

**FISCAL YEAR 2008
MONITORING REPORT ON THE
VOCATIONAL REHABILITATION AND
INDEPENDENT LIVING PROGRAMS
IN THE STATE OF
DELAWARE**



**U.S. DEPARTMENT OF EDUCATION
OFFICE OF SPECIAL EDUCATION AND
REHABILITATIVE SERVICES
REHABILITATION SERVICES ADMINISTRATION**

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Contents

	Page
Executive Summary	1
Introduction.....	3
Chapter 1: RSA’s Review Process.....	5
Chapter 2: Delaware’s Division of Vocational Rehabilitation (DVR) Vocational Rehabilitation (VR) and Supported Employment (SE) Programs.....	7
Chapter 3: Fiscal Management of DVR’s Vocational Rehabilitation and Supported Employment Programs	32
Chapter 4: Delaware’s Division for the Visually Impaired (DVI) Vocational Rehabilitation and Supported Employment Programs	37
Chapter 5: Fiscal Management of DVI’s Vocational Rehabilitation and Supported Employment Programs.....	55
Chapter 6: Independent Living (IL) Program	63
Chapter 7: Independent Living Services Program for Older Individuals Who Are Blind (OIB)	68
Appendix: Sources of Data	71

Executive Summary

The Rehabilitation Services Administration (RSA) reviewed the performance of the following programs authorized by the *Rehabilitation Act of 1973*, as amended (the Act) in the state of Delaware (DE):

- the vocational rehabilitation (VR) program, established under Title I;
- the supported employment (SE) program, established under Title VI, part B;
- the independent living (IL) 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 Delaware, the Delaware Division of Vocational Rehabilitation (DVR) is responsible for the VR, SE and IL programs for individuals with all disabilities, except those who are blind or visually impaired. The Delaware Division for the Visually Impaired (DVI) administers the VR, SE, IL and OIB programs for individuals who are blind and visually impaired.

RSA's review began in the fall of 2007 and ended in the summer of 2008. During this time, RSA's DE 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 on-site visits, and held multiple discussions with state agency staff, State Rehabilitation Council (SRC) members, Statewide Independent Living Council (SILC) members, and stakeholders to share information, identify promising practices, compliance findings, and areas for improvement;
- provided technical assistance during the review process;
- identified promising practices;
- recommended that DVR and DVI undertake specific actions to improve their performance;
- required DVR and DVI to take corrective action in response to compliance findings;
- in collaboration with DVR and DVI, identified technical assistance that would be helpful to improve their performance or correct compliance findings; and

- identified issues for further review.

RSA identified the following strengths and challenges of the VR, SE, and IL programs.

DVR

Strengths:

- DVR has developed a supported education program for individuals in postsecondary education.
- The high percentage of transition-age youths in the state that receive services.
- DVR's benefits counseling (CLIMB) program.

Challenges:

- Serving individuals with physical disabilities.
- Assisting individuals to achieve SE outcomes;
- Achieving self-employment outcomes.
- Establishing an SRC that can effectively carry out their mandated responsibilities.

DVI

Strengths:

- DVI has well-qualified rehabilitation teachers and orientation and mobility instructors.

Challenges:

- DVI must make fundamental changes in the administration of its Title I and Title VI, part B federal funds to run an effective and efficient VR program that results in more applicants coming into the program, more individuals receiving services in the program, and more individuals achieving employment outcomes.
- DVI must reallocate its Title I and Title VI resources in order to carry out effective outreach activities, improve the nature and scope of the VR service it provides (or purchases), and employ a sufficient number of qualified VR counselors. In order to properly reallocate its Title I and Title VI resources, DVI must plan strategically, develop a comprehensive process of quality assurance, and manage its fiscal administration of the program in a manner that is consistent with federal requirements.

INTRODUCTION

Section 107 of the Act requires the commissioner of the 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 Supported Employment under Title VI part B of the Act and 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;
- recommends that the state agency take specific actions to improve program performance; and
- provides technical assistance (TA) to the state agency in order to improve its performance, meet its goals, and fulfill its state plan assurances.

Scope of the Review

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

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

In addition, RSA also reviewed DVR and DVI's progress on:

- the Corrective Action Plans for both agencies that were established as a result of findings from RSA's FY 2004 Section 107 monitoring reviews;
- the agency's Program Improvement Plan that was established as a result of the fact that DVI did not meet performance standards for indicators 1.1, 1.2 and 1.5 in FY 2004; and
- the assurances that DVR and DVI made to RSA in conjunction with the FY 2007 state plans.

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

The Delaware Department of Labor (DOL) serves as the Designated State Agency for DVR. DVR provides VR, SE and IL services to individuals with disabilities in the state, except those who are blind and visually impaired. DVR offices are primarily co-located in DOL one-stop centers.

The Delaware Department of Health and Social Services (DHSS) is the Designated State Agency for DVI, which provides VR, SE, IL and OIB services to individuals who are blind and visually impaired. DVI has three offices located in the northern and central parts of the state.

For the four programs listed above, this report describes RSA's review of DVR and DVI, provides information on their performance, identifies promising practices, identifies performance and compliance issues, along with the related recommendations for program improvement. The report also identifies the TA that RSA will provide to DVR and DVI to address each of the issues covered during the review.

Appreciation

RSA wishes to express appreciation to the representatives of DOL, DHSS, DVR, DVI, the SRC, SILC, and the stakeholders who assisted the RSA monitoring team in the review of DVR and DVI.

CHAPTER 1: RSA'S REVIEW PROCESS

Data Used During the Review

RSA's review of DVI and DVR began in the fall of 2007 and ended in the summer of 2008. 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 2006 and FY 2007 collections. As a result, this report cites data from FY 2006 and FY 2007.

Review Process Activities

During the review process, the RSA DE 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 on-site visits, and held multiple discussions with state agency staff, SRC members, SILC members, and stakeholders to share information, and identify promising practices, compliance findings, and areas for improvement;
- provided technical assistance during the review process;
- identified promising practices;
- recommended that DVR and DVI undertake specific actions to improve their performance;
- required DVR and DVI to take corrective action in response to compliance findings;
- in collaboration with DVR and DVI, identified technical assistance that would be helpful to improve performance or correct compliance findings; and
- identified issues for further review.

RSA DE State Team Review Participants

Members of RSA's DE state team included representatives from each of the five functional units within RSA's State Monitoring and Program Improvement Division. The RSA DE state team was led by RSA's state liaison to DE, Lawrence Vrooman (VR Unit) and the following RSA DE team members: David Wachter (VR Unit), William Bethel (Fiscal Unit), Thomas Kelley (IL Unit), Yann-Yann Shieh (Data Unit) and Janette Shell (TA Unit).

Information Gathering

During FY 2008, RSA began its review of DVR and DVI by analyzing information including, but not limited to, RSA's various data collections, DVR and DVI's VR and IL state plans, and DVR and DVI's SRC's Annual Report. After completing its internal review, the RSA team carried out the following information gathering activities with DVR, DVI and stakeholders in order to gain a greater understanding of DVR and DVI's strengths and challenges:

- conducted five teleconferences with VR and IL stakeholders beginning in December, 2007;
- conducted 27 teleconferences with DVR and DVI management beginning in November 2007;
- conducted eight teleconferences with DVR, DVI, IL program staff, SILC members and administrative staff, and OIB staff; and
- conducted on-site monitoring visits from March 17 through March 20, 2008, and May 27 through May 30, 2008, and met with the Directors, District Administrators, Program Specialists, Counselors and support staff of DVR and DVI, the CAP and the PAIR program, and members of the SILC and SRC.

CHAPTER 2: DVR VOCATIONAL REHABILITATION AND SUPPORTED EMPLOYMENT PROGRAMS

Agency Information and Performance

In FY 2007, DVR served 1,302 individuals and successfully rehabilitated 850 individuals. Of those who were successfully rehabilitated, 35 achieved an SE outcome. Over the past five years, DVR's number and percentage of employment outcomes has remained unchanged at approximately 850 outcomes, with a success rate of approximately 65 percent. The number of applicants and number of individuals served has remained largely unchanged as well, although the percentage of Transition-Age Youths served has increased from 32.79 percent in FY 2002 to 39.32 percent in FY 2007.

Table 2.1 provides fiscal and program data for FYs 2003 through 2007. 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 2.1
Program Highlights
FY 2003 through FY 2007

Delaware Division of Vocational Rehabilitation	2003	2004	2005	2006	2007
Total funds expended on VR and SE	\$9,562,179	\$9,166,780	\$9,618,406	\$10,473,625	\$11,490,809
Individuals whose cases were closed with employment outcomes	845	796	835	840	850
Individuals whose cases were closed without employment outcomes	443	465	594	481	452
Total number of individuals whose cases were closed after receiving services	1,288	1,261	1,429	1,321	1,302
Employment rate	65.61%	63.12%	58.43%	63.59%	65.28%
Individuals whose cases were closed with supported employment outcomes	17	18	18	19	35
New applicants per million state population	2,774.39	2,807.23	2,523.81	2,620.00	2,858.14
Average cost per employment outcome	\$3,100.16	\$3,553.21	\$3,642.57	\$3,854.92	\$3,771.64
Average cost per unsuccessful employment outcome	\$1,973.43	\$1,855.30	\$2,275.07	\$2,030.12	\$1,921.19
Average hourly earnings for competitive employment outcomes	\$8.89	\$9.14	\$9.50	\$9.64	\$9.64
Average state hourly earnings	\$19.69	\$20.07	\$21.13	\$22.50	\$22.57
Percent average hourly earnings for competitive employment outcomes to state average hourly earnings	45.15%	45.54%	44.96%	42.84%	42.71%
Average hours worked per week for competitive employment outcomes	32.70	33.03	32.68	33.00	33.27
Percent of transition age served to total served	35.33%	38.86%	37.72%	40.42%	39.32%
Employment rate for transition population served	68.57%	63.88%	64.56%	65.54%	72.66%
Average time between application and closure (in months) for individuals with competitive employment outcomes	16.9	17.4	17.7	17.9	18.2

VR and SE Service Delivery

DVR utilizes a combination of DOL employment specialists, DVR employment specialists and approximately 24 private community rehabilitation programs (CRP) to provide employment services, utilizing each when appropriate to best meet individual needs in a cost efficient manner.

DVR has over the last several years expanded services to transition-age youths and has collaborated with the community college system in Delaware to create supported education opportunities for individuals from all age groups, with Individualized Plans for Employment (IPE) containing postsecondary education services. DVR has identified postsecondary education as an effective means to improve the quality of employment outcomes for DVR participants.

Personnel

DVR administers the VR, SE and IL programs with a staff of 75 full-time equivalent employees, overseen by a senior management team comprised of the director and deputy director. Five District Administrators (DA) oversee five district offices, four of which are co-located with one-stops and one has a small satellite office. Rehabilitation services are provided by 30 VR counselors. Ten are located in Wilmington, seven in Dover, nine in Newark and four in Georgetown. One counselor in each county is dedicated to the provision of transition services and another to the provision of SE services. There are two counselors in Newcastle County assigned to work with individuals who are deaf or hard of hearing.

Under its comprehensive system of personnel development (CSPD), DVR has established the following as its personnel standard for VR counselors:

- Masters Degree in Rehabilitation Counseling or a related field; or
- Having obtained the credentials of Certified Rehabilitation Counselor, with or without a Masters Degree.

Twenty-one VR counselors currently meet the CSPD standard and two counselors are enrolled in masters degree programs to achieve the CSPD standard. DVR has put into place a seven year plan to have 100 percent of its counselors meet the CSPD standard.

Staff members in management or supervisory positions as well as those members of staff aspiring to supervisory or management positions, are encouraged to participate in management training offered by the division, the State Human Resource Management Office, the Regional Rehabilitation Continuing Education Program, or external consultants.

Data Management

DVR utilizes an effective case management system to track caseload data and to generate a variety of monthly management reports. Monthly reports are archived for 60 months to allow access to trend information. The case management system has various edits in place to ensure

chronological order of dates. RSA-113 and RSA-911 reports are generated by the case management system. DVR uses the system for efficient planning and management of program operations and data.

Quality Assurance

DVR's case management system tracks over a dozen indicators including case load numbers, placements, rehabilitation rates, wages, job retention, costs, demographic information and disability information and all statistics can be tracked by office, counselor and service provider. DVR uses this information to generate reports to track quality and efficiency of counselor, agency and provider performance.

Through its quality assurance process, DVR reviews approximately 10 percent of the cases each year. Reviews are done quarterly with random sampling. DVR uses a modified RSA case file review instrument. The review team consists of a group of twelve supervisors and counselors. The results are discussed in management meetings and counselors are given feedback on the overall results as well as their individual cases.

DVR tracks employment retention and other quality indicators longitudinally using contractors who perform consumer satisfaction surveys that include collection of retention data. Every individual whose case is closed is contacted shortly after exit from the program and individuals who achieved successful employment outcomes are also contacted one year later. A list of case closures is sent to the contractor monthly and attempts are made to contact each individual. On average valid responses are obtained from approximately 60 percent of individuals with closed cases. After one year, approximately 80 percent of the respondents to the survey have retained employment.

Planning

The State plan development and review processes are co-planned and co-facilitated with the SRC. DVR participates in a statewide STAR plan process that begins in August or September of each year. As part of this process DVR identifies environmental issues, strategic goals and benchmarks and then shares this information with DOL leadership for inclusion in the department plan that is submitted to the governor's office.

DVR also engages in a more traditional strategic planning process utilizing a SWAT analysis to develop goals and action plans. This was last accomplished in FY 2006 to develop a strategic plan for FY 2007 through FY 2009.

In FY 2007, DVR also examined services acquired through CRP's and conducted an informal strategic planning process regarding issues in service delivery. DVR then conducted a vendor retreat where it provided demographic and service information to use as part of a planning exercise to identify services needed in the community. This resulted in the development of a service model that became the foundation for the RFPs used to write new provider contracts.

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. DELTech – Supportive Education Program

DVR collaborated with Delaware Technical & Community College (DTCC), the only community college in Delaware, to develop a supported education program. This initiative provides additional tutoring, study skills training, college life and other training for transition students who enroll in DTCC, but require remedial courses before matriculating into a degree or certificate program. The goal is to make community college education and training an option for more transition-age youths with disabilities, and increase their success rate in college.

DVR has observed several benefits of this program. The program has had the unintended effect of having a significant positive impact as a drop out prevention program in secondary education, as the drop out rate in SPED is lower than that of the general population.

VR and SE Program Technical Assistance Provided to DVR During the Review Process

RSA provided VR and SE program technical assistance to DVR during the review process regarding:

- development of outcome based contracts;
- development of measurable goals and priorities for inclusion in the State Plan;

- policies related to the affect of missed appointments and case closures for individuals during the eligibility process;
- policies regarding the use of Trial Work Experience (TWE); and
- the presentation and use of MIS data and ad hoc queries for program monitoring and strategic planning purposes.

Observations of DVR and Its Stakeholders about the Performance of the VR and SE Programs

RSA solicited input from DVR and a wide range of its stakeholders about the performance of the VR and SE programs. DVR and its stakeholders shared the following observations:

- the limited resources for extended services and its impact on the provision of Supported employment;
- there is an increasing number of individuals with disabilities with criminal backgrounds in need of services from DVR;
- the agency's current small business and self-employment policy limits the ability of DVR to assist individuals with disabilities to achieve this form of employment;
- the strength of the agency's transition program; and
- the need to expand services to individuals with autism.

RSA discussed the observations of its stakeholders with DVR and addressed as many of them as possible either directly or by consolidating them into a broader issue area.

VR and SE Performance Observations and RSA Recommendations

RSA identified the following performance observations and made recommendations to DVR about those observations. DVR responded to each of the recommendations and in those instances when RSA and DVR agreed upon a recommendation, RSA and DVR identified the technical assistance that RSA would provide to DVR to successfully implement the recommendation.

1. Low number of applicants

Observations: DVR serves a lower number of individuals per million population compared to its peer¹ states.

¹ Selection of peers was based on grant size and includes the Idaho general, Maine general, South Dakota general and Vermont general programs.

- Table 2.2 data indicate that DVR served 2,858 applicants per million population, compared to a peer average of 3,456 during FY 2007.

**Table 2.2
New Applicants per Million Population
FY 2007**

Performance measures from the RSA-113	DE - General 2007	ID - General 2007	ME - General 2007	SD - General 2007	VT - General 2007
New applicants per million state population	2,858.14	3,468.67	2,559.09	2,553.75	5,841.94

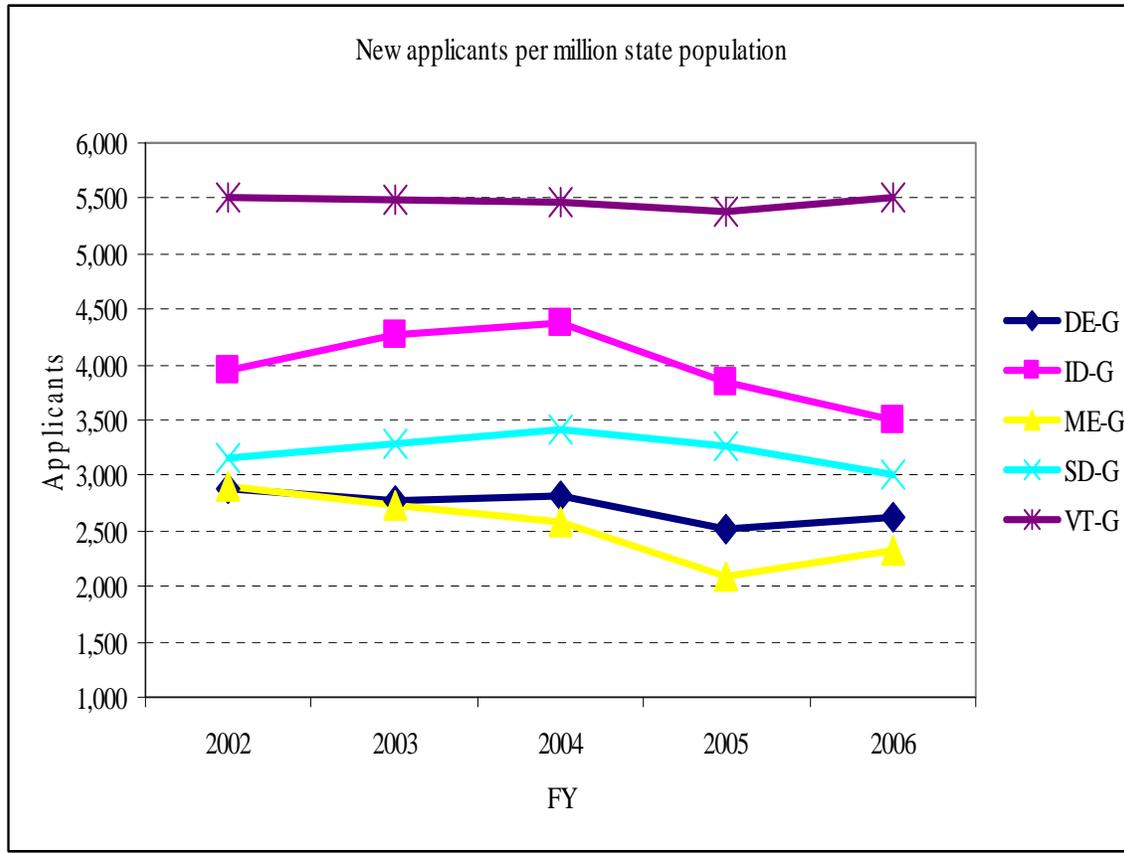
- Table 2.3 indicates that DVR performance on this measure has been unchanged from FY 2003 to FY 2007.

**Table 2.3
DVR New Applicants per Million Population
FY 2003 through FY 2007**

New applicants per million state population Performance measures from the RSA-113	2003	2004	2005	2006	2007
Delaware Division of Vocational Rehabilitation	2,774.39	2,807.23	2,523.81	2,620.00	2,858.14

- Chart 2.1 shows that 4 of the 5 peer states show very similar trends over time in terms of applicants per million.

**Chart 2.1
DVR and Peer Agencies
FY 2002 through FY 2006**



- As indicated in Table 2.4, DVR serves fewer persons who receive SSI or SSDI than the average for its peers in FY 2007.

Table 2.4
Individuals in the DVR Program Receiving SSI and SSDI Compared to Peers
FY 2007

SSI recipients and SSDI beneficiaries	Delaware (G) 2007	Idaho (G) 2007	Maine (G) 2007	South Dakota (G) 2007	Vermont (G) 2007	Peer Averages 2007
SSI recipients	178	621	331	348	569	409
SSI recipients - percent of agency	13.67%	19.18%	24.43%	25.38%	25.27%	21.59%
SSDI beneficiaries	248	682	403	381	735	490
SSDI beneficiaries - percent of agency	19.05	21.07	29.74	27.79	32.64	26.06

- DVR served 178 SSI recipients, 13.67 percent of the total number of individuals whose cases were closed during FY 2007, compared to a peer average of 409 (21.59 percent). DVR was the lowest in both number and percentage compared to its peers. DVR also had a 51.12 percent employment rate among SSI recipients in FY 2007, the second lowest in the peer group and 2 percent below the peer average.
- DVR served 248 SSDI recipients, 19.05 percent of the total number of individuals whose cases were closed during FY 2007, compared to a peer average of 490 (26.06 percent).
- DVR differs from the national average in terms of referral sources, with the largest source being elementary/secondary schools at 30.34 percent, compared to a national average of 17.23 percent.

Recommendation 1: RSA recommends that DVR:

1.1 identify and evaluate the possible reasons for the comparatively low number of individuals who apply for VR services in Delaware; and

1.2 develop strategies, including increased out reach efforts, in order to increase the number of applicants, and SSI and SSDI recipients who may be able to benefit from VR services.

Agency Response: RSA data from FY 2006 revealed a lower number of applicants per million than other similarly situated states, and “peer averages.” The Delaware FY 2006 applicants per million was 2,620, compared to peer average of 3,538. Data provided for the period 2002 through 2006 showed a smaller number of applicants in 2005 and 2006 as compared to earlier years. Delaware DVR has experienced a substantial increase in applicants in FY 2007 and FY 2008 to date. The number of applicants in 2007 (2,458) was ten percent higher than 2006, and in 2008 to date, DVR is at 2,374 through ten months, 20 percent ahead of last year’s rate. Comparing 2008 to the benchmark year of 2006, DVR is 37 percent ahead of the 1,735 applicants at the ten month mark of that year.

Delaware DVR serves a lower proportion of people in service who are on SSI and SSDI compared to the peer states and peer averages. The number of individuals in service for FY 2007 is substantially higher than the numbers reported by RSA for FY 2006. In FY 2007, 407 individuals receiving SSI were in active statuses in Delaware, with another 353 closures. As for SSDI recipients, DVR had 616 active cases and 380 closures. DVR desires to serve more people receiving SSI and SSDI, and thereby increase the number and proportion of people in our caseload on SSA benefits. This is clearly the population who could most benefit from DVR services. DVR has had a clear emphasis on transition over the past ten years, and has experienced consistent success in this program.

The past devolution of supported employment services for individuals with mental health disabilities and corresponding reduction of referrals from the mental health providers may have contributed to the low service rates for SSI recipients. The joint initiative with our mental health agency, the Division of Substance Abuse and Mental Health (DSAMH), and service providers to establish an evidence-based supported employment program for people with chronic and

persistent mental illness will have a positive impact on the service rate for SSI recipients, and may account for the substantial increase over the past two fiscal years. DVR is working with the George Washington University and Virginia Commonwealth University to provide training on Supported Employment Services to the service providers. DVR and DSAMH have acquired technical assistance from the University of Massachusetts Institute for Community Inclusion to establish and develop the Supported Employment program for people with mental illness in Delaware. Delaware has also passed and is in the process of implementing the Medicaid Buy-in program.

DVR has developed and administers a very strong benefits counseling program in Delaware. It was initiated under an RSA Systems Change Grant, and DVR received funding to maintain it through the Social Security WIPA Grant. The missing piece was the Medicaid Buy-in, which will allow SSI recipients to go to work and retain Medicaid benefits. Implementation of this program, along with outreach to eligible SSI/Medicaid recipients should increase the number of individuals who seek DVR services to become employed.

DVR is motivated to serve more SSI and SSDI recipients. DVR can accomplish this goal, working in concert with Delaware stakeholders, and cooperating with SSA initiatives. DVR does not request RSA technical assistance to achieve this result. Receiving regular and timely feedback from RSA on Delaware and peer performance will be helpful in benchmarking results.

TA: DVR does not request TA.

2. Transition-Age Youths

Observations: DVR has invested significant time and resources to expand services to transition-age youths and has in the course of the last several years increased the percentage of the total DVR caseload that is comprised of individuals age 14 to 24. In FY 2007, 39.32 percent of the total population served by DVR consisted of transition-age youths, compared to a peer average of 30.77 percent. This high percentage of transition-age youths has produced both benefits and unintended consequences to the overall program. Compared to its peers, DVR achieves a successful employment rate similar to its peers, but there are differences in the population served by DVR compared to peer states.

- DVR has a 72.66 percent employment rate for Transition-Age Youths. This is comparable to the peer average of 61.97 percent
- Stakeholders (who were not aware of the FY 2007 data at the time they expressed their observations) indicated that DVR is serving a lower percentage of transition-age youths with the most significant disabilities than in the past, and that those with the most significant disabilities may be under-served in the transition program. They opined that the types of disabilities served by the program had changed with the majority of individuals in the transition program now having specific learning disabilities or other cognitive impairments. Stakeholders noted a comparative absence of physical disabilities compared to the population served in the past or in the population of individuals over age 24 receiving services from DVR.

- Counselors, staff and providers involved in transition expressed similar concerns that the transition population has changed and they were not working with as high a percentage of individuals with most significant disabilities as they did several years ago.
- FY 2002 through FY2007 data as indicated in Table 2.7 and peer data for FY 2007 supported these concerns due to a decrease in the percentage of cases for transition-age youths closed from 69.97 percent in FY2002 to a low of 50.29 percent in FY 2005, and 56.00 percent in FY 2006, well below the peer average.
- FY 2007 data indicate a significant decrease in the percentage of transition-age youths with a significant disability at 72.66 percent, slightly higher than the FY 2002 percentage.

Table 2.7
Closure performance – Transition-Age Youths
FY 2002 to FY 2007

Delaware Division of Vocational Rehabilitation Closure Performance - Transition population	2002	2003	2004	2005	2006	2007
With employment	317	312	313	348	350	372
Without employment	142	143	177	191	184	140
Percent of transition age served to total served	32.79%	35.33%	38.86%	37.72%	40.42%	39.32%
Percent closed with competitive employment with a significant disability	69.97%	65.16%	51.13%	50.29%	56.00%	72.66%
Percent closed with competitive employment at SGA level at 35 or more hours per week	78.50%	66.13%	67.52%	63.51%	68.57%	68.29%

Table 2.8
Closure performance – Transition-Age Youths Peer Comparison
FY 2007

Closure Performance - Transition population	DE -G 2007	ID -G 2007	ME-G 2007	SD - G 2007	VT -G 2007	Peer Average
Number with employment	372	593	192	264	350	354
Percent with employment	72.66	68.32	46.15	58.93	63.87	61.97
Percent of transition age served to total served	39.32%	26.81%	30.70%	32.68%	24.33%	30.77%
Percent closed with competitive employment with a significant disability	70.73%	98.64%	100.00%	94.98%	100.00%	92.87%

- Table 2.9 shows a 20.86 percent increase for all transition age youth with significant disabilities between FY 2006 to FY 2007. DVR’s FY 2007 performance in this area is comparable to peer states that are not on an order of selection.

Table 2.9
Number and Percent of TAYs with Significant Disabilities all closure types
for DVR and its Peer Agencies, FY 2002 through FY 2007

Year	AGE GROUP	DE-G		ND-C		SD-G*		VT-G*		WY-C	
		N	%	N	%	N	%	N	%	N	%
2007	transition	555	71.61	578	70.66	655	89.73	752	95.07	251	67.65
2006	transition	373	50.75	515	69.59	671	84.51	817	94.23	159	52.82
2005	transition	389	50.32	605	71.26	624	79.90	802	94.46	223	61.60
2004	transition	385	53.18	475	66.90	605	83.33	756	93.68	175	52.71
2003	transition	421	61.82	508	68.19	546	73.29	700	94.72	213	60.17
2002	transition	443	73.59	508	66.15	444	59.76	506	98.83	194	61.20

*Program is on Order of Selection

- Data in Table 2.10 below indicate that closures for individuals with physical disorders listed as the primary disorder are substantially lower in all categories. Individuals with cognitive impairments comprise the largest single category for successful closures, unsuccessful closures, closures prior to an IPE and closures after an IPE but prior to service provision. The data do not differentiate between learning disorders and developmental disabilities.

Table 2.10
Disability category by closure type
Transition Age Youth

Closure type	Status	disability type	FY 2006		FY 2007	
			N	%	N	%
Exited as an application	2	Physical disorders	1	2.08		
		Cognitive impairment	3	6.25	1	2.13
Exited during or after a trial work experience/extended evaluation	6	Physical disorders	4	12.12	2	8.00
		Cognitive impairment	20	60.61	11	44.00
Exited with an employment outcome	26	Physical disorders	14	4	18	4.84
		Cognitive impairment	293	83.71	305	81.99
Exited w/o employment outcomes	28	Physical disorders	9	4.89	13	9.29
		Cognitive impairment	142	77.17	98	70.00
Exited w/o an employment outcomes, after a signed IPE, but before receiving services	30	Physical disorders	1	3.57		
		Cognitive impairment	25	89.29	59	78.67
Exited w/o an employment outcomes, after eligibility, but before an IPE was signed	30	Physical disorders	8	8.7	10	8.62
		Cognitive impairment	61	66.3	73	62.93

- Consequently, while FY 2007 data for transition-age youths showed an increase in the percentage of youth with significant disabilities, the distribution of the population by primary disability type remains unchanged, supporting concerns that individuals with physical disabilities may be under-served in the transition program.
- The increase in the number of significantly disabled transition youth appears to be due to DVR's collaboration with the Delaware Division of Developmental Disability Services (DDDS) and with special education staff in secondary schools to improve referral rates, improvements in the application process for adult services for individuals with developmental disabilities and in the creation of the Early Start program.
- The Early Start program was created in March 2005, to increase long-term supports to transition age youth entering supported employment. This program identifies students two years prior to graduation and then refers these students to VR services during the fall of their senior year. Ideally DVR works with the students in their senior year, places them during the summer following graduation and DDDS then initiates long term supports in the fall when the VR case is closed. DVR reports that 54 percent of the transition-age youths coming into the system through Early Start are graduating with jobs and long-term supports in place.

- The Delaware DDDS has also recently switched to a portable funding system, through which funds for home and community-based services follow the individual, rather than the previous slot-based system in which funds were tied to specific community rehabilitation providers. This change should continue to create better access to long-term supports and transition services for individuals with developmental disabilities who can more appropriately be served in integrated community-based settings, and will enhance individual choice.
- The large percentage of transition-age youths served by DVR has had an impact on the agency's overall average wage at closure, due to the entry-level nature of transition placements. Transition-age youths typically are placed in entry-level employment with low wages. The percentage of transition-age youths who obtain employment with wages at or above substantial gainful activity, as defined by the Social Security Administration, and who work 35 or more hours per week has decreased from 78.5 percent to 67.21 percent from FY 2002 to FY 2007.
- DVR administrators indicate that decreasing wages, hours and benefits are statewide trends in the non-disabled population as well in Delaware and is focusing on a greater use of postsecondary education to improve the quality of employment outcomes in both transition and adult populations.
- To accomplish this, DVR has successfully partnered with the Delaware Technical and Community College system to develop an initiative to specifically meet the needs of transition-age youths. The DelTech initiative includes the following:
 - the modification of admission standards for degree and certification programs to serve students who are not normally served in postsecondary education;
 - the ability of students to take entrance examinations in tenth or eleventh grade, serving as a reality check regarding the skills, motivations and supports needed to succeed in postsecondary education;
 - the substitution of traditional gatekeeper courses, such as college algebra;
 - required tutorial sessions and the integration of a study skills curriculum in the program;
 - reduced course loads when appropriate if students with Specific Learning Disorders are overloaded with a normal 4 to 5 course class schedule;
 - the use of certification rather than degree programs when appropriate; and
 - the regular presence of DVR counselors at DelTech, allowing students and instructors to obtain feedback from the DVR counselors.

Recommendation 2: RSA recommends that DVR:

- 2.1 continue to monitor the percentage of transition-age youth with significant disabilities to determine if the FY 2007 data are an indication of return to the FY 2002 level of participation of significantly disabled transition-age youths;
- 2.2 analyze the low percentage of transition-age youths with physical disabilities in order to determine whether individuals in this category are being under served or are receiving adequate services through other agencies; and
- 2.3 increase out reach efforts and partnerships with schools in Delaware to ensure that all students with physical disabilities who may benefit from VR services are referred to DVR.

Agency Response: The decrease in the proportion of transition-age youths with significant disabilities in FY 2004 and FY 2005 caused DVR to review its classification process and instrument. DVR provided training to transition counselors and provided resource material on the RSA guidance regarding classification of severity of learning disabilities. As a result, DVR improved the classification process and more accurately captured the proportion of transition-age youths with significant disabilities.

Transition-age youths with severe cognitive disabilities who can benefit from supported employment are served by a dedicated supported employment counselor in each county. The transition counselor for each particular school refers appropriate students to the supported employment counselor in that county. The supported employment counselors did not participate in transition activities. Some transition counselors believed that since they were the transition counselors, and they personally did not serve these clients, that the DVR transition program did not serve those significantly disabled students.

DVR agrees with the recommendations to continue to monitor the proportion of transition-age youths with significant disabilities, and to work with its education partners to ensure that it is reaching all students with physical disabilities.

TA: DVR does not request TA.

3. Supported Employment

Observations: DVR assists two percent of the individuals it serves to obtain supported employment outcomes. The number of individuals placed in supported employment is very low compared to peer and national averages. In addition, due to the limited availability of long-term supports in Delaware, an unknown number of individuals who could benefit from employment supports are not classified as SE individuals and are closed in competitive employment without supports. DVR has recognized the problem and has begun developing strategies to improve availability of employment supports and improve both the quality and number of supported employment outcomes.

- In FY 2007, DVR assisted 4.12 percent of the total individuals closed after receiving services to obtain Supported Employment, compared to a peer average of 10.89 percent. DVR achieved a 2 percent increase in SE closures compared to FY 2006 but remained the lowest percentage of SE outcomes in the peer group.

Table 2.11
Percentage of DVR Closures including Supported Employment
FY 2003 through FY 2007

Delaware Division of Vocational Rehabilitation Individuals whose cases were closed after receiving services	2003	2004	2005	2006	2007
Percent closed with employment in an integrated setting	96.69%	97.36%	97.01%	96.90%	95.18%
Percent closed in supported employment	2.01%	2.26%	2.16%	2.26%	4.12%

Table 2.12
DVR Supported Employment Closures Compared to Peers
FY 2007

Individuals whose cases were closed after receiving services	DE - General 2007	ID - General 2007	ME - General 2007	SD - General 2007	VT - General 2007	Peer Averages 2007
Percent closed with employment in an integrated setting	95.18%	88.82%	76.33%	78.02%	89.35%	85.54%
Percent closed in supported employment	4.12%	6.60%	17.65%	20.47%	5.635	10.89%

- DVR administrators indicated that DDDS has switched from a slot-based system, through which funds were attached to specific providers, to a portable system, in which funds follow the individual.
- DDDS has also modified the application process with the goal of bringing individuals into the system and at the same time initiating the process for home and community based services and/or self directed support waivers to ensure employment supports will be available. The self-directed support waiver is designed to provide support for people living with families by folding in day program monies to use for state match. As a result \$2,500 per year is available to fund supports for individuals remaining at home as opposed to a residential facility and day program. Under this system, individuals are able to choose vendors at open houses where vendors talk to students and parents. The program creates viable options to sheltered workshops and has the potential to improve individual choice, increase the availability of individual supports and improve employment outcomes.

- To address the low number of individuals achieving supported employment outcomes in Delaware, DVR has developed the Early Start initiative (described above) and the Customized employment program.
- The Customized Employment program is being developed as an outgrowth of Early Start. Customized Employment is designed to meet the needs of individuals with greater job matching challenges and addresses both transition-age youths and adults with supported employment needs. The program encourages integrated employment and more specific employment planning, focusing on creating and developing an infrastructure to promote integrated employment for persons with severe disabilities. Compared to the Early Start program, the Customized Employment program is envisioned to target individuals who need more time to achieve successful community-based employment and who may require on-going supports in excess of one year.
- The program is still in the developmental stages and is addressing specific problems, such as the higher costs associated with vendors who will be spending a much longer period of time working with a given individual and the need for highly specialized programming.
- DVR has also recently begun partnering with the Mental Health system in the state to initiate community-based wrap around services and focus on employment as a primary vehicle toward mental health treatment. Under this system, employment is achieved through an evidence based practices model where employment must be competitive and in an area of the individual's choice. It is a team-based approach, with one employment specialist and one VR Counselor on each team. The program includes development of a vocational profile, development of an IPE, job finding activities, employment supports and long-term supports. Both Mental Health and DVR share the costs of providing services.
- The Mental Health system in Delaware is undergoing a process of capacity building and a culture change is needed, as employment is often not seen as an option by mental health providers.
- DVR is in the process of developing an improved and expanded working relationship with the mental health system in Delaware and as part of this process has implemented contracts for CRP's utilizing the Evidence Based Practice model to improve supported employment outcomes for individuals with mental health disabilities.

Recommendation 3: RSA recommends that DVI:

3.1 continue to collaborate with the state mental health system and DDDS to coordinate supported employment resources; and

3.2 establish goals and develop strategies to increase the number of supported employment outcomes.

Agency Response: As discussed in the review report, DVR has been working with its partners to improve supported employment services in Delaware. The lack of long-term employment supports for individuals by mental health service providers hampered an effective supported employment program for people with mental illness. Limited funding of employment supports for individuals with developmental disabilities restricted the growth of their supported employment opportunities. DVR has worked collaboratively with the DSAMH and DDDS to develop a supported employment program and provide or expand adequate long-term employment supports. Delaware DVR and DSAMH are in the third year of collaborating in establishing an evidence-based supported employment program for people with chronic and persistent mental illness. The four mental health providers in Delaware have all established supported employment programs and are collaborating with DVR and DSAMH to integrate employment supports into their service delivery model. Training programs for the provider staff is currently underway through collaboration between George Washington University and Virginia Commonwealth University. Technical Assistance is being provided by the University of Massachusetts Institute for Community Inclusion.

The Early Start Program is a collaboration between DVR, DDDS and the community rehabilitation providers to work with transition students in their senior year of high school- and get them established in a supported employment program before they graduate. DDDS is able to obtain adequate funding to provide long-term supports for students exiting high school. Students are experiencing a seamless transition from high school to employment. After several years of success, the two agencies are building on that success to add a customized employment component to the program, which will enable the program to serve even more significantly disabled students through customized job creation.

These efforts have yielded results. DVR increased the number of supported employment outcomes to 45 last year, and has already matched that number in only nine months of 2008. Delaware is committed to continue to grow the supported employment program and hopes to increase employment outcomes by at least five percent annually and reach the peer average of ten percent within three years.

TA: DVR does not request TA.

4. Application and Orientation

Observations: DVR utilizes an orientation and application process that creates the potential for a delay of up to four weeks between the initial expression of interest by a prospective VR participant and the completion of an application for VR services. RSA recognizes the need to efficiently educate and inform potential applicants and that group orientations are often used to accomplish these objectives. However, to the maximum extent possible, the process should not delay the ability of an individual to apply for services and the subsequent determination of eligibility. The efficiency of the group orientation must be balanced with the specialized needs of individuals to ensure that individuals are fully informed and empowered to request individual orientation sessions when required for disability, transportation or other reasons that may make attendance of a group orientation difficult.

- DVR utilizes a process where first-time VR applicants participate in an orientation process to learn about VR services and to ensure they are able to make an informed decision as to whether they are interested in continuing with an application for VR services.
- DVR offices are located within the one stop system and individuals who could potentially benefit from DVR services are identified on a common intake form expressing their need for or interest in VR services. In addition, One Stop staff can identify individuals who could potentially benefit from VR services and refer them to DVR.
- DVR administrative specialists collect information from the individual at the initial contact and schedule the individual for the next orientation session. Each field office is required to have at least one orientation session every other week. These sessions occur on a weekly or bi-weekly basis depending on the demand in each office location. DVR indicated that it has found this to be more efficient than the previous system of scheduling a meeting with a counselor within 2 weeks of the initial contact. Given that DVR has only 30 counselors, the current orientation method is more cost and time effective. Back to back orientations are frequently conducted in offices with a large number of referrals.
- The orientation process takes approximately one hour and involves a video introduction, scripted presentation of information by an administrative specialist and Vocational Rehabilitation Counselor as well as group discussion. Upon completion of the orientation, interested individuals are given an appointment to meet with a VR counselor within 2 weeks. Forms are provided so the individual can use the intervening time to collect and record information needed when they begin working with a counselor.
- Field Office Supervisors ensure that counselors reserve an adequate number of appointment times to ensure all individuals attending orientation sessions can be seen by a VR counselor within 10 working days of the orientation and same day appointments are available for individuals who need to be seen immediately.
- An application for VR services is then completed at the first meeting with the VR counselor and this date is used in the RSA 911 as the date of application. Releases of information needed to obtain medical records, social security information and other information required for eligibility determination are completed at this time.
- The group orientation process is not mandatory and individuals may be given the option of an individual orientation with a VR counselor.
- Counselors noted that exceptions to the process do occur in situations when the individual has a prior history with VR. For example the orientation requirement may be waived in the case of a transition student who had met with the counselor previously and who is consequently aware of the services available and has expressed an informed choice to apply for services.

- DVR staff indicated that an orientation may occur the next day or two weeks from the day an individual completes the intake process. Similarly, upon completion of the orientation, an individual may be scheduled to see a vocational rehabilitation counselor anywhere from the same day to 2 weeks from the day of the orientation. Consequently, an individual may wait up to four weeks after expressing interest in VR before completing a formal application for VR services, at which point the 60-day eligibility timeline begins.
- The use of a common orientation process is found in many state VR programs and is a frequent response to the need to efficiently inform and educate potential VR program participants prior to application. However, this process must be conducted in a manner fully consistent with the regulations that does not unnecessarily delay the application process.
- During the review, RSA found that neither the application, nor any required releases of information for medical or social security information are requested or completed until the first meeting with the VR counselor despite two prior contacts with the VR field office. This creates an additional delay following the first contact with the VR counselor before information needed to proceed with the eligibility determination can be acquired.

Recommendation 4: RSA recommends that DVR evaluate the current application process to determine if the current policy and procedures result in an excessive delay or an excessive number of applicants dropping out of the process prior to orientation.

If the results of the evaluation indicate that the current policies and procedures are causing undesirable delays, then RSA recommends that:

4.1 change its policy and procedures to allow for the completion of a formal application for VR services by individuals who remain interested in applying for VR services immediately following completion of the group orientation;

4.2 modify its policies and procedures to provide for completion of releases of information at the earliest opportunity to the extent that appropriate information and releases can be determined by non-counseling staff to speed the availability of medical records, social security records or other information needed for eligibility purposes; and

4.3 ensure field office staff are fully aware of and extend the opportunity for individual orientations when appropriate.

Agency Response: DVR moved to a group orientation process to achieve some process efficiency and facilitate a quicker entry into the program. DVR has only 30 vocational rehabilitation counselors statewide in four offices. Individuals returning for additional services, or those who are not appropriate group orientation participants, can meet individually with DVR counselors. Counselors regularly provide appointment times for the next two weeks to their supervisor, who schedules initial intakes, either after orientation or in lieu of orientation. DVR

has been challenged this year with a 28 percent increase in the number of people eligible for services over the same time last year. The agency is looking for additional process efficiencies to bring people into an in-service status more quickly. Providing individuals with an opportunity to complete applications, sign releases, and even complete informational questionnaires at the close of orientation is a suggestion that DVR is embracing. DVR has also reduced the application questionnaire to further streamline the process.

TA: DVR does not request TA.

5. Use of Trial Work Experience

Observations: DVR uses trial work experience (TWE) at a significantly higher rate than the peer average. This is reported to be an artifact of some DVR counselors using TWE to obtain assessment information during eligibility that would normally be collected during plan development.

- During FY 2006, DVR had 124 applicants in TWE at the beginning of the year, compared to a peer average of 42. DVR had 160 new applicants in TWE for the year, compared to a peer average of 60. DVR had a total of 284 individuals in TWE during FY 2007, a significant reduction from 423 in FY 2006. This compares to an FY 2007 peer average of 102 and a DE-excluded average of 56.
- During FY 2007, 138 individuals were closed during or immediately following TWE raising concerns that the higher than normal incidence of TWE may prolong eligibility determinations and exclude a higher number of individuals seeking services than is the case in comparable programs. Due to limitations in data collected, it is not known how many of the 138 closures were due to ineligibility decisions versus individuals discontinuing program participation for other reasons.
- DVR administrators indicated that some DVR counselors appear to be following a pattern where Status 06, normally used for TWE to determine if an individual is ineligible due to being too severely disabled to benefit from VR services with respect to the achievement of an employment outcome, is instead used for situational assessments that would be more appropriately conducted between eligibility and plan.
- DVR agreed this practice could unnecessarily delay the eligibility decision and DVR indicated that it recently changed its case management system to eliminate Status 06, requiring counselors to process applications differently.
- The average length of time to determine eligibility is reported by DVR to be 33 days and it continues to attempt to reduce the number of eligibilities that exceed 60 days. RSA data indicate that eligibility decisions were made within 60 days in 85.5 percent of the applications completed during FY 2007.

Recommendation 5: RSA recommends that DVR:

5.1 continue to develop and implement strategies to improve the timeliness of eligibility decisions and to limit the use of TWE and/or extended evaluation during eligibility to only those cases where it is required for an eligibility decision; and

5.2 conduct case reviews on a quarterly basis to evaluate the effectiveness of its strategies regarding eligibility, use of TWE and extended evaluation.

Agency Response: DVR leadership eliminated status 06 in FY 2007, after a number of unsuccessful efforts to restrict the use of status 06 “extended evaluation” to only those relatively few clients who required additional evaluation and trial work to establish clear and convincing evidence about whether they could achieve and employment outcome. Counselors must now complete their determination within 60 days, unless they obtain a waiver because they lack adequate information to determine eligibility. The elimination of status 06 seems to have had the desired impact, and clients are no longer “parked” in this status for what amounted to extensive assessments. DVR continues to conduct quarterly case reviews to evaluate the timeliness and quality of DVR services provided to our clients. The number of cases reviewed constitutes about five percent of the total cases in service. In addition, counselor statistics on timeliness of eligibility and plan development are kept for all counselors and the statistics are printed in reports and shared with counselors periodically and used in annual performance evaluations.

TA: DVR does not request TA.

6. Self-Employment

Observations: DVR assists individuals to achieve self-employment outcomes at a rate significantly below the peer average.

- As indicated in Tables 2.13 and 2.14 below, DVR has achieved 3 to 4 self employment outcomes per year from FY 2003 through FY 2007, compared to a peer average of 51 in FY 2007.

**Table 2.13
DVR Self-Employment Outcomes
FY 2003 through FY 2007**

Delaware Division of Vocational Rehabilitation Employment Status at Closure	2003	2004	2005	2006	2007
Self-Employment	3	3	4	4	4

**Table 2.14
DVR Self-Employment Outcomes Compared to Peers
FY 2007**

Employment Status at Closure	DE - General 2007	ID - General 2007	ME - General 2007	SD - General 2007	VT - General 2007	Peer Averages 2007
Self-Employment	4	86	42	13	63	51

- DVR recently revised its self-employment policy, which requires the individual to “fully develop and manage” all aspects of the business.
- The RSA team observed that this approach reflects a very traditional business model approach that may limit the ability for individuals to utilize this type of employment outcome. The requirement restricts the ability of counselors to explore and develop natural or paid supports that could be used to accommodate specific disability related deficits in potential business opportunities when an individual may be unable to perform all functions required to develop and manage the business, but is able to perform the essential functions needed to manage the business with the use of related supports and resources.
- DVR’s current approach to the operation of a small business is not conducive to encouraging counselors to view self-employment as a viable option for a significant number of individuals.

Recommendation 6: RSA recommends that DVR:

6.1 review and revise its self-employment policy to ensure it allows for full participation by individuals utilizing reasonable accommodations; and

6.2 conduct staff training to ensure staff are aware of the policy, philosophy and the resources that can be used to make small business outcomes a viable outcome for a greater number of individuals.

Agency Response: DVR recognized that its self-employment outcomes were relatively minimal. As mentioned in the review, it worked with the Abilities Fund to improve the agency’s practices and procedures relative to self-employment. The director of the Abilities Fund, came to Delaware and provided a day long training to DVR management. As recommended, a future training will be conducted for DVR Counselors, on the changes and upgrades to the self-employment policies and practices. DVR secured the services of a small business consultant to work with individuals in developing and implementing self-employment plans.

As recommended, Delaware revised the self-employment policy so that it facilitated a more efficient and user friendly policy. It incorporated the feasibility review process which is a key component of the Abilities Fund model. This would allow DVR to approve the individual and the proposed self employment objective prior to requiring the individual to develop a complete business plan. In addition, management reviewed the outcomes coded during the current fiscal year and found a number of employment outcomes that should have been coded as self-employed that were not. These were primarily professions such as hair dresser where an individual rented a chair from a salon and served their own clientele; or a real estate agent in which the individual was self-employed within an umbrella type organization. Information was provided to counselors about correctly identifying self-employment type outcomes. The number of clients pursuing self-employment in DVR has grown during this fiscal year. The new policy

and consultant is helping DVR counselors to better serve these individuals. DVR expects the number of self-employment outcomes to double in the next few years.

TA: DVR does not request TA.

7. Engagement of the Statewide Rehabilitation Council

Observations: DVR receives input on policy and strategic planning issues from the SRC through scheduled SRC meetings and through the inclusion of SRC members on the Policy Development Committee. DVR agreed with RSA that the annual goals developed by DVR and the SRC could be improved. DVR indicated that in the past the SRC in conjunction with DVR carried goals forward from year to year with little change and often developed goals that were not outcome-based or measurable.

- The program would benefit from an active SRC that developed and utilized the results of a comprehensive consumer satisfaction survey (i.e., a survey of individuals who did and not achieve employment outcomes) in order to make substantive recommendations to DVR on how to improve the program's performance.
- DVR and its SRC would benefit from training on the roles and responsibilities of the SRC.
- DVR and the SRC indicated they have difficulty recruiting new qualified members to the SRC and expressed consensus that recruitment efforts should be expanded.

Recommendation 8: RSA recommends that DVR:

7.1 expand its efforts to recruit new qualified SRC members;

7.2 participate in technical assistance and training opportunities to enable the SRC to fulfill its statutory obligations as effectively as possible. This should include RSA's new State Rehabilitation Council (SRC) Training. The link to the training is <http://www.erehab.org>

7.3 develop strategies to improve and support the work of the SRC and enhance its independence.

Agency Response: Delaware DVR agrees with the RSA recommendations relative to its work with the SRC. A representative of the George Washington University RRCEP attended the SRC meeting in May and discussed training opportunities with the members of the SRC. She provided information about the new online training programs for State Rehabilitation Councils. Recently, four members of the SRC met and reviewed five of the online training modules and discussed them. They found some to be very useful. A decision was made to access one of the training modules- the role of the SRC- at the next full meeting of the SRC. This will provide the information to all council members as well as familiarize them with how to access further modules on the internet. In the future, additional training will be provided to council members through the online modules as well as onsite training. The DVR liaison to the SRC continues to

work with council leadership as well as the Governor's Office to identify and appoint new members to the SRC. In the past few months three or four new members have been appointed, and there are currently several additional membership applications pending appointment.

TA: DVR may request TA.

8. Contracts with Community Rehabilitation Programs

Observations: DVR utilizes DVR Employment Specialists and private CRPs, as well as DOL one stop employment specialists depending on the needs of the individual being placed. DVR currently uses contracts with process or milestone based payment systems and may benefit from the adoption of performance-based contracts.

- DVR requires that its providers be accredited by the Council on Accreditation of Rehabilitation Facilities (CARF) unless DVR issues a waiver, though in cases of a waiver, the providers are required to follow CARF guidelines.
- DVR monitors and evaluates its external service providers through customer satisfaction surveys and an external QA program. DVR gathers information on providers through customer service data collected by the providers, surveys of counselors and the analysis of database and case management information. DVR develops internal reports using case management system data on placements, outcomes, annual wage, and the retention of employment. DVR assesses on-site training providers through the percentage of successful completions and placements, in addition to any internal data base indicators that may apply.
- Monthly provider reports are required in certain service agreements such as job placement contracts. These reports are most often submitted via e-mail allowing the efficient cutting and pasting into system case logs.
- Despite existing quality assurance measures, provider performance continues to pose challenges to DVR.
- During the review process, some CRPs expressed concern that VR counselors drive the job placement process through control of the referrals to providers. They also indicated that there is competition between DVR employed employment specialists and CRP employed job developers. CRPs stated that they are usually given individuals who are more challenging to serve and felt that easier to serve consumers were given to in-house employment specialists.
- In separate sessions, VR counselors stated that the CRPs control the process through the existing contract provisions and the ability to decline to serve individuals they feel may be too difficult to place.
- In addition to the perceived competition between DVR and CRP job developers, CRPs indicated that the DelTech program (described above) posed another source of

competition in an environment where they feel they are struggling to maintain a stable and consistent flow of referrals.

- Currently the DVR contracts for employment services combine assessment and pre-employment activities with placement, resulting in a requirement for community-based work assessment services in all placement contracts regardless of whether the individual or VR counselor deem such assessments to be needed. From the CRP perspective this is important, as assessment services comprise a significant portion of the total placement package payment, while VR Counselors often see it as an unnecessary expense and delay in services, particularly for consumers who have previously been assessed.
- DVR has not evaluated whether DVR employment specialists or CRPs are more cost effective or differ in quality of placements.
- DVR also utilizes one stop placement services for easy to place individuals, utilizes DVR employment specialists for harder to place individuals and utilizes CRP's primarily in situations where pre-employment training, job coaching or on-the-job supports may be required.
- DVR indicates it has established measurable goals for contracts with CRPs, but has yet to establish criteria for both baseline and future performance measures.
- Current contracts for general caseload individuals are based on a milestone system that is not outcome-based, because the milestone payments allow the majority of the maximum payment to be received without a successful closure.
- Job placement contracts with CRPs providing services to mental health consumers are based on adherence to the processes specified in the Evidence-Based Practice model.
- RSA observed that clarification was needed regarding the roles of DVR employment specialists and those employed by the CRPs to highlight the different skill sets of each group and the different populations that they serve. This will potentially clarify the rationale used in selecting one type of provider in place of the other.

Recommendation 8: RSA recommends that DVR:

8.1 adopt strategies for improving the performance of its providers, such as the development of performance-based contracts, benchmarks that promote quality employment outcomes, and incentives for providers to assist individuals to achieve high quality outcomes;

8.2 evaluate whether DVR employment specialists or CRPs are more cost effective or differ in quality of placements and utilize the results of the evaluation in job placement service decisions; and

8.3 develop contracts with CRPs that are designed to strengthen communication between DVR and its providers, and to ensure individuals obtain meaningful employment outcomes in a cost effective, timely and efficient manner reflecting individual choice.

Agency Response: DVR has an outcome oriented focus with its community providers. The agency seeks to have its contracts pay for outcomes, not process. DVR contracts with providers for placement call for partial payment after placement has occurred, and complete payment after 90 days of successful employment. Supported Employment contracts have milestone payments that are outcome focused, a completed assessment, placement, stabilization of employment, completion of training.

By utilizing in-house employment specialists, community service providers, and counselor-assisted placements, DVR maintains an array of placement choices for clients, and multiple resources to meet its outcome goals. DVR acknowledges that it often refers the challenging clients to the CRPs for placement services. It views that as the purpose of having CRPs providing this service, to provide services to challenging clients. It feels the service is appropriately priced to reflect these challenges.

DVR will explore alternative approaches to contracting which promote outcomes and quality performance, especially the idea of providing incentives for higher quality outcomes. Measuring the quality of results from providers and in-house Employment Specialists can be an interesting exercise in evaluating the quality of placement services and identify areas for improvement. DVR will continue to collaborate with providers to improve periodic reporting on client progress.

TA: DVR does not request TA.

CHAPTER 3: FISCAL MANAGEMENT OF DVR VOCATIONAL REHABILITATION AND SUPPORTED EMPLOYMENT PROGRAMS

RSA reviewed DVR's fiscal management of the VR and SE programs. 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.

Fiscal Management

The data in the following table, based on data reported on the fiscal reports submitted by the state agency, address the overall fiscal performance of the agency. The data related to matching requirements are taken from the respective fiscal year's final or latest Financial Status Report (SF-269). The carryover data are taken from the unobligated balance of federal funds portion of the fourth quarter SF-269. The maintenance of effort (MOE) requirement data are taken from the final or latest SF-269 report of the fiscal year that is 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 3.1
Fiscal Profile Data for DVR
FY 2003 through FY 2007**

Fiscal Year	2003	2004	2005	2006	2007
Grant Amount	7,173,364	7,322,306	7,377,561	7,653,262	8,057,739
Required Match	1,941,457	1,981,768	1,996,722	2,071,340	2,180,811
Federal Expenditures	7,173,364	7,322,306	7,377,561	7,653,262	8,057,739
Actual Match	1,941,505	1,981,768	1,996,723	2,071,340	2,180,811
Over (Under) Match	48	0	1	0	0
Carryover at 9/30 (year one)	0	0	0	0	0
Program Income	192,358	183,443	291,842	237,059	233,062
Maintenance of Effort (MOE)	1,827,242	1,899,363	1,941,505	1,981,768	1,996,723
Administrative Costs	1,383,835	1,320,547	1,190,795	1,304,127	1,631,271
Total Expenditures*	9,562,179	9,166,780	9,618,406	10,473,625	11,490,809
Percent Admin Costs to Total Expenditures	14.47%	14.41%	12.38%	12.45%	14.20%

*Includes Supported Employment Program Expenditures.

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 State VR Services Program, other than for the construction of a facility related to a community rehabilitation program, is 21.3 percent, as established in the 1992 amendments to the Rehabilitation Act (act). 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).

Fiscal Technical Assistance Provided to DVR During the Review Process

RSA provided VR and SE program technical assistance to DVR during the review regarding:

- developing and maintaining formalized written policies and procedures for governing the rates of payment for all VR services;
- clearly separating the duties between the counselor who approves the service for the consumer and the staff person who approves payment for the service;
- integrating fiscal staff into the strategic planning process from the beginning;
- ensuring that all required reports and supporting documents are submitted before processing payments for services or goods;
- avoiding developing payment points within a contract that may be duplicative of services delivered; and

- reviewing Delaware's insurance requirements to determine if listing DVR as co-insured would be appropriate.

Observations of DVR about the Fiscal Management Performance of the VR and SE Programs

RSA solicited input from DVR about the performance of the VR and SE programs. The DVR shared the following observations:

- the benefit of involving fiscal staff in the strategic planning process;
- maintaining procurement files, which require specific pre-award documents, on-site and grouped by CRP; and
- communication between program and fiscal staff.

RSA discussed the observations with DVR and addressed as many of them as possible either directly or by consolidating them into a broader issue area.

VR and SE Program Fiscal Management Performance Observations and RSA Recommendations

RSA identified the following fiscal performance observations and made recommendations to DVR about those observations. DVR responded to each of the recommendations and in those instances when RSA and DVR agreed upon a recommendation, RSA and DVR identified the technical assistance that RSA would provide to DVR to successfully implement the recommendation.

1. Fiscal Review – Performance and Internal Controls

Observation: A review of some contract formats and payment structures led to the identification of problematic areas that may affect the cost efficiency of the delivery of services. In addition, there appears to be a lack of separation of duties to ensure proper handling of the CRP billing.

- Payment benchmarks were time driven and paid according to time spent in the activity, and the contract did not indicate a need for proof of services delivered to achieve payment.
- The counselor approves the service to be delivered and approves the payment for that service, which is processed by financial staff.
- Financial staff only process the payments for the CRP according to the approval of the counselor.

Recommendation 1: RSA recommends that DVR:

1.1 use benchmarks which are tied to specific services provided and not issue payments based only on time spent with a CRP; and

1.2 develop a checks and balance system, for the process of billing for purchased services, to ensure that more than one person is involved in ordering the services to be provided and approving the expenditures for those services.

Agency Response: As previously mentioned, DVR believes in paying for outcomes and not process. Payment is made for “time spent” for some services, such as job coaching, or skill training services, when a time focused service is purchased. DVR Counselors have an array of rehabilitation services to choose from, and determine what services to purchase for an individual client based upon his or her VR needs after conducting an assessment and developing an IPE that is signed by the counselor and the client. The counselor will initiate delivery of specific services at the appropriate time by issuing an authorization to the service provider. When the service is completed, the provider will complete a section of the authorization documenting the delivery of the requested service. The counselor, who independently verifies that the service has been provided, will certify that fact on the authorization, and submit it to fiscal department for payment. Documentation of reports or service results are contained in the case record.

The counselor verifies with the client that the service was provided. A DVR fiscal staff person will review the authorization to determine if there is certification that the service has been provided by the provider, and released for payment by the counselor. Payment will then be issued. There are thousands of individual authorizations for services issued by DVR counselors each year, and counselors track and verify services as they are provided, and cancel authorizations for services if services are not provided.

DVR will cooperate with RSA to ensure that appropriate fiscal controls are in place, and procedures required by the law and regulations are followed. In order to follow these recommendations, additional information is needed by DVR as to specific Rehabilitation Act or EDGAR procedures and requirements that are involved, and how to appropriately meet those requirements.

TA: DVR requests TA. Additional consultation between DVR program and fiscal managers and RSA is requested to further expand on these observations and recommendations.

CHAPTER 4: DVI VOCATIONAL REHABILITATION AND SUPPORTED EMPLOYMENT PROGRAMS

Agency Information and Performance

In FY 2007, DVI served 21 individuals and successfully rehabilitated 13 individuals. Of those who were successfully rehabilitated, one achieved a supported employment outcome. Over the past five years, DVI's number and percentage of employment outcomes has decreased from 24 to 13, and the number of applicants and number of individuals served has decreased from 87 to 77.

Table 4.1
Program Highlights
FY 2003 through FY 2007

Delaware Division for the Visually Impaired -- DHHS Campus	2003	2004	2005	2006	2007
Total funds expended on VR and SE	\$1,792,560	\$1,883,134	\$1,821,728	\$1,778,143	\$1,858,542
Individuals whose cases were closed with employment outcomes	24	12	9	13	13
Individuals whose cases were closed without employment outcomes	12	7	2	3	8
Total number of individuals whose cases were closed after receiving services	36	19	11	16	21
Employment rate	66.67%	63.16%	81.82%	81.25%	61.90%
Individuals whose cases were closed with supported employment outcomes	3	1	0	1	0
New applicants per million state population	60.98	55.42	44.05	35.29	48.84
Average cost per employment outcome	\$7,567.38	\$3,276.92	\$11,827.89	\$1,694.38	\$11,702.00
Average cost per unsuccessful employment outcome	\$3,942.33	\$8,473.71	\$488.00	\$17,664.67	\$3,677.00
Average hourly earnings for competitive employment outcomes	\$8.00	\$8.21	\$11.68	\$11.51	\$10.54
Average state hourly earnings	\$19.69	\$20.07	\$21.13	\$22.50	\$22.57
Percent average hourly earnings for competitive employment outcomes to state average hourly earnings	40.63%	40.91%	55.28%	51.16%	46.70%
Average hours worked per week for competitive employment outcomes	29.50	32.67	31.56	30.38	30.17
Percent of transition age served to total served	13.89%	15.79%	36.36%	25.00%	23.81%
Employment rate for transition population served	40.00%	66.67%	100.00%	50.00%	60.00%
Average time between application and closure (in months) for individuals with competitive employment outcomes	40.7	37.7	45.4	19.4	35.8

VR and SE Service Delivery

DVI administers a number of programs in addition to its VR and SE programs funded under Title I and Title VI, part B. VR and SE funding comprises \$1.78 million of DVI's \$9 million annual budget. DVI's mission is to increase the independence of the individuals it serves through three primary programs: Education, Independent Living, and Vocational Rehabilitation (including two direct employment units, the Business Enterprise Program (BEP) and Delaware Industries for the Blind (DIB)). Employment is addressed by DVI as a means of assisting individuals to achieve greater independence.

The majority of services are provided directly by DVI employees and very few services are provided by CRPs, contractors or outside agencies. VR counselors within DVI are paired with employment specialists who work as a team to manage a single caseload. Rehabilitation technology, adjustment to blindness and orientation and mobility services are also provided by DVI employees.

Personnel

DVI employs 70 individuals within the entire agency. In FY 2006, of these 70 individuals, 34 individuals directly or indirectly supported the VR program, with Title I funds providing the resources for 23 FTEs.

The DVI administration team for the VR program includes the Director, Deputy Principal Assistant, District Administrator and VR Program Specialist. The District Administrator supervises three VR counselors, three employment specialists and two administrative assistants.

Title I funds are utilized for six FTE's that support the BEP and additional FTE's are utilized for various positions providing technical, fiscal and administrative support to the VR unit. Costs are also charged to Title I funds for services provided by rehabilitation instructors and special education teachers located in other program units who provide independent living and orientation and mobility services to individuals receiving VR services.

DVI recently added a VR counselor position and all VR counselors employed by DVI currently meet the CSPD standard. DVI requires all VR counselors to have a Masters degree in Rehabilitation Counseling or a related field and encourages counselors to obtain their CRC certification within 5 years.

Data Management

DVI developed and maintains its own case management system, the Visual Impaired Client Registry system (VICR). This system is integrated into the Delaware Blind Registry that DVI is also responsible for maintaining.

The case management system is moving towards a goal of becoming paperless, but case management at present involves both electronic and paper copies. Counselors currently copy

and paste from the case management system to MS Word to print case notes. DVI is working on enhancements to allow printing of the entire record at closure. DVI administrators and technical staff meet monthly to discuss program enhancements. However the speed at which enhancements occur is limited by having only one programmer on staff and desired enhancements as well as system queries and additional report functions are prioritized based on needs and overall benefit to the program.

The case management system incorporates established monthly reports and has the ability to generate ad hoc reports that can be requested from the information resource management team. At present, ad hoc queries cannot be done on all data elements.

Counselors can generate their own caseload reports and can utilize a tickler system in VICR by inputting a date for a "work list." Counselors can also track deadlines, due dates and task lists via MS Outlook.

The case management system tracks expenditures by client based on requisitions by both fiscal year and life time costs for the individual. The system can also track costs by vendor and by funding source. Tracking of expenditures is limited to costs associated with a specific case and overall administrative and indirect costs cannot be tracked by the system.

RSA-911 reports are currently generated from the system but all other RSA reports are compiled manually utilizing a variety of information sources. DVI recently enhanced the case management system to track system status change dates and is in the process of cleaning up the process to allow generation of 113 reports and monthly case lists.

Quality Assurance

Quality assurance to ensure consistency of planned services and timely completion of assessments, eligibilities and other phases of the case flow process depend on monthly and quarterly case reviews completed by supervisors. Case services are currently not tied to the IPE by the VICR system. Internal control maintained through case file reviews and an approval chain for authorizations with anything over \$2500 requiring Director approval.

DVI utilizes few external providers, but does have the ability to track costs by vendor and service and maintains quality through views of monthly vendor reports.

Planning

As part of DHSS, DVI updates and submits its strategic plan annually as part of the State budget process. The DVI Planning Unit provides guidance and technical assistance during the strategic planning process. Included in the plan are one or more performance measures for each of the operating units within DVI. The performance measures are included in the DVI budget narrative and also accompany the general fund budget request for review and approval at the department level. In addition, DVR engages in additional annual planning with the SRC to develop and review annual goals and progress.

VR and SE Program Technical Assistance Provided to DVI During the Review Process

RSA provided VR and SE program technical assistance to DVI during the review process regarding:

- assistance regarding tracking money spent through indirect billing. RSA suggested adopting a practice of billing back to the individual case to allow tracking of actual costs in the system. DVI could, by tying the cost to a specific individual, track the long term impact of the costs and services on outcome;
- clarification of post-employment services versus opening a new case for a person at risk of losing a job;
- information regarding options and remediation of potential match and maintenance of effort penalties that could result from restructuring of personnel and revision of cost allocation processes within DVI; and
- clarification of CAP and Pair responsibilities and authority to become involved in issues involving VR individuals participating in the BEP.

Observations of DVI and Its Stakeholders about the Performance of the VR and SE Programs

RSA solicited input from DVI and a wide range of its stakeholders about the performance of the VR and SE programs. The DVI and its stakeholders shared the following observations:

- there are not many individuals are served by DVI through the VR program;
- DVI and DIFB staff members demonstrate a high degree of professionalism and respect toward consumers;
- DVI is always helpful and forthcoming with requests for assistance, data, information, and provided very rapid responses to requests;
- DVI is well regarded and respected in Delaware, receives positive public responses, has good relations with Joint Finance Commission, and is well respected by the disability community;
- there is satisfaction with the services provided to transition-age youths and with the technical assistance provided to teachers;
- the agency's orientation and mobility services are good quality;
- there is a positive view of the BEP program;

- the state's limited transportation options has an affect on the ability of individuals to obtain employment; and
- there is concern among consumers regarding the low numbers of VR consumers served and low numbers seeking services.

RSA discussed the observations of its stakeholders with DVI and addressed as many of them as possible either directly or by consolidating them into a broader issue area.

VR and SE Performance Observations and RSA Recommendations

RSA identified the following performance observations and made recommendations to DVI about those observations. DVI responded to each of the recommendations and in those instances when RSA and DVI agreed upon a recommendation, RSA and DVI identified the technical assistance that RSA would provide to DVI to successfully implement the recommendation.

Section I. Performance Observations

On a wide range of measures, DVI is the lowest performing agency of all 80 VR agencies. Primarily, DVI provides IL services while providing a minimum of VR services to a very small number of individuals who are seeking to obtain or retain employment. DVI's focus, organizational structure, and resource allocation profoundly compromise the agency's ability to effectively and efficiently provide VR services.

- DVI administers a number of programs in addition to its VR program and is divided into three primary program areas: Independent Living, Education and Vocational Rehabilitation. The majority of services provided by DVI are either IL services or primary and secondary special education services (supported through its Individuals with Disabilities Education Act (IDEA) grant) and these services are not provided to individuals who are seeking to obtain or retain employment.
- The largest group of individuals served by DVI are over age 55. These individuals' primary needs are independent living services and assistive technology devices provided by orientation and mobility specialists and rehabilitation instructors.
- In FY 2006 DVI provided:
 - IL services to an estimated 800 individuals under the OIB program and IL program;
 - education services to 200 individuals ages 4 to 14;

- VR services to 72 individuals, or 18 percent of the average number of individuals served by DVI’s peer² blind agencies.
- DVI assists the fewest individuals to achieve employment out of all 80 VR agencies.

1. Applicants and Eligible Individuals

- As indicated in Table 4.2 below, DVI has the lowest number of applicants for services per million population when compared with its peer agencies.

**Table 4.2
Number of DVI Applicants Compared to Peer Agencies
FY 2007**

Agency	DE-B	ID-B	NE-B	SD-B	VT-B
New applicants per million state population	48.84	89.33	81.92	240.00	225.81
Number of Applicants	66	148	153	211	147

- As indicated in Table 4.3 below, the number of individuals applying to DVI for services decreased steadily from FY 2003 through FY 2006 and improved in FY 2007.

**Table 4.3
Number of DVI Applicants
FY2003 through FY 2007**

Year	2003	2004	2005	2006	2007	Change from 2003
New applicants per million state population	60.98	55.42	44.05	35.29	48.84	-19.9%
Number of Applicants	55	55	40	35	66	+20%

- DVI maintains the blind and visually impaired registry in Delaware. This registry currently tracks approximately 3000 individuals who are blind or visually impaired and have either been referred to DVI and other Department of Human Service agencies or have received services from those agencies.
- Projections of 2000 census data suggests the number of persons in Delaware with blindness or visual impairment should be between 7000 and 8000 persons, indicating that the blind and visually impaired community as a whole may be under-served in Delaware.

² Idaho Blind, Nebraska Blind, South Dakota Blind, and Vermont Blind. These four agencies were chosen as peer agencies because these agencies receive a federal Title I grant award that is closest in amount to the grant received by DVI.

- DVI indicated the agency is not recognized to any significant degree by either the blind community or the employer community as being associated with employment services or employment opportunities.
- RSA staff observed that DVI is well known as a provider of independent living and rehabilitation technology training and services. This appears to be due to the multiple services provided within DVI and the resulting focus on older blind and IL services as well as IDEA related services provided to children under age 14 who fall below the transition age range.
- As indicated in Table 4.4, in FY 2007, DVI identified approximately half as many individuals eligible for services compared to its peer agencies.

**Table 4.4
Number of DVI’s Eligible Individuals Compared to Peer Agencies
FY 2007**

	DE-B	ID-B	NE-B	SD-B	VT-B
Number of eligible individuals	61	124	125	194	138

- As indicated in Table 4.5 below, the number of individuals that DVI identified as eligible has increased 36 percent from FY 2003 through FY 2007, but has not yet recovered to the FY 2002 level of 90 eligible individuals.

**Table 4.5
Number and Percent Change of DVI Eligible Individuals
FY 2002 through FY 2007**

	2002	2003	2004	2005	2006	2007	Change from 2003
Number of eligible individuals	90	45	42	82	69	61	+35.6%

Recommendation 1: RSA recommends that DVI

1.1 promote an employment related focus and vision to the blind and visually impaired community, employers and other potential referral sources for working age individuals; and

1.2 expand outreach efforts to increase awareness of the employment services offered by DVI, resulting in an increased number of blind and visually impaired individuals served through the VR program and competitive employment outcomes.

Agency Response: DVI is the State’s oldest agency with a history dating from 1909. That year the State Legislature made a \$1500 appropriation and passed a bill establishing the Delaware Commission for the Blind. Today our all funds budget for this statewide agency is now over \$9 million with federal funding sources representing less than twenty percent. DVI is now organized into three primary programs, which include Education, Vocational Rehabilitation, and Independent Living. Additionally there are two direct employment units: DIB and BEP. Finally

there are support services including: Materials Center, Volunteer Services, Orientation and Mobility, Low Vision Services, Training Center Services, Fiscal Operations, and Information Systems Support.

The agency's mission is to work in partnership with Delawareans who are blind and visually impaired empowering each to be self-sufficient. DVI provides a continuum of services throughout a person's lifespan which includes:

- early diagnosis and intervention;
- education in the least restrictive environment;
- family and individual counseling;
- independent living skills, training and equipment;
- vocational training and related job placement services;
- employment opportunities;
- advocacy; and
- low vision evaluation and utilization training.

DVI's key objectives are to promote health and well being, by eliminating barriers to lifelong personal independence produced by the sensory disability of vision loss, to foster self-sufficiency through employment and job related skills training programs for persons who are blind or visually impaired and, to protect vulnerable populations through maximizing outreach efforts in underserved communities.

During FY 2006, the DVI stepped up its efforts to increase outreach efforts to employers and underserved communities. DVI hired a part-time communications coordinator, created and redesigned outreach materials promoting employment and its other services, expanded the content and circulation of its newsletter highlighting consumers' successful outcomes, promoted a series of human interest stories which were featured on regional television and in print media, and developed an 18 month awareness campaign celebrating its centennial anniversary. In addition, the Agency works hand in hand with the Governor's Council for the Blind, The Governor's Vocational Rehabilitation Advisory Council for the Visually Impaired (State Rehabilitation Council) and the Governor's Commission for the Purchase of Products and Services for the Blind and other Severely Handicapped Individuals (State Use Commission) to increase awareness of the agency and its programs and services. Also, DVI has established relationships with a host of other advocacy organizations such as the Governors Council for the Employment of Persons with Disabilities, and the State Council of Person's with Disabilities, the Delaware Ophthalmology Society as well as state and local Chambers of Commerce. The results of these and like efforts are evident in FY 2007 and FY 2008 reports to RSA.

TA: DVI does not request TA.

2. Persons Served

Observation: As indicated in Table 4.6, DVI served 77 individuals in the VR program during FY 2007, compared to an average of 390 individuals for DVI’s peer agencies.

**Table 4.6
Number of Individuals Served by DVI compared to Peer Agencies
FY 2007**

	DE-B	ID-B	NE-B	SD-B	VT-B
Number of individuals served	77	369	447	373	371

- As indicated in Table 4.7, the number of individuals receiving VR services from DVI has decreased 11.5 percent since FY 2003.

**Table 4.7
DVI Individuals Served and Employment Outcomes
FY 2003 through FY 2007**

	2003	2004	2005	2006	2007	Change from 2003
Number of individuals served	87	60	61	72	77	-11.5%

- Despite the fact that DVI serves so few individuals, the agency has been on an order of selection for a number of years and implausibly has maintained a waiting list for VR services.
- As indicated in Table 4.8 below, in FY 2004 when the agency served only 60 persons, 27 blind and visually impaired individuals were placed on a waiting list for services.

**Table 4.8
Number of Individuals on DVI’s Waiting List
FY 2003 through FY 2007**

	2003	2004	2005	2006	2007
Number of individuals on waiting list at the end of the fiscal year	16	27	0	5	0

Recommendation 2: RSA recommends that DVI:

2.1 develop and implement goals, objectives, and strategies with measurable targets to increase the number of persons served by the agency;

2.2 develop and implement a plan that will enable DVI to avoid being on an OOS and placing individuals on a waiting list; and

2.3 ensure that it uses an effective methodology the next time it conducts its comprehensive needs assessment to accurately identify individuals who may be under-served and the VR services they require.

Agency Response: DVI has recognized the need to increase the number of persons served through Vocational Rehabilitation. In FY 2007, DVI requested a new Counselor position to service transition-age youths and State General Funding for employment-related contractual services. In addition, DVI developed and implemented a single point of entry service delivery model earlier this year. It is fully expected that the strategies implemented in FY 2007 will have positive results for FY 2008 and beyond.

DVI operates as a statewide direct service provider for nearly all vocational rehabilitation and ancillary support services for the blind and visually impaired. Contractual service dollars are limited and with the exception of post secondary education there are almost no Delaware-based private service providers available to serve the blind and visually impaired. For the period beginning FY 2004 through FY 2007, DVI was plagued with critical staffing shortages, namely VR counselors, VR employment specialists, as well the key position of VR District Administrator. The average caseload per VR Counselor in DVI during FY 2004 was 60. A substantially higher caseload than most other states. Since SFY 2007 the agency has increased by one the number of VR Counselors, received a ten percent increase in state support to address the VR waiting list and is fully staffed. DVI will make every effort to reevaluate Category 1 services regularly and maintain open categories as long and often as practical.

TA: DVI requests technical assistance with developing a methodology to identify underserved individuals and their service needs.

3. Cases Closed

Observation: As indicated in Table 4.9 below, DVI closed 36 cases in FY 2007 compared to an average of 161 cases for its peer agencies.

**Table 4.9
Number of DVI Cases Closed Compared to Peer Agencies in
FY 2007**

	DE-B	ID-B	NE-B	SD-B	VT-B
Number of cases closed	36	176	144	190	134

As indicated in Table 4.10 below:

- During FY 2007, nine consumers were closed from application or trial work prior to eligibility, six were closed after eligibility but prior to service delivery, 13 were closed with successful employment outcomes and eight were closed without successful employment outcomes.

- In FY 2005, FY 2006 and FY 2007, the number of cases closed prior to service delivery exceeded the combined total of cases closed successfully and unsuccessfully after the provision of services.

Table 4.10
DVI Types of Closure
FY 2003 through FY 2007

Type of Closure	FY 2003		FY 2004		FY 2005		FY 2006		FY 2007	
	N	%	N	%	N	%	N	%	N	%
Exited as an application	7	11.86	9	25	5	13.89	2	4.35	5	13.89
Exited during or after a trial work experience	1	1.69					1	2.17	2	5.56
Exited with an employment outcomes	24	40.68	12	33.33	9	25	13	28.26	13	36.11
Exited w/o employment outcomes	12	20.34	7	19.44	2	5.56	3	6.52	8	22.22
Exited w/o an employment outcomes, after a signed IPE, but before receiving services							1	2.17		
Exited from an OOS waiting list	1	1.69	5	13.89	7	19.44	1	2.17	2	5.56
Exited w/o an employment outcomes, after eligibility, but before an IPE was signed	14	23.73	3	8.33	13	36.11	25	54.35	6	16.67
Total	59	100	36	100	36	100	46	100	36	100.00

Recommendation 3: RSA recommends that DVI evaluate the reasons for the high number of cases closed prior to service delivery; and

Agency Response: DVI accepts this recommendation.

TA: DVI does not request TA.

4. Delays in IPE development

Observation: Of the cases closed in FY 2007, the agency completed only 14.3 percent of the IPE’s within 3 months, compared to a national average for blind agencies of 78.1 percent.

- In addition, in 23.8 percent of the DVI cases closed with an IPE in FY 2007, the agency required more than 12 months to develop the IPE compared to a national average for blind agencies of 7.5 percent.
- RSA staff noted that given the longer waiting list for older blind services, the potential exists that some DVI consumers may have either been served as VR consumers to avoid a longer wait for OIB services or alternatively expressed a less than genuine interest in employment in order to qualify for VR services and obtain the desired services sooner.

Recommendation 4: RSA recommends that DVI:

4.1 analyze data and other information to determine the reasons for the delay in the development of the IPE and refusal of services by individuals for whom eligibility was determined; and

4.2 develop strategies to address the factors leading to the delay and develop measures by which the agency can evaluate the success of the strategies.

Agency Response: During the time that FY 2006 application and eligibility data was generated, DVI program policy allowed 120 days to develop an IPE. The Division Program Policy was revised to 90 days in accordance with the requirements of the most recent Corrective Action Plan. In addition the VR District Administrator monitors IPE development monthly.

TA: DVI does not request TA.

5. Employment Outcomes

Observation: As indicated in Table 4.11 below, in FY 2007, DVI achieved 13 employment outcomes compared to an average of 87.25 outcomes for its peer agencies. The 13 employment outcomes equaled 14.9 percent of the outcomes achieved by DVI's peer agencies.

Table 4.11
DVI Employment Outcomes Compared to Peers
FY 2007

	DE-B	ID-B	NE-B	SD-B	VT-B
Number of employment outcomes	13	91	57	100	101

- As indicated in Table 4.12 below, the number of DVI's employment outcomes decreased by 45.8 percent between FY 2003 and FY 2007.

Table 4.12
DVI Individuals Served and Outcomes
FY 2003 through FY 2007

	2003	2004	2005	2006	2007	Change from 2002
Employment outcomes for the FY	24	12	9	13	13	-45.8%

- As indicated in table 4.13 below, most of DVI's employment outcomes from FY 2002 through FY 2007 were in integrated settings and the agency made little use of self-employment or the Business Enterprise Program (BEP) with only two self-employment outcomes and no BEP outcomes from FY 2002 through FY 2007.

Table 4.13
DVI Employment Status at Closure
FY 2002 through FY 2007

Employment Status at Closure	2002	2003	2004	2005	2006	2007
Employment without Supports in Integrated Setting	20	20	10	9	12	11
%	90.91%	83.33%	83.33%	100.00%	92.31%	84.62%
Self-Employment	0	0	1	0	0	1
%			8.33%			7.69%
Business Enterprise Program (BEP)	0	1	0	0	0	0
%		4.17%				
Homemaker	0	0	0	0	0	0
%						
Unpaid Family Worker	0	0	0	0	0	1
%						7.69%
Employment with Supports in Integrated Setting	2	3	1	0	1	0
%	9.09%	12.50%	8.33%		7.69%	
Total	22	24	12	9	13	13

- DVI indicated that it placed two individuals through the BEP program in FY 2008.

Recommendation 5:

See Section II.

Agency Response: DVI placed two individuals through the BEP program in FY 2008. See Agency Response for observation two.

TA: DVI does not request TA.

6. Transition Services and Outcomes

Observation: DVI performance with transition-age youths mirrors its performance with the adult population. DVI assists few transition-age youths who are blind or visually impaired to achieve employment outcomes. The number of transition-age youths served in VR Transition and the outcomes achieved indicate that transition efforts are not successfully focusing on competitive employment outcomes.

- DVI estimates that it serves approximately 240 students age four to 21 through the agency’s educational program. However, only an estimated 20 to 25 individuals are served in the VR transition program.
- During the on-site review, counselors reported an active caseload of 20 transition-age youths compared to the approximately 80 students that would statistically be expected to be in the 14 to 21 year age range. Given that DVI policy is to move transition-age youths to an adult caseload upon graduation, the 20 students reported may under-represent the total number of individuals age 14-21 who were served in transition by as much as 5 to 8 additional individuals.
- VR program staff serving transition-age youths indicated that the Education Specialists and Youth Counselors historically have not focused on employment and are resisting working with VR counselors to incorporate an emphasis on independent living and employment goals into the IPE during the last 2 years of the student’s academic career.
- As indicated in Table 4.14 below, during FY 2007, DVI closed five transition cases. Of these five closures, two were closed without the individual achieving an employment outcome and three were closed with the individuals achieving successful employment outcomes.
- As indicated in Table 4.14 below, from FY 2003 through FY 2007, DVI closed a total of 13 transition-age youths with an employment outcome.
- DVI transfers transition cases to VR counselors with adult caseloads at the time of graduation. This may cause a lack of continuity in some instances, as the new VR counselors become familiar with the students and their cases. This adds to traditional systemic transition challenges caused by the loss of services and supports that naturally occur upon graduation from secondary education.
- To expand transition services, DVI recently employed a full time transition counselor who operates on a statewide basis to work with school staff, the education specialist and parents to facilitate transition.

**Table 4.14
Types of DVI Closures for Transition-age Youths
FY 2003-FY 2007**

FY Types of Closure	2003		2004		2005		2006		2007	
	N	%	N	%	N	%	N	%	N	%
Exited as an application	1	9.1	5	45.4	1	10.0				
Exited during or after a trial work experience/extended evaluation	1	9.1					1	9.1		
Exited with an employment outcome	2	18.2	2	18.2	4	40.0	2	18.2	3	60.0
Exited w/o employment outcomes	3	27.3	1	9.1			2	18.2	2	40.0
Exited from an OOS waiting list	1	9.1	3	27.3	2	20.0				

Exited w/o an employment outcomes, after eligibility, but before an IPE was signed	3	27.3			3	30.0	6	54.6		
Total	11	100	11	100	10	100	11	100	5	100

Recommendation 6: RSA recommends that DVI:

6.1 consider maintaining transition-age youths with the transition counselor until an employment outcome is achieved to improve the retention of youths in the VR program during this critical period of transition;

6.2 develop strategies using the full range of available staff and resources to prioritize outreach efforts to parents to improve their support of IEP transition plans that promote IL and VR goals; and

6.3 develop staff training strategies that ensure all DVI supervised staff share common goals regarding transition and maintain a focus on employment outcomes as well as the IL goals that must be achieved to accomplish those employment outcomes.

Agency Response: DVI will consider maintaining transition-age youths with the transition counselor until an employment outcome is achieved only for those who are not seeking postsecondary education services.

DVI accepts recommendations 6.2 and 6.3.

TA: DVI will work with the Technical Assistance and Continuing Education (TACE) center to obtain TA.

7. Fiscal Management

Observation: As indicated in Table 4.15 below:

- DVI has consistently spent more per employment outcome and more per individual served than any of its peer states.
- During FY 2007 DVI expended \$1,858,542 to achieve 13 successful employment outcomes, for an average cost of \$142,965 per successful outcome. This was \$79,549 more than its closest peer state and \$109,470 more per successful outcome than the average of Delaware’s four peer states.

Table 4.15
DVI's Cost Per Employment Outcome Compared to Peer Agencies
FY 2007

	DE-B 2007	ID - B 2007	NE - B 2007	SD - B 2007	VT - B 2007
Total funds expended	\$1,858,542	\$2,470,124	\$3,614,731	\$2,926,671	\$1,429,503
Successful employment outcomes	13	91	57	100	101
Average cost per employment outcome	\$142,965	\$27,144	\$63,416	\$29,267	\$14,153
Total individuals served	77	369	447	373	371
Average cost per individual served	\$24,137	\$6,694	\$8,087	\$7,846	\$3,853

- As indicated in Table 4.16 below, between FY 2002 and FY 2006, DVI's average cost per employment outcome in increase by 91 percent from \$74,690 to \$142,965.

Table 4.16
DVI's Average Cost per Employment Outcome
FY 2003 through FY 2007

	2003	2004	2005	2006	2007
Average cost per employment outcome	\$74,690	\$156,927	\$202,414	\$136,780	\$142,965

Recommendation 7:

See Section II.

Agency Response: DVI acknowledges and accepts the recommendation to substantially increase the number of VR applicants and employment outcomes. However, there is no causal relationship between IL services delivered to aging individuals with low vision, education supports and services delivered to children ages 0-14 and the Division VR Program's performance. See also agency response to observation one.

TA: DVI does not request TA.

Section II. Factors Related to DVI's Low VR Program Performance

DVI's very low performance and its minimal efforts to assist individuals to achieve employment outcomes are in large part due to the fact that the agency concentrates its resources on providing IL services to an aging population who are not seeking to obtain or retain employment. DVI has also acquired an additional role of providing educational supports and services to school age children in Delaware that is for the most part outside the scope of serviced provided by a VR

program. The numbers of individuals served by the IL and education program administered by DVI and the blending of program staff and funding sources has substantially re-directed the program away from what should be a primary focus on the provision of VR services and the achievement of employment outcomes.

8. DVI Lacks Focus on Vocational Rehabilitation and Employment Outcomes

Observation: DVI is organized into three primary programs which include Education, Vocational Rehabilitation, and Independent Living, along with two direct employment units - Delaware Industries for the Blind and the Business Enterprise Program. DVI's primary mission is to provide independent living services rather than services directed more specifically at employment outcomes.

- DVI administrators reported that they serve approximately 800 individuals per year who require OIB and/or Independent Living services. Data reported to RSA places this number at 607 for FY 2006.

DVI estimates that it served 240 children age 4 to 21 in FY 2006.

Recommendation 8: RSA recommends that DVI:

8.1 aggressively redefine the primary mission of the designated state unit as one of assisting consumers with blindness or visual impairments to achieve competitive employment in integrated settings;

8.2 convey the resulting employment focus and emphasis on integrated employment outcomes as well as the values that underlie that focus to staff at all levels of the agency;

8.3 aggressively promote this focus and mission to the blind and visually impaired community, employers and other potential referral sources for working age consumers; and

8.4 develop and implement a strategic plan that establishes goals, objectives and strategies to significantly increase the number and quality of employment outcomes achieved by program participants.

Agency Response: See agency response to observations one and two. DVI accepts recommendation 8.2.

TA: DVI does not request TA.

9. Limited Communication Between Staff in DVI

Communication, both vertically among staff in the VR program and horizontally across the various units within the agency is limited. This has a detrimental effect on the efficiency, coordination and focus on VR services.

- DVI would benefit from more communication between management and staff, such as regular all-staff meetings and notices from agency leadership.
- Some staff members and administrators indicate unease in expressing suggestions about how to improve service delivery.

Recommendation 9: RSA recommends that DVI:

9.1 expand its formal and informal methods for communication such as division wide staff meetings, shared training session, regular interdisciplinary district office meetings, and opportunities for exchange of best practices and interdisciplinary staffing of specific cases; and

9.2 conduct in service training to improve communication, teamwork and problem solving skills between the various units in the division.

Agency Response: DVI accepts these recommendations.

TA: DVI requests TA.

CHAPTER 5: FISCAL MANAGEMENT OF DVI VOCATIONAL REHABILITATION AND SUPPORTED EMPLOYMENT PROGRAMS

RSA reviewed DVI's fiscal management of the VR and SE programs. 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.

Fiscal Management

The data in the following table, based on data reported on the fiscal reports submitted by the state agency, address the overall fiscal performance of the agency. The data related to matching requirements are taken from the respective fiscal year's final or latest Financial Status Report (SF-269). The carryover data are taken from the unobligated balance of federal funds portion of the fourth quarter SF-269. The maintenance of effort (MOE) requirement data are taken from the final or latest SF-269 report of the fiscal year that is 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 5.1 Fiscal Profile Data for DVI FY 2003 through FY 2007

Fiscal Year	2003	2004	2005	2006	2007
Grant Amount	1,265,888	1,292,171	1,301,922	1,350,482	1,421,425
Required Match	342,610	349,724	352,363	365,505	384,706
Federal Expenditures	1,265,888	1,292,171	1,301,922	1,350,482	1,395,029*
Actual Match	434,190	527,663	470,019	528,347	535,757
Over (Under) Match	91,580	177,939	117,656	162,842	151,051
Carryover at 9/30 (year one)	14,641	37,656	0	0	99,793
Program Income	0	0	0	0	0
Maintenance of Effort (MOE)	393,126	413,846	434,190	527,663	470,019
Administrative Costs	542,417	594,574	521,016	396,019	478,533
Total Expenditures**	1,792,560	1,883,134	1,821,728	1,778,143	1,858,542
Percent Admin Costs to Total Expenditures	30.26%	31.57%	28.60%	22.27%	25.75%

*Deadline for obligating FY 2007 federal grant funds – September 30, 2008.

**Includes Supported Employment Program Expenditures.

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 State VR Services Program, other than for the construction of a facility related to a community rehabilitation program, is 21.3 percent, as established in the 1992 amendments to the Rehabilitation Act (act). 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).

Fiscal Technical Assistance Provided to DVI During the Review Process

RSA provided VR and SE program technical assistance to DVI during the review process regarding:

- allocating staff to increase expenditures in areas that will contribute to an increase in employment outcomes;
- properly allocating staff and costs to avoid improperly assigning non-administrative functions to the administrative cost objective;
- managing non-federal contributions to transform DVI to a even match agency;
- developing and managing personnel activity reports; and
- managing non-federal match contribution.

Observations of DVI about the Fiscal Management Performance of the VR and SE Programs

RSA solicited input from DVI about the performance of the VR and SE programs. The DVI shared the following observations:

- the current allocation of staffing costs needs to be tracked better;
- the utilization of funds for higher education require closer monitoring; and
- exceeding required match may cause DVI to experience possible future MOE deficits.

RSA discussed the observations with DVI and addressed as many of them as possible either directly or by consolidating them into a broader issue area.

VR and SE Program Fiscal Management Performance Observations and RSA Recommendations

RSA identified the following fiscal performance observations and made recommendations to DVI about those observations. DVI responded to each of the recommendations and in those instances when RSA and DVI agreed upon a recommendation, RSA and DVI identified the technical assistance that RSA would provide to DVI to successfully implement the recommendation.

1. Allocation of Cost to VR Program

Observation: The lack of adequate cost allocation records makes it extremely difficult to verify the number of positions and percentage of time DVI staff committed to the VR program or charge to Title I funds.

- The majority of staff members employed by DVI are not engaged in the work of the VR program. Under the current organizational structure, a majority of program staff within DVI are assigned ancillary duties and do not spend 100 percent of their time on vocational rehabilitation services focused on assisting persons with disabilities to obtain competitive employment outcomes in integrated settings.
- In addition to the small number of persons who receive VR services, agency personnel provide services to older blind individuals and school age children receiving special education services. As indicated above, these populations taken together comprise approximately 92 percent of the individuals served by the DVI.
- On its RSA-2 data collection, DVI reported 34 FTEs to RSA for FY 2006 and 23 in FY 2007. Consistent with this information for FY 2007, DVI administrators indicated that the agency has 34 staff persons serving in 23 federally funded FTE's.

- During the review, DVI provided two organizational charts identifying 65 unique positions within DVI, a Direct Client Services (DCS) organizational chart and an Operations and Business Programs (OBP) chart.
- Nine positions on the DCS chart are entirely in the VR program.
- The nine positions in the VR unit are comprised of three counselors, three Employment Specialists, two administrative specialists and one District Administrator.
- Two additional administrative positions on the DCS chart are directly associated with the VR program, and include the VR program Specialist and the Deputy Principal Assistant, the title used on the chart for the assistant director of the entire division.
- An indeterminate number of staff persons on the Operations and Business Programs chart provide support to the VR program in fiscal, information technology and administrative roles.
- As indicated in Table 5.2, DVI had the highest number of administrative staff and the lowest number of counseling staff compared to peers.

**Table 5.2
Staff Breakdown of DVI Compared to Peer Agencies
FY 2006**

	DE - Blind 2006	ID - Blind 2006	NE - Blind 2006	SD - Blind 2006	VT - Blind 2006	Peer Averages 2006
Total	34	39	45	22	11	30
Administrative Staff	13	6	6	4	3	6
Counselor Staff	3	19	31	8	5	13
Staff Supporting Counselor Activities	3	11	6	4	3	5
Other Staff	14	3	2	6	0	5

- RSA found that numbers and descriptions of staffing patterns varied depending on the source of the information or report. For example, the Operations and Business Programs chart indicated that 4 staff persons were located in the BEP, although DVI reported through the most recent RSA-15, that 6.5 positions in the BEP are provided for with 110 program funds.
- DVI administrators stated that under the current organizational structure the majority of available Title I funds are committed to salaries split among staff who are in many cases providing services in more than one program area. DVI administrators indicated this limited flexibility interfered with the ability to shift resources to meet shifting demands and service priorities when necessary to fully support the VR program.

- The centralized personnel system in Delaware has developed very narrow and specific job descriptions that have served to reduce the risk of losing positions to other agencies during down turns in funding. This has also made it very difficult to shift existing staff to new job duties due to the need to engage in a cumbersome process of reclassifying each position. This has decreased the control the DSU has over the delivery of vocational rehabilitation services because it limits the ability of the director to alter job duties and position descriptions without reclassifying the position.

Recommendation 1: RSA recommends that DVI:

1.1 restructure and reallocate the resources of the primary program units within the DVI to promote a strong vocational rehabilitation mission to the staff involved in vocational rehabilitation activities, including, but not limited to, significantly increasing the number of VR counselors; and

1.2 identify the organizational units and staff directly providing or supporting employment outcomes and redefine job duties as required to ensure the agency has sufficient staff focused on the Vocational Rehabilitation activities of the agency to ensure the program is administered and operated in an effective and efficient manner.

Agency Response: DVI will develop a plan to restructure or reorganize agency resources to strengthen vocational rehabilitation services. The Agency agrees and will incorporate the BEP staff and activities along with the Vocational Rehabilitation activities.

TA: DVI requests TA. DVI requests assistance to restructure or reorganize agency resources.

2. Expenditure of Funds Under “Services to Groups”

Observation: The use of Title I funds spent under services to groups in order to fund the administrative costs of the Business Enterprise Program is allowable under the regulations found at 361.49(a)(5). A review of the performance of the Randolph-Shepherd program in Delaware is also beyond the scope of this review. However, the large percentage of expenditures and the low return on the investment raise the concern that this practice may be detrimental to the performance of DVI and may contribute significantly to the low number of employment outcomes during a period of time where DVI has operated under an order of selection.

- Since FY 2002, DVI has spent between 22 percent and 26 percent of its total expenditures each fiscal year on the BEP program through services to groups.
- Since FY 2002, BEP has resulted in only two successful employment outcomes reported by DVI to have occurred in FY 2007 and FY 2008.
- The FY 2006 RSA-15 indicated that 15 individuals were employed, but that only three were individuals with disabilities.

- DVI reports that BEP currently serves 95 sites, but RSA staff noted that the BEP program administrators expressed a goal of maintaining vending sites with only a secondary focus on employing persons with disabilities.
- Despite the low number of individuals served, DVI utilizes Title I funds to maintain a BEP staff of 6 persons to administer the BEP program.

Recommendation 2: RSA recommends that DVI consider the cost and efficiency of this program and the appropriateness of the amount of Title I funds expended given that the program does not materially contribute to employment outcomes.

Agency Response: The agency will reevaluate and refocus resources as attrition requires and permits.

TA: DVI does not request TA.

VR and SE Program Fiscal Management Compliance Findings and Corrective Actions

RSA identified the following compliance findings and corrective actions that DVI is required to undertake. DVI must develop a corrective action plan for RSA's review and approval that includes specific steps the agency will take to complete the corrective action, the timetable for completing those steps, and the methods the agency will use to evaluate whether the compliance finding has been resolved. RSA anticipates that the corrective action plan can be developed within 45 days and is available to provide TA to assist DVI.

1. Cost Allocation Plan

Legal Requirement: OMB A-87 – Attachment A - Sec.C.3.a states: A cost is allocable to a particular cost objective if the goods or services involved are chargeable or assignable to such cost objective in accordance with relative benefits received.

Finding: DVI does not have an approved Cost Allocation Plan or Indirect Cost Rate.

- DVI is organized into three primary programs which include Education, Vocational Rehabilitation, and Independent Living, along with two direct employment units - Delaware Industries for the Blind and the Business Enterprise Program.
- On any day of the DVI time study, when staff are not clear which grant is benefiting from their time, the DVI guide instructs them to charge their personnel costs to the category of "All DVI." These charges are then directly charged to the Basic VR program. This is a direct charge and not part of any approved Indirect Cost Rate.

- For charging direct administrative personnel costs, DVI currently does not allocate these administrative costs to their respective benefiting grant, and charges all administrative personnel costs to the Basic VR program.
- DVI directs staff to charge their time for any meetings or training (that cannot be identified to a particular program) to the Basic VR grant. This is a direct charge and not part of any approved Indirect Cost Rate.
- Direct service staff indicated that in a majority of cases that the focus of services was on Independent Living and Older Blind services, including Orientation and Mobility or Rehabilitation Technology training. These services were usually not associated by the staff members providing the services as being related to employment or involving individuals who had active VR cases or employment goals.
- Staff interviewed by RSA provided differing explanations of how their time was charged to various programs. Some stated that assignment on time study forms was based on age with time spent working with transition and working age individuals charged to the VR program regardless of the presence of a VR case or employment goal.
- DVI is not in compliance with OMB A-87 Sec. C.3.a because DVI has a written policy that directs staff to incorrectly allocate their personnel cost objectives, and because DVI lacks an adequate system and procedures to ensure staff time and resources are properly charged to the respective primary programs that DVI administers.

Corrective Action 1: DVI must develop a cost allocation plan that meets the requirements of OMB A-87 – Attachment A - Sec.C.3.a. and submit the plan to U.S. Department of Education as soon as possible. For additional information, DVI may contact either of the two Team Leaders listed on the Indirect Cost Group’s Website. A link to the following Web site:

<http://www.ed.gov/about/offices/list/ocfo/fipao/icgreps.html>

CHAPTER 6: INDEPENDENT LIVING PROGRAM

Agency Information and Performance

In FY 2007, the DVR IL program served 265 individuals directly, or through grants or contracts with centers for independent living (CILs) and other service providers. An additional 285 individuals in the state received IL services through CILs receiving funding directly from DVR.

Table 6.1
Funding, Performance, and FTEs
FY2006 and FY 2007

IL program for Delaware	2006	2007
Funding: Title VII, Chapter 1, Part B	319,125	293,173
Funding: Total Resources (including Part B funds)	362,251	337,063
Performance: Total Served	269	265
Performance: Total Consumer Service Records Closed	227	168
Performance: Cases Closed, Completed All Goals	85	110
Performance: Total Goals Set	629	1,448
Performance: Total Goals Met	529	586
Performance: Total Accesses Achieved	277	311
Staffing: Total FTEs	2.00	2.00
Staffing: Total FTEs with Disabilities	2.00	2.00

IL Program Administration and Service Delivery

In FY 2007, DVR utilized \$266,277, the majority of Part B resources, to provide services directly to consumers such as home modifications, assistive technology devices, vehicle modifications and hand controls for drivers with disabilities. Services are provided through a network of service providers and in coordination with the DVR Vocational Rehabilitation program. An additional \$784,879 in Part C funding is awarded to the two CILs in the state.

The SILC has \$39,000 available in Part B funds to support its operations. The SILC is a freestanding organization that operates separately from any State Agency. The SILC does not have offices or facilities within any agency in the State of Delaware. The SILC is reimbursed for expenses related to SILC activities.

The DSU uses a portion of Part B funds to contract with the CILs to provide additional core services such as peer support. DVR also provides \$39,000 in Part B funding to the Division of Visually Impaired to provide IL services to individuals with significant disabilities in the areas of low vision devices, training, peer support counseling, exams, outreach and interpreters.

Personnel

The SILC does not have staff. DVR provides staff support to the SILC through a program director and a program specialist. The director sits on the SILC as an ex-officio member and serves as a resource person for the SILC and a liaison between the Council and the DVR staff. This individual is also appointed to the Council as the ex-officio member representing DVR. Administrative services, such as clerical support, are provided by DVR. Supervision for DVR staff rests within the DSU.

Data Management

The IL program is not part of the DVR data management system. Annual RSA-704 data reports are compiled by the two CILs and forwarded to DVR and the SILC, where they are reviewed for accuracy.

Quality Assurance

DVR evaluates each consumer's progress toward meeting the specified goals of the consumer and his or her Independent Living Plan (ILP) or waiver of the ILP on a continual basis. Case reviews serve to ensure that timely and effective services are provided, with the ultimate goal of providing quality services. The Program Specialist and staff conduct case reviews, at random, on a quarterly basis.

DVR reports to the SILC on the completion of consumer identified goals and initiation of new programming within the IL program quarterly. The IL Program Specialist also meets regularly with the contractual providers to ensure timely and efficient service delivery and maintains regular communication with the Division Director and Deputy Director.

DVR annually sends a satisfaction survey to all consumers who are determined eligible and are closed successfully or unsuccessfully during the fiscal year. The DVR contacts consumers who were not satisfied and attempts to identify and resolve problems and issues whether individual or systemic. This gives DVR the ability to make adjustments to the program when deemed necessary.

The SILC membership also includes the directors of the two CILs. The CILs provide a report on activities at each SILC meeting.

Planning

The SPIL serves as the Delaware strategic plan for IL. The SILC scheduled public hearings throughout the state prior to the development of the SPIL. Advertisement were placed in local news media, mailed to advocacy groups, advertised on websites, and posted in CILS and DSU locations throughout the State. The notice also informed interested parties of the acceptance of written comments if attendance was not possible. The SILC will continue to utilize consumer feedback and other media alternatives to increase the attendance and responses

at public hearings.

IL Program Technical Assistance Provided to DVR During the Review Process

RSA provided IL program technical assistance to DVR during the review process regarding:

- the review and guidance on new contracts being developed by DVR to purchase services for home modifications for consumers; and
- guidance on roles and responsibilities of the SILC.

Observations of DVR and Its Stakeholders about the Performance of the IL Program

RSA solicited input from DVR and a wide range of its stakeholders about the performance of the IL program. The DVR and its stakeholders shared the following observations:

- the SPIL process, both development of the Plan and monitoring of its implementation, are inclusive;
- every partner feels valued and participates in the process; and
- consumers find DVR readily accessible.

RSA discussed the observations of its stakeholders with DVR and addressed as many of them as possible either directly or by consolidating them into a broader issue area.

IL Program Performance Observations and RSA Recommendations

RSA identified the following performance observations and made recommendations to DVR about those observations. DVR responded to each of the recommendations and in those instances when RSA and DVR agreed upon a recommendation, RSA and DVR identified the technical assistance that RSA would provide to DVR to successfully implement the recommendation.

1. SILC Roles and Responsibilities

Observation: The SILC has the potential to exercise a greater leadership role in the development, implementation and evaluation of the SPIL. In the SPIL evaluation plan, the SILC undertakes SPIL review activities once annually and does not continuously assess the SPIL's effectiveness in meeting the priority IL needs in the state.

- The DE SPIL submitted to RSA last year details that the SILC has recently experienced a tremendous amount of turnover as several members have experienced life-changing events.
- The SILC has several new members and some current members who would benefit from training on performing the duties as a SILC member.
- The SILC indicated that membership development is a priority.

Recommendation 1: RSA recommends that:

1.1 both the SILC and DSU participate in training regarding their respective roles and responsibilities in the development, implementation and evaluation of the SPIL. The training would provide the knowledge necessary for the DE SILC to assume its rightful leadership role in partnership with DE RSA;

1.2 based on this training, the DE SILC would review and update its bylaws and promotional materials as necessary; and

1.3 the SILC should utilize the services of Independent Living Research Utilization (ILRU), RSA's technical assistance provider who offers quality trainings on the roles and responsibilities of SILC's.

Agency Response: DVR works closely with the SILC to administer the IL program in Delaware. The DVR Program Specialist for IL Services and Rehabilitation Technology is the lead person in DVR for the IL program. DVR has a dedicated VR Counselor that provides direct services to IL clients and achieves a number of independent living outcomes. DVR provides a variety of independent living services, including home and vehicle modifications. DVR also coordinates independent living services with the Division of Services for the Aged and Adults with Physical Disabilities (DSAAPD), which also has an independent living program in Delaware. By coordinating programs, DVR and DSAAPD are able to achieve program efficiencies, and serve more individuals with disabilities and independent living needs. DVR encourages the SILC membership to exercise their appropriate role in the administration of the IL program in Delaware. The SILC has recently supported the provision of independent living skills training for people with disabilities in collaboration with the CIL's in Delaware. With the recent turnover in SILC membership, training for new members is very appropriate.

TA: DVR requests TA. DVR will participate in the training programs in order to administer the program consistent with the principles in the training. DE will use the resources of the ILRU to provide technical assistance on the roles and responsibilities of the SILC and the appropriate role for DVR in support of the SILC.

2. Fiscal Management

Observation: There appears to be a lack of separation of duties to ensure proper handling of the billing for home modification services offered through the IL program.

- The Director of IL Services for DVR approves the home modification services to be delivered, the contractor to be used, and approves the payment for that service.
- Financial staff only process the payments for the home modification contractor according to the approval of the IL Director.

Recommendation 2: RSA recommends that DVR develop a checks and balance system, for the process of billing for home modification services, to ensure that more than one person is involved in ordering the home modification services to be provided and approving the expenditures for those services.

Agency Response: The DVR staff person administering the IL Program is the knowledge expert in the agency with respect to contractors in Delaware providing home and vehicle modification. He is the most familiar with the specifics of proposals for services. He is also the person who is best capable of inspecting completed projects and ensuring that the project is completed.

TA: DVR requests TA. To enable DVR fiscal staff to provide independent fiscal oversight, DVR will work with the fiscal administrator and RSA fiscal staff to identify the most appropriate role and procedures for the fiscal staff in the process of ordering, verifying, and paying for independent living services.

CHAPTER 7: INDEPENDENT LIVING FOR OLDER INDIVIDUALS WHO ARE BLIND PROGRAM

Agency Information and Performance

In FY 2007, the DVI OIB program reported that it served 651 individuals directly, or through grants or contracts with other service providers. The most common services provided were individual communication skills and daily living skills.

Table 7.1
Program Highlights
FY 2006 and FY 2007

Delaware Division for the Visually Impaired -- DHHS Campus	2006	2007
Expenditures: Title VII, Chapter 2	232,918	225,111
Expenditures: Total (including Chapter 2)	369,793	360,901
Performance: Total Older Individuals who are Blind Served	724	651
Staffing: Total FTEs	3.25	3.25
Staffing: Total FTEs with Disabilities	0.80	0.80

OIB Program Administration and Service Delivery

DVI administers the OIB program in conjunction with the Agency's services provided to blind and low-vision individuals in the state. Within the DVI program, IL and OIB are administered as a single program sharing the same staff, services, service delivery system, policy manual, staff development practices, job evaluation criteria and quality assurance procedures. The IL and OIB programs are differentiated only by the latter's age-based (55 years and older) eligibility requirement. Consumer cost services such as transportation, adaptive devices and assistive technology are allocated based upon the program through which the individuals are being served. DVI's specialized staff provides all services. IL and OIB senior rehabilitation specialists provide services through visits to consumers' homes and communities.

Personnel

DVI has a program director for the OIB/IL program. The OIB service provision staff includes 5 senior rehabilitation specialists who provide independent living skills training in the home on an itinerant basis. Consumers needing orientation and mobility services are referred to the DVI agency personnel who are certified O&M specialists. Consumers in need of technology training services are referred to DVI agency staff technology trainer/educators.

Data Management

Senior rehabilitation specialists enter data on consumers served in the DVI electronic casework/data management system. The program director reviews the casework files and data

quarterly for completeness and accuracy. The program manager's review also serves as a check on staff competencies that inform training.

Quality Assurance

The Program Director examines data placed in the electronic data management system by staff on a quarterly basis to ensure accuracy. The review not only ensures accuracy but also serves as a diagnostic tool to evaluate staff performance. The Director is able to address performance problems or set trainings for staff should there be questions regarding data and management quality.

Planning

DVI was an active participant in the development of the FY 2008 - 2010 State Plan for IL (SPIL). The SPIL goals reflect the particular interest of the OIB program.

OIB Program Technical Assistance Provided to DVI During the Review Process

RSA provided OIB program technical assistance to DVI during the review process regarding:

- An examination of the data from the most recent RSA-7OB report and feedback on information entry;
- An examination of and provision of suggestions on a draft contract being developed for IL core service provision.

Observations of DVI and Its Stakeholders about the Performance of the OIB Program

RSA solicited input from DVI and a wide range of its stakeholders about the performance of the VR and SE programs. The DVI and its stakeholders shared the following observations:

- the OIB program does not have enough funds and the wait for services is too long; and
- the IL skills training is a particular strength of the blind program.

RSA discussed the observations of the stakeholders with DVI and addressed as many of them as possible either directly or by consolidating them into a broader issue area.

OIB Program Performance Observations and RSA Recommendations

RSA identified the following performance observations and made recommendations to DVI about those observations. DVI responded to each of the recommendations and in those instances

when RSA and DVI agreed upon a recommendation, RSA and DVI identified the technical assistance that RSA would provide to DVI to successfully implement the recommendation.

1. Number of Individuals Served Under the OIB Program

Observation: Interviews with staff and information provided in the most recent RSA-7-OB report, indicate that the OIB program is DVI's primary conduit for providing services to blind and visually-impaired individuals in the state. For example, of the 919 individuals served in DVI's VR, Supported Employment, Education, IL and OIB programs, 60 percent are OIB consumers.

Approximately 80 percent of the applicants to DVI's various programs are 55 or older and have no expressed desire to obtain employment. This places a strain on the OIB program's resources. DVI's longstanding mission to focus on independent living rather than employment appears to be the major contributing factor, as discussed earlier in this report.

Recommendation 1: RSA recommends that the DVI OIB program:

1.1 develop and implement strategies to increase the awareness of blind and visually-impaired individuals in the state about their ability to work and about the services VR offers to make employment possible. OIB can promote this awareness through its community outreach activities as well as through its contact with individual consumers; and

1.2 develop and implement a strategic plan to facilitate the OIB program's adaptation to the changes that will result from the re-orientation and resource reallocation of the VR program to an employment-oriented program.

Agency Response: Data for FY 2006 demonstrates that 724 persons aged 55 and older were served under Older Blind and 167 persons under 55 were served through Independent Living. Total persons served through the Independent Living Services Unit were 891. As previously stated DVI provides a continuum of services for the blind and visually impaired throughout their lifespan. DVI has implemented a variety of marketing and outreach strategies aimed at reaching employers, physicians, and the un-served/underserved communities in Delaware.

The Older Blind and Independent Living Services Unit does not receive resources from the VR program, therefore no resource reallocation will be required. Independent Living Unit will assist VR in any way it can to promote employment for persons of all ages particularly those persons under 65.

TA: DVI does not request TA.

APPENDIX: SOURCES OF DATA

VR and SE Program Highlights

- Total funds expended on VR and SE – RSA-2 line I.4
- Individuals whose cases were closed with employment outcomes - RSA-113 line D1
- Individuals whose cases were closed without employment outcomes - RSA-113 line D2
- Total number of individuals whose cases were closed after receiving services – RSA-113 line D1+D2
- Employment rate – RSA-113 line D1 divided by sum of RSA-113 line D1+D2, multiplied by 100
- Individuals whose cases were closed with supported employment outcomes – Total number of individuals whose employment status at closure (record position 161) = 7 in the RSA-911 report
- New applicants per million state population – RSA-113 line A2 divided by the result of the estimated state population divided by 1 million. The estimated state population is found on the following website:<http://www.census.gov/popest/states/NST-ann-est.html>
- Average cost per employment outcome – Sum of individuals' cost of purchased services from the RSA-911 (record position 104-109) for individuals who achieved an employment outcome (record position 198 =3) divided by the total number of these individuals
- Average cost per unsuccessful employment outcome – Sum of individuals' cost of purchased services from the RSA-911 (record position 104-109) for individuals who did not achieve an employment outcome (record position 198 =4) divided by the total number of these individuals
- Average hourly earnings for competitive employment outcomes - Sum of individuals' weekly earnings at closure (record position 163-166) divided by the total hours worked in a week at closure (record position 167-168) for individuals where weekly earnings at closure > 0, where the type of closure (record position 198) = 3, and where competitive employment (record position 162) = 1
- Average state hourly earnings – Using the most relevant available data from the Bureau of Labor Statistics Report (<http://www.bls.gov>), state average annual earnings divided by 2,080 hours

- Percent average hourly earnings for competitive employment outcomes to state average hourly earnings – Average hourly earnings for competitive employment outcomes (above) divided by the Average state hourly earnings (above) multiplied by 100
- Average hours worked per week for competitive employment outcomes - Average hours worked in a week at closure (record position 167-168) for individuals where weekly earnings at closure (record position 163-166) > 0 and where the type of closure (record position 198) = 3 and competitive employment (record position 162) = 1
- Percent of transition-age youths served to total served – Total number of individuals whose age at closure is 14-24 and whose type of closure (record position 198) is 3 or 4 divided by all individuals of any age whose type of closure (record position 198) is 3 or 4
- Employment rate for transition-age youths population served – Total number of individuals whose age at closure is 14-24 and whose type of closure (record position 198) = 3 divided by the number of individuals whose age at closure is 14-24 and whose type of closure (record position 198) is 3 or 4 multiplied, the result of which is multiplied by 100
- Average time between application and closure (in months) for individuals with competitive employment outcomes - Average of individuals date of closure (record position 201-208) minus date of application (record position 15-22) in months where type of closure (record position 198) = 3 and competitive employment (record position 162) = 1

II Program Highlights (From RSA 704 report)

- Funding: Title VII, Chapter 1, Part B - Subpart I, Administrative Data, Section A, Item 1(A)Funding: Total Resources (including Part B funds) - Subpart I, Administrative Data, Section A, Item 4
- Performance: Total Served - Subpart II, Number and Types of Individuals with Significant Disabilities Receiving Services, Section A(3)
- Performance: Total Consumer Service Records Closed - Subpart II, Number and Types of Individuals with Significant Disabilities Receiving Services, Section B(6)
- Performance: Cases Closed - Completed All Goals - Subpart II, Number and Types of Individuals with Significant Disabilities Receiving Services, Section B(4)
- Performance: Total Goals Set - Subpart III, Section B, Item 1, sum of (A) + (B) + (C) + (D) + (E) + (F) + (G) + (H) + (I) + (J) + (K) + (L) for the column “Goals Set”
- Performance: Total Goals Met - Subpart III, Section B, Item 1, sum of (A) + (B) + (C) + (D) + (E) + (F) + (G) + (H) + (I) + (J) + (K) + (L) for the column “Goals Achieved”
- Performance: Total Accesses Achieved - Subpart III, Section B, Item 2, sum of (A) + (B) + (C) for the column “# of Consumers Achieving Access”
- Staffing: Total FTEs - Subpart I, Section F, sum of Item 2 for the column “Total Number of FTEs”

- Staffing: Total FTEs with Disabilities - Subpart I, Section F, sum of Item 2 for the column “Total Number of FTEs with Disabilities”

ILOB Program Highlights (From RSA 7-OB Form)

- Expenditures: Title VII, Chapter 2 - Part I-Sources and Amounts of Funding, (A)(1)
- Expenditures: Total (including Chapter 2) - Part I-Sources and Amounts of Funding, (A)(6)
- Performance: Total Older Individuals who are Blind Served - Part III-Data on Individuals Served During This Fiscal Year, (B)-Gender, sum of (1) + (2)
- Staffing: Total FTEs - Part II-Staffing, sum of (1) + (2) + (3) + (4) for the column “Total FTEs: State Agency + Contactors”
- Staffing: Total FTEs with Disabilities - Part II-Staffing, sum of (1) + (2) + (3) + (4) for the column “FTEs with Disability”