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

U.S. Department of Education
Office of Special Education and Rehabilitative Services
Rehabilitation Services Administration
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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 Wyoming (WY):

- the Vocational Rehabilitation (VR) Services Program, established under Title I;
- the Supported Employment Services (SE) Program, established under Title VI, Part B;
- the Independent Living (IL) Services Program, 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 WY, the Wyoming Division of Vocational Rehabilitation (WDVR) is responsible for administering the VR, SE, and OIB programs. WDVR and the Statewide Independent Living Council (SILC) jointly administer the IL program under Title VII, Part B.

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

- gathered and reviewed information regarding each program’s 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, WDVR’s State Rehabilitation Council (SRC) members, Client Assistance Program (CAP) staff, SILC members, and stakeholders to share information and to identify promising practices and areas for improvement;
- provided technical assistance (TA);
- worked with WDVR and stakeholders to develop goals, strategies, and evaluation methods to address performance issues; and
- identified the TA that RSA would provide to help improve program performance.

As a result of the review, RSA:

- identified promising practices;
- identified performance issues;
- worked with WDVR to develop performance goals and strategies related to selected issues;
- identified the TA that it would provide to assist the agency to achieve the goals identified as a result of the review;
- made recommendations in those instances when WDVR and RSA did not agree on issues; and
- identified potential issues for further review.
The following is a summary of WDVR’s strengths and challenges in the VR, SE, IL, and OIB programs:

Historically, WDVR has been performing well on the VR program standards and indicators and has enjoyed the support and respect from the majority of its stakeholders. The management team appears poised to undertake the numerous challenges facing WDVR as the baby boom employees begin to retire and the disability demographics in the state begin to change.

WDVR has a strong commitment to fulfilling the requirements of the Act in a manner that promotes the achievement of the goals of the VR and IL programs. WDVR staff members are well qualified and dedicated to the agency’s mission and goals. The agency has established or is in the process of establishing interagency agreements with the numerous social service programs and employment agencies that will assist WDVR to effectively provide services in a large and sparsely populated state. WDVR has demonstrated its partnership with one-stop career centers by co-locating staff and serving as the resident disability experts in the centers.

WDVR faces challenges posed by individuals with complex rehabilitation needs, such as youths with disabilities, individuals with severe and persistent mental illness, American Indians with disabilities, individuals with acquired brain injuries, and individuals participating in the SSI and SSDI programs. There are pockets of excellence in service delivery in WY, and it will be important for WDVR to replicate these promising practices throughout the state as much as possible. WDVR has a number of new employees as the result of normal staff attrition. WDVR is investing in training personnel and in promoting secession planning. WDVR is also reaching out to other social service agencies in order to maximize resources.
Introduction

Section 107 of the Act requires the Commissioner of 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 state plan supplement for SE under Title VI of the Act and the degree 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 IL 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 program, authorized under Title VII, Part B; and
- the OIB program, established under Title VII, Chapter 2.

In addition, RSA also reviewed WDVR’s progress on:

- the agency’s Corrective Action Plan that was established as a result of findings from RSA’s fiscal year (FY) 2004 Section 107 monitoring review.

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

In WY, WDVR is the designated state unit (DSU) responsible for administering the VR, SE, IL and OIB programs. WDVR is located within the WY Department of Workforce Services (WDWS), which is the designated state agency (DSA).

For the four programs listed above, this report describes RSA’s review of WDVR, 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 WDVR to address each of the issues identified during the review.
Appreciation

RSA wishes to express appreciation to the representatives of the WDVR and WDWS; the SRC and SILC; the CAP; the WY Department of Education (WDE); and the stakeholders who assisted the RSA monitoring team in the review of WDVR.
Chapter 1: RSA’s Review Process

Data Used During the Review

RSA’s review of WDVR 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, RSA’s WY state team:

- gathered and reviewed information regarding WDVR’s 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, CAP staff, SILC members, and stakeholders to share information, identify promising practices and areas for improvement;
- provided TA to WDVR during the review;
- worked with WDVR to develop goals, strategies, and evaluation methods to address performance issues;
- reviewed the goals and strategies developed with WDVR at an on-site SRC meeting;
- made recommendations to WDVR in those instances when WDVR and RSA did not agree on issues;
- identified potential issues for further review; and
- identified the TA that RSA would provide to help WDVR improve its performance.

RSA WY State Team Review Participants

Members of RSA’s WY state team included representatives from each of RSA’s State Monitoring and Program Improvement Division’s (SMPID) five functional units. The RSA WY state team was led by Charles Sadler (TA Unit), and included the following members: David Wachter (VR Unit); Yann-Yann Shieh (Data Unit); Regina Luster (Fiscal Unit); and Thomas Kelley (IL Unit).

Information Gathering

During FY 2007, RSA began its review of WDVR by analyzing information including, but not limited to, RSA’s various data collections, WDVR’s VR and IL state plans, and WDVR’s SRC’s annual report. After completing its internal review, the RSA team carried out the following information gathering activities with WDVR and its stakeholders in order to gain a greater understanding of WDVR’s strengths and challenges:
• conducted an initial teleconference with the WDVR management to identify issues to be reviewed;
• conducted an initial teleconference with the chairpersons of the SRC and the SILC to identify issues to be reviewed;
• held two teleconference with stakeholders to gather input on the performance of WDVR’s VR and IL programs;
• conducted a series of individual teleconferences with both WDVR’s management team as well as stakeholders, particularly those stakeholders who were unable to participate in the two teleconferences;
• reviewed the drafts of the WDVR VR state plan and talked to management about the linkage between monitoring goals and state plan goals;
• reviewed the draft interagency agreement between WDVR and the WY Department of Behavioral Health (WDBH) and recommended revisions in order to improve the provision of VR and SE services within the state;
• conducted two on-site monitoring visits: the first monitoring visit was conducted from March 27-29, 2007, and the second from May 21-25, 2007; and
• conducted teleconferences with the WY IL constituency, including members of the SILC, and staff from the centers for independent living (CILs), OIB program, and WDVR.
Chapter 2: Vocational Rehabilitation and Supported Employment Programs

Program Organization

WDVR is located within the WY Department of Workforce Services. WDVR’s administration is centralized in its Cheyenne office and consists of the following three components: Fiscal, Field Services, and Resource Development. The Field Services section is divided into five regions, each of which is managed by an Area Manager. There are 29 VR counselors who provide services to eligible individuals with disabilities in 16 district and 20 satellite offices.

Table 1 provides 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.

Table 1
WDVR Performance Measures by Year: FYs 2002-2006

<table>
<thead>
<tr>
<th>WYOMING</th>
<th>2002</th>
<th>2003</th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total funds used</td>
<td>$9,147,862</td>
<td>$9,525,203</td>
<td>$9,856,933</td>
<td>$10,003,769</td>
<td>$10,786,084</td>
</tr>
<tr>
<td>Individuals served during year</td>
<td>2,505</td>
<td>2,549</td>
<td>2,305</td>
<td>2,348</td>
<td>2,313</td>
</tr>
<tr>
<td>Applicants</td>
<td>1,965</td>
<td>2,065</td>
<td>1,914</td>
<td>1,889</td>
<td>1,921</td>
</tr>
<tr>
<td>Closed after receiving services</td>
<td>972</td>
<td>1,038</td>
<td>812</td>
<td>981</td>
<td>921</td>
</tr>
<tr>
<td>Closed with employment outcomes</td>
<td>727</td>
<td>727</td>
<td>507</td>
<td>664</td>
<td>670</td>
</tr>
<tr>
<td>Employment outcomes without supports in an integrated setting</td>
<td>557</td>
<td>594</td>
<td>413</td>
<td>534</td>
<td>553</td>
</tr>
<tr>
<td>Average cost per individual served</td>
<td>$3,651.84</td>
<td>$3,736.84</td>
<td>$4,276.33</td>
<td>$4,260.55</td>
<td>$4,663.24</td>
</tr>
<tr>
<td>Average cost per employment outcome</td>
<td>$12,583.03</td>
<td>$13,102.07</td>
<td>$19,441.68</td>
<td>$15,065.92</td>
<td>$16,098.63</td>
</tr>
<tr>
<td>Employment outcomes per $million spent</td>
<td>79.47</td>
<td>76.32</td>
<td>51.44</td>
<td>66.37</td>
<td>62.12</td>
</tr>
<tr>
<td>Competitive employment outcomes per $million spent</td>
<td>76.63</td>
<td>74.12</td>
<td>50.42</td>
<td>65.58</td>
<td>61.28</td>
</tr>
<tr>
<td>Average hourly earnings for paid employment outcomes</td>
<td>$8.27</td>
<td>$8.47</td>
<td>$8.89</td>
<td>$9.40</td>
<td>$10.28</td>
</tr>
<tr>
<td>Average state hourly earnings</td>
<td>$13.93</td>
<td>$14.38</td>
<td>$14.84</td>
<td>$15.64</td>
<td>$17.13</td>
</tr>
</tbody>
</table>
Table 2 illustrates WDVR’s five-year performance on the VR program’s standards and indicators. WDVR’s performance has been fairly consistent in meeting the standards and indicators over this period of time, with the exception of not meeting indicator 1.1 in FY 2004.

Table 2
WDVR Five-Year Performance on the VR Program Standards and Indicators

<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Standard 1 Met?</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>1.1 Employment outcome change</td>
<td>Met</td>
<td>Met</td>
<td>Not Met</td>
<td>Met</td>
<td>Met</td>
</tr>
<tr>
<td>RSA Criterion: &gt;= 0</td>
<td>1</td>
<td>0</td>
<td>-220</td>
<td>157</td>
<td>6</td>
</tr>
<tr>
<td>1.2 Percent achieved employment outcome (Primary)</td>
<td>Met</td>
<td>Met</td>
<td>Met</td>
<td>Met</td>
<td>Met</td>
</tr>
<tr>
<td>RSA Criterion: &gt;=55.8%</td>
<td>74.79%</td>
<td>70.04%</td>
<td>62.44%</td>
<td>67.69%</td>
<td>72.75%</td>
</tr>
<tr>
<td>1.3 Percent achieved competitive employment outcome (Primary)</td>
<td>Met</td>
<td>Met</td>
<td>Met</td>
<td>Met</td>
<td>Met</td>
</tr>
<tr>
<td>RSA Criterion: &gt;= 72.6%</td>
<td>96.42%</td>
<td>97.11%</td>
<td>98.03%</td>
<td>98.80%</td>
<td>98.66%</td>
</tr>
<tr>
<td>1.4 Percent of significant disability with employment outcome (Primary)</td>
<td>Met</td>
<td>Met</td>
<td>Met</td>
<td>Met</td>
<td>Met</td>
</tr>
<tr>
<td>RSA Criterion: &gt;= 62.4%</td>
<td>73.61%</td>
<td>68.56%</td>
<td>67.61%</td>
<td>71.95%</td>
<td>67.32%</td>
</tr>
<tr>
<td>1.5 Ratio of the average hourly wage of competitive employment vs. total employment (Primary)</td>
<td>Met</td>
<td>Met</td>
<td>Met</td>
<td>Met</td>
<td>Met</td>
</tr>
<tr>
<td>RSA Criterion: &gt;= .52</td>
<td>0.60</td>
<td>0.60</td>
<td>0.61</td>
<td>0.61</td>
<td>0.61</td>
</tr>
<tr>
<td>1.6 Primary income of competitive employment outcome with significant disability</td>
<td>Met</td>
<td>Met</td>
<td>Met</td>
<td>Met</td>
<td>Met</td>
</tr>
<tr>
<td>RSA Criterion: &gt;= 53.0</td>
<td>58.63</td>
<td>71.39</td>
<td>72.64</td>
<td>65.85</td>
<td>64.90</td>
</tr>
</tbody>
</table>

| Standard 2 Met?                                                                          | Yes     | Yes     | Yes     | Yes     | Yes     |
| 2.1 Ratio of the minority population served                                              | Met     | Met     | Met     | Met     | Met     |
| RSA Criterion: >= .80                                                                    | 1.02    | 1.01    | 0.86    | 0.93    | 0.88    |
Provision of TA to the VR and SE Programs During the Review Process

RSA provided TA to WDVR 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 (MIS);
- discussed RSA’s goals for improving QA in the state VR agencies and provided feedback to WDVR on its current QA system;
- shared data tables generated from the RSA-911 and assisted WDVR staff in interpreting the results and in generating ideas as to how results might be improved;
- discussed WDVR’s challenges in engaging more youths with disabilities in the VR program, and made recommendations for improvement;
- discussed WDVR’s performance in working with individuals with severe and persistent mental illness (SPMI) with a goal of improving service delivery and the achievement of employment outcomes;
- convened a meeting with representatives from WDVR, the Department of Labor and the Veterans Administration to promote effective collaborative arrangements for serving veterans with disabilities;
- provided guidance on ways to create more measurable goals so that WDVR's progress can be readily evaluated; and
- discussed the ability of the SRC to fulfill its required functions and recommended increased WDVR support.

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

RSA’s review process solicited input from WDVR and stakeholders about promising practices. The following promising practice was identified:

1. Comprehensive Statewide Needs Assessment

The Act requires that the VR state plan include the results of a triennial comprehensive, statewide assessment, jointly conducted by the state VR agency and the SRC, describing the rehabilitation needs of individuals with disabilities residing within the state. The specific requirements for the assessment are listed in section 101(a)(15) of the Act. The assessment forms the foundation for identifying the challenges facing the VR agency and for developing the goals, strategies, and methods for evaluating progress in achieving the goals. WDVR’s current assessment, entitled the Wyoming Assessment of Rehabilitation Needs (WYARN), provides a comprehensive analysis of the needs of individuals with disabilities within WY.1 The assessment was conducted in an inclusive manner, involving the SRC and other WDVR stakeholders throughout the process. This inclusive approach to the conduct of the review

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appears to have contributed to more ownership of the results of the review by WDVR and the SRC. The contractor who conducted the assessment worked closely with WDVR staff members in order to meet the intent of the federal requirements. Another positive factor related to the conduct of the WYARN was the fact that the contractor was not a WDVR employee and this contributed to a more objective analysis of the data and WDVR performance. WDVR has begun to use the WYARN as one of the cornerstones in the development of the goals, strategies, and methods of evaluation contained in the FY 2008 VR state plan submission.

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

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

- WDVR is providing effective service delivery to youths with disabilities and individuals with SPMI in certain areas around the state, but there is a need for more consistent performance;
- WDVR needs to hire additional staff in order to improve its performance in working with youths with disabilities;
- a cooperative agreement is necessary between WDVR and WDBH in order to improve service delivery and the achievement of employment outcomes for individuals with SPMI;
- WDVR needs to develop agreements with local community mental health centers;
- there is a lack of SE opportunities throughout the state, particularly for individuals with SPMI, because of a lack of service providers for extended services;
- VR counselors need ongoing training in the skills necessary to effectively manage a VR caseload, conduct the comprehensive assessment of rehabilitation potential, provide services to American Indians, and provide services to youths with disabilities, individuals with SPMI, and individuals with acquired brain injuries (ABIs);
- there is a need for more consistent delivery of IL services around the state; and
- WDVR does not match all of the federal funds provided by the federal government and returns some of its appropriation to the government.

Following compilation and discussion with WDVR about the issues, RSA worked with WDVR 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, Methods of Evaluation, and TA

RSA and WDVR agreed on the following performance goals, strategies to achieve those goals, methods of evaluation, and TA that RSA would provide to assist WDVR to achieve each goal. These goals and strategies are included in WDVR’s FY 2008 state plan, and progress on achieving these goals will be reported in WDVR’s FY 2010 annual state plan submission.
1. Access to VR and Achievement of Employment Outcomes for Transition-Age Youths

Issue: From FY 2002 to FY 2006, approximately 17 percent of the total individuals served by WDVR were youths with disabilities (see Table 1). This compares with approximately 26.6 percent of the total individuals served by general and combined state VR agencies.

WDVR’s rehabilitation rate for youths in transition varies according to disability as shown in Table 4, but the total rehabilitation rate for FYs 2004-2006 is within approximately 2 percent of the rate for all individuals achieving employment (See Table 2). Thus, once youths with disabilities in WY have been determined eligible for VR and have been provided services, their chances for being successful are approximately the same as for adult participants in the VR program.

<table>
<thead>
<tr>
<th>Disability</th>
<th>FY 2004</th>
<th>FY 2005</th>
<th>FY 2006</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>N</td>
<td>%</td>
<td>N</td>
</tr>
<tr>
<td>Development disability</td>
<td>3</td>
<td>41</td>
<td>31.78</td>
</tr>
<tr>
<td>Psychiatric disability</td>
<td>3</td>
<td>16</td>
<td>17.20</td>
</tr>
<tr>
<td>Disability caused by TBI</td>
<td>3</td>
<td>6</td>
<td>37.50</td>
</tr>
<tr>
<td>Other disability</td>
<td>3</td>
<td>24</td>
<td>27.27</td>
</tr>
<tr>
<td>Total</td>
<td>3</td>
<td>87</td>
<td>26.20</td>
</tr>
</tbody>
</table>

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

As WDVR improves its outreach capacity, and as increasing numbers of youths with disabilities gain access to WDVR, there will be a concomitant need to maintain and improve the success rate in achieving employment outcomes. During the on-site review, RSA and WDVR discussed the importance of being able to measure WDVR’s performance in working with transition-age youths with disabilities. RSA recommended that WDVR analyze its statewide performance in order to determine which regions in the state are doing well in increasing access to youths with disabilities, and conversely in order to determine which regions may need additional assistance. WDVR agreed that this data would be useful in establishing benchmarks for performance and in targeting and meeting training needs.

While many individuals with disabilities benefit from effective collaborative relationships between service providers, this is especially true for youths with disabilities. Collaborative relationships enable youths to receive the array of services necessary to achieve employment and independence. Not locating suitable after-school activities in a timely manner often results in youths gravitating towards other activities that do not further their achievement of vocational
goals. Stakeholders pointed out that youths with disabilities are able to get jobs without unnecessary delay due to the state’s low unemployment and that youths are more likely to go to the one-stop career centers to look for work because the process is less cumbersome than VR. Consistent with the findings contained in the WYARN and input from the stakeholders, WDVR needs to improve its outreach to the schools in order to generate more referrals and increase access to VR services.²

WDVR has signed and implemented the required memorandum of understanding (MOU) with the WDE. However, it is critically important that the local VR offices have a presence in each of WY’s 48 school districts in order to work collaboratively with school personnel to provide services to youths as early as possible. The federal regulations at 361.22(a)(2) require the development and approval of an individualized plan for employment (IPE) as early as possible during the transition planning process or, at the latest, by the time each student determined to be eligible for VR leaves the school setting. WDVR currently lacks a sufficient number of VR counselors with expertise in providing services to transition-age youths with disabilities. Since many WDVR VR counselors are new, there is a need to promote understanding of the federal requirements in some parts of the state. This factor combine results in decreased access to WDVR for potentially eligible youths with disabilities.

This issue is complicated in a state as geographically large and sparsely populated as WY, where there are 48 school districts operating independently of the WDE and where 29 VR counselors must cover the state’s 97,000 square miles.

The WYARN states that students with disabilities appear to be an underserved group, noting that during the 2005-2006 school year, there were approximately 1,386 11th and 12th grade special education students. According to the WYARN, WDVR served approximately 133 students who were sixteen or seventeen years old, and another 247 eighteen year olds, some of who may have still been in school.³ The WYARN findings concerning the difficulties in accessing the VR program for youths with disabilities are consistent with the RSA data indicating that approximately 153 youths with disabilities were closed by WDVR during FY 2006.

WDVR management concurred with the need to improve service delivery to this population. During the teleconferences leading up to the on-site review, the director stated that he was currently interviewing applicants for a position as Transition Consultant to address this need. Currently, one WDVR staff member devotes approximately 15 percent of his time to serving in this capacity. In addition, WDVR has begun to shift counselor responsibilities in order to develop transition expertise in each of the regions. The VR counselors with transition expertise will work with the Transition Consultant in implementing a statewide strategy for improving WDVR’s performance.

WDVR has highly skilled VR counselors who are working with knowledgeable counterparts in the schools to provide quality services to youths with disabilities. The RSA Team visited a local transition project at the Able Program Building in Casper where representatives from both VR and the schools collaborated to address the needs of students with disabilities. The team in

² Degroot, pp 66.
³ Degroot, pp 20.
Casper could serve as a model for the state. First, the team recommended agency responsibilities for specific services occurs in advance of referrals. School personnel were trained in the mission, purpose, and requirements of the eligibility-based VR program and the role of self-advocacy and informed choice in the VR program. All of the agencies involved in the transition process met and discussed the overall strategy for assisting youths to achieve employment and independence beyond the school system and VR program. Finally, VR had a presence at the schools, so that both students and teachers became familiar with the person and the program.

Goal: Improve access to services, service delivery, and the achievement of employment outcomes for youths with disabilities.

Strategies:

1. Develop benchmarks for measuring WDVR performance in increasing access, providing services, and assisting youths with disabilities to achieve employment outcomes.
2. WDVR and WDE will develop a joint strategy in order to improve collaboration at state and local levels.
3. WDVR will review local VR office performance in order to determine successful models for working with local school districts.
4. WDVR will hire a transition consultant to lead the transition effort, develop consistent VR policies, provide training to WDVR and school special education staff members, and to serve as a focal point for initiating improvements.
5. WDVR will shift counselor responsibilities in order to develop transition expertise in each of the regions.
6. VR counselors with transition expertise will work with the transition consultant in implementing a statewide strategy for improving agency performance.

Methods of Evaluation:

1. WDVR will establish benchmarks for measuring performance.
2. WDVR and WDE will develop and implement a strategy to improve performance.
3. WDVR will select a local office model, if available, to present at WDVR training activities.
4. WDVR hired a transition consultant subsequent to the completion of the monitoring review.
5. WDVR’s development of transition expertise in each of the regions.
6. WDVR will increase the number of students receiving services.
7. WDVR will have an increase in the number of students who achieve employment.

TA:

1. RSA will assist WDVR in establishing benchmarks for measuring performance in increasing access, providing services, and assisting youths with disabilities to achieve employment outcomes.
2. RSA will seek effective strategies in improving access to services and employment outcomes for youths with disabilities used by other successful state VR agencies, and will share this information with WDVR.

2. Access to VR and Achievement of Employment Outcomes for Severe and Persistent Mental Illness

Issue: A constant theme throughout RSA’s discussions with WDVR management and stakeholders was the need to improve service delivery and the achievement of employment outcomes for individuals with SPMI. The WYARN describes the following three populations of special concern: individuals with brain injuries, students in transition, and individuals with SPMI.4

The WYARN contains information on the disabilities of individuals on the WDVR caseload during FY 2006. While individuals may have more than one disability, 59 percent of the individuals on the WDVR caseload had the following disabilities: anxiety disorders, depressive or other mood disorders, personality disorders, schizophrenia and other psychotic disorders, or a mental illness not listed elsewhere.5

Table 5 contains data describing the rehabilitation rate by year and disability for individuals served by WDVR from FYs 2004-2006. The table shows that WDVR’s rehabilitation rate for individuals with psychiatric disabilities steadily increased from 54.6 percent in FY 2004, to 58.9 percent in FY 2005, to 65.6 percent in FY 2006. This performance compares favorably to that of all state VR agencies in rehabilitating individuals with psychiatric disabilities, which for FY 2005 was 51.3 percent.6

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4 Degroot, pp 13-18
5 Degroot, pp 19
6 RSA FY 2005 WDVR Annual Review Report
Table 5
Rehabilitation Rate for Individuals Served by WDVR By Year and Disability:
FY 2004 to FY 2006

<table>
<thead>
<tr>
<th>Disability</th>
<th>Closure</th>
<th>FY 2004</th>
<th></th>
<th>FY 2005</th>
<th></th>
<th>FY 2006</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>N</td>
<td>%</td>
<td>N</td>
<td>%</td>
<td>N</td>
<td>%</td>
</tr>
<tr>
<td>Development disability</td>
<td>3</td>
<td>84</td>
<td>38.36</td>
<td>105</td>
<td>40.70</td>
<td>102</td>
<td>47.00</td>
</tr>
<tr>
<td></td>
<td>4</td>
<td>33</td>
<td>15.07</td>
<td>42</td>
<td>16.28</td>
<td>35</td>
<td>16.13</td>
</tr>
<tr>
<td>Psychiatric disability</td>
<td>3</td>
<td>130</td>
<td>26.53</td>
<td>178</td>
<td>31.06</td>
<td>200</td>
<td>38.17</td>
</tr>
<tr>
<td></td>
<td>4</td>
<td>108</td>
<td>22.04</td>
<td>124</td>
<td>21.64</td>
<td>105</td>
<td>20.04</td>
</tr>
<tr>
<td>Disability caused by TBI</td>
<td>3</td>
<td>17</td>
<td>34.00</td>
<td>30</td>
<td>36.59</td>
<td>18</td>
<td>31.03</td>
</tr>
<tr>
<td></td>
<td>4</td>
<td>14</td>
<td>28.00</td>
<td>11</td>
<td>13.41</td>
<td>8</td>
<td>13.79</td>
</tr>
<tr>
<td>Other disability</td>
<td>3</td>
<td>276</td>
<td>30.84</td>
<td>351</td>
<td>38.15</td>
<td>350</td>
<td>43.75</td>
</tr>
<tr>
<td></td>
<td>4</td>
<td>150</td>
<td>16.76</td>
<td>140</td>
<td>15.22</td>
<td>103</td>
<td>12.88</td>
</tr>
<tr>
<td>Total</td>
<td>3</td>
<td>507</td>
<td>30.11</td>
<td>664</td>
<td>35.45</td>
<td>670</td>
<td>40.85</td>
</tr>
<tr>
<td></td>
<td>4</td>
<td>305</td>
<td>18.11</td>
<td>317</td>
<td>16.92</td>
<td>251</td>
<td>15.30</td>
</tr>
</tbody>
</table>

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

During the on-site review, RSA provided WDVR with data regions of the state in order to describe WDVR’s performance in assisting individuals with SPMI to achieve competitive employment outcomes. Table 6 provides cumulative data on the employment of individuals with SPMI during FYs 2004-2006. For the three-year period, there was only one SE outcome in Region 1 and none in Region 2. The majority of SE outcomes occurred in Regions 3, 4, and 5. Therefore, these data show the inconsistency within the state with respect to the SE program.

As noted by stakeholders, a key factor contributing to the inconsistencies and to the limited SE opportunities and outcomes throughout the state, particularly for individuals with SPMI, is the overall lack of service providers for extended services. The RSA review team had the opportunity to visit one such provider in Casper, the Central Wyoming Counseling Center (CWCC), that serves Region 5. Staff of the local VR office in Casper indicated there is a positive working relationship with the CWCC, and, together, they meet monthly to discuss issues related to individuals with SPMI. The meetings are also designed to serve as a cross-training opportunity for the staff of both programs to share information about their respective programs and to develop strategies to better address the SE needs of individuals with SPMI. Stakeholders in other parts of the state, however, noted the lack of similar programs across the state targeting SE services to individuals with SPMI.

Consistent with the WYARN’s primary finding and the input from WDVR stakeholders, WDVR needs to coordinate service delivery with, and possibly secure funding from, agencies that provide essential services, such as long-term follow up, to enable individuals with SPMI to obtain and maintain employment.7

7 Degroot, pp 64
Table 6  
Individuals with SPMI Achieving SE or Other Competitive 
Employment Outcomes by Region and Year: 
FY 2004 to FY 2006

<table>
<thead>
<tr>
<th>Region</th>
<th>Employment type</th>
<th>FY 2004</th>
<th>FY 2005</th>
<th>FY 2006</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>N</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td></td>
<td></td>
<td>%</td>
<td>%</td>
<td>%</td>
</tr>
<tr>
<td>1</td>
<td>Employment in integrated setting</td>
<td>20</td>
<td>21</td>
<td>27</td>
</tr>
<tr>
<td></td>
<td></td>
<td>100.00</td>
<td>95.45</td>
<td>100.00</td>
</tr>
<tr>
<td></td>
<td>Employment with supports in integrated setting</td>
<td>0</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1.00</td>
<td>4.55</td>
<td>0.00</td>
</tr>
<tr>
<td>2</td>
<td>Employment in integrated setting</td>
<td>18</td>
<td>31</td>
<td>22</td>
</tr>
<tr>
<td></td>
<td></td>
<td>100.00</td>
<td>100.00</td>
<td>100.00</td>
</tr>
<tr>
<td></td>
<td>Employment with supports in integrated setting</td>
<td>0</td>
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<td>0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>3</td>
<td>Employment in integrated setting</td>
<td>15</td>
<td>10</td>
<td>20</td>
</tr>
<tr>
<td></td>
<td></td>
<td>68.18</td>
<td>55.56</td>
<td>68.97</td>
</tr>
<tr>
<td></td>
<td>Employment with supports in integrated setting</td>
<td>7</td>
<td>8</td>
<td>9</td>
</tr>
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<td></td>
<td></td>
<td>31.82</td>
<td>44.44</td>
<td>31.03</td>
</tr>
<tr>
<td>4</td>
<td>Employment in integrated setting</td>
<td>33</td>
<td>44</td>
<td>74</td>
</tr>
<tr>
<td></td>
<td></td>
<td>97.06</td>
<td>88.00</td>
<td>96.10</td>
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<td></td>
<td>Employment with supports in integrated setting</td>
<td>1</td>
<td>6</td>
<td>3</td>
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<td></td>
<td></td>
<td>2.94</td>
<td>12.00</td>
<td>3.90</td>
</tr>
<tr>
<td>5</td>
<td>Employment in integrated setting</td>
<td>20</td>
<td>34</td>
<td>21</td>
</tr>
<tr>
<td></td>
<td></td>
<td>57.14</td>
<td>62.96</td>
<td>46.67</td>
</tr>
<tr>
<td></td>
<td>Employment with supports in integrated setting</td>
<td>15</td>
<td>20</td>
<td>24</td>
</tr>
<tr>
<td></td>
<td></td>
<td>42.86</td>
<td>37.04</td>
<td>53.33</td>
</tr>
<tr>
<td>WDVR</td>
<td>Employment in integrated setting</td>
<td>106</td>
<td>140</td>
<td>164</td>
</tr>
<tr>
<td></td>
<td></td>
<td>82.17</td>
<td>80.00</td>
<td>82.00</td>
</tr>
<tr>
<td></td>
<td>Employment with supports in integrated setting</td>
<td>23</td>
<td>35</td>
<td>36</td>
</tr>
<tr>
<td></td>
<td></td>
<td>17.83</td>
<td>20.00</td>
<td>18.00</td>
</tr>
</tbody>
</table>

Goal: Improve service delivery and the achievement of employment outcomes, particularly SE, for individuals with SPMI.

Strategies:

1. Finalize and implement the draft WDVR and WDBH interagency agreement in order to improve the coordination of VR and MH services in the state.
2. Develop and implement a joint WDVR and WDBH strategy to improve VR-MH collaboration at state and local levels.
3. Develop and implement an MOU between WDVR and the CWCC.
4. Use MOU between WDVR and the CWCC as a model for other parts of the state.
5. Develop benchmarks for measuring WDVR performance in assisting individuals with SPMI to achieve employment outcomes, particularly in SE.
Methods of Evaluation:

1. WDVR and WDBH will sign the final agreement.
2. WDVR and WDBH will implement a joint strategy to improve VR-MH collaboration at state and local levels.
3. WDVR and the CWCC will sign the MOU.
4. WDVR will use the WDVR – CWCC MOU as a model for other parts of the state.
5. WDVR will establish benchmarks for measuring performance.
6. WDVR will increase the numbers of individuals with SPMI achieving competitive employment outcomes statewide, particularly in SE.

TA:

1. RSA will provide WDVR with the contact information for state VR agencies that successfully assist individuals with SPMI to achieve SE outcomes.

3. Quality Assurance

Issue: WDVR’s current quality assistance (QA) protocol is based casework documentation compliance to the federal law and regulations. One WDVR employee, the QA Consultant, is responsible for maintaining the QA protocol and for periodically reporting the results to the Assistant Administrator for Field Services/Transition. The Assistant Administrator for Resource Development Services develops reports containing the results of reviews of caseload statistics and the other information pertaining to WDVR performance. The data system containing this information is named the WY Rehabilitation and Employment System (WYRES). WDVR plans to make WYRES Internet accessible in four years. Currently, 20 satellite offices lack computer access. Both Assistant Administrators periodically report the results of their reviews to the WDVR Administrator.

WDVR’s district office Area Managers conduct ongoing reviews of service records in order to ensure: casework documentation compliance to state policies and federal requirements, quality of service delivery, and progress towards the rehabilitation goal. The QA Consultant conducts an electronic review of the records, and then discusses regional and statewide themes with the Assistant Administrator for Field Services/Transition. The results of this review are then provided to the Area Managers who discuss the findings with the VR counselors.

Apart from the QA protocol, WDVR also carefully tracks the following on a periodic basis: caseload statistics (demographic data, expenditures, time in status, disability types, transition cases, post-secondary education, and closures); agency performance on the standards and indicators; and VR counselor performance. WDVR also partners with the SRC in the conduct of a consumer satisfaction survey. WDVR is primarily responsible for the conduct and aggregation of the survey results.

The RSA team proposed integrating all of these sources of performance information, together with the results of the comprehensive statewide assessment, employee satisfaction surveys, financial reports, CRP performance reports, and other performance-based reports, in order to
provide management with up-to-date information with which to guide agency decision-making. Providing this information to the SRC will enable the SRC members to conduct their functions more effectively. Finally, it is recommended that the applicants and eligible individuals be provided with information regarding the performance of the CRPs so that they may make informed decisions in choosing service providers.

Goal: Develop and implement an integrated QA system.

Strategies:

1. Document WDVR’s current procedures for maintaining compliance with the federal requirements, for measuring performance, and for disseminating these data.
2. Explore strategies for developing a comprehensive QA system that integrates the following components: state plan goals, strategies, and methods of evaluation; casework documentation requirements; performance reports; financial reports; SRC reports; results of consumer, employee, employer, and vendor satisfaction surveys; results of the comprehensive statewide assessment; and any other information deemed necessary to effectively manage the agency.
3. Develop a strategy leading to the development of a comprehensive QA system.
4. Develop the QA system.

Methods of Evaluation:

2. Development of possible strategies for developing the QA system.
3. Selection of the most appropriate strategy.
4. Development of the QA system.

TA:

1. RSA will provide WDVR with information on state VR agencies comparable to WDVR who have operational QA systems as possible sources of support and consultation.
2. RSA will explore the possibility of arranging for assistance to be provided to WDVR by a Regional Rehabilitation Continuing Education Program or a contractor with expertise in developing QA systems.

4. State Rehabilitation Council

Issue: The WY SRC has experienced a great deal of attrition and change in leadership during the past several years that has affected its ability to carry out its functions. Recently, the membership has stabilized and the members are feeling more able to perform their functions. One SRC member also has experience with the SILC, and this will serve to further a better understanding between the SRC and the SILC. Also, a representative from a Section 121 American Indian VR program was appointed to the SRC, thus occupying a vacancy that had been difficult to fill.
The RSA team suggested that SRC members with expertise in information technology are a potential resource to assist WDVR transform WYRES into a web-based system.

At the SRC meeting on May 23, the WDVR director affirmed his interest in the SRC becoming more effective at performing its functions. He assigned a WDVR staff member, who had worked closely with the SRC for many years to return to work with the SRC in a facilitative capacity, and also increased the SRC budget from $20,000 to $30,000. The SRC was encouraged to use WDVR office space and resources when it conducts its consumer satisfaction survey, and to have greater involvement in the quarterly employer awards.

Goal: Improve the effectiveness of the SRC.

Strategies:

1. WDVR will provide ongoing support to the SRC in order to ensure it is able to fulfill its functions.
2. WDVR and the SRC will develop an effective strategy for assessing consumer satisfaction both while the individual is receiving services, as well as upon closure.
3. SRC will be take responsibility for directing its budget.
4. SRC will partner with WDVR in the quarterly employer awards.

Methods of Evaluation:

1. Continued assignment of WDVR liaison.
2. Development and implementation of the new strategy for conducting consumer satisfaction surveys.
3. SRC budget decisions being made by the SRC.
4. SRC solicits information of possible awardees and participates in selection process.

TA:

1. RSA will solicit examples of SRCs that have become more adept at performing their required functions and provide this information to the WY SRC.
2. RSA will solicit examples of consumer satisfaction surveys used by other SRCs to be shared with the WY SRC.
Chapter 3: VR Program Fiscal Review

RSA reviewed WDVR’s fiscal management of the VR program. During the review process, RSA provided TA to the state VR 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 is 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>
<thead>
<tr>
<th>Fiscal Year</th>
<th>2002</th>
<th>2003</th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grant Amount</td>
<td>6,839,299</td>
<td>7,106,493</td>
<td>7,398,771</td>
<td>7,566,973</td>
<td>8,193,581</td>
</tr>
<tr>
<td>Required Match</td>
<td>1,851,043</td>
<td>1,923,358</td>
<td>2,002,463</td>
<td>2,047,986</td>
<td>2,217,577</td>
</tr>
<tr>
<td>Federal Expenditures</td>
<td>6,839,299</td>
<td>7,106,493</td>
<td>7,398,771</td>
<td>7,566,973</td>
<td>8,193,581</td>
</tr>
<tr>
<td>Actual Match</td>
<td>1,851,043</td>
<td>1,923,358</td>
<td>2,002,463</td>
<td>2,047,986</td>
<td>2,217,577</td>
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<td>Over(Under) Match</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Carryover</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Program Income</td>
<td>221,700</td>
<td>126,547</td>
<td>131,089</td>
<td>73,245</td>
<td>108,520</td>
</tr>
<tr>
<td>Maintenance of Effort (MOE)</td>
<td>1,764,058</td>
<td>1,760,952</td>
<td>1,836,029</td>
<td>1,923,358</td>
<td>1,898,930</td>
</tr>
<tr>
<td>Administrative Costs</td>
<td>1,282,369</td>
<td>1,662,614</td>
<td>1,648,280</td>
<td>1,613,196</td>
<td>1,747,415</td>
</tr>
<tr>
<td>Total Expenditures</td>
<td>9,147,862</td>
<td>9,525,203</td>
<td>9,856,933</td>
<td>10,003,769</td>
<td>10,786,084</td>
</tr>
<tr>
<td>Percent Admin Costs to Total Expenditures</td>
<td>14.02%</td>
<td>17.45%</td>
<td>16.72%</td>
<td>16.13%</td>
<td>16.20%</td>
</tr>
</tbody>
</table>

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:** The 1992 Amendments revised the requirements in section 111(a)(2)(B)(ii) of the Act with respect to maintenance of effort provisions. Effective 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 mean 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 Fiscal TA to WDVR during the review process. RSA:

- provided a synopsis of each requirement and reviewed with financial staff RSA’s assessment of the agency’s compliance with specific financial requirements – match, MOE, carryover, reallocation, program income, liquidation of outstanding obligations, and grant closeout;
- conducted one day of intensive financial management training with newly assigned financial staff in the following topics: VR Program formula, allotment process and program cost of living increases, match/overmatch, maintenance of effort, carryover, grant period, liquidation of obligations, grant closeout, prior approval requirements, program income, allowable costs, guidance and reference materials, financial reports, and reallocation;
- reviewed agency’s business enterprise program – sources of revenues collected, administrative costs, and resources utilized as VR Program match;
- discussed agency’s participation in the one-stop system and expenditures allocated to the VR Program;
- reviewed remaining balances of federal grant funds on final Financial Status Reports (SF-269s) for FYs 2004 and 2005 and discussed with financial staff the agency’s procedures for releasing federal VR Program funds through the reallocation process;
- discussed projected increase in program income funds and requirements for transferring these funds to the Independent Living-Part B and Independent Living – Older Blind programs to pay the salaries of staff assigned work related to these programs;
- analyzed the availability of matching funds;
- discussed the agency’s history of not having adequate state appropriations to fully match the state’s VR Program allotment, and based on total projected FY 2007 resources of $2,298,075, a minimum of $851,379 will need to be released through the reallocation process; and
- reviewed the closeout of FYs 2003, 2004 and 2005, including adjustments made after submission of the 4th quarter Financial Status Report after approval of the final indirect cost rate for FY 2003.
VR and SE Performance Issues, Goals, Strategies, and TA

1. Program Match

Issue: For a number of years, WDVR has not been provided with state appropriations to fully match the state’s VR Program allotment. For FY 2007, a minimum of $851,379 will need to be released through the reallocation process. The additional funding returned to RSA could be used to address some of the challenges addressed in this report.

Goal: Obtain additional on-going program match from allowable sources.

Strategies:

1. RSA will identify and explore solutions with staff to the obstacles encountered in obtaining additional state-appropriated matching funds.
2. RSA will review with staff the allowable external sources of program match and determine if any of these are appropriate for WDVR’s VR Program.
3. RSA will explore the legality of utilizing all Business Enterprise Program revenues for VR Program match.

Methods of Evaluation:

1. Conduct meetings to identify solutions.
2. Determine if allowable sources for match are appropriate to WDVR.
3. Determine legality of using these funds for match.

TA:

1. RSA will provide TA by meeting with WDVR staff to identify state impediments, share strategies used by other states to increase state-appropriated matching funds, explain federal requirements in this area, and determine if it is permissible to use all revenue generated in WDVR’s unique Business Enterprise Program as match for the VR Program.
Chapter 4: Independent Living Program

Program Organization

The WDVR IL program provides a variety of services that enhance the ability of an individual with a significant disability to function with greater independence in the home and community. IL services are provided to consumers through two centers on independent living (CILs). The Wyoming Independent Living Rehabilitation (WILR) provides services to individuals living in the eastern half of the state, and the Wyoming Services for Independent Living (WSIL) to those living in the western half of the state.

Table 8
Sources and Amounts of Funding:
FY 2006

<table>
<thead>
<tr>
<th>Sources of Funding</th>
<th>Amounts of Funding</th>
</tr>
</thead>
<tbody>
<tr>
<td>Part B Funds</td>
<td>301,477</td>
</tr>
<tr>
<td>Older Blind</td>
<td>225,000</td>
</tr>
<tr>
<td>Other Federal Funds</td>
<td>359</td>
</tr>
<tr>
<td>State Funds</td>
<td>34,605</td>
</tr>
<tr>
<td>Local Government</td>
<td>0</td>
</tr>
<tr>
<td>Private/Other Funds</td>
<td>23,989</td>
</tr>
<tr>
<td>Total</td>
<td>585,430</td>
</tr>
</tbody>
</table>

Provision of TA to the IL Program During the Review Process

RSA provided TA to WDVR in the following areas:

- responded to a request, with written clarification, on a number of issues related to the appointment, tenure, and qualifications of SILC members; and
- worked with the WDVR SILC liaison and SILC chairperson to identify areas where Wyoming is successful in delivery of services to individuals with disabilities and to identify areas of service delivery needing improvement.

IL Issues Identified by WDVR and Stakeholders During the Review Process

RSA’s review process solicited input from WDVR and their stakeholders about IL performance and compliance issues. The following issues were identified:

- members of the SILC are not knowledgeable of their roles and responsibilities;
lack of resources to adequately meet the IL service needs of individuals with significant
disabilities in WY, particularly in the more remote areas of the state, and on the
American Indian reservations; and
lack of collaboration among the SILC, SRC, CILs, and WDVR; and
inconsistency in the provision of services to individuals with disabilities across the
state.

IL Performance Issues, Goals, Strategies, and TA

As a result of the review, RSA and WDVR agreed on the following IL performance goals,
strategies to achieve those goals, and TA that RSA would provide to assist WDVR achieve each
goal.

1. SILC Capacity Building

Issue: Members of the SILC need to be knowledgeable and proactive representatives of the
disability community in Wyoming.

Goal: Improve SILC members’ understanding of their roles and responsibilities as members of
the SILC so that they may more effectively perform the SILC functions.

Strategy: The SILC and WDVR will identify and make available to SILC members and CILs
training materials that will increase their knowledge and understanding of IL philosophy and
their understanding of their respective roles and responsibilities in administering the program.

Method of Evaluation: Development of a SILC capacity-building plan that will target specific
training activities on or before September 30, 2008.

TA:

   1. RSA will provide the SILC with a PowerPoint presentation on roles and responsibilities
      of the SILC.
   2. RSA will assist in identifying other available trainings/materials that that will benefit
      new members of the SILC.

2. Consistency of IL Service Delivery

Issue: There is a lack of uniform standards and accountability for the provision of IL services in
the state, a lack of information sharing between the two CILs in the state, and a lack of
coordination of services between the CILs and the Wind River Reservation. Stakeholders stated
that one of the CILs was not adequately represented on the SILC and that this interfered with
coordinating services statewide. Concerns were expressed regarding the need for increased
accountability for the use of IL resources.

Goal: Improve the quality of IL services provided across the state.
Strategies:

1. WDVR and the SILC will work together to review the performance of the CILs, including consumer satisfaction surveys, and an assessment of the quality of IL services.
2. In conjunction with the SILC’s quarterly meetings, WDVR and the SILC will host public forums and take public comment from consumers on the delivery of IL services in the state.
3. WDVR and the SILC will identify areas where services are inconsistent.
4. WDVR and the SILC will take the necessary steps to ensure the consistent delivery of IL services in the state.

Method of Evaluation:

1. WDVR and the SILC will develop a reporting form with which WDVR can assess the quality of services provided by the CILs.
2. The SILC will report to WDVR on the quality of services delivered to consumers in the state by September 30, 2008.
3. WDVR and the SILC will complete the conduct of the public forums.
4. WDVR and the SILC will identify inconsistent service areas in the state.
5. WDVR and the SILC will complete the specific actions necessary to ensure consistent IL service delivery in the state.

TA: RSA will assist in identifying reliable consumer satisfaction survey instruments and will advise WDVR in the actions necessary to provide consistent IL services statewide. Success will be achieved if the SILC, WDVR, CILs, and IL service providers engage in a facilitated process designed to improve communication and collaboration, gather information about the needs of individuals with significant disabilities in WY, and develop mechanisms to improve IL service delivery in WY.
Chapter 5: Independent Living Program for Older Individuals Who are Blind

Program Organization

WDVR contracts with the WILR, located in Casper, to provide OIB services in the state. Services include the following: information and referral; daily living skills training; mobility training; low vision equipment; loan closet of low vision devices; peer support groups; and other individualized services to help individuals overcome barriers to independent living, such as, self-care, self-direction, mobility, and communication.

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

1. Aging and Disability Resource Center

The WILR CIL contracted with the Wyoming Institute for Disabilities (WIND) to establish a pilot Aging and Disability Resource Center (ADRC) at WILR in Casper, with a satellite resource center in Glenrock, to conduct rural outreach. ADRC works with hospital discharge planners and with organizations and agencies, such as the Rehabilitation Center, Public Health, the Aging Division, and the Medicaid Waiver program, in order to educate consumers on the option to remain in their homes with appropriate community supports, rather than being institutionalized.

OIB Issues Identified by WDVR and Stakeholders During the Review Process

RSA’s review process solicited input from WDVR and stakeholders about OIB performance and compliance issues. The issue that was identified involves expansion of WILR’s assistive technology (AT) loan closet.

OIB Performance Issues, Goals, Strategies, and TA

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

1. AT Loan Closet

Issue: WY is a state with many rural communities and a growing number of citizens who are 55 years or older who can benefit from services from the state’s OIB program. Many members of the older blind population reside in communities where there is no public transportation and limited access to IL services. Currently, the program is experiencing increasing demand from consumers for AT.

Goal: Expand the AT available for loan to individuals who are blind or have low vision.

Strategy: Access new sources of funding for the purchase of AT.
Method of Evaluation: WILR will submit a report to WDVR on a yearly basis on the extent to which new AT was purchased or otherwise acquired.

TA: RSA will coordinate with the WY OIB program in order to obtain for additional TA resources from the Rehabilitation Research and Training Center on Blindness and Low Vision at Mississippi State University, APRIL, and the IL training and technical assistance grant.
Chapter 6: Status of Issues Raised in Previous Reviews

As a result of the RSA reviews conducted with WDVR in FY 2003 and 2004, the agency developed a Corrective Action Plan (CAP). WDVR provides RSA with quarterly progress reports describing its progress in resolving the findings. A summary of the progress that WDVR has made on the CAP is described below.

CAP

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

- achievement of a 90 percent standard for complying with the requirement contained in Section 34 CFR 361.46(a)(2)(i) that the services needed by the individual must be identified in the IPE;
- achievement of a 90 percent standard for complying with the requirement contained in Section 34 CFR 361.46(a)(2)(ii) that the services provided to the individual must be identified in the IPE; and
- completion of all interagency agreements with public institutions of higher education (IHEs) in WY.
Chapter 7: Summary Conclusion

WDVR has the following strengths in the VR, SE, IL, and OIB programs:

- dedicated and knowledgeable employees;
- a statewide presence in the one-stop career centers;
- a comprehensive statewide needs assessment that will serve as a cornerstone for goal development; and
- the WY Rehabilitation and Employment System that provides WDVR management with useful performance reports and will be an important part of WDVR’s future quality assurance activities.

WDVR faces the following challenges in the VR, SE, IL, and OIB programs:

- because of the low level of its state support, WDVR will return a portion of its VR program allotment;
- new WDVR staff members need to continue to receive training in program requirements and in WDVR policies and procedures in order to provide consistent and effective services;
- WDVR needs to improve collaborative mechanisms with the school districts and with the mental health centers in order to improve service delivery to youths with disabilities and individuals with SPMI, respectively;
- WDVR needs to coordinate service delivery with, and possibly secure funding from, agencies who provide essential services, such as long-term follow up, to enable individuals with SPMI to obtain and maintain employment;
- members of the SRC and SILC need assistance in understanding their roles and responsibilities;
- a need for improved collaboration among WDVR, the SRC, the SILC, and the CILs; and
- an increased demand for AT in the OIB program.

Table 8
Summary of the Results of RSA’s Review

<table>
<thead>
<tr>
<th>State: Wyoming</th>
<th>Programs: VR &amp; SE</th>
<th>Strategies</th>
<th>Technical Assistance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Goal: Improve access to services, service delivery, and the achievement of employment outcomes for youths with disabilities.</td>
<td>Develop benchmarks for measuring WDVR performance in increasing access, providing services, and assisting youths with disabilities to achieve employment outcomes. WDVR and WDE will</td>
<td>RSA will assist WDVR in establishing benchmarks for measuring performance in increasing access, providing services, and assisting youths with disabilities to achieve employment outcomes. RSA will seek effective strategies in improving access</td>
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<tr>
<td>State: Wyoming</td>
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<tr>
<td><strong>Goal</strong></td>
<td><strong>Strategies</strong></td>
<td><strong>Technical Assistance</strong></td>
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</table>
| 1. Develop a joint strategy in order to improve collaboration at state and local levels. | • WDVR will review local VR office performance in order to determine successful models for working with local school districts.  
• WDVR will hire a Transition consultant to lead the transition effort, develop consistent VR policies, provide training to WDVR and school special education staff members, and to serve as a focal point for initiating improvements (completed).  
• WDVR will shift counselor responsibilities in order to develop transition expertise in each of the regions. VR counselors with transition expertise will work with the transition consultant in implementing a statewide strategy for improving agency performance. | to services and employment outcomes for youths with disabilities used by other successful state VR agencies, and will share this info with WDVR. |
| 2. Improve service delivery and the achievement of employment outcomes, particularly SE, for individuals with SPMI. | • Finalize and implement the draft WDVR and WDBH interagency agreement in order to improve the coordination of VR and MH services in the state.  
• Develop and implement a joint WDVR and WDBH strategy to improve VR-MH collaboration at state and local levels.  
• Develop and implement an MOU between WDVR and the CWCC. | • RSA will provide WDVR with the contact information for state VR agencies that successfully assist individuals with SPMI to achieve SE outcomes. |
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<tr>
<th>Goal</th>
<th>Strategies</th>
<th>Technical Assistance</th>
</tr>
</thead>
</table>
| 3. Develop and implement an integrated QA system. | • Use MOU between WDVR and the CWCC as a model for other parts of the state.  
• Develop benchmarks for measuring WDVR performance in assisting individuals with SPMI to achieve employment outcomes, particularly in SE. | • RSA will provide WDVR with contact information for high performing state VR agencies comparable to WDVR who have effective QA systems as possible sources of support and consultation.  
• RSA will explore the possibility of arranging for assistance to be provided to WDVR by a Regional Rehabilitation Continuing Education Program or a contractor with expertise in developing QA systems. |
| | • Document WDVR’s current procedures for maintaining compliance to the federal requirements, for measuring performance, and for disseminating the results of these collections.  
• Explore strategies for developing a comprehensive QA system that integrates the following components: state plan goals, strategies, methods of evaluation; casework documentation requirements; performance reports; financial reports; SRC reports; results of consumer, employee, employer, and vendor satisfaction surveys; results of the comprehensive statewide assessment; and any other information deemed necessary to provide WDVR with the information necessary to effectively manage the agency.  
• Develop a strategy leading to the development of a comprehensive QA system.  
• Develop the QA system. |
### State: Wyoming

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<tr>
<th>Goal</th>
<th>Strategies</th>
<th>Technical Assistance</th>
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</table>
| 4. Improve the effectiveness of the SRC. | • WDVR will provide ongoing support to the SRC in order to ensure it is able to fulfill its functions.  
• WDVR and the SRC will develop an effective strategy for assessing consumer satisfaction both while the individual is receiving services, as well as upon closure.  
• SRC will be take responsibility for directing its budget.  
• SRC will partner with WDVR in the quarterly Employer Awards. | • RSA will solicit examples of SRCs that have become more adept at performing their required functions and provide this information to the WY SRC.  
• RSA will solicit examples of effective consumer satisfaction surveys to be shared with the WY SRC. |
| Obtain additional on-going program match from allowable sources. | • RSA will identify and explore solutions with staff to the obstacles encountered in obtaining additional state-appropriated matching funds.  
• RSA will review with staff the allowable external sources of program match and determine if any of these are appropriate for WDVR’s VR Program.  
• RSA will explore the legality of utilizing all Business Enterprise Program revenues for VR Program match. | • RSA will provide TA by meeting with WDVR staff to identify state impediments, share strategies used by other states to increase state-appropriated matching funds, explain federal requirements in this area, and determine if it is permissible to use all revenue generated in WDVR’s unique Business Enterprise Program as match for the VR Program. |

### Program: IL

<table>
<thead>
<tr>
<th>Goal</th>
<th>Strategies</th>
<th>Technical Assistance</th>
</tr>
</thead>
</table>
| 1. Improve SILC members understanding of their roles and responsibilities as members of the SILC so that they may more effectively perform the SILC functions. | • The SILC and WDVR will identify and make available to SILC members and CILs training materials that will increase their knowledge and understanding of IL | • Provide to the SILC a PowerPoint presentation developed by RSA’s TA Unit on roles and responsibilities of the SILC.  
• Assist in identifying other |
<table>
<thead>
<tr>
<th>State: Wyoming</th>
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</thead>
<tbody>
<tr>
<td><strong>Goal</strong></td>
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<td></td>
</tr>
</tbody>
</table>
| 2. Increase the quality of services provided to consumers across the state. | • WDVR and the SILC will work together to review the performance of the CILs, including consumer satisfaction surveys, and an assessment of the quality of IL services.  
• In conjunction with the SILC’s quarterly meetings, WDVR and the SILC will host public forums and take testimony from consumers on the delivery of IL services in the state.  
• WDVR and the SILC will identify areas where services are inconsistent.  
• WDVR and the SILC will take the necessary steps to ensure the consistent delivery of IL services in the state. | • RSA will assist in identifying reliable consumer satisfaction survey instruments and will advise WDVR in the actions necessary to provide consistent IL services statewide. |

### Program: OIB

| 1. Expand the AT available for loan to individuals who are blind or have low vision. | • Access new sources of funding for the purchase of AT. | • RSA will coordinate with the WY OIB program in order to obtain for additional TA resources from the Rehabilitation Research and Training Center on Blindness and Low Vision at Mississippi State University, APRIL, and the IL training grant. |
Please take a moment to participate in a survey about RSA's performance on the FY 2007 monitoring of Vocational Rehabilitation agencies.