

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



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

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## EXECUTIVE SUMMARY

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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 Maine (ME):

- 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.

The Bureau of Rehabilitation Services (BRS) is located within the Department of Labor (DOL). The majority of Bureau expenditures are for vocational rehabilitation (VR) services. BRS provides these services through the Division for the Blind and Visually Impaired (DBVI), which exclusively serves blind and visually impaired persons, and the Division of Vocational Rehabilitation (DVR), which serves all others.

RSA's review began in the fall of 2007 and ended in the summer of 2008. During this time, RSA's ME 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 an on-site visit, and held multiple discussions with each designated Division's staff, State Rehabilitation Council (SRC) members, Statewide Independent Living Council (SILC) members, and stakeholders to share information, identify promising practices and areas for improvement;
- provided technical assistance during the review process and identified the technical assistance that RSA would provide in the future to help improve program performance or ensure compliance;
- identified promising practices;
- worked with DVR, DBVI and stakeholders to develop goals and strategies to address performance issues; and
- made recommendations for DVR and DBVI to undertake specific actions to improve their performance.

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

## **DVR**

### **Strengths:**

- DVR has an active CSPD program that supports staff education and training.
- DVR staff at all levels participate in the Division's strategic planning activities to improve services to consumers.
- As a result of an Executive Order, "An Order regarding Maine State Government As a Model Employer of People with Disabilities," BRS is charged as a partner to lead efforts to facilitate the employment of people with disabilities in all state agencies. This program will increase the number of individuals with disabilities hired within state government and provide natural supports for those individuals who will need more intensive or longer-term supports.
- Mission Transition is an initiative designed to increase referrals by promoting awareness of DVR's services for transitioning-age youths. The outreach program has multiple events at Community Colleges throughout the state to encourage involvement and awareness within the school system and families of vocational rehabilitation services for this population.

### **Challenges:**

- Addressing the significant delays in the development of the IPE.
- Implementing the order of selection.
- Reducing the large number of consumer who drop out of the program.
- Strengthening caseload management skills.
- DVR has developed two important MOUs with Adult Developmental Services (DS) and the Office of Adult Mental Health Services (OAMHS) that is expected to result in 1,400 new referrals of individuals with developmental disabilities or mental health problems.
- Evaluating community rehabilitation providers.
- Addressing the service needs of the additional numbers of student entering the DVR system as a result of the Mission Transition program.

- Staff turnover has resulted in the need for consumers to be transferred from counselor-to-counselor. This results in reduced consumer satisfaction and gaps in service delivery as the new counselors attempt to meet the increased demands of larger caseloads.
- The recruitment, retention, and availability of qualified rehabilitation counselors are significant challenges.

## **DBVI**

### **Strengths:**

- The experience and expertise of DBVI's staff. The employment groups meet on a regular basis with management participation.
- Staff positions have been upgraded to address the consumers and agency staffing and recruitment needs, and the agency relocated staff positions to meet consumers and agency needs throughout the state.
- Ongoing educational opportunities for all staff are supported by all levels of management. The agency has developed creative means to access additional training funds for DBVI's CSPD efforts.
- DBVI has expanded services to individuals by changing the fee for services agreements, developing specialty contract services, and by offering Career Center Classes. These changes have increased individuals' choices.
- Staff being located in Career Centers has increased employer awareness of the employment potential of hiring the blind and visually impaired in employment.
- DBVI has a long-term relationship with the community resources serving individuals with blindness or visual impairments.
- The SRC has been an effective partner with the State Agency.
- The agency has statewide expertise in low vision services.

### **Challenges:**

- Increasing the numbers of applicants who are working-age and interested in obtaining or retaining employment.
- Providing VR services to individuals who are interested in obtaining or retaining employment.

- Achieving more competitive employment outcomes.
- Implementing innovative methods to effectively meet the demands for transition-age youths services.
  
- DBVI has a difficult time recruiting specialized staff to relocate to Maine and this will continue to be a significant issue as staff retire. Maine's pay for state employees is less than neighboring states further reducing the pool of potential new employees. The State has undertaken a salary study, but the results of the study are not published yet.
  
- Maine does not have graduate programs offering advanced degrees in Rehabilitation Counseling, Orientation and Mobility, and Vocational Rehabilitation teachers.

## INTRODUCTION

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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;
- develops, jointly with the state agency, performance and compliance goals as well as strategies to achieve those goals; 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.

### Maine Administration of the VR, SE, IL and OIB Programs

In ME, the Department of Labor (DOL) serves as the designated state agency (DSA) for the two VR agencies that administer the VR and SE programs. The Bureau of Rehabilitation Services (BRS) is located within the DOL. BRS's mission is to provide full access to employment, independence, and community integration for people with disabilities. The Division of Vocational Rehabilitation (DVR) is the designated state unit (DSU) for the general VR services program, and the Division for the Blind and Visually Impaired (DBVI) is the separate DSU for individuals who are blind or visually impaired. DVR and DBVI are located within the BRS.

DVR regional offices are co-located in CareerCenters. DBVI has seven offices, six of which are located in CareerCenters and the other is a regional office. DVR and the ME SILC jointly administer the IL program under Chapter 1, Part B, and DBVI administers the OIB program under Chapter 2.

## **Appreciation**

RSA wishes to express appreciation to the representatives of the DOL, DVR, DBVI, DVR's and DBVI's State Rehabilitation Councils (SRC), the Statewide Independent Living Council (SILC), and the stakeholders who assisted the RSA ME monitoring team in the review of DVR and DBVI VR, SE and IL programs.



## CHAPTER 1: RSA'S REVIEW PROCESS

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### Data Used During the Review

RSA's review of DVR and DBVI 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 in addition to the trend data since FY 2002.

### Review Process Activities

RSA's review began in the fall of 2007 and ended in the summer of 2008. During this time, RSA's ME 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 an on-site visit, and held multiple discussions with state agency staff, SRC members, SILC members, and stakeholders to share information, and identify promising practices and areas for improvement;
- provided technical assistance during the review process and identified the technical assistance that RSA would provide in the future to help improve program performance or ensure compliance;
- determined if there were any compliance issues and if there were, worked with DVR and DBVI to ensure their correction; and
- made recommendations for DVR and DBVI to address areas for improvement.

### RSA ME State Team Review Participants

Members of RSA's ME state team included representatives from each of RSA's State Monitoring and Program Improvement's (SMPID's) five functional units. The RSA ME state team was led by RSA's state liaison to ME, Yann-Yann Shieh (Data Collection and Analysis Unit) and the following RSA ME team members: Janette Shell (TA Unit), David Wachter (VR Unit), Larry Vrooman (VR Unit), Thomas Macy (VR Unit), Regina Luster (Fiscal Unit), and Thomas Kelley (Independent Living Unit).

## Information Gathering

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

- conducted five teleconferences with VR and IL stakeholders beginning in November, 2007;
- conducted monthly teleconferences with the DVR and DBVI management beginning in October, 2007;
- conducted four video conferences with DVR and DBVI management team to discuss their program performance;
- conducted five teleconferences with DVR and DBVI IL program staff, SILC members and administrative staff, and OIB staff;
- conducted an on-site monitoring visit from March 31 through April 4 for DVR and met with staff of DOL, BRS, DVR, the CAP, community rehabilitation programs (CRPs), service providers, consumers, and members of the SILC and SRC;
- conducted an on-site monitoring visit from April 14 through April 18 for DBVI and met with staff of DOL, BRS, DBVI, the CAP, CRPs, service providers, consumers, and members of the SILC and SRC; and
- conducted two statewide video conferences with DVR and DBVI stakeholders during the weeks of the on-site visits to share observations about DVR's and DBVI's performance, provide information about DVR's and DBVI's monitoring goals, and solicit their input on the goals.

## CHAPTER 2: DVR VOCATIONAL REHABILITATION AND SUPPORTED EMPLOYMENT PROGRAMS

### Agency Information and Performance

In FY 2007, DVR served 4,304 individuals, of which 697 were closed with an employment outcome and 658 were closed without an employment outcome. Of those who were successfully rehabilitated, 123 achieved a supported employment outcome. Over the past five years, the number of DVR's employment outcomes has decreased by 160 or 19 percent. The number of new applicants has decreased by 421 or 10 percent, and the number individuals closed after services has decreased by 327 or 19 percent.

**Table 2.1**  
**Program Highlights for ME DVR Program for**  
**FY 2003 through FY 2007**

Program Elements	2003	2004	2005	2006	2007
Total funds expended on VR and SE	\$15,403,388	\$15,681,058	\$15,037,143	\$15,481,892	\$16,290,771
Individuals' cases closed with employment outcomes	857	745	655	643	697
Individuals' cases closed without employment outcomes	825	904	716	638	658
Total individuals' cases closed after receiving services	1,682	1,649	1,371	1,281	1,355
Employment rate	50.95%	45.18%	47.78%	50.20%	51.44%
Individuals whose cases were closed with supported employment outcomes	180	136	134	109	123
New applicants per million state population	2,738.17	2,584.09	2,086.36	2,325.76	2,559.09
Average cost per employment outcome	\$5,562.50	\$5,281.50	\$5,913.71	\$5,744.64	\$6,343.56
Average cost per unsuccessful employment outcome	\$3,059.73	\$3,537.02	\$3,782.96	\$4,128.50	\$4,459.10
Average hourly earnings for competitive employment outcomes	\$9.12	\$9.53	\$9.60	\$10.50	\$11.03
Average state hourly earnings	\$14.78	\$15.16	\$15.71	\$16.13	\$16.71
Percent average hourly earnings for competitive employment outcomes to state average hourly earnings	61.71%	62.86%	61.11%	65.10%	66.01%
Average hours worked per week for competitive employment outcomes	26.92	28.14	27.53	27.27	28.39
Percent of transition-age youths served to total served	31.15%	33.41%	31.00%	37.08%	30.70%
Employment rate for transition-age youths served	47.90%	44.65%	43.06%	44.84%	46.15%
Average months between application and closure for individuals with competitive employment outcomes	31	31.8	36.3	37.9	38

## **VR and SE Service Delivery**

Maine is geographically the largest state in New England and one of the most rural with its population centered in Portland, Augusta, and Bangor. DVR divided the state into five regions supervised by two regional managers. Within these regions are ten district offices assigned to a casework supervisor. DVR Bureau leaders are the director, the assistant director and the quality assurance manager.

DVR is on an order of selection and provides services only to those who are in Category One, the most significantly disabled. Maine has a rapidly growing transitioning students program school outreach, "Mission Transition," and a large population of students identified as "special needs" contribute to this number. Maine purchases many job coaching, job development and job placement services through negotiated fee for service arrangements with community rehabilitation programs, (CRPs).

Each VR counselor provides counseling and guidance for every applicant requesting services. DVR provides a majority of job development and placement services through contracts with 60 CRP's of which 45 are used on a regular basis. 19 of those 45 providers have CARF certification with the rest consisting of small agencies with five or fewer staff. In 2005, a state accreditation process modeled after CARF was instituted. The in-state accreditation process provides an option for those firms for whom CARF is not a suitable alternative. Additionally, BRS allows firms with licensing as Mental Health providers as CRPs. DVR provides new applicants with basic information about the CRP's and is researching and developing a "report card" data program indicating the effectiveness of each program. While the agency encourages these individuals to use this information to make their own choice as to which CRP they want help from in obtaining gainful and competitive employment, it regularly has CRPs report on various measurements, including but not limited to the number of successful outcomes in a given month, type of vocational successes, service time used to assist consumers.

Maine DVR has ten offices, Saco, Portland, Lewiston, Augusta, Rockland, Bangor, Skowhegan, Machias, Presque Isle and Houlton. Some of these offices are co-located with One-Stop CareerCenters. All of these offices have a casework supervisor positions.

## **Personnel**

DVR staff providing service delivery consists of sixty-six vocational rehabilitation counselors, six paraprofessionals, ten supervisors and two regional managers

Since late 2006, Maine State government has experienced a hiring freeze, thereby limiting the number and type of positions that the agency has been able to realize. While still in a significant hiring freeze coupled with the overall reduction of the total number of positions available within State Government, BRS successfully argued the merit of maintaining the ability to fill Vocational Rehabilitation counselors, thus making certain that direct services continue to be delivered to thousands of customers. DVR anticipates a turnover of 15 percent of its employees

during the next five years, which would include some of the senior management and potentially up to 50 counselors.

## **Data Management**

Maine Bureau of Rehabilitation Services (BRS) has developed its own in-house information system, Office of Rehabilitation Services Information Services (ORSIS), for DVR to track consumer progress and individual case expenditures, as well as to facilitate RSA reporting requirements. ORSIS tracks case service budget information, maintains information on consumer demographics, and tracks case status and outcomes by caseload and by office.

## **Quality Assurance**

In 2006, BRS created the Systems Improvement Quality Assurance unit, commonly referred to as SIQA, to provide non-operational technical support services within the agency, which result in systems improvement and assure the delivery of quality services. Support is provided to DVR in order to track State Plan goals, keeping the wait list to less than six months, tracking IPE development, arranging quarterly case record reviews and other related quality assurance issues. SIQA is developing a quarterly data report that will be required from each CRP, which will then be used to create an outcome-based report card. The individuals in IPE development will have access to these report cards, so that they can choose a provider that best meets their needs and has a proven success record.

## **Planning**

DVR uses strategic planning to develop goals for the State Plan and improve program services. DVR acquired and enhanced its video-conferencing capacity through the purchase of the Poly-Com system, which is used for audio-visual meetings with management and direct service staff. These meetings are with two or three of the district offices at a time and last about 90 minutes. The monthly meetings with the SRC and quarterly SILC meetings are often used as part of the planning process and then once a year a more formal strategic planning day is held with a facilitator and the senior management. During this stage of the strategic plan, everyone reviews progress on goals from the previous year, the “hot issues” and identification of new goals for the following year.

## **VR and SE Programs Technical Assistance Provided to DVR During the Review Process**

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

- coordinating with the IL program to provide services such as mentoring and self-determination skills development concurrent with the IPE development process or while individuals are on an order of selection waiting list for VR services;
- guidance on the content of the State Rehabilitation Council (SRC) Annual Report;

- examples of opportunities for the SRC to identify and exchange best practices with other SRCs;
- utilization of the National Rehabilitation Clearinghouse for comprehensive assessment curricula and professional development materials for serving behaviorally challenged individuals;
- referral to another state agency to discuss the electronic application system used in the supported employment program;
- specific internet websites to learn about evidence based practice supported employment;
- technical Assistance Circular 05-01 “Guidelines for Assessing the Functional Capacities of an Individual with Specific Learning Disabilities to Determine Significance of Disability for Order of Selection Purposes;
- strategies for staff recruitment and retention;
- strategies to serve and employ individuals with violent behavior;
- maximization of the SRC’s assets and talents; and
- how the VR agency and SRC should develop joint work with other agencies to expand beyond referrals.

### **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. The DVR and its stakeholders shared the following observations:

- there is interest in the resolution of the findings in the Office of Program Evaluation and Government Accountability (OPEGA) report;
- there is a need to reduce waiting time to obtain services;
- effective planning is needed for the additional referrals from the Developmental Services;
- there is a need to improve services for the transition-age youths;
- there is a need to improve implementation of section 121 grant funds to work with tribal youths;

- the lack of transportation available to consumers in rural areas is a problem;
- there is a need to improve communication between the SRC and the SILC;
- services are provided inconsistently in offices throughout the state;
- there is a need to improve relations with Social Security, OAMHS, DS and the schools;
- there is a need for more financial resources than are available to DVR under the current base formula;
- a sufficient number of counselors should be competent in American Sign Language; and
- there is a need to standardize the agency's approach to providing AT services.

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 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 ME-DVR to successfully implement the recommendation.

### **1. Implementation of the Order of Selection**

According to DVR's implementation of its Order of Selection (OOS):

- all eligible DVR consumers are placed on a waiting list for approximately 180 days;
- after 180 days those in Category 1 are taken off the waiting listing;
- in DVR these consumers experience an additional delay of 325 days (on average) before an IPE is developed; and
- those individuals in Categories 2 and 3 never have an IPEs developed.<sup>1</sup>

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<sup>1</sup> Combining the amount of time that an individual spends on the waiting list (180 days) with the amount of time it takes DVR to develop an IPE after an individual comes off the waiting list (325 days on average), all individuals who are placed in Category 1 have their IPE developed approximately 505 days or 1.38 years after they are first determined eligible.

**Observation:** Because DVR defines its Category 1 so broadly and so many individuals are placed into Category 1, the agency prevents anyone from receiving services without being put on a waiting list.

- A VR agency that determines that it does not have the financial and/or staff resources to serve all eligible individuals in the state must develop an order of selection to ensure that individuals with the most significant disabilities are given priority in the provision of services, in accordance with the regulations found at 34 CFR 361.36(d)(1), establishing an order of selection.
- In 1999, DVR established written policies to implement an order of selection. These policies define three priority categories for the provision of services as follows:
  - Category One: most significantly disabled, severe limitations in two or more functional capacity areas in terms of an employment outcome and requires multiple VR services;
  - Category Two: significantly disabled, severe limitations in one functional capacity area in terms of an employment outcome and requires multiple VR services; and
  - Category Three: all other individuals with non-significant disabilities.
- Consistent with past years' distribution of those assigned to a Category, according to its FY 2009 VR State Plan, on March 1, 2008, DVR had 1,247 individuals on its waiting list, with:
  - 990 individuals in Category One (79.39 percent);
  - 238 individuals in Category Two (19.09 percent);
  - 39 individuals in Category Three (1.52 percent).
- During the past five years, the agency has, on average, found 91.5 percent of its applicants eligible for services and placed individuals from all three categories on a waiting list.
- As indicated in Table 2.2 below, an average of 1,591 individuals have been placed on DVR's waiting list from FY 2002 through FY 2007.



**Table 2.2**  
**Number of Individuals on DVR's OOS Waiting List for**  
**FY 2002 through FY 2007**

	2002	2003	2004	2005	2006	2007
<b>Total Number On OOS Waiting List at End of Period</b>	1,246	1,354	2,201	2,136	1,188	1,421

- DVR improperly describes Category 1 as being “open” because individuals from Category 1 are taken off the waiting list (after six months) and IPE development begins. Since individuals from Category 1 are placed on a waiting list before IPE development begins, Category 1 is “closed,” just as Categories 2 and 3 are “closed.” Category 1 would be “open” if individuals in the category moved immediately from eligibility to IPE development.
- As a result of such a large percentage of individuals being placed into Category 1, and all individuals in Category 1 being placed on a waiting list for six months, DVR has instituted an OOS that does not allow anyone to receive services immediately after being determined eligible. DVR's OOS is inconsistent with the principle underlying the implementation of an OOS, i.e., providing a priority to those individuals with the most significant disabilities. If 80 percent of all eligible individuals are individuals with the most significant disability, then in effect, no one is provided the priority that the OOS was intended to provide.

**VR Recommendations:** RSA recommends that DVR:

- 1.1 conduct an analysis to determine if eligible individuals are properly assigned to the priority categories for the provision of services, particularly Category One;
- 1.2 including the results of this analysis, redefine the criteria by which individuals are assigned to each of the priority categories to ensure that individuals with the most significant disabilities are given priority in the provision of services;
- 1.3 separate Category 1 into two or more categories so that not all of DVR's categories are closed; and
- 1.4 provide training to staff to assure accurate and consistent assignment of eligible individuals to the priority categories, particularly to Category One.

**Agency Response:**

- DVR has addressed this issue in the 2009 State Plan Goals: “Refine Maine’s Order of Selection (OOS) category definitions and identification of most Significantly Disabled and provide training to DVR counselors.”
- DVR first instituted an OOS 16 years ago, and at that time RSA provided TA in the analysis of DVR's process and supported DVR's methodology.

- DVR continues to work on consistent and equitable OOS determination. DVR acknowledges RSA's observation and renews its request for further TA.

**TA:** DVR requests TA.

## 2. Drop Out Rate

**Observation:** As described in Observation 1 above, all individuals seeking services from DVR wait an extended period of time before receiving them. One of the possible effects of these delays is that DVR has one of the highest rates of all agencies for individuals who drop out of the program. As described above, with a total waiting time of nearly a year and half, people in need of services may give up, lose the motivation to seek employment, or look elsewhere for assistance.

- As indicated in Table 2.3 below, the percentage of individuals exiting before the development of an IPE increased from 28 percent in FY 2003 to 45.89 percent in FY 2007. The national rate for this type of closure is 23.46 percent, indicating that Maine's drop out rate is more than 20 percent above the national average. This significant increase in the dropout rate prior to signing an IPE is directly related to the increase in time between eligibility and IPE.
- DVR has indicated that counselor caseloads have increased from 80 to 120 during the past ten years and the agency has increased its staffing by five new staff (three new counselors and two case worker supervisors). In 2006, Maine DVR completed the first stage of its reorganization by creating two Regional DVR areas and carving the state into more geographically and appropriately staff distributed Teams.
- Currently, DVR is unable to add new positions and to hire new staff (VR counselors are excluded) to fill vacancies due to a state-hiring freeze. According to the FY 2009 State Plan, Maine will probably replace 15 percent of the staff each year. DVR management is exploring strategies to increase the efficiency of counselor staff.

**Recommendations:** RSA recommends that DVR:

- 2.1 conduct an analysis to determine the factors creating the long delay between eligibility and implementation of the IPE; and
- 2.2 develop measurable goals, including annual and long-term targets, to reduce the number of individuals who drop out of the VR process prior to the development of the IPE and strategies to achieve the goals.

**Table 2.3**  
**Closure Types for DVR Compared to All General and Combined Agencies for**  
**FY 2003 through FY 2007**

FY	2003		2004		2005		2006		2007		Nat. G& C in FY 07	
	N	%	N	%	N	%	N	%	N	%	N	%
Exited as an applicant	251	8.64	243	7.88	239	8.39	259	8.67	246	7.48	90,864	15.50
Exited during or after a trial work experience/ extended evaluation	5	0.17	5	0.16	2	0.07			1	0.03	3,940	0.67
Exited w/ employment outcome	857	29.5	745	24.16	655	23.0	643	21.5	697	21.20	198,525	33.87
Exited w/o employment outcome	825	28.4	904	29.32	716	25.6	638	21.7	658	20.01	136,233	23.25
Exited w/ employment outcome, after a signed IPE, but before receiving services	43	1.48	37	1.2	24	0.84	30	1	36	1.09	6,731	1.15
Exited from an OOS waiting list	111	3.82	124	4.02	105	3.69	109	3.65	141	4.29	12,259	2.09
Exited w/ employment outcome, after eligibility, but before an IPE was signed	814	28.00	1,025	33.25	1,106	38.90	1,308	43.80	1,509	45.89	137,508	23.46
<b>Total</b>	<b>2,906</b>		<b>3,083</b>		<b>2,847</b>		<b>2,987</b>		<b>3,288</b>		<b>586,060</b>	

**Agency Response:**

- DVR acknowledges the issue and accepts the finding.
- DVR has addressed this issue in the 2009 State Plan goals: Analyze time of individuals in Plan Development (status10) comparing FY 2007 with FY 2008.
- DVR is addressing eligibility decisions through the revised quality assurance case review process.
- DVR will revisit the use of extended evaluation and trial work experiences.

- The Systems Improvement Quality Assurance unit was established in 2006 and currently consists of a director and three rehabilitation consultants. This unit is involved in all data collection and analysis with the goal of improved services to our consumers.

**TA:** DVR requests TA.

### **3. Office of Rehabilitation Services Information Services (ORSIS) system**

**Observation:** DVR's case management system is in need of improvement or replacement. ORSIS was developed in house to track consumer progress through service provision, to accumulate and account for individual case expenditures, and to facilitate the reporting requirements of RSA. ORSIS also tracks budget information.

- Data is entered into the ORSIS system through seven servers located throughout the state. This data is downloaded to a central server as the data is entered. There may be a short delay as the data is transmitted, but if it is more than a few minutes, it is because there is a transmission problem that would be reported and repaired.
- Staff at local offices do not have access to the central database, and in fact, this access is something users have requested for its statewide look-up capacity, which is not available at this time except on the central server. Users who have access to more than one local office server are set-up using one (the same) user ID and are able to use the same password if they choose on each server.
- Although there continue to be data entry errors, the ORSIS system does have edit checks to verify the data accuracy for the inputs, as well as alerts for various types of work deadlines. It does not have the ability to generate IPEs, which have to be done by hand. The system does have a built-in function to generate reports. As indicated by DVR, data are available as they are entered, so if a standard "built-in" report is requested (selected from the list), the data are current and reports can be run in a matter of minutes. Non-standardized reports are a different issue and timeliness could be a problem.
- DVR staff and counselors expressed their frustration with using ORSIS because it is not user-friendly, too time consuming, and inefficient.
- According to DVR, ORSIS has been problematic ever since its development more than ten years ago. Recently, the costs of maintaining ORSIS have been around \$200,000 a year. Maine DVR is aware of the problems with ORSIS and has been in dialogue with other state agencies concerning acquiring another case management system.

**Recommendations:** RSA recommends that DVR:

- 3.1 continue discussions with other agencies or vendors for acquiring another case management system to provide for centralized tracking of consumer services and their costs through the VR system, development of IPEs, accounting for results of standards and indicators,

counselor and/or office budgets or goals, and the generation of effective management reports and RSA forms;

- 3.2 centralize ORSIS office servers with the central office as an interim measure prior to the acquisition of a new system to increase efficiency.

**Agency Response:** The Daily Operations Group, which has representation from DVR field staff, SIQA and the Office of Information Technology (OIT), meets twice a month to prioritize and resolve issues related to DVR's electronic case management system and daily operations. Migration and consolidation of the servers is being addressed by this group and the BRS Lead Team, but is part of a much larger State of Maine OIT initiative. The DOG has established a preliminary project plan to address the need for the next generation of ORSIS, which includes gathering information from other state agencies and vendors.

**TA:** DVR requests TA.

#### **4. Strategic Planning due to implementation of Medicaid Waiver**

**Observation:** The new MOUs with Department of Health and Human Services Office of Adults with Cognitive and Physical Disabilities (OACPD) and the Office of Adult Mental Health Services (OAMHS) will increase referrals to the program. The most significant increase will be from OACPD's Developmental Services, where as many as 1,400 individuals could be referred for employment services due to changes in a Medicaid Community Supports Waiver.

- Many of these individuals do not have independent living skills, competitive employment experience and some have never worked in an integrated community based setting, which will require significant rehabilitation skills and time to be served effectively.
- Earlier sections of this report document the waiting list and delays that DVR is currently experiencing. An influx of 1,400 referrals involving a challenging population of individuals, many of whom may fall into the highest OOS category, may overwhelm DVR's resources.

**Recommendations:** RSA recommends that DVR:

- 4.1 continue to work with the SRC on how best to assimilate these referrals into a program that already has a very long wait before services are provided;
- 4.2 establish a task force with provider agencies to address planning, challenges, opportunities, progress; and
- 4.3 consult with the SILC and centers for independent living to discuss referrals for independent living and community services for individuals who would benefit from these services.

**Agency Response:** DVR has addressed this in the FY 2009 State Plan goals to have joint trainings with DHHS case managers and employment specialists in the community mental health programs and with DHHS case managers for individuals who are developmentally disabled. Additionally, administrative and regional cross-departmental meetings are occurring to collaborate and establish best practices in achieving integrated, community-based employment outcomes with individuals served by both DVR and DHHS.

**TA:** DVR does not request TA.

## 5. Evaluation and Monitoring of CRPs

**Observation:** CRPs indicate that DVR would benefit from being more consistent in its expectations of CRPs related to: vocational evaluation; how services are to be provided; how services are to be documented; how services will be paid for; and how authorizations for extended services and new services are approved.

- DVR management indicated the SIQA (System Improvement Quality Assurance) program has recently implemented a pilot report card system designed to maintain more fiscal and quality control over the CRP's. The reports will be generated from CRP quarterly reports and ORSIS generated data. At this time the monitoring program is not fully in place.

**Recommendations:** RSA recommends that DVR:

- 5.1 review and refine measurable criteria for evaluation of CRP services;
- 5.2 include staff from DVR and CRP's in developing the "report card;"
- 5.3 explore developing a performance-based fee for services system as an incentive for better outcomes; and
- 5.4 provide CRP evaluation information to consumers to facilitate informed choice in the selection of services and service providers.

**Agency Response:**

- DVR has addressed this in the FY 2009 State Plan goals. The following activities will improve evaluation and monitoring of the CRPs:
  - quarterly meetings with the CRP providers;
  - working with the Region 1 collaborative of CRPs; and
  - tracking performance outcome data of the Maine CRP's.

**TA:** DVR requests TA.

## VR and SE Compliance Findings and Corrective Actions

RSA identified the following compliance finding and corrective action that DVR is required to undertake. DVR 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 DVR.

### 1. Delay in the Development of the IPE

**Legal Requirement:** Pursuant to Section 101(a)(9), and 34 CFR 361.45(a)(1) and (e), VR agencies are required to develop written policies, including timelines, for the development of the IPE following the determination of eligibility. The regulatory provisions read as follows:

361.45(a)(1): An individualized plan for employment (IPE) meeting the requirements of this section and Sec. 361.46 is developed and implemented in a timely manner for each individual determined to be eligible for vocational rehabilitation services or, if the designated State unit is operating under an order of selection in accordance with Sec. 361.36, for each eligible individual to whom the State unit is able to provide services; and

361.45(e): Standards for developing the IPE. The designated State unit must establish and implement standards for the prompt development of IPEs for the individuals identified under paragraph (a) of this section, including timelines that take into consideration the needs of the individuals.

#### **Finding:**

- DVR has established a written policy for the prompt development of the IPE specifying that "The IPE will be developed within six (6) months after the eligibility determination, unless there are extenuating circumstances based upon client need. If there is a waiting list, the IPE will be developed within (6) months from the date the individual comes off the waiting list."
- As described in Observation 2 below, according to DVR's implementation of its Order of Selection (OOS):
  - all eligible DVR consumers are placed on a waiting list for approximately 180 days;
  - after 180 days those in Category 1 are taken off the waiting listing;

- those in Category 1 who are taken off the waiting list then experience an additional delay of 325 days (on average) before an IPE is developed; and
  - those individuals in Categories 2 and 3 never have an IPEs developed.<sup>2</sup>
- As indicated in Table 2.4 below, the number of individuals whose IPE have not been developed within DVR's established timeline has increased significantly between FY 2003 and FY 2007.
- In FY 2003, 74.20 percent of individuals served had their IPE developed within the 180-day timeline after coming off the wait list. By the end of FY 2007, 70.18 percent (951) of eligible individuals completed plan development some time after 180 days including 469 individuals whose plan was developed sometime after 12 months from coming off the waiting list.
- As indicated in Table 2.4 below, DVR is not in compliance with its written policies and timelines for the prompt development of the IPE for each individual following the determination of eligibility because the time required for the development of the IPE far exceeds 180 days for a majority of the individuals.

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● <sup>2</sup> Combining the amount of time that an individual spends on the waiting list (180 days) with the amount of time it takes DVR to develop an IPE after an individual comes off the waiting list (325 days on average), all individuals who are placed in Category 1 have their IPE developed approximately 505 days or 1.38 years after they are first determined eligible.



**Table 2.4**  
**Time between Eligibility and IPE for Consumer After Getting Off Waiting List for DVR**  
**Compared to National Averages for All General and Combined Agencies for**  
**FY 2003 through FY 2007**

Agency	Year Closed	Total	Within 3 months	3 to 6 months	6 to 9 months	10 to 12 months	More than 12 months
DVR	2003	1,682	995	253	152	112	170
DVR	2004	1,649	532	430	332	139	216
DVR	2005	1,371	294	253	348	168	308
DVR	2006	1,281	183	164	268	244	422
<b>DVR</b>	<b>2007</b>	<b>1,355</b>	<b>168</b>	<b>236</b>	<b>255</b>	<b>227</b>	<b>469</b>
<i>DVR</i>	<i>2003</i>	<i>100%</i>	<i>59.16%</i>	<i>15.04%</i>	<i>9.04%</i>	<i>6.66%</i>	<i>10.12%</i>
<i>DVR</i>	<i>2004</i>	<i>100%</i>	<i>32.26%</i>	<i>26.08%</i>	<i>20.13%</i>	<i>8.43%</i>	<i>13.10%</i>
<i>DVR</i>	<i>2005</i>	<i>100%</i>	<i>21.44%</i>	<i>18.45%</i>	<i>25.38%</i>	<i>12.25%</i>	<i>22.46%</i>
<i>DVR</i>	<i>2006</i>	<i>100%</i>	<i>14.29%</i>	<i>12.80%</i>	<i>20.92%</i>	<i>19.05%</i>	<i>32.94%</i>
<b>DVR</b>	<b>2007</b>	<b>100%</b>	<b>12.40%</b>	<b>17.42%</b>	<b>18.82%</b>	<b>16.75%</b>	<b>34.61%</b>
Nat. G-C	2003	100%	72.88%	12.29%	5.74%	2.45%	6.63%
Nat. G-C	2004	100%	72.50%	12.55%	5.96%	2.54%	6.45%
Nat. G-C	2005	100%	70.05%	13.28%	6.60%	2.79%	7.26%
Nat. G-C	2006	100%	69.72%	13.32%	6.55%	2.82%	7.58%
<b>Nat. G-C</b>	<b>2007</b>	<b>100%</b>	<b>69.85%</b>	<b>13.66%</b>	<b>5.80%</b>	<b>3.14%</b>	<b>7.55%</b>

**VR Corrective Action 1:** DVR must take the steps necessary to ensure that it is in compliance with the timeline established for the development of the IPE following the determination of eligibility, unless an exception is required based on the needs of the individual. DVR should develop a method to evaluate whether the steps taken have successfully resolved the compliance finding.

**Agency Response:** DVR acknowledges and accepts this finding, and to this end, DVR:

- has addressed the time delay in developing an IPE in their FY 2009 State Plan;
- believes that the Implementation of a Statewide Career Exploration protocol will support the reduction of time in plan development; and
- will evaluate the impact of these activities through measurements implemented in the January 2008 Case Review System.

Under this redesigned system, supervisors will review:

1. all cases assigned to VRCs during their first 6 months of employment at specific points in the VR process - eligibility determination, comprehensive assessment of rehabilitation needs, IPE development and closure;
2. individual high cost and long-term cases; and
3. all post-secondary and self-employment cases where expenditures are estimated to be greater than DVR policy.

Additionally, ten percent of all cases active for at least 6 months will be reviewed annually through quarterly supervisor sessions and ten percent of all closed and post-employment cases will be reviewed annually through quarterly SIQA-led sessions.

Development of supervisory skills necessary for effective case review is currently underway. In addition, the case reviews will be performed and documented using a revised case review form that prompts coverage of both programmatic and fiscal aspects of the case, as well as the adequacy of documentation to meet both programmatic and fiscal requirements. Case review documentation will be maintained centrally with a notation made in the individual case record. Information gathered will be shared with counselors, supervisors, managers and training coordinators for performance and system improvement.

## **CHAPTER 3: FISCAL MANAGEMENT OF BRS' VOCATIONAL REHABILITATION AND SUPPORTED EMPLOYMENT PROGRAMS**

RSA reviewed BRS' 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, addresses the overall fiscal performance of the agency. The data related to matching requirements is taken from the respective fiscal year's final or latest Financial Status Report (SF-269). The carryover data is taken from the unobligated balance of federal funds portion of the fourth quarter SF-269. The maintenance of effort (MOE) requirement data is 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 is taken from the RSA-2.

**Table 3.1  
Fiscal Profile Data for DVR for  
FY 2003 through FY 2007**

Fiscal Year	2003	2004	2005	2006	2007
Grant Amount	11,676,161	11,712,249	11,821,428	12,262,221	12,451,831
Required Match	3,160,130	3,169,897	3,199,446	3,318,746	3,370,064
Federal Expenditures	11,676,161	11,712,249	11,821,428	12,262,221	12,451,831
Actual Match	3,391,588	3,251,782	3,391,589	3,421,119	3,391,589
Over (Under) Match	231,458	81,885	192,143	102,373	21,525
Carryover at 9/30 (year one)	0	0	309,563	1,580,345	1,684,297
Program Income	711,814	672,739	784,133	1,455,574	1,200,585
Maintenance of Effort (MOE)	3,221,838	3,251,782	3,391,588	3,251,782	3,391,589
Administrative Costs	1,827,008	2,476,685	1,775,449	1,578,541	1,714,658
Total Expenditures*	15,403,388	15,681,058	15,037,143	15,481,892	16,290,771
Percent Admin Costs to Total Expenditures	11.86%	15.79%	11.81%	10.20%	10.53%

\*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 State VR Services 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 the following VR and SE program technical assistance to BRS during the review process regarding:

- a synopsis of each requirement and RSA's assessment of the agency's compliance with specific financial requirements, including match, maintenance of effort (MOE), carryover, reallocation, program income, liquidation of outstanding obligations and grant closeout;
- BRS' responsibility for ensuring that corrective action is taken in a timely manner to resolve all audit (and monitoring) findings, including the 18 findings stemming from Maine's single audits for FYs 2004 (6 findings), 2005 (7 findings), 2006 (5 findings) and the Office of Program Evaluation & Government Accountability of the Maine State Legislature performance audit issued in December 2007 that contained 7 findings related to weak internal controls over consumer procurements;

- the entire reallocation process and strategies for requesting and utilizing reallocated federal grant funds (funding priorities);
- forecasting, including the financial aspects of opening and closing waiting list categories, decisions to bring consumers off of the waiting list, and the maximum utilization of available resources;
- the sufficiency of actions taken by BRS to strengthen internal controls over consumer procurements;
- SF-269 reporting requirements related to program income on year-end and subsequent reports and transferring program income to other formula grant programs;
- innovation and expansion expenditure reporting and the tie-in to the State Plan goals identified under this authority and the annual accomplishments reported by program staff;
- the impact of proposed changes to the agency's cost allocation plan and allocation bases;
- accurately reporting year-end obligations and required revisions to SF-269s to correct errors related to year-end obligations transferred to the next fiscal year to expedite the closeout of open grants; and
- reviewed, corrected and approved formula grant program SF-269s for FYs 2005, 2006 and 2007.

## **VR and SE Programs' Fiscal Management Performance Observations and RSA Recommendations**

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

### **1. Financial Reporting (Year-End Obligations)**

**Observation 1:** State auditors incorrectly instructed Department of Administrative and Financial Services (DAFS) staff responsible for preparing financial reports for DVR to report all year-end unliquidated obligations as federal/state obligations, with 78.7 percent of these obligations reported as federal, and 21.3 percent reported as state, to correspond with the statutory matching requirement for the State Vocational Rehabilitation Services Program. Federal FY 2007 was the first time that this methodology was used to report year-end obligations.

- As of 9/30/2007, DVR had met the State Vocational Rehabilitation Services Program matching and maintenance of effort requirements for FY 2007 by expending \$3,391,589. Per direction from the auditors, the agency incorrectly reported \$185,999 in non-federal

unliquidated obligations. If liquidated in FY 2008, the final non-federal expenditures for FY 2007 would increase to \$3,577,588. This would also increase the maintenance of effort level applicable to FY 2009 and future odd-numbered fiscal years by \$185,999.

- In addition to total unliquidated obligations of \$805,190 (federal and state), DVR also had \$1,684,297 in remaining federal funds that were carried over and expended in FY 2008. The total amounts of obligated funds and carryover funds (\$2,489,487) were matched by the state by the statutory deadline of September 30, 2007, and would, therefore, require no additional state match in FY 2008.
- Reporting non-federal obligations at year-end that will not be liquidated in the subsequent fiscal year distorts the financial information that RSA uses to determine compliance with statutory requirements applicable to the current and future periods and impacts agency specific performance data, as well as national data.

**Recommendations:** RSA recommends that BRS:

- 1.1 ensure that DAFS reports as the non-federal share of total unliquidated obligations, only those obligations that will actually be liquidated using non-federal resources on Financial Status Reports submitted to RSA; and
- 1.2 ensure that DAFS maintains documentation supporting all unliquidated obligations, federal and non-federal, reported on Financial Status Reports submitted to RSA.

**Agency Response:**

- The Security and Employment Service Center has corrected this situation. Unliquidated obligations are liquidated using federal funds and will be reported as federal. If at any point there is a change and non-federal resources are used to liquidate the obligations, they will be reported as such.
- The back up for the liquidated obligations is kept in the grant binder and will be available for review by the auditors.
- The SF-269 Report for the FY 2007 was corrected for the 9/30/07 quarterly report, and the state match (non-federal expenditure) has been met within the first fiscal year of the grant.

**TA:** DVR does not request TA.

**2. Audit Resolution**

**Observation 2:** DVR has the responsibility for ensuring that corrective action is taken in a timely manner to appropriately resolve all audit (and monitoring) findings. This includes findings resulting from the financial management responsibilities assigned to and carried out by DAFS. RSA financial and program staff are working with DVR and DAFS to resolve a total of

18 findings stemming from Maine's Single Audits for FYs 2004 (6 findings), 2005 (7 findings) and 2006 (5 findings).

During RSA's onsite review visits, a considerable amount of time was devoted to reviewing the basis for each finding and the current status of the corrective actions being taken by DVR and DAFS to resolve these findings.

**Recommendations:** RSA recommends that DVR:

- 2.1 continue to aggressively pursue the completion of corrective action required to resolve all outstanding audit findings applicable to this agency (RSA will review the actions taken before clearing and closing each of these findings);
- 2.2 continue efforts to strengthen internal controls over cash management, program eligibility determinations and the accuracy of federal reports; and
- 2.3 develop internal policies and procedures applicable to the resolution of outstanding audit findings. These policies should address responsible officials, timetable for completing corrective action, documentation of actions taken and any follow-requirements.

**Agency Response:** One of the reasons why audit findings are repeated from one year to the next is the timing of the audit report. By the time the Single Audit report is issued, the Bureau is already several months into the next fiscal year and unaware of audit concerns. The findings are repeated because the correction occurs after the audit report is issued.

Once the Single Audit is complete, the process requires management responses to be issued. The management responses list whether there is an agreement with the finding(s) and describe the corrective action plan. The corrective action plan is submitted to the State Controller's office where it is reviewed and forwarded to the Department of Audit. The Controller's office has staff that is dedicated to audit resolution and works with the various state departments and bureaus to ensure that the corrective action is either completed or in progress. The progress is tracked by a matrix that is sent to all auditees by the Controller's office roughly twice a year.

In summary, BRS feels that every effort is made to resolve all outstanding audit findings. The matrix from the Controller's office addresses timetables, type of corrective actions, follow-up requirements, and responsible officials.

To better address internal controls as of spring 2008, the Security and Employment Service Center (SESC) began conducting annual internal audits of client files at the BRS field offices. In the audits, client files are selected at random and are reviewed for proper approvals, expenditures pertaining to the IPE, receipts and other necessary documentation. These internal audits have resulted in strengthened compliance with policy guidelines and regulations.

**TA:** DVR does not request TA.



## CHAPTER 4: MAINE DBVI VOCATIONAL REHABILITATION AND SUPPORTED EMPLOYMENT PROGRAMS

### Agency Information and Performance

In FY 2007, DBVI served 591 individuals, of which 184 were closed with an employment outcome and 48 were closed without an employment outcome. Of those who were successfully rehabilitated, 8 achieved a supported employment outcome. Over the past five years, the number of DBVI's employment outcomes has decreased by 19 or 10 percent. The number of new applicants has decreased by 112 or 30 percent, and the number individuals closed after services has decreased by 13 or 5 percent. Table 4.1 below highlights trend of the ME DBVI program from FY 2003 to 2007.

**Table 4.1**  
**Program Highlights for ME DBVI Program for**  
**FY 2003 through FY 2007**

Program Elements	2003	2004	2005	2006	2007
Total funds expended on VR and SE	\$3,569,869	\$3,924,170	\$3,526,734	\$3,653,291	\$3,951,411
Individuals' cases closed with employment outcomes	203	133	203	206	184
Individuals' cases closed without employment outcomes	42	27	73	68	48
Total individuals' cases closed after receiving services	245	160	276	274	232
Employment rate	82.86%	83.13%	73.55%	75.18%	79.31%
Individuals whose cases were closed with supported employment outcomes	5	5	3	5	8
New applicants per million state population	232.82	226.52	202.27	208.33	173.48
Average cost per employment outcome	\$2,891.99	\$4,225.13	\$2,613.81	\$3,165.80	\$2,943.13
Average cost per unsuccessful employment outcome	\$3,443.14	\$1,804.33	\$2,251.82	\$2,003.38	\$3,386.54
Average hourly earnings for competitive employment outcomes	\$10.63	\$11.58	\$13.70	\$12.59	\$14.21
Average state hourly earnings	\$14.78	\$15.16	\$15.71	\$16.13	\$16.71
Percent average hourly earnings for competitive employment outcomes to state average hourly earnings	71.92%	76.39%	87.21%	78.05%	85.04%
Average hours worked per week for competitive employment outcomes	26.40	28.45	25.27	25.15	29.53
Percent of transition-age served to total served	4.08%	1.88%	3.62%	3.65%	6.03%
Employment rate for transition-age youths served	40.00%	66.67%	70.00%	60.00%	50.00%
Average months between application and closure for individuals with competitive employment outcomes	29.4	29.2	26.2	38.2	36.4

## **VR and SE Service Delivery**

DBVI operates three supervisory units out of six offices distributed geographically around Maine. DBVI provides service from birth through the elderly population. DBVI operates an Early Childhood Program, a School Program, the VR Program, an Independent Living Program, and an Older Blind Program. DBVI contracts with two major providers, the IRIS Network and Catholic Charities, to provide most of the Education and Independent Living program services. Approximately 70 percent of DBVI's successful closures are homemakers.

## **Personnel**

DBVI has a total of thirty-three staff in FY 2007, comprised of six administrative staff; 10 VR counselors; 12 vocational rehabilitation support staff (such as Orientation and Mobility Instructors and Rehabilitation Counseling Assistants); and five other staff (including, Office Administration, Business Enterprise Program, and an Education Counselor). In addition, there were three vacancies in FY 2007, including the agency Director. Over the next five years, DBVI anticipates losing between 40 percent and 60 percent of its staff due to retirement. This will cause significant staffing issues for DBVI. DBVI has anticipated this high turnover rate and has developed a comprehensive succession plan. The difficult part of the process is recruiting individuals to work in the state due to fact that DBVI salaries are lower than neighboring states and there are no in-state graduate training programs. All current staff meet the state's CSPD standard or in an approved plan to meet it.

## **Data Management**

Maine Bureau of Rehabilitation Services (BRS) has developed its own in-house information system, Office of Rehabilitation Services Information Services (ORSIS), for DBVI to track consumer progress and individual case expenditures, as well as to facilitate RSA reporting requirements. ORSIS tracks budget information, maintains information on consumer demographics, and tracks case status and outcomes by caseload and by office.

## **Quality Assurance**

In 2006, BRS created the Systems Improvement Quality Assurance unit, commonly referred to as SIQA, to provide non-operational technical support services within the agency, which result in systems improvement and assure the delivery of quality services consistent with the BRS mission. In addition to support provided by SIQA, DBVI's quality assurance system is a multiple part system consisting on the following components.

- DBVI surveys individuals who have received services to determine those individuals' satisfaction with the services received. This process is under the SRC direction.
- Managers sit in on classes including orientation and mobility to insure content and curriculum is taught and individuals are getting the instructions they need.

- The agency does a quality assurance review of fiscal practices to ensure proper procedures and policies are followed. In addition, the agency pays particular attention to the Ticket to Work program, self-employment expenditures, and looks for system improvement and improved quality of services opportunities.
- DBVI has a well-developed case review system. The system involves staff from all levels of the organization.

## **Planning**

Currently DBVI does not engage in strategic planning. As part of the on site visit, the RSA Maine team discussed strategic planning with the SRC and DBVI staff.

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

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

- DBVI has a relationship with The Lovill Trust to assist with training funds for counselors and for other staff training in conjunction with its CSPD training grant. The Lovill Trust pays for specific training for staff plus \$500 to the agency (\$250 per participant and \$250 to reduce the cost of supervising interns in the program). Maine DBVI also cooperates with Maine DVR to jointly do staff training.
- DBVI also has a relationship with the Lighthouse in New York State to assist currently certified Mobility Instructors to gain training and a second certification in Vision Rehabilitation Therapy. In addition, DBVI is training para-professionals through the Lighthouse to assist its Mobility Instructors and Rehabilitation Therapists. DBVI pays \$50 annually to employees for each additional professional certification they maintain.

## **VR and SE Programs Technical Assistance Provided to DBVI During the Review Process**

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

- approaches and opportunities to increase employment outcomes by having discussions with all clients regarding the benefits of work;
- methods to improve transition VR counselor work with students as well as numbers served; and
- guidance to improve their contract processes.

## Observations of DBVI and Its Stakeholders about the Performance of the VR and SE Programs

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

- CRPs expressed an interest in DBVI using performance-based contracts in order to improve the effectiveness and efficiency of services.
- Individuals expressed concern that individuals who are physically disabled can get their needs met through Medicare/Medicaid while individuals who are blind or visually impaired must rely on DBVI.
- Members of the SILC expressed a desire to improve their relationship with the SRC. The SILC members also indicated a desire to revitalize the SILC.
- DBVI staff raised concerns that BEP funds were transferred to the general fund to help address a state budget shortfall.

RSA discussed the observations of its stakeholders with Maine DBVI 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 Maine DBVI about those observations. Maine DBVI responded to each of the recommendations and in those instances when RSA and Maine DBVI agreed upon a recommendation, RSA and Maine DBVI identified the technical assistance that RSA would provide to Maine DBVI to successfully implement the recommendation.

### 1. Employment Outcomes

**Observation:** DBVI has focused its VR program on independent living training and outcomes rather than on employment training and employment outcomes with earnings. As a result, the agency may be under-serving a significant number of working-age individuals who desire to obtain or retain their employment.

DBVI has focused the VR Program on the needs of its customers. In Maine, a significant number of these individuals are elders in need of independent living training to maintain Homemaker status. Persons of any age who are interested in employment outcomes with earnings are often provided basic elements of comprehensive rehabilitation, which can include skills training in orientation and mobility, vision rehabilitation therapy, and computer access as part of an employment plan which also includes vocational counseling, assessment of

transferable work skills, vocational training, job site modifications and other services directly related to an employment outcome with earnings.

Historically, DBVI's performance on the percentage individuals whose cases are successfully closed and who achieve a competitive employment outcome has been consistently very low. As indicated in the Table 4.2, for FY 2003 through FY 2007, the proportion of the number of individuals who achieve some form of employment outcome to those who achieve a homemaker or unpaid family worker outcome has remained constant. On average over the last five years, of those persons who DBVI identified as a successful outcome, a little less than 1 in 5 persons (20.89 percent) achieved employment without supports in an integrated setting while 7 out of every 10 persons (70.23 percent) had their cases closed as homemakers.

**Table 4.2**  
**DBVI Employment Status at Closure for**  
**FY 2003 through FY 2007**

<b>Employment Status at Closure</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>
Employment without Supports in Integrated Setting	39	39	38	33	39
%	19.21%	29.32%	18.72%	16.02%	21.20%
Self-Employment	15	7	10	12	4
%	7.39%	5.26%	4.93%	5.83%	2.17%
Business Enterprise Program (BEP)	0	1	0	3	3
%	0.00%	0.75%	0.00%	1.46%	1.636%
Homemaker	143	79	152	153	130
%	70.44%	59.40%	74.88%	74.27%	70.65%
Unpaid Family Worker	0	2	0	0	0
%	0.00%	1.50%	0.00%	0.00%	0.00%
Employment with Supports in Integrated Setting	5	5	3	5	8
%	2.46%	3.76%	1.48%	2.43%	4.35%
Total Successful Employment Outcomes	203	133	203	206	184

DBVI's performance on the percentage of successful outcomes that achieve competitive employment is significantly lower than every other blind VR agencies. As indicated in the Table 4.3, in FY 2007 DBVI achieved a competitive employment outcome for 27.72 percent of the individuals whose case were closed successfully after receiving services. The next lowest agency achieved a competitive employment outcome for 52.9 percent of its successful closures. Nationally in FY 2007, 82.6 percent of all closures for blind agencies were competitive employment closures.

These data and DBVI's focus on independent living training rather than employment training raise the fundamental question of whether the agency is under-serving individuals who are blind or visually impaired in the state of Maine who need VR services to obtain or retain employment.

**Table 4.3**  
**The Percentage of Homemaker closures and Competitive Employment Outcomes For All**  
**Of The Agencies Serving The Blind And Visually Impaired In FY 2007**

Agency Name	No. of Successful employment outcomes	No. of Homemakers	% of Homemakers	No. of Competitive Employment	% of Competitive Employment
<b>Maine-B</b>	<b>184</b>	<b>130</b>	<b>70.65</b>	<b>51</b>	<b>27.72</b>
Arkansas-B	347	58	16.71	276	79.54
Connecticut-B	127	20	15.75	105	82.68
Delaware-B	13	0	0.00	12	92.31
Florida-B	710	1	0.14	704	99.15
Idaho-B	91	12	13.19	77	84.62
Iowa-B	124	15	12.10	109	87.90
Kentucky-B	377	47	12.47	304	80.64
Massachusetts-B	191	88	46.07	101	52.88
Michigan-B	285	103	36.14	151	52.98
Minnesota-B	81	0	0.00	80	98.77
Missouri-B	256	28	10.94	228	89.06
Nebraska-B	57	4	7.02	53	92.98
New Jersey-B	303	11	3.63	283	93.40
New Mexico-B	42	0	0.00	42	100.00
New York-B	665	276	41.50	384	57.74
North Carolina-B	700	6	0.86	693	99.00
Oregon-B	113	24	21.24	88	77.88
South Carolina-B	301	61	20.27	235	78.07
South Dakota-B	100	0	0.00	98	98.00
Texas-B	1,385	104	7.51	1,230	88.81
Vermont-B	101	43	42.57	56	55.45
Virginia-B	197	5	2.54	187	94.92
Washington-B	172	0	0.00	169	98.26
National Blind Agencies	6,922	1,036	14.97	5,716	82.58

The ages of the individuals who are served by DBVI indicates that the agency primarily serves individuals who are traditionally not working-age. As indicated in Table 4.4, 66.4 percent of all individuals served by DBVI are over 55 and 36.2 percent are age 75 or older in FY 2007. By comparison 27.9 percent of all individuals served by all blind agencies are over 55 and 4.6 percent are ages 75 or older in FY 2007.

**Table 4.4**  
**Percentage of Individuals Served by DBVI by Age at Application Compared to**  
**Individuals Served by All Blind Agencies in FY 2007**

Age at Application	Maine Blind		National Blind
	Number of Persons Served	Percent	Percent
Below 14	3	1.29%	0.66%
14-24	17	7.33%	14.33%
25-34	13	5.60%	13.04%
35-44	22	9.48%	18.72%
45-54	23	9.91%	25.34%
55-64	32	13.79%	19.10%
65-74	38	16.38%	4.21%
75- above	84	36.21%	4.62%

One of the primary sources of information that a VR agency uses to identify the VR service needs of its consumers is the triennial comprehensive statewide needs assessment (CSNA) required under section 101(a) (15)(A) of the Rehabilitation Act of 1973, as amended. As described in its FY 2008 State Plan and FY 2009 draft State Plan, in 2005 and in 2008 DBVI conducted its CSNA through SRC-led statewide forums via a statewide video-conferencing system. While such forums provide an opportunity to discuss a range of issues, the results do not provide the agency with information regarding the number of working-age persons who are blind and visually impaired in the state of Maine and who need VR services to obtain or retain employment. As a result, DBVI does not know whether it is under-serving a significant number of working-age persons who need VR services to obtain or retain employment.

DBVI has two options when the agency purchases employment training: Catholic Charities and The Iris Network. These CRPs provide a limited number of employment training services. The services provided by these CRPs have an independent living and homemaker focus. According to counselors, providers, and consumers, the primary services offered to individuals include computer access, mobility training, low vision training, cooking, meal planning, cleaning, financial activities such as bill paying and balancing check, correspondence, and community safety. The goal of these services is to provide a personal adjustment to vision loss and help the consumer be self-sufficient at home.

DBVI's de-emphasis of employment training is evident in the earliest phase of the VR process. According to DBVI, when a referral is made, a DBVI counselor or intake worker visits the consumer in his or her home or conducts a phone interview. The goal of the visit or phone interview is to determine the services that are needed by the consumer to be self-sufficient in his or her home. Based on the consumer needs, the consumer is offered the choice of becoming a VR program participant leading to a homemaker closure, or an IL program participant. The deciding factor is usually the level and intensity of services needed to become self-sufficient at home. According to DBVI staff, a discussion of employment is not part of the initial visit or interview and any discussion of employment is incidental.

**Recommendations:** RSA recommends that Maine DBVI

- 1.1 develop and implement a thorough CNA that will provide identify the number of individuals who need VR services to obtain or retain employment and the nature and scope of those services;
- 1.2 expand its referral network and resources so that more individuals of working age will apply for services;
- 1.3 develop and implement goals, objectives, and strategies to increase the number of individuals who achieve employment outcomes with earnings;
- 1.4 collaborate with CRPs to expand their services to provide more employment training services; and
- 1.5 develop and implement a process for agency staff to discuss the benefits of employment with prospective program participants.

**Agency Response:** DBVI does recognize that the comprehensive needs assessment does not specifically identify numbers of individuals in the state who may require vocational rehabilitation services to achieve or maintain competitive employment. This is an area that we feel that technical assistance from RSA could help us to identify those individuals who we may not have reached through our existing activities.

The data shown in Table 4.4 imply that a large percentage of eligible consumers needing VR services from DBVI are older than 55. The Division sends out yearly information and program mailings to all ophthalmologists and optometrists in the state in an effort to identify potential blind or visually impaired individuals who need VR services to achieve or maintain competitive employment. DBVI is always looking for new and innovative ways for outreach activities because of DBVI's desire to serve all individuals who are blind or have low vision. DBVI would welcome any technical assistance from RSA to help identify any working age individuals who DBVI are not reaching through DBVI current activities.

DBVI has implemented a goal to the 2009 State Plan to develop a 'Financial Enhancement' initiative for 'homemakers' and Older Blind IL participants in an effort to increase the number of competitive employment outcomes. In order to assist and support those consumers, the division will take a more proactive approach with this group of consumers by determining when the most appropriate or most effective time would be to introduce information pertaining to pursuing a goal of full or part-time employment prior to exiting our programs.

DBVI has two major contracts contractual partners in meeting the independent living and educational needs of persons with blindness and visual impairment: Catholic Charities and the Iris Network. These CRPs do not provide employment training services, but focus on the educational preparation of infants and children with blindness or visual impairment (Catholic Charities) and independent living skill training needs as noted (Iris Network).



DBVI uses a variety of other CRP's to access employment training services including:

Work Opportunities Unlimited  
 Gouzie Associates  
 Maine Voc Assoc. Inc.  
 Goodwill  
 Good Works Employment Services  
 Job Placement Services  
 RM Transition Inc  
 Terry Smith  
 Creative Work Systems  
 EMPOWERS Employment Options  
 Community Rehab Services/ESS  
 Katahdin Friends, Inc.  
 Community Partners, Inc.  
 Independence Association  
 MMC SCARBORO  
 Employment Specialist of Maine  
 CEI Staffing Services, Inc.  
 Robin Thayer

Because of the rural nature of Maine, some DBVI VR Counselors have VR and IL caseloads and the intake interview is conducted to determine which program best meets the needs of that person. When a referral is received, a DBVI counselor or intake worker visits the consumer in the home or conducts a phone interview. Based on the consumer needs, the consumer is offered choices in competitive employment, homemaker or IL services. The deciding factor is usually the person's interest in obtaining or retaining employment, and the level and intensity of services needed to first become self-sufficient. A discussion of employment is part of the initial visit or interview if the person has any interest in this area. The provision of services needed for the individual to first become self-sufficient is a key component in the rehabilitation process that enables DBVI consumers to gain the self-confidence to believe in themselves to the level where they can seriously think about entering or returning to the world of work.

**TA:** DBVI requests TA.

## **2. Transition-Age Youths Services**

**Observation:** DBVI serves and successfully rehabilitates relatively few transition-age youths. In FY 2007, 17 individuals' age of 14 to 24 were referred to DBVI by Catholic Charities and served by DBVI. Seven of these 17 individuals were closed successfully, representing 3.8 percent of all (184) successful closures in FY 2007. As indicated in Table 4.4, 7.3 percent of the persons that DBVI served in FY 2007 were of transition age compared to 14.3 percent for all blind agencies.

DBVI contracts with Catholic Charities to provide education services to individuals with visual impairments from age 3 to 21. These educational services may include low vision instruction, Braille instruction, providing special equipment to students in the classroom, and in-service training to regular school staff, students, and parents. Catholic Charities serves approximately 280 to 300 individuals annually from birth to age 22, including approximately 50 individuals age 14 to 18 years old.

A number of years ago, a group of high school students with assistance from DBVI and Catholic Charities started a group called Vision Impairment Community Awareness team (VICAT). This group developed plays, skits, and other information on blindness and low vision awareness. They made presentations and performed at community events, schools, and business. VICAT's goal is to increase the general community awareness and to dispel myths regarding visual impairments. This group provided an opportunity for transition-aged youth to engage with DBVI and each other developing the programs, and learning self-advocacy. All participants graduated from high school with IPEs with employment goals.

**Recommendations:** RSA recommends that DBVI:

- 2.1 revise its contract with Catholic Charities to emphasize employment related services, benefits counseling, and the relationship of employment to increased independence;
- 2.2 develop and implement a plan to increase referrals of transition-age youths to DBVI;
- 2.3 develop and implement goals, objectives, and strategies to increase the number of transition-age youths who achieve employment outcomes with earnings; and
- 2.4 determine whether it would be beneficial to reconstitute and support a new VICAT for engaging in both community awareness and employment awareness for individual with vision impairments.

Agency Response: DBVI does not agree with the first recommendation in that Catholic Charities' sole responsibility is in the education of children who are blind or have low vision. This contract is funded totally with General Fund money for the express purpose of educating children who are blind or who have low vision in the State of Maine.

The DBVI 2009 State Plan outlines a goal for staff to be involved in VICAT activities this coming year. We anticipate these activities will reach out to at least five new transition-aged students.

Other transition activities that staff will be involved in will be to work with transition-age students to incorporate the principles/strategies from the Transition Bullying Awareness Prevention Program conference. These are prevention strategies for bullying others based upon disability status, ethnic and cultural differences or socio-economic status.

**TA:** DBVI requests TA.

### 3. Strategic and Human Resource Planning

**Observation:** Currently DBVI does not have a strategic planning process or formally adopted mission or vision statement.

DBVI indicated a need to engage with their SRC in a strategic planning process in order to provide direction to the agency including developing strategies for recruitment and retention of staff.

DBVI indicated that the agency has difficulty finding qualified candidates for certain positions, especially counselors and orientation and mobility (O&M) instructors. Within the past year DBVI has lost 5 staff including its director. In addition, the agency is losing two of three supervisors in the near future. The agency anticipates needing a minimum of five VR counselors, two O&M instructors, 3 supervisors, 2 support staff and 1 management position due to retirements within the next 5 years. Based on the recent, current, and projected turnover, DBVI will have turned over 20 of its staff (67 percent) in 5 years.

**Recommendations:** RSA recommends that DBVI

- 3.1 develop and implement a strategic plan in collaboration with the SRC and stakeholders;
- 3.2 expand the stakeholders who provide input in the development of DBVI guidance memos to obtain a broader input, including the SRC, CAP and other stakeholders;
- 3.3 increase training to insure that the guidance memos are for guidance, training and good practice, and not policy; and
- 3.4 develop a succession plan that includes strategies to develop, recruit, and retain qualified staff.

**Agency Response:** The Rehabilitation Counselor II classification has been approved for a pay increase, which will aid in the recruitment of qualified vocational rehabilitation professionals. DBVI management has begun to implement an internal program that offers staff opportunities to participate in more formalized leadership training. This plan includes creating opportunities for staff to participate in leadership roles within the agency, such as mentoring, supervising professional interns, and serving on the agency lead management team.

In addition, a reclassification effort is underway for our Orientation & Mobility Specialists and Casework Supervisors.

**TA:** DBVI requests TA.

#### 4. SRC

**Observation:** DBVI and its SRC would benefit from training on the roles and responsibilities of the SRC.

- DBVI and SRC indicated the desire to frame working relationship of DBVI and the SRC in new and mutually understood ways.
- DBVI and the SRC indicated a difficulty in recruiting new qualified members to the SRC.

**Recommendations:** RSA recommends that DBVI:

- 4.1 develop and institute a training program on the roles and responsibilities of the SRC and provide training to all board members and appropriate agency staff;
- 4.2 develop a recruitment process with a list of potential SRC members be developed; and
- 4.3 develop a training program utilizing the RSA's new State Rehabilitation Council (SRC) Training. The link to the training is <http://www.erehab.org>.

**Agency Response:** DBVI is committed to a strong, active SRC and to training staff/SRC on the roles and responsibilities of each group. Evidence of that is that DBVI is participating in the RSA's new SRC training (*as noted above in Recommendation 4.3*) in September 2008.

**TA:** DBVI requests TA.

## **CHAPTER 5: FISCAL MANAGEMENT OF DBVI'S VOCATIONAL REHABILITATION AND SUPPORTED EMPLOYMENT PROGRAMS**

RSA reviewed DBVI'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, addresses the overall fiscal performance of the agency. The data related to matching requirements is taken from the respective fiscal year's final or latest Financial Status Report (SF-269). The carryover data is taken from the unobligated balance of federal funds portion of the fourth quarter SF-269. The maintenance of effort (MOE) requirement data is 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 is taken from the RSA-2.

**Table 5.1  
Fiscal Profile Data for DBVI for  
FY 2003 through FY 2007**

Fiscal Year	2003	2004	2005	2006	2007
Grant Amount	2,668,276	2,931,275	2,683,391	2,784,778	2,837,179
Required Match	722,164	793,344	726,254	753,695	767,877
Federal Expenditures	2,668,276	2,931,275	2,683,391	2,784,778	2,837,179
Actual Match	851,237	944,462	851,237	944,462	851,237
Over (Under) Match	129,073	151,118	124,983	190,767	83,360
Carryover at 9/30 (year one)	0	0	674,934	528,064	756,608
Program Income	2,356	187,735	80,187	79,810	165,376
Maintenance of Effort (MOE)	851,236	897,675	851,237	944,462	851,237
Administrative Costs	455,882	633,391	635,507	494,714	591,223
Total Expenditures*	3,569,869	3,924,170	3,526,734	3,653,291	3,951,411
Percent Admin Costs to Total Expenditures	12.77%	16.14%	18.02%	13.54%	14.96%

\*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 State VR Services 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 DBVI During the Review Process**

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

- a synopsis of each requirement and RSA's assessment of the agency's compliance with specific financial requirements, including match, maintenance of effort (MOE), carryover, reallocation, program income, liquidation of outstanding obligations and grant closeout;
- DBVI's responsibility for ensuring that corrective action is taken in a timely manner to resolve all audit (and monitoring) findings, including the 18 findings stemming from Maine's single audits for FYs 2004 (6 findings), 2005 (7 findings), and 2006 (5 findings);
- obtaining the appropriate clearances to enter financial and submit financial and statistical data through RSA's Management Information System (MIS);
- SF-269 and RSA-2 reporting requirements;

- the need to ensure that the OMB Circular A-87 semi-annual certification requirement applicable to staff charging 100 percent of their time to one federal grant program, is only completed by staff that actually spend 100 percent of their time working on this one program;
- maintaining appropriate time distribution documentation for all staff that spend time working on more than one program and ensuring that final charges to federal grant programs reflect the cost of actual and not budgeted time spent working in these programs;
- accurately reporting year-end obligations and required revisions to SF-269s to correct errors related to year-end obligations transferred to the next fiscal year to expedite the closeout of open grants;
- the impact of proposed changes to the agency's cost allocation plan and allocation bases;
- strengthening the scope of work statements and payment terms to protect federal and non-federal resources going into contractual arrangements;
- federal requirements applicable to the receipt, use and disbursement of program income and reconciled program income match information reported to RSA; and
- reviewing, correcting and approving formula grant program SF-269s for FYs 2005, 2006 and 2007.

## **VR and SE Programs' Fiscal Management Performance Observations and RSA Recommendations**

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

### **1. Audit Resolution**

**Observation:** DBVI has the responsibility for ensuring that corrective action is taken in a timely manner to appropriately resolve all audit (and monitoring) findings. This includes findings resulting from the financial management responsibilities assigned to and carried out by DAFS. RSA financial and program staff are working with DBVI and DAFS to resolve a total of 18 findings stemming from Maine's Single Audits for FYs 2004 (6 findings), 2005 (4 findings) and 2006 (5 findings).

During RSA's onsite review visits, a considerable amount of time was devoted to reviewing the basis for each finding and the current status of the corrective actions being taken by DBVI and DAFS to resolve these findings.



**Recommendations:** RSA recommends that DBVI:

- 1.1 continue to aggressively pursue the completion of corrective action required to resolve all outstanding audit findings applicable to this agency (RSA will review the actions taken before clearing and closing each of these findings.);
- 1.2 continue efforts to strengthen internal controls over cash management, program eligibility determinations and the accuracy of federal reports; and
- 1.3 develop internal policies and procedures applicable to the resolution of outstanding audit findings. These policies should address responsible officials, timetable for completing corrective action, documentation of actions taken and any follow-requirements.

**Agency response:** Maine's Single Audits that are listed in the RSA report list the findings:

- FY04 6 Findings;
- FY05 4 Findings; and
- FY06 5 Findings.

One of the reasons why audit findings are repeated from one year to the next is the timing of the audit report. By the time the Single Audit report is issued, the Bureau is already several months into the next fiscal year and unaware of audit concerns. The findings are repeated because the correction occurs after the audit report is issued.

Once the Single Audit is complete, the process requires management responses to be issued. The management responses list whether there is an agreement with the finding(s) and describe the corrective action plan. The corrective action plan is submitted to the State Controller's office where it is reviewed and forwarded to the Department of Audit. The Controller's office has staff that is dedicated to audit resolution and works with the various state departments and bureaus to ensure that the corrective action is either completed or in progress. The progress is tracked by a matrix that is sent to all auditees by the Controller's office roughly twice a year.

In summary, DBVI feels that every effort is made to resolve all outstanding audit findings. The matrix from the Controller's office addresses timetables, type of corrective actions, follow-up requirements, and responsible officials.

**TA:** DBVI does not request TA.

**2. Time Certification Requirement**

**Observation:** OMB Circular A-87, "Cost Principles for State, Local and Indian Tribal Governments (revised May 17, 1995) added a new certification requirement for employees who work solely on one single federal grant program. Attachment B, Paragraph 11.h. (3), requires that charges for the salaries and wages for such individuals be supported by periodic

certifications that the employees worked solely on that program for the period covered by the certification. These certifications must be prepared at least semi-annually and must also be signed by the employee or a supervisory official having first-hand knowledge of the work performed by the employee.

- DBVI has chosen to comply with this requirement by having employees code their bi-weekly timesheets to reflect the actual time spent working on each program administered by the agency.
- This methodology is unsuccessful since employees are given only one program code under which their time can be reported.

**Recommendations:** RSA recommends that DBVI:

- 2.1 conduct staff training to explain the legal basis for requiring the OMB Circular A-87 semi-annual certification and the importance of correctly recording actual time spent working on any of the programs administered by the agency; and
- 2.2 provide employees with a list of codes for all programs administered by the agency to complete this certification.

**Agency Response:** Currently staff training includes how to accurately record work time in the Time and Attendance Management System (TAMS), including use of appropriate codes to account for hours spent in each program. The TAMS is a process that has proven to be an efficient way to get accurate information using the program codes. We have consulted with the Service Center to ensure that staff are coding their time appropriately. Staff who work in multiple programs currently are using the various program codes pertinent to that program to record their time.

**TA:** DBVI does not request TA.

### 3. Contractual Arrangements

**Observation:** RSA reviewed several DBVI contracts, including those with the IRIS Network and Project Staffing. Project Staffing is a temporary employment agency used by Maine DBVI to employ readers and drivers needed by staff. RSA noted the following.

- Most contracts are fixed price with unspecific payment terms. From reviewing the actual contracts, it was difficult to determine at what point the contractor was to be paid, i.e., monthly, quarterly, or upon completion of all work activities specified in the contract.
- The scope of work to be performed under contractual arrangements was not always clearly defined.
- There were no penalties for non-performance or not meeting stated contract goals. Contractors are eventually paid the entire fixed price amount.

- DBVI does not always evaluate contractor performance to determine if it is acceptable, exceeds expectations or exceptional.
- The IRIS Network contract is funded from several funding sources with specific performance goals for the programs associated with each funding source. By funding the contract in this manner, it is easy for programs with sufficient funding to resulting in subsidizing programs with limited funds.
- The Iris Network receives referrals from a number of sources. If the consumer has not been referred from DBVI, Iris Network then makes the referral to DBVI for employment services or an intensive homemaker program if it is determined by the VR counselor that the individual requires VR services, an IPE is developed with the consumer. If it determined that the individual requires independent living services, a plan is developed and the individual may be referred to the Iris Network for independent skills training. These services through the Iris Network are paid for by an annual contract, which covers services for participants of the IL or VR programs.

**Recommendations:** RSA recommends that DBVI:

- 3.1. strengthen internal controls over contractual arrangements to ensure that the scope of work is clearly defined, payment terms are appropriate for the contract type and details are included to outline how payments under each arrangement are to be made, along with the supporting documentation required for payments to be approved;
- 3.2. develop criteria for evaluating the performance of contractors; and
- 3.3. re-examine the decision to mix multiple funding sources and programs in one contractual arrangement with the IRIS Network. If continued, DBVI should develop sufficient internal controls to ensure that funds from various programs are not used to subsidize programs with insufficient funds to serve all consumers requiring services.

**Agency Response:** DBVI is committed to strong internal controls over contractual agreements and will utilize the most relevant criteria for evaluating the performance of the contractors.

**TA:** DBVI does not request TA.

#### **4. Internal Controls – RSA’s MIS**

**Observation:** A DAFS employee that had been granted access to RSA’s Management Information System (MIS) to enter reports for all of Maine’s formula grant programs. This individual gave her user ID and password to another employee upon transferring to another position. The DAFS employee currently responsible for entering financial and program data had not been granted access to the MIS by RSA prior to the RSA onsite visit.

- State policies are responsible for determining the level of access needed and subsequently requesting access for specific employees to enter data into RSA's MIS, submitting this data to RSA, and revising data.
- States also have the responsibility for notifying RSA to cancel access to the MIS if designated employees no longer have a need for the access granted.
- Each individual using the MIS will be given his/her own user ID and password. This information should not be shared. This allows RSA to track system users and individual responsible for data entered for each state and changes to previously reported information.

**Recommendations:** RSA recommends that DBVI:

- 4.1 review the list of individuals granted access to RSA's MIS to ensure that only current employees with appropriate levels of access have been granted permission to view and enter financial and statistical data into RSA's MIS; and
- 4.2 develop procedures, including the assignment of responsibilities, to ensure that RSA is notified in a timely manner of employees no longer requiring access to the MIS.

**Agency Response:** DBVI has reviewed and updated the list of individuals granted access to RSA's MIS.

**TA:** DBVI requests TA.

## CHAPTER 6: INDEPENDENT LIVING (IL) PROGRAM

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### Agency Information and Performance

In FY 2007, DVR IL program served 413 individuals through its Part B contract with Alpha One, which also receives Part C funds directly from RSA.

**Table 6.1**  
**Funding, Performance, and FTEs for ME IL Program for**  
**FY 2006 and FY 2007**

Data Elements	2006	2007
Funding: Title VII, Chapter 1, Part B	301,477	301,477
Funding: Total Resources (including Part B funds)	1,058,468	1,183,422
Performance: Total Served	0	0
Performance: Total Consumer Service Records Closed	0	0
Performance: Cases Closed, Completed All Goals	0	0
Performance: Total Goals Set	0	0
Performance: Total Goals Met	0	0
Performance: Total Accesses Achieved	—	—
Staffing: Total FTEs	0.00	0.00
Staffing: Total FTEs with Disabilities	0.00	0.00

### IL Program Administration and Service Delivery

DVR provides the four core services with Part B funds through a contract for \$217,733 with Alpha One CIL, which has three offices in Maine. They are located regionally so as to make services available to consumers where needed. Offices are in South Portland, Bangor, and Presque Isle, each about two hours apart. DVR allocates \$25,000 in Part B funds and \$4,925 in Section 101 funding to support the activities of the SILC. In addition, Alpha One receives \$784,879 in Part C funds directly from RSA for the provision of IL services.

### Personnel

Staffing consists mostly of administrative functions carried out by an employee of Maine SILC supervised by the chair. The representative of the DSU serves as a liaison between the DVR and the SILC, providing support and documents from DVR when requested by the SILC.

### Data Management

DVR does not include the IL program in its data management system. Data for the IL program is developed by Alpha One CIL and forwarded to the SILC and DSU for examination.

## **Fiscal Management**

DVR develops an annual contract with Maine's CIL to deliver independent living services funded under Part B. The funding is used to provide for delivery of essential services to individuals with disabilities so they can live more independent lives. The three-year SPIL establishes priorities for the SILC funding and how it shall be used.

The DSU carefully monitors the contract with DVR and works closely with them to ensure proper expenditures of funds according to the resource plan. The resources available to the SILC at this time are Title VII part B and Title I ME funds. As a 501(c)3 non-profit organization, Maine SILC is not a state agency, but by statute its members are appointed by the Governor. The Maine SILC carefully monitors and shepherds resources, finding in-kind opportunities when possible.

## **Quality Assurance**

The State evaluates the effectiveness of the SPIL by reviewing progress toward achieving the goals and objectives and by reviewing the contracts with Alpha One and DVR for delivery of IL services and IL planning.

Under the contract with Alpha One, the contract manager receives quarterly reports describing whether the contract objectives are being met. Specific issues concerning individuals with disabilities are evaluated as they arise. The CIL director and the manager review the effectiveness of the IL services contract in meeting SPIL goals on an annual basis. These findings are reported to the DSU and the SILC.

Under the contract with SILC, DSU receives monthly reports regarding the budget and quarterly reports on progress toward the SPIL goals. The DSU regularly participates in SILC meetings. The Council as a whole and the Executive Committee monitor the overall effectiveness of the SPIL and review the completion of SPIL goals on an annual basis.

## **Planning**

During the development of the SPIL, SILC invited and included underserved disability groups and identified needs among Native Americans (specific culturally appropriate rehabilitation services), people who have cognitive disabilities (support for inclusion and employment) and mental impairments (inclusion and employment). SILC also identified a general need for improved transportation information and additional communications regarding housing and emergency preparedness. The Goals and Outcomes for SILC Work focus on activities designed to increase awareness about emergency planning and collaboration and improvement of communication between organizations serving individuals with disabilities.

## **IL Program Technical Assistance Provided to DVR During the Review Process**

RSA provided the following IL program technical assistance to ME-DVR during the review process:

- reviewed SILC by-laws and policies and procedures to ensure the quality of conflict of interest requirements; and
- examined program policies and procedures to ensure they comport with legal requirements of the Rehab Act.

## **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 main focus of the IL program is on providing services to consumers at the local level through the Alpha One CIL and its two district offices; and
- there is a high degree of collaboration among the DSU, CIL, SILC and stakeholders.

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 IL program would benefit if the SILC were more proactive in performing the duties related to monitoring the implementation of the State Plan for Independent Living (SPIL). Members of the SILC would be more effective in providing fulfilling its roles and responsibilities if members received training on performing their duties as SILC members.

- The SILC also strongly feels that membership development is a priority.

**Recommendations:** RSA recommends:

- 1.1 that both the SILC and DVR participate in training regarding their respective roles and responsibilities in the development, implementation and evaluation of the SPIL;
- 1.2 following the training, ME SILC would review and update its bylaws and promotional materials as necessary;
- 1.3 the SILC should utilize the services of ILRU, RSA's technical assistance provider who offers quality trainings on the roles and responsibilities of the SILC; and,
- 1.4 expand the SILC's capacity to create a pool of future SILC members by exploring strategies to reach out to youth groups and other organizations serving persons with disabilities.

**Agency Response:** These recommendations are in line with the 2008-2010 SPIL Goals and Objects.

**TA:** DVR requests TA.



## CHAPTER 7: INDEPENDENT LIVING SERVICES PROGRAM FOR OLDER INDIVIDUALS WHO ARE BLIND (OIB)

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### Agency Information and Performance

In FY 2007, DBVI program served 342 individuals directly through its specialized staff and through contracts with other service providers. \$225,000 in Part B money funds is contracted to provide direct service to individuals participating in the Blind Independent Living Program. DBVI supplements this program with approximately \$100,000 - 150,000 each year.

**Table 7.1**  
**Expenditures, Performance, and FTEs, ME for**  
**FY 2006 and FY 2007**

Data Elements	2006	2007
Expenditures: Title VII, Chapter 2	270,000	232,000
Expenditures: Total (including Chapter 2)	631,500	623,816
Performance: Total Older Individuals who are Blind Served	313	342
Staffing: Total FTEs	11.30	11.45
Staffing: Total FTEs with Disabilities	1.30	2.10

### OIB Program Administration and Service Delivery

The DBVI designates 6.3 contractors to provide services that enable individuals who are blind or visually impaired to live more independently in their homes and communities. These FTEs represent portions or percentages of staff time spent on the Older Blind services as specified in the contract with the IRIS Network. Some rehabilitation teachers work in both the VR program and the IL-OB program so the direct service FTE's indicated on the report is proportionate to the total amount of time that is spent in the IL-OB program under the contract. There is also minimal support and administrative work that is connected to this service. The IRIS network uses some volunteers as part of this service.

The programs deliver IL services to eligible persons to overcome substantial barriers to functioning independently. Services and equipment available include *vision rehabilitation therapy* to provide techniques on safe cooking and cleaning practices and efficient and effective communication, orientation and mobility instruction to provide safe and independent travel instruction and low vision services to include magnification devices and Braille. The skills training will assist those who are older and blind to gain the skills and confidence to gain freedom from nursing homes and remain more independent. Services are primarily provided in the home of the consumer by agency personnel.

DBVI's intake process provides an opportunity to discuss employment and Independent Living options. Representatives of the Division in each region do the intakes for both the VR and IL programs. The consumer is offered choices throughout their involvement with DBVI's services

where and when it is appropriate. Age is never considered in the area of employment. Older clients may qualify for both competitive and homemaker categories as well as Independent Living when they apply.

The population of residents who are older and blind or visually impaired has access statewide to a full service delivery system. Division staff and private partners staff the regional offices. Both individual and group instruction is offered in an office setting or in an itinerant setting in the person's home. Low vision services remain an integral part of the service delivery system. The Division employs a Low Vision Specialist under contract approximately one day per week. This individual is available to consult with clients and staff statewide and provides individual and group training. Several of the Vision Rehabilitation Therapists and Orientation and Mobility Specialists are dual certified and can provide both services for a region. Since Maine is a large state geographically, dual certified direct service specialists provide the Division more flexibility and efficiency in providing services to consumers residing in remote areas of the state.

## **Personnel**

DBVI employs 5 full-time staff who deliver services directly to consumers. Staff workers are placed strategically throughout the state in regional offices. DBVI also has access to three volunteers.

## **Data Management**

The data management is compiled from information from DBVI's internal information system, as well as from the Department of Administrative and Financial Services (DAFS), all of whom are state employees. DBVI tracks data such as age, gender, or visual impairment. DAFS provides DBVI with the financial data by tracking information such as expenditures for the IL-OB based on DBVI's coding system. DBVI's financial services unit is charged for the time those state employees spend on our specific program data management activities.

## **Quality Assurance**

DBVI ensures quality assurance through a few complementary methods. Quarterly, each supervisor reviews several cases of those employees providing direct services to consumers in the older blind program. Supervisors review and discuss with staff specific elements of the case including; evaluations, goals and objectives, services provided, final reports and outcomes. This provides an opportunity for an in-depth discussion of what worked and what didn't. DBVI's major blindness rehabilitation partner, The Iris Network, performs internal case reviews as well as consumer surveys of those individuals they worked with. MBVI also holds quarterly Regional meetings throughout the state, where all of the programs and activities related to the provision of services under Title I, Older Blind and education programs are discussed. This provides a regular forum for supervisors and staff to discuss overall issues and program and service improvement needs.

## **OIB Program Technical Assistance Provided to DBVI During the Review Process**

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

- the nature and scope of service delivery and the related need for conversation with consumers regarding employment; and
- the new 704 Report.

## **Observations of DBVI and Its Stakeholders about the Performance of the OIB Program**

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

- the large size of the state and the fact that Maine has the largest number of elderly per capita in the nation places tremendous demands for services on the ILOB program; and
- the rising cost of gasoline used by staff and contractors to provide services to consumers in their homes and communities is cutting into service provision.

RSA discussed the observations of its stakeholders with DBVI 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 DBVI about those observations. DBVI responded to each of the recommendations and in those instances when RSA and DBVI agreed upon a recommendation, RSA and DBVI identified the technical assistance that RSA would provide to DBVI to successfully implement the recommendation.

### **1. Service Provision Including Employment Opportunity**

**Observation:** The focus of the Maine Title VII, Part 2, Older Blind program is helping consumers to avoid the need for costly institutionalization in nursing homes or other facilities through the provision of services that allows them to remain in their homes. This is an appropriate use of OIB funds.

The OIB program served 313 consumers in FY 2007. Approximately 27 percent of the consumers were between the ages of 55 and 65, an age group that may have an interest in obtaining or retain employment with earnings.

Available information suggests that about 40 OIB consumers are referred to VR annually. These referrals have the effect of supplementing OIB's limited resources with Title I VR funds. These referrals generally lead to homemaker closures rather than employment closures with earnings.

According to DBVI staff, there is little OIB staff discussion with the consumers about the possibility of pursuing employment goals with earnings or how the available OIB and/or VR services that could contribute to achieving such employment goals. As a result, the VR program is not assisting OIB program participants who are referred to the VR program to obtain or retain employment with earnings.

**Recommendation 1:** RSA recommends that the OIB program work closely with the VR program to increase the employment outcomes with earnings for consumers being referred to VR by OIB. The referrals from the OIB should be those individuals that require VR services to obtain or retain employment with earnings. The services provided by the OIB program such as orientation and mobility and independent skills training may be utilized as a complimentary service.

**Agency Response:** While only some of the DBVI VR Counselors have a mixed caseload of VR and IL clients, all but one regional office have VR Counselors and IL case managers located within the same office. This co-location allows for increased access for clients into which ever program best meets their needs at any given time, as well as for easy movement of clients between both programs.

DBVI has implemented a goal to the 2009 State Plan to develop a 'Financial Enhancement' initiative for 'homemakers' and Older Blind IL participants in an effort to increase the number of competitive employment outcomes. In order to assist and support those consumers, the division will take a more proactive approach with this group of consumers by determining when the most appropriate or most effective time would be to introduce information pertaining to pursuing a goal of full or part-time employment prior to exiting our programs.

**TA:** DBVI requests TA.

## APPENDIX: SOURCES OF DATA

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### 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”