 | \$1,479,320 |
| Individuals served during year | 298 | 315 | 355 | 380 | 367 |
| Applicants | 142 | 152 | 155 | 160 | 132 |
| Closed after receiving services | 110 | 120 | 117 | 126 | 129 |
| Closed with employment outcomes | 77 | 90 | 88 | 101 | 97 |
| Employment outcomes without supports in an integrated setting | 39 | 49 | 61 | 55 | 42 |
| Average cost per individual served | \$4,101.30 | \$4,302.86 | \$3,761.82 | \$4,096.33 | \$4,030.84 |
| Average cost per employment outcome | \$15,872.57 | \$15,060.00 | \$15,175.53 | \$15,411.93 | \$15,250.72 |
| Employment outcomes per \$million spent | 63.00 | 66.40 | 65.90 | 64.88 | 65.57 |
| Competitive employment outcomes per \$million spent | 34.36 | 39.10 | 45.68 | 39.19 | 35.83 |
| Average hourly earnings for paid employment outcomes | \$12.87 | \$10.58 | \$11.92 | \$13.42 | \$11.71 |
| Average state hourly earnings | \$14.92 | \$15.43 | \$15.90 | \$16.40 | \$16.93 |
| Average hours worked per week for paid employment outcomes | 31.14 | 27.91 | 32.70 | 29.21 | 26.77 |
| Percent of transition age served to total served | 6.36 | 8.33 | 6.84 | 6.35 | 5.43 |

| | | | | | |
|---|-------|-------|-------|-------|-------|
| Employment rate for transition age served | 28.57 | 70.00 | 50.00 | 87.50 | 28.57 |
| Average time between application and closure (in months) for individuals with successful paid employment outcomes | 21.90 | 23.20 | 22.30 | 20.20 | 20.50 |
| Average number of individuals served per total staff | 27.09 | 28.64 | 32.27 | 34.55 | |

DBVI and the RSA VT team conducted a series of in-depth data analyses on performance measures related to table 1. These analyses were incorporated into discussions about trends, outcomes, disability populations, and service programs throughout the course of the review process. The results of these analyses were used to formulate the goals and strategies developed by DBVI and RSA.

Provision of Technical Assistance to the VR and SE Programs During the Review Process

RSA provided technical assistance to DBVI 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;
- provided feedback to the agency on its case management system;
- provided training on how to use RSA’s Management Information System;
- recommended two organizations for assistance with transportation, United We Ride, a Department of Transportation Program to assist communities in overcoming transportation barriers for people with disabilities and Community Transportation Association, an organization that advocates for improved transportation programs in rural communities.
- provided resources on how other States have eliminated or greatly reduced homemaker outcomes; and
- discussed with the agency methods for improved performance on Indicator 1.6.

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

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

1. Learn, Earn and Prosper (LEAP)

DBVI is in its first year of a three year grant from the Gibney Foundation to develop partnerships with local non-profits, including ReCycle North, Linking Learning to Life, the Vermont Youth Conservation Corp (VYCC) and the Vermont Association for the Blind and Visually Impaired (VABVI) to provide community based training and paid work opportunities to transitioning students.

The LEAP program engages blind and visually impaired youths in a program in which they learn skills that will help them become more independent, confident, and productive young adults. LEAP is an intensive, four-week program, during which youth live with an

adult VYCC Crew Leader, in an apartment-style suite. Throughout the experience, members will learn to use adaptive equipment to cook meals, shop for groceries, use public transportation, do laundry, and live as a community. Additionally, LEAP members gain employment skills by participating in one of five vocational training programs at ReCycle North. Through these programs, the participants will learn professional and interpersonal skills while helping ReCycle North accomplish its three-part mission of waste reduction, job skills training, and poverty relief.

Following the four weeks of intensive training the students will receive follow up case management from DBVI or the Vermont Association for the Blind and Visually Impaired. Also as part of the follow-up, Linking Learning to Life will match students with role models, who are professionals in a field in which the student has expressed interest. For a period of one year, the student and his or her mentor will participate in weekly e-mail exchanges to discuss designated topics. The dialogue is intended to provide an opportunity to develop interpersonal skills, the constructive use of technology, career exploration, the use of resources and information, setting goals and devising the means to reach the goals.

2. Self-Employment Program

DBVI supports a group of consumers who have goals to start a small business. The group consists of individuals who had been successful in a career that was then cut short because the individuals became blind or visually impaired. The group meets quarterly over a year and participates in a DBVI sponsored workshop designed to motivate them as individuals with potential to become successful. Last year, 23 consumers and staff attended the motivational conference, "Creating the Life You Want, Walking the Path to Get You There." The group continues to meet at least quarterly in order to discuss topics such as the writing of a business plan, tax organization, marketing and basic accounting. Since the group meets on a regular basis with a designated DBVI counselor it has also become a self-support group that focuses on "learned optimism and resiliency."

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

RSA's review process solicited input from DBVI and stakeholders about VR and SE performance and compliance issues. The following issues were identified:

- the impact of 1.6 on the high percentage of homemakers; and
- the need to increase the percentage of transitioning youths who are served by DBVI.

VR and SE Performance Issues, Goals, Strategies, and Technical Assistance

RSA and DBVI agreed on the following performance goals; strategies to achieve these goals, and technical assistance that RSA will provide to assist DBVI to achieve each goal. These goals and strategies will be considered for inclusion in DBVI's FY 2009 state plan and if they are included, progress on achieving these goals will be reported in DBVI's FY 2011 annual state plan submission.

VR and SE Performance Issues, Goals, Strategies, and Technical Assistance

RSA and DBVI agreed on the following performance goals; strategies to achieve these goals, and technical assistance that RSA would provide to assist DBVI achieve each goal. These goals and strategies will be considered for inclusion in DBVI's FY 2009 state plan and if they are included, progress on achieving these goals will be reported in DBVI's FY 2011 annual state plan submission.

1. Performance on 1.6

Issue: With respect to agencies serving individuals who are blind and visually impaired, Performance Indicator 1.6 requires that, for individuals exiting the VR program in competitive employment, the difference between the percentage of individuals who claim their own income as their primary source of support at application and those who claim their own income as their primary source of support at case closure is 30.4 (34 CFR 361.84 (c)(1)(vi) and 361.86 (b)(1)). DBVI has not passed Performance Indicator 1.6 since FY 2000, as shown in the appendix, table 8.

Goal: Meet or exceed the required performance level for Indicator 1.6.

Strategy: DBVI will hire two part-time job developers who are charged with helping consumers to obtain high quality competitive employment.

Method of Evaluation: In FY 2008, DBVI will be successful if it maintains its performance on Indicator 1.6 compared to FY 2007; in FY 2009, if it improves compared with FY 2008; and in FY 2010, if it improves compared with FY 2009.

Technical Assistance: RSA will work with DBVI to identify state VR agencies for the blind and visually impaired with high performance on Standard and Indicator 1.6.

2. Homemaker Outcomes

Issue: DBVI assists a significant number and percentage of individuals to achieve homemaker outcomes. In FY 2006, the percentage of DBVI consumers who achieve homemaker outcomes was 41.2 percent, 19.9 percent above the national average of 21.3 percent, as shown in Table 9 in the appendix. In order to increase the number and percentage of competitive employment outcomes achieved, DBVI has developed the following goal:

Goal: Decrease the percentage of homemaker outcomes to eight percent above the national average by 2010.

Strategies:

- Hire two part-time job developers to increase the number and quality of competitive employment placements.

- Seek additional state funding for individuals in need of homemaker/independent living services.

Method of Evaluation: In FY 2008, DBVI will be successful if it maintains its performance on decreasing the percentage of homemaker outcomes compared to FY 2007; in FY 2009, if it improves compared with FY 2008; and in FY 2010, if it improves compared with FY 2009.

Technical Assistance: RSA will identify state VR agencies for the blind and visually impaired with low numbers of homemaker outcomes.

3. Transition

Issue: The percentage of transitioning youths served by DBVI is 6.4 percent while the national average for blind agencies is 10.3 percent.

Goal: Increase the percentage of transitioning students served to the national average for blind and visually impaired agencies, (10.3 percent) by FY 2010.

Strategy: DBVI will increase the marketing of the LEAP program and its other transitioning services among families of children who are blind or visually impaired.

Method of Evaluation: In FY 2008, DBVI will be successful if it maintains its performance on increasing the percentage of transitioning students served compared to FY 2007; in FY 2009, if it improves compared with FY 2008; and in FY 2010, if it improves compared with FY 2009.

Technical Assistance: RSA will identify state VR agencies for the Blind and Visually Impaired who serve transitioning students at a rate equal or greater to the national average.

4. Expand Quality Assurance

Issue: The agency's quality assurance and evaluation activities are focused on casework documentation and compliance, and not the performance of the agency or service providers. The agency uses the traditional model of collecting a random sample of records from each of the regions and then reviews those records for errors in compliance.

Goal: Develop and implement an integrated quality assurance system that enables DBVI to fully utilize the data it collects, the results of its comprehensive state-wide needs assessment, its performance on the RSA evaluation standards and indicators, service record review findings, training activities and ongoing evaluative activities in improving agency management and the achievement of employment outcomes.

Strategy: RSA will work with the agency to enhance its quality assurance system.

Method of Evaluation:

- development and implementation of a comprehensive quality assurance system that is aligned with DBVI strategic goals and objectives;
- continue development of an automated case management system; and
- development of measurable state plan objectives.

Technical Assistance: RSA will identify quality assurance resources useful to states in the development of a quality assurance system.

Chapter 5: Fiscal Review of the VR Program
For the Division for the Blind and Visually Impaired

RSA reviewed DBVI'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 4
Fiscal Data for DBVI for FY 2002 through FY 2006

| Fiscal Year | Vermont (B) | | | | |
|--|--------------------|-------------|-------------|-------------|-------------|
| | 2002 | 2003 | 2004 | 2005 | 2006 |
| Grant Amount | 988,182 | 1,013,444 | 1,033,656 | 1,041,538 | 1,079,869 |
| Required Match | 267,450 | 274,287 | 279,757 | 281,890 | 292,264 |
| Federal Expenditures | 860,858 | 864,361 | 905,855 | 1,041,538 | 1,079,869 |
| Actual Match | 267,450 | 274,287 | 279,757 | 379,965 | 386,790 |
| Over (Under) Match | 0 | 0 | 0 | 98,075 | 94,526 |
| Carryover | 127,324 | 149,083 | 127,801 | 0 | 0 |
| Program Income | 37,697 | 88,559 | 0 | 60 | 10,116 |
| Maintenance of Effort (MOE) | 251,307 | 257,991 | 267,450 | 274,288 | 279,757 |
| Administrative Costs | 153,077 | 194,385 | 208,176 | 243,699 | 261,495 |
| Total Expenditures | 1,222,188 | 1,355,400 | 1,335,447 | 1,556,605 | 1,479,320 |
| Percent Admin Costs to Total Expenditures | 12.52% | 14.34% | 15.59% | 15.66% | 17.68% |

Explanations Applicable to the Fiscal Profile Table

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 Technical Assistance to the VR and SE Programs During the Review Process

RSA provided the following fiscal technical assistance to DBVI:

- 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, reallocation, program income, liquidation of outstanding obligations and grant closeout;
- Reviewed with staff time distribution (including adherence to the OMB Circular A-87 semi-annual certification requirement), cash management procedures and the sources and sufficiency of matching funds;
- Reviewed financial reporting requirements for each program with agency staff;
- Obtained, reviewed, entered and approved Financial Status Reports for all formula grant programs that were not previously entered into RSA's Management Information System (MIS)
- Discussed requirements for transferring Supported Employment Program funds between the two VR agencies in Vermont. This is a state determination and funds that cannot be utilized by either VR agency can be transferred at any point within the two-year period available for the obligation of supported employment funds.

Summary of RSA's fiscal review: No fiscal performance or compliance issues were identified found during the review of DBVI.

Chapter 6: Independent Living Programs Administered by DVR and DBVI

Program Organization

DVR received \$301,477 in Title VII, Part B funds for its FY 2007 Independent Living Rehabilitation Services (ILRS) program. DVR provides IL services in Vermont through its support for the general operations of two CILs. DVR funds its IL activities through a combination of Part B federal funds and state matching funds.

In each fiscal year, DBVI receives \$75,000 in Title VII, Part B funds to provide independent living services to eligible individuals who are blind or have low vision. DBVI uses these funds in conjunction with the funding it receives through the OIB program to provide services such as transportation, vision rehabilitation, daily living skills training, orientation and mobility and community integration support to individuals who are eligible.

Table 5

Sources and Amounts of Funding (FY 2006)

| | Amounts of Funding |
|---------------------|--------------------|
| Part B Funds | 301,477 |
| Older Blind | 225,000 |
| Other Federal Funds | 276,436 |
| State Funds | 155,208 |
| Local Government | 0 |
| Private/Other Funds | 0 |
| Total | 958,121 |

Provision of Technical Assistance to the IL Program During the Review Process

RSA provided technical assistance to DVR and DBVI in a number of IL program areas during the review process. RSA:

- discussed ways to improve the effectiveness of the SILC and to ensure that the SILC is fully constituted; and
- discussed strategies to improve service delivery.

IL Issues Identified by DVR and DBVI and Stakeholders During the Review Process

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

- the effectiveness of the SILC; and

- collaboration between the SILC and the DVR and DBVI.

Following the gathering of this information, RSA worked with DVR and DBVI to address as these issues.

IL Performance Issues, Goals, Strategies, and Technical Assistance

As a result of the review, RSA, DVR, and DBVI agreed on the following IL performance goals, strategies to achieve the goals, and technical assistance that RSA will provide to assist DVR and DBVI to achieve each goal.

1. SILC Capacity-Building

Issue: Vermont has a fully functional SILC that works well with DVR and DBVI. Both agencies and the SILC agree that the SILC could be further strengthened. The SILC members need to be more proactive in representing the needs and issues of individuals with disabilities in Vermont. Also, a system needs to be established to ensure that vacant positions on the SILC are promptly filled with knowledgeable individuals meeting the membership and composition requirements under Title VII of the Act.

Goal: All members of the SILC will understand their roles and responsibilities, and be empowered to serve as leaders in the IL movement in Vermont.

Strategies:

- develop and implement a SILC capacity-building plan focused on the fulfillment of SILC duties, responsibilities and other requirements, as well as the development of leadership skills;
- establish nominating mechanisms for SILC membership; and
- establish a tracking mechanism to ensure fulfillment of SILC composition requirements.

Method of Evaluation: Development of a SILC capacity-building plan on or before September 30, 2008.

Technical Assistance: RSA will work with both agencies and the SILC to identify other technical assistance resources, such as local non-profits.

Chapter 7: Independent Living Services for Older Individuals Who Are Blind

DBVI received \$225,000 in Title VII, Chapter 2 funds for its FY 2006 OIB program. All funds are directed to the Vermont Association for the Blind (VABVI) via a grant process and overseen by DBVI. VABVI also funds the OIB program through state funds and third-party contributions. VABVI provides services to those whose primary goal is to remain as independent as possible. Services include skills training in activities of daily living, transportation, and adaptive technology and equipment. Services are designed to help individuals remain in their homes and participate in community life.

Provision of Technical Assistance to the OIB Program During the Review Process

RSA provided technical assistance to DBVI in a number of OIB program areas during the review process. RSA:

- held discussions regarding the nature of the program, the allocation of Chapter 2 funds and improvements in the service delivery network; and
- explored VABVI's reliance on volunteers to drive consumers to training sites.

Promising OIB Practices Identified by DBVI and Stakeholders During the Review Process

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

1. Coordinated Service Delivery

VABVI effectively addresses its available funds by providing Chapter II services to groups of clients in ten different locations throughout the state. Because of a lack of transportation in rural areas, VABVI has an extensive network of volunteers who transport clients to the locations, enabling them to participate in IL training, social and community activities. In this way, Rehabilitation Teachers are able to meet with consumers twice per month to provide IL living skills training, peer-to-peer support and community integration.

OIB Issues Identified by DBVI and Stakeholders During the Review Process

RSA's review process solicited input from DBVI and stakeholders about OIB performance and compliance issues. The following issues were identified:

- challenges to providing services in a rural state;
- the need to increase the number of AT trainers available to assist consumers in identifying and using AT; and

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

OIB Performance Issues, Goals, Strategies, and Technical Assistance

As a result of the review, RSA and DBVI agreed on the following OIB performance goals, strategies to achieve the goals, and technical assistance that RSA will provide to assist DBVI to achieve each goal.

1. The Number of AT Trainers Available to Consumers

Issue: Vermont is a rural state with an increasing aging population. OIB provides a majority of its services to individuals 75 and older, with a majority of these individuals being 85-89 years of age. Consumers are often able to obtain AT equipment on their own. However, their ability to effectively utilize the equipment for independent living is limited by insufficient AT training to help consumers use the technology. VABVI does not have a sufficient number of trainers to meet this need.

Goal: DBVI in partnership with its grantee, VABVI, will increase the capacity of the OIB program to provide training in the use of assistive technology.

Strategies:

- VABVI will request funding from the Vermont Legislature to support the increase in available AT trainers.
- VABVI will research AT equipment and software vendors to inquire about possible in-kind donations to train Assistive Technology trainers on the utilization of AT and software.
- VABVI will contact the Vermont Assistive Technology Program to discuss coordinating strategies to develop AT training opportunities.

Method of Evaluation: By September 30, 2009, DBVI will increase the number of AT and software trainers available to consumers.

Technical Assistance:

- RSA will identify other states with successful AT programs for mentorship and TA opportunities;
- RSA will coordinate TA resources with the OIB program from the Rehabilitation Research and Training Center on Blindness and Low Vision at Mississippi State University, APRIL;
- RSA's technical assistance and training grant; and
- RSA will identify and inform VABVI of successful TA and mentoring programs being used by other state agencies.

Chapter 8: Progress on Issues Raised in Previous Reviews of the Division of Vocational Rehabilitation

As a result of the RSA review conducted with DVR in FY 2003-2004, the agency developed a Corrective Action Plan (CAP). A summary of the progress that DVR has made on the CAP is described below.

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

- services identified for consumer IPEs are being appropriately identified;
- presumption of eligibility is being utilized for applicants receiving SSI or SSDI;
- assessments are more comprehensive and describe the individual's service needs to obtain a goal consistent with the individual's unique strengths, priorities, concerns, abilities, capabilities, interests, and informed choice;
- consumers' IPEs are being implemented in a timely manner as required;
- DVR is amending IPEs to conform to revisions in consumers' employment goals and identify the purpose and reasoning for the change;
- DVR is maintaining services with consumers for at least 90 days after placement to ensure job stability;
- wages and benefit levels of competitively employed consumers are consistently verified to be at least minimum wage and no less than that customarily paid by employers for the same or similar work;
- DVR's policy manual has been updated to include policies regarding the nature and scope of three categories of VR services specified in Section 361.48(a) of the regulations: counseling and guidance; referral; and other goods and services;
- DVR's policies related to Physical Restoration Services and Mental Restoration Services (Health Services) indicate that VR services are based on the rehabilitation needs; and
- DVR's Transportation policy does not include limited caps on some services (vehicle repairs, modifications, etc.).

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

- service records lacked sufficient documentation to support the determination of the level of significance of disability and the priority category to which the individual was assigned, thus calling into question the appropriateness of those assignments
- status: DVR has not yet achieved the 90% threshold indicating that this issue has been resolved. Regional Managers will be reviewing these findings with staff to re-emphasize this issue.

Chapter 9: Progress on Issues Raised in Previous Reviews **Vermont Division for the Blind and Visually Impaired**

As a result of the RSA review conducted with DBVI in FY 2003-2004, the agency developed a Corrective Action Plan (CAP). A summary of the progress that DBVI has made on the CAP is described below.

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

- DBVI has made substantial progress in developing a required interagency agreement with the state education agency;
- DBVI counselors adequately utilize presumptive eligibility for all applicants receiving SSI or SSDI;
- DBVI is consistently developing IPEs in a timely manner or ensuring that delays in IPE development are appropriate;
- DBVI's homemaker policy has been changed and 55 and older is no longer identified as a criterion for applicants;
- Only qualified DBVI counselors, are making eligibility determinations and approving IPEs on behalf of the agency;
- DBVI policies no longer place absolute dollar limits on two specific service categories-- vocational and other training services and interpreter services;

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

- DBVI needs to achieve 90 percent compliance in verifying that competitively employed consumers received customary wages and benefits for the same or similar work; and
- DBVI served less than 100 individuals from minority backgrounds during both FY 2002 and FY 2003, meaning that its ratio of service rates for minorities to non-minorities is not considered statistically valid and in order to meet the standard, DBVI must describe its past and future policies and steps for ensuring equal access to services;

Criteria: DBVI will have met with at least three organizations representing diverse, minority or underserved populations in Vermont.

Status: DBVI has met with the Imani organization of Burlington, Vermont. DBVI is attempting to reach out to the Abanaki Indians, located in northern Vermont, but has not been successful. In order to obtain support in this effort DBVI has been in contact with a representative of the Pequot Tribe of Connecticut.

Chapter 10: Summary Conclusion

Strengths and Challenges of the Division of Vocational Rehabilitation

DVR has been very successful at developing networks and partnerships with the business community, agencies sharing common goals and other Vermont state agencies serving individuals with disabilities. These relationships are well developed and utilized by DVR. They function to support an array of broad services designed to improve the quality of life of the consumers through high quality jobs intended to meet their individual needs and increase their ability to be independent.

The most significant challenges confronting the program are the high number of consumers receiving SSI and SSDI, the rural nature of the state, and the lack of adequate public transportation for individuals seeking employment. The data from the 911 reports indicates that over 40 percent of DVR's consumers receive SSI or SSDI benefits at application. Most of DVR's consumers have severe and persistent mental illness or an intellectual developmental disability. Being a rural state impedes the ability to provide comprehensive services to many of those in need, since vendors require a large pool of applicants in order to operate a financially viable program. The barrier identified most often by the stakeholders and supported by the VR program is the lack of public transportation. Without a complete and functional public transportation system, many individuals who are motivated to seek employment and are capable of being productive employees are not able to accept job opportunities.

The performance of the DVR program has consistently improved over the past fifteen years. In 1991 DVR placed 443 consumers. DVR has increased the number of employment outcomes to 1,452 in FY 2006. This accomplishment was achieved, in part, by reducing the cost of a placement in 1991 from \$17,565 to the cost for a placement in 2006 to \$9,476. DVR is committed to providing services to all Vermonters with significant disabilities, adding and expanding programs to serve those who are dependent on state aide (TANF), those who are about to reenter the community after incarceration and assuring that each high school in the state has a transition counselor.

DVR received \$301,477 in Part B funds for its FY 2007 Independent Living Rehabilitation Services (ILRS) program. DVR provides IL services in Vermont through its support for the general operations of two CILs. DVR funds its IL activities through a combination of Part B federal funds and state matching funds.

The IL program manages two grants to operate two CILs run by one director. The SILC and stakeholders indicated that significant challenges besides transportation are the increasing cost of technology and the need to reach out to the unserved and underserved populations, especially those in the Northeast Kingdom, Rutland, Springfield and parts of White River Junction. In addition, the program has experienced eleven years of flat funding.

Strengths and Challenges of the Division for the Blind and Visually Impaired

DBVI is a small agency with 13 staff members. Because of the nature and culture of this state, partnerships and networks are well developed and utilized by the agency. These partnerships support an array of services designed to improve the quality of life of the consumers through high quality jobs intended to meet their individual needs and increase their ability to be independent.

The challenges confronting the DBVI program are the high number of consumers receiving SSI and SSDI, the rural nature of the state, and the lack of adequate public transportation for individuals seeking employment. The data from the 911 reports indicates that 56 percent of DBVI's consumers receive either SSI or SSDI. Many of DBVI's consumer's have multiple disabilities and some require co-case management of services with other agencies in the state, such as the Division for Developmental Disabilities and the Division for Mental Health. Vermont is a rural state with only a few population centers, impeding the agency's ability to provide comprehensive services to some of those in need, since vendors require a large pool of applicants and dependable public transportation in order to run a financially viable program. The most costly and significant barrier identified by most of the stakeholders and DBVI is the lack of public transportation. Without a complete and functional public transportation system, many individuals who are motivated to seek employment and are capable of being productive employees are not able to accept job opportunities.

DBVI receives \$75,000 in Part B funds to provide independent living services to eligible individuals who are blind or have low vision. To address the lack of transportation, VABVI has an extensive network of volunteers who provide rides to clients, enabling them to participate in more training, social and community activities. DBVI has actively explored innovative approaches to service delivery, such as the LEAP program.

Table 6 summarizes the results of RSA's review

| Agency: DVR | | |
|---|--|--|
| Program: VR | | |
| Goal | Strategies | Technical Assistance |
| 1. DVR will meet or exceed performance Indicator 1.6 | Hired employment services manager to increase contacts with business community and identify job development and placement trainings for VRC's | RSA will assist DVR to network with those similarly situated agencies that have met or exceeded the required performance level for indicator 1.6 and will work to identify additional resources, such as new concepts in job development or helping individuals maintain their employment. |
| 2. Increase Performance on Indicator 1.2. | The employment services manager will use his experience in job development and networking skills to increase the number of employers interested in hiring DVR consumers. Counselors will increase their skills in job development and placement retention. | RSA will work with DVR to further explore the reasons for the decrease in performance. RSA recommends DVR conduct team case reviews during FY 2008 on unsuccessful cases in order to identify consumer planning and readiness factors and agency processes that contribute to unsuccessful outcomes. |
| 3. Develop and implement an integrated quality assurance system. | Implementation of a comprehensive quality assurance system that is tied into DVR strategic goals and objectives; | RSA will develop resources useful to states in the development of a quality assurance system. |
| Recommendations | | |
| 4. Integrate training activities into goal statements and evaluated effectiveness of training | | |
| 5. Assessed DVR internal communications and recommended a constant flow up and down the chain of command; | | |
| Promising practices | | |
| 6. Reach Up Program for individuals on TANF | | |
| 7. Offenders Re-entry Program for individuals returning to the community from being incarcerated. | | |
| 8. Jump on Board for Success (JOBS) for transitioning youth who are at risk. | | |
| 9. Project Choice for individuals who are seeking self-employment. | | |
| Issues for Further Review | | |

| | | |
|--|--|--|
| 10. Progress on 2 for 1 grant with SSA | | |
| 11. Progress on Benefits counselors grant with SSA | | |
| Agency: DBVI | | |
| Program: VR | | |
| Goal | Strategies | Technical Assistance |
| 8. Meet or exceed the required performance level for Indicator 1.6. | DBVI has contracted with VABIR hire 2 part time job developers with a goal to increase the number of competitive placements. | RSA will continue to research programs like IA and NM concerning their success in discontinuing homemakers as a positive outcome for a VR program. |
| 9. Decrease the percentage of homemaker outcomes to eight percent above the national average by 2010. | Seek additional state funding for individuals in need of homemaker/independent living services. | Share with DBVI best practices from agencies that have been successful at decreasing the number of Homemaker outcomes. |
| 10. Increase the number of transitioning youths served. | Increase marketing of services available to youth who are blind or visually impaired. | RSA will review promising practices from other programs that are comparable with DBVI and have developed affordable marketing campaigns |
| 11. Develop and implement an integrated quality assurance system. | Develop an integrated quality assurance system. | RSA will provide model quality assurance systems applicable to DBVI. |
| Recommendations | | |
| 12. Integrate training activities into goal statements and evaluated effectiveness of training | | |
| 13. Assessed DBVI internal communications and assess for the constant flow up and down the chain of command. | | |
| Promising practices | | |
| LEAP Program | | |
| Self Employment support group | | |
| Issues for Further Review | | |
| 14. Progress on marketing program to potential consumers. | | |
| 15. Progress on decreasing homemaker outcomes | | |
| Program: OIB | | |
| Goal | Strategies | Technical Assistance |
| 16. DBVI in partnership with its grantee, VABVI, will increase the capacity of the OIB program to provide | VABVI will ask the Vermont Legislature to approve funding for increased technology training. | RSA will assist in identifying a variety of AT vendors. RSA will identify other states with successful AT programs for |

| | | |
|--|---|--|
| training in the use of assistive technology. | | mentorship and TA opportunities. RSA will coordinate TA resources with the VT OIB program from the Rehabilitation Research and Training Center on Blindness and Low Vision at Mississippi State University, APRIL, the IL training grant and other resources as appropriate. |
| 17. Promising Practices | | |
| 18. Coordinated service delivery | | |
| Issues for Further Review | | |
| 19. Explored VABVI's reliance on volunteers to drive consumers to training sites. | | |
| | IL Program | |
| Goal | Strategies | Technical Assistance |
| All members of the SILC will understand their roles and responsibilities as members of the SILC, and be empowered to serve as leaders in the IL movement in Vermont. | Develop and implement a SILC capacity-building plan focused on the fulfillment of SILC duties, responsibilities and other requirements, as well as leadership skills development. | RSA will provide training and technical assistance, as needed. Technical assistance will also be sought from locally available resources such as non-profits. |
| 20. Recommendations | | |
| Improve the effectiveness of the SILC; | | |
| 21. Improve collaboration between the SILC and the DSU | | |
| Issues for Further Review | | |
| 22. Progress on keeping the SILC fully reconstituted | | |

APPENDIX
Vermont General and Vermont Blind
State Review
Table 7

DVR Performance on Indicator 1.6

| | RSA Mini- mum Perfor- mance Level | Computational Data & Results | | | | | | | |
|--|--|------------------------------|---------|---------|---------|---------|---------|---------|-----|
| | | Met (M) Did Not Meet (DNM) | | | | | | | |
| | | FY 2000 | FY 2001 | FY 2002 | FY 2003 | FY 2004 | FY 2005 | FY 2006 | |
| Indicator 1.6 | | | | | | | | | |
| Difference Between Percent Self-Supporting at Closure and Application | | | | | | | | | |
| Competitive Employment Outcomes | 1,043 | 1,130 | 1,197 | 1,298 | 1,311 | 1,381 | 1,419 | | |
| Primary Support is Own Income at Application | 224 | 302 | 302 | 348 | 336 | 361 | 390 | | |
| % self-support at application | 21.50% | 26.73% | 25.23% | 26.81% | 25.63% | 26.14% | 27.48% | | |
| Primary Support is Own Income at Closure | 698 | 799 | 796 | 881 | 1005 | 1007 | 1016 | | |
| % self-support at closure | 66.90% | 70.71% | 66.50% | 67.87% | 76.66% | 72.92% | 71.60% | | |
| | 53.0 | 43.98 | 41.27 | 41.06 | 51.03 | 46.78 | 44.12 | | |
| | | DNM | DNM | DNM | DNM | DNM | DNM | | DNM |

Table 8
Five Year Summary of results of Indicator 1.2

| | RSA Minimum Performance Level | Computational Data & Results | | | | |
|--|--|------------------------------|---------|---------|---------|---------|
| | | Met (M) Did Not Meet (DNA) | | | | |
| | | FY 2002 | FY 2003 | FY 2004 | FY 2005 | FY 2006 |
| Indicator 1.2 | | | | | | |
| Percent with employment outcomes after services | | | | | | |
| Employment outcomes | 1,222 | 1,316 | 1,336 | 1,420 | 1,452 | |
| Individuals served | 1,855 | 2,187 | 2,206 | 2,349 | 2,423 | |
| | 55.8% | 60.17% | 60.56% | 60.45% | 59.93% | |
| | | M | M | M | M | M |

Table 9
DBVI Performance on Indicator 1.6 for DBVI

| | RSA Minimum Performance Level | Computational Data & Results | | | | | | | | | | | | |
|---|--|------------------------------|---------|---------|---------|---------|--------------------|---------|-----|-----|-----|--------|-----|-----|
| | | Met (M) | | | | | Did Not Meet (DNM) | | | | | | | |
| | | FY 2000 | FY 2001 | FY 2002 | FY 2003 | FY 2004 | FY 2005 | FY 2006 | | | | | | |
| Indicator 1.6 Difference Between Percent Self- Supporting at Closure and Application | | | | | | | | | | | | | | |
| Competitive Employment Outcomes | 88 | 105 | 94 | 95 | 114 | 122 | 114 | | | | | 114 | | |
| Primary Support is Own Income at Application | 44 | 53 | 48 | 48 | 56 | 68 | | | | | | 61 | | |
| % self-support at application | 50.00% | 50.50% | 51.06% | 50.53% | 49.12% | 55.74% | | | | | | 53.51% | | |
| Primary Support is Own Income at Closure | 67 | 82 | 71 | 66 | 84 | 97 | | | | | | 83 | | |
| % self-support at closure | 76.14% | 78.10% | 75.53% | 69.47% | 73.68% | 79.51% | | | | | | 72.81% | | |
| | 30.4 | 26.14 | 24.47 | 18.95 | 24.56 | 23.77 | DNM | DNM | DNM | DNM | DNM | 19.30 | DNM | DNM |

An analysis of the above data indicates that without the high percentage of homemaker outcomes, DBVI would pass 1.6.

Table 10
Unpaid employment outcomes for DBVI

| Employment Type | FY 02 | | FY 03 | | FY 04 | | FY 05 | | FY 06 | |
|---|-----------|--------------|-----------|--------------|-----------|--------------|-----------|--------------|-----------|--------------|
| | # served | Percentage |
| Homemaker & Unpaid family worker | 28 | 36.36 | 32 | 35.56 | 25 | 28.41 | 38 | 37.62 | 40 | 41.24 |

Table 11
DVR Transition Youth Consumers Served and Rehab Rate
Broken Down By Disability: FY04 to FY06

| Disability | Closure | FY 2004 | | | FY 2005 | | | FY 2006 | | |
|--|---------|------------|--------------|---------------|------------|--------------|---------------|------------|--------------|---------------|
| | | N | % | Rehab rate | N | % | Rehab rate | N | % | Rehab rate |
| Visual impairments | 3 | 3 | 100.00 | 100.00% | 1 | 33.33 | 33.33% | | | |
| | 4 | 0 | | | 2 | 66.67 | | | | |
| Physical disorders | 3 | 26 | 40.00 | 66.67% | 25 | 46.30 | 62.50% | 20 | 31.75 | 48.78% |
| | 4 | 13 | 20.00 | | 15 | 27.78 | | 21 | 33.33 | |
| Communicative impairments | 3 | 8 | 50.00 | 72.73% | 9 | 37.50 | 45.00% | 11 | 44.00 | 57.89% |
| | 4 | 3 | 18.75 | | 11 | 45.83 | | 8 | 32.00 | |
| Cognitive impairment | 3 | 180 | 47.62 | 64.06% | 178 | 44.28 | 64.96% | 200 | 46.51 | 67.34% |
| | 4 | 101 | 26.72 | | 96 | 23.88 | | 97 | 22.56 | |
| Mental and emotional (psychosocial) disabilities | 3 | 107 | 31.10 | 49.54% | 121 | 33.06 | 51.05% | 121 | 34.67 | 52.38% |
| | 4 | 109 | 31.69 | | 116 | 31.69 | | 110 | 31.52 | |
| Total | 3 | 324 | 40.15 | 58.91% | 334 | 39.34 | 58.19% | 352 | 40.60 | 59.86% |
| | 4 | 226 | 28.00 | | 240 | 28.27 | | 236 | 27.22 | |

Note. Closure 3: Exited with an employment outcome • Closure 4: Exited without an employment outcome after receiving services

For FY 2004 and FY 2006, we conducted the analyses for transition youth consumers served and rehab rate broken down by disability group. As shown in Table 9, the overall rehab rate stayed about the same, 59%. In FY 2006, the rehab rate for transition youth consumers with physical disorders dropped dramatically from previous year. The rehab rate for transition youth consumers with mental and emotional disabilities remained stably.

Table 12
DVR Transition Youths' Average Hourly Earnings and Hours Worked Per Week For Paid Jobs Broken Down By Disability:
FY 2004 to FY 2006

| Year | Disability | N | Wage/hr | | Hrs worked | |
|------|--|-----|---------|------|------------|------|
| | | | Mean | Mean | Mean | Mean |
| 2004 | Visual impairments | 3 | 9.33 | | 40.00 | |
| | Physical disorders | 26 | 8.17 | | 31.23 | |
| | Communicative impairments | 8 | 8.99 | | 37.63 | |
| | Cognitive impairment | 180 | 8.19 | | 28.06 | |
| 2005 | Mental and emotional (psychosocial) disabilities | 106 | 7.81 | | 29.84 | |
| | Visual impairments | 1 | 7.00 | | 40.00 | |
| | Physical disorders | 25 | 8.68 | | 23.32 | |
| | Communicative impairments | 9 | 12.28 | | 38.11 | |
| | Cognitive impairment | 176 | 8.49 | | 30.13 | |
| | Mental and emotional (psychosocial) disabilities | 121 | 8.43 | | 30.98 | |
| 2006 | Visual impairments | | | | | |
| | Physical disorders | 20 | 8.40 | | 29.55 | |
| | Communicative impairments | 11 | 9.52 | | 37.09 | |
| | Cognitive impairment | 200 | 8.73 | | 29.72 | |
| | Mental and emotional (psychosocial) disabilities | 121 | 8.79 | | 29.36 | |

As shown in Table 10, for the transition consumers with successful paid employment outcomes, transition youth consumers with communicative impairments tended to earn more hourly wage and work more hours per week than those with other disabilities.

Table 13
DVR Transition Youths with Successful Employment Outcomes
Received Post-secondary Education Services in VR Program
Broken Down By Disability: FY 2004 to FY 2006

| | FY 2004 | | FY 2005 | | FY 2006 | |
|--|---------|-------|---------|--------|---------|-------|
| | N | % | N | % | N | % |
| Disability | 2 | 66.67 | 1 | 100.00 | | |
| Visual impairments | 4 | 15.38 | 4 | 16.00 | 3 | 15.00 |
| Physical disorders | 4 | 50.00 | 4 | 44.44 | 3 | 27.27 |
| Communicative impairments | 21 | 11.67 | 37 | 20.79 | 26 | 13.00 |
| Cognitive impairment | 10 | 9.35 | 12 | 9.92 | 13 | 10.74 |
| Mental and emotional (psychosocial) disabilities | | | | | | |

For the transition youth consumers with successful employment outcomes, as shown in Table 11, most of them did not receive post-secondary education services when they were in VR program.

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>