

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



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

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EXECUTIVE SUMMARY

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

- the vocational rehabilitation (VR) program, established under Title I;
- the supported employment (SE) program, established under Title VI, part B;
- the independent living (IL) program, authorized under Title VII, part B; and
- the independent living services program for older individuals who are blind (OIB), established under Title VII, Chapter 2.

In Oklahoma, ODRS is responsible for the four programs.

RSA's review began in the fall of 2007 and ended in the summer of 2008. During this time, RSA's OK 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, Independent Board of Commissioners, Oklahoma Rehabilitation Council, Statewide Independent Living Council (SILC) members, and stakeholders to share information, and areas for improvement;
- provided technical assistance during the review process;
- recommended that ODRS undertake specific actions to improve its performance;
- required ODRS to take corrective action in response to compliance findings; and
- in collaboration with ODRS identified technical assistance that would be helpful to improve its performance or correct compliance findings.

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

ODRS

Strengths:

- ODRS' partnering with the tribal programs and the tribal liaison.
- ODRS' collaborating and partnering with other state agencies and the Oklahoma Rehabilitation Council.
- The quality of the services provided to individuals in the OIB program.
- The skills and knowledge of the financial staff, especially on the topics of meeting non-federal match and MOE requirements;

Challenges:

- Passing indicator 1.2, the percentage of individuals with employment outcomes after services.
- Forecasting the number of future consumers with available resources in managing order of selection (OOS).
- Developing a more efficient communication system between central office and the field staff to improve the bi-directional flow of information and improve consistency in implementing policies and procedures.
- Enhancing access to transportation and supported employment services in rural areas.
- Implementing self-employment plans
- Integrating fiscal staff into the strategic planning process.

INTRODUCTION

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

In order to fulfill its' monitoring responsibilities, RSA:

- reviews the state agency's performance in assisting eligible individuals with disabilities to achieve high-quality employment and independent living outcomes;
- 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.

In addition, RSA also reviewed ODRS' progress on the agency's Corrective Action Plan that was established as a result of findings from RSA's FY 2004 Section 107 monitoring review;

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

ODRS is a combined state agency serving Oklahomans with disabilities. An independent three-member board of commissioners governs the ODRS. The members are appointed by the Governor, Senate Pro-Tem, and House Speaker respectively. ODRS also has an SRC. ODRS maintains a Legislative Information Representative and reports directly to the Governor's Office. ODRS is composed of the Division of Vocational Rehabilitation (DVR) and the Division of Visual Services (DVS). ODRS has administrative responsibility over the IL and OIB programs.

The ODRS' central office is headquartered in Oklahoma City and provides statewide service provision coverage through 4 geographic quadrants in Oklahoma. DVR/DVS services are administered through 54 field offices in the 2 administrative divisions. In addition, the American Indian Vocational Rehabilitation Services (AIVRS) program in OK has 8 tribal offices.

Appreciation

RSA wishes to express appreciation to the representatives of the ODRS, the SRC, SILC, and the stakeholders who assisted the RSA monitoring team in the review of ODRS. RSA also wishes to thank Ms. Linda Parker for her years of dedicated service to persons with disabilities.

CHAPTER 1: RSA'S REVIEW PROCESS

Data Used During the Review

RSA's review of ODRS began in the fall of 2007 and ended in the summer of 2008. RSA's data collections are finalized and available at different times throughout the year. During this review, RSA and the state agency used the most recent data that was available from the FY 2006 and FY 2007 collections. As a result, this report cites data from FY 2006 and FY 2007.

Review Process Activities

RSA's review began in the fall of 2007 and ended in the summer of 2008. During this time, RSA's OK 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 areas for improvement;
- provided technical assistance during the review process;
- recommended that ODRS undertake specific actions to improve its performance;
- required ODRS to take corrective action in response to compliance findings; and
- in collaboration with ODRS identified technical assistance that would be helpful to improve its performance or correct compliance findings.

RSA OK State Team Review Participants

Members of RSA's OK state team included representatives from each of RSA's State Monitoring and Program Improvement's (SMPID's) five functional units. The RSA OK state team was led by Edward J. West (VR Unit) and the following RSA OK team members: RSA's state liaison to OK Joan Ward (Data Unit), Joe Doney (TA Unit), Pamela Hodge (IL Unit), Jacqueline Stuckey (Fiscal Unit) and Bill Bethel (Fiscal Unit).

Information Gathering

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

- conducted 3 teleconferences with VR and IL stakeholders beginning in December 2007;
- conducted 3 teleconferences with the ODRS management beginning in December 2007;
- conducted 1 teleconferences with ODRS IL program staff, SILC members and administrative staff, and OIB staff; and
- conducted an on-site monitoring visit from 5/19/08 through 5/23/08 and met with staff of ODRS, the Governor's Office, Oklahoma ABLE Tech, Visual Services Center, CAP, PAIR, OK Association of Rehabilitation Facilities, AIVRS ,DMH, DOE and members of the SILC and SRC.

CHAPTER 2: ODRS VOCATIONAL REHABILITATION AND SUPPORTED EMPLOYMENT PROGRAMS

Agency Information and Performance

In FY 2007, ODRS served 11,824 individuals and successfully rehabilitated 2,218 individuals. Of those who were successfully rehabilitated, 110 achieved a supported employment outcome. Except for an almost 50 percent increase in FY 2006, the number of individual cases closed from FY 2003 to FY 2007 has remained stable as has the number of employment outcomes.

Table 2.1
VR and SE Program Highlights for ODRS for FY 2003 through FY 2007

Program Highlights	2003	2004	2005	2006	2007
Total funds expended on VR and SE	\$39,967,814	\$41,871,862	\$49,677,167	\$55,881,036	\$56,772,486
Individuals whose cases were closed with employment outcomes	2,355	2,009	2,105	2,307	2,218
Individuals whose cases were closed without employment outcomes	3,025	3,006	3,532	5,493	2,848
Total number of individuals whose cases were closed after receiving services	5,380	5,015	5,637	7,800	5,066
Employment rate	43.77%	40.06%	37.34%	29.58%	43.78%
Individuals whose cases were closed with supported employment outcomes	115	130	149	129	110
New applicants per million state population	2,159.26	2,514.49	2,570.70	2,385.20	1,967.68
Average cost per employment outcome	\$4,447.31	\$5,061.46	\$5,214.67	\$5,386.55	\$6,235.70
Average cost per unsuccessful employment outcome	\$2,501.96	\$2,587.21	\$2,616.70	\$2,620.82	\$2,864.44
Average hourly earnings for competitive employment outcomes	\$9.19	\$9.28	\$9.31	\$9.77	\$10.22
Average state hourly earnings	\$14.28	\$14.60	\$15.15	\$16.13	\$16.78
Percent average hourly earnings for competitive employment outcomes to state average hourly earnings	64.36%	63.56%	61.45%	60.57%	60.91%
Average hours worked per week for competitive employment outcomes	35.22	35.42	35.92	35.65	35.79
Percent of transition age served to total served	32.43%	38.09%	37.34%	32.06%	34.88%
Employment rate for transition population served	38.11%	35.18%	31.50%	27.87%	35.20%
Average time between application and closure (in months) for individuals with competitive employment outcomes	30.3	35.0	33.6	34.1	33.9

VR and SE Service Delivery

ODRS is operating on an OOS in accordance with Section 101(a)(5) of the Act, because it lacks the financial and/or staff resources to provide services to all individuals eligible for VR services. ODRS has implemented an OOS that includes three priority categories for the provision of services “Most Significantly Disabled,” “Significantly Disabled,” and “Non-Significant.” All priority categories have been closed since February 2008. Priority categories “Significantly Disabled” and “Non-Significant” have been closed since January 19, 2007.

ODRS counselors provide vocational guidance, counseling, and referral services. The vast majority of services are purchased through contract. Service Delivery in rural areas is difficult in OK based on the geographical distances between offices, the lack of community rehabilitation programs (CRPs) in rural areas, and the high cost of transportation.

DVS provides VR services, oversees the Business Enterprise program, and operates the Rehabilitation Technology Lab for Blindness and Low Vision, which also provides assistive technology (AT) evaluation services. DVS partners with OK Able-Tech to provide Oklahomans short-term AT device loans and, device demonstrations as required under the Assistive Technology Act (ATA) of 1998 as amended. During FY 2007, 37 devices were loaned and 96 devices were demonstrated.

ODRS has SE contracts with 51 providers with a total of 104 employment contracts. ODRS developed a Rural Employment contract designed specifically for rural parts of the state requiring one Job Coach for the contract. ODRS has recognized the need to expand the number of SE vendors in rural areas where vendors are currently unavailable.

OK AgrAbility and ODRS began a partnership in 2003 and maintain a yearly Memorandum of Understanding that describes collaboration and creates training materials to provide DVR/DVS personnel with enhanced resources, knowledge and skills regarding OK farmers and ranchers with disabilities who are either seeking or maintaining farm related employment. Nearly 75 percent of OK AgrAbility clients qualify for services from ODRS

OK AgrAbility supports the rehabilitation and assistive technology needs of Oklahomans with disabilities who face barriers to participating in agriculture. AgrAbility fills the gap in services and resources available to rural families. Approximately 17,000 Oklahomans working in agriculture experience injuries that limit their ability to perform essential farm tasks. Adaptations are made on farms and ranches to facilitate independent living and working. Assistive Technology (AT) includes lifts that provide access to equipment, tools that can be used with one hand, hand controls or lever extensions for operating equipment, and adapted hitches to make attaching field equipment easier.

Personnel

In FY 2007 ODRS staff included the following FTEs: 23 Program Managers, 12 Program Field Representatives, 112 DVR Specialist Counselors, 8 DVR Specialist Vocational Evaluators, 16

Rehabilitation of the Blind Specialists, and 1 Specialist on Deaf/Blindness. ODRS maintains an average counselor to consumer ratio of 1 counselor to 144 consumers.

Data Management

ODRS fully deployed its new electronic case management system in November 2007. The system offers greater data security, the ability to produce federal reports in a timely manner, and increased accessibility for all staff.

Quality Assurance

ODRS created a dedicated quality control team in FY 2006 that became fully functional in late FY 2007. The quality assurance (QA) team is comprised of four staff that routinely perform case reviews of approximately 800 cases per year. In addition, the QA team upon exit reviews a random sampling of status 26 and status 28 closures including vacated counselor caseloads. The QA process encompasses a case review system that is rooted in requirements of the Act and prior RSA policy. The QA team developed a case review instrument that specifically analyzes assessment services, four elements of eligibility, and the types of documentation utilized to support counselor assignment to a priority category in the order of selection.

The QA process at ODRS is single faceted. It analyzes quality in the case record only and does not extend out into the service delivery system. It does not encompass any other agency components such as finance, data, independent living, or strategic planning. Further, the agency did not indicate there was a formal process for measuring the quality of services delivered by CRPs.

Planning

ODRS completed its most recent comprehensive statewide needs assessment in FY 2006. The agency reported this assessment was limited in design and scope and that the assessment process is not incorporated into any strategic planning process. Separate strategic planning processes were completed for DVR and DVS in FY 2008. Each division completed the strategic planning process separately and without formal input from stakeholders or counselor staff. Each division used the Vinfen Strategy Map model. Both divisions outlined strategic themes in the areas of customer perspectives, internal perspectives, learning and growth perspectives, and financial perspectives. The Balanced Score Card model is used by ODRS to manage the perspectives around objectives that focus on a small number of goals that are intended to drive the success of the agency.

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

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

- RSA demonstrated the RSA Management Information System (MIS) to ODRS staff. The demonstration included how to locate and retrieve the RSA-113/RSA-2 monitoring tables, RSA-911 monitoring tables, the standard and indicators, agency report cards and the underlying report card tables. The RSA team also showed staff how to conduct ad hoc queries on the MIS to obtain information about ODRS and/or compare and contrast its performance with that of other similar agencies.
- RSA met with directors of the AIVRS programs and the ODRS/AIVRS liaison to better understand the ODRS/AIVRS relationship. In the course of that meeting RSA facilitated a forum for the review and modification of cooperative agreements; a work group to develop a cultural awareness-training program for ODRS was discussed; and a work group to create database-tracking processes for co-served Native Americans with disabilities was discussed.

Observations of ODRS and its Stakeholders about the Performance of the VR and SE Programs

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

There is a need:

- to increase employment outcomes for adults and transition-age youths;
- for better fiscal planning related to OOS;
- for more integrated agency planning;
- for a more effective internal communication system;
- for expanded QA activities;
- to develop a policy review and evaluation system;
- to expand training on the electronic case management system;
- to provide improved access to services for individuals in rural areas of OK;

RSA discussed the observations of its stakeholders with ODRS 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 ODRS about those observations. ODRS responded to each of the recommendations and in those

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

1. Employment Outcomes

VR Observations

ODRS has not met indicator 1.2, the percentage of individuals with employment outcomes after services, for the past five years. The employment rate is determined by dividing the number of employment outcomes by the total of employment outcomes and unsuccessful employment outcomes.

- In FY 2006, ODRS' employment rate was 29.58 per cent, the lowest of any agency in the country. This very low rate was partially attributable to the fact that in FY 2006 the agency closed out a significant number of inactive cases.
- Preliminary reports for FY 2007 show a significant 14 point gain in reversing this downward trend, however, this apparent increase in employment rate performance is a function of ODRS reducing the number of number of unsuccessful closures (2,734) while virtually maintaining the number of successful employment closures.
- From FY 2003 through FY 2007, despite growth in the Oklahoma economy and substantial in-state job creation, the number of successful employment outcomes has remained constant.

As indicated in Table 2.2 below:

- The employment rate percentage for ODRS had been dropping continuously from FY 2000 through FY 2006.
- The number of individuals whose cases were closed with employment after receiving has remained constant from FY 2003 through FY 2006.
- Preliminary data for FY 2007 indicates that ODRS achieved 2,218 successful employment closures. This represents a decrease of 88 successful employment outcomes and would result in ODRS not meeting performance indicator 1.1 (the difference in the number of individuals with employment outcomes from prior year for general and combined agencies).
- The number of individuals whose cases were closed with unsuccessful employment increased steadily from FY 2000 though FY 2006.
- In FY 2007 unsuccessful closures decreased dramatically, mostly as a result of inactive cases being closed in FY 2006 though some of the decrease may be attributable in part to the ODRS counselors having been instructed to re-engage with clients on their caseloads and use all means available to work these cases.

Table 2.2
ODRS Employment Performance from FY 2000 through FY 2007

Oklahoma Department of Rehabilitation Services								
	FY 2000	FY 2001	FY 2002	FY 2003	FY 2004	FY 2005	FY 2006	FY 2007
Employment outcomes	3,433	3,195	3,011	2,355	2,009	2,105	2,307	2,218
Unsuccessful Employment Outcomes	1,782	1,777	2,597	3,025	3,006	3,532	5,493	2,848
Individuals served	5,215	4,972	5,608	5,380	5,015	5,637	7,800	5,066
Indicator 1.2: Percent with employment outcomes after services (ODRS must equal or exceed 55.8% in order to pass this indicator.)								
Employment Rate	65.83%	64.26%	53.69%	43.77%	40.06%	37.34%	29.58%	43.78%

- As indicated in Table 2.3, in FY 2006 when compared to the peer¹ state average of cases closed with employment, OK had 514 fewer successful employment outcomes in FY 2006 and 797 fewer outcomes in FY 2007.

Table 2.3
ODRS Compared to Peers on Number of Successful Employment Closures in FY 2006 and FY 2007

Employment Outcomes	OK - Combined	AZ - Combined	CO - Combined	MD - Combined	MS - Combined	Peer Averages
FY 2006	2,307	2,005	2,209	3,082	4,516	2,824
FY 2007	2,218	2,096	2,509	3,097	4,544	2,893

- In FY 2007 preliminary reports show a decrease in homemaker closures to 129 having followed a rise in homemaker closures from 48 in FY 2004 to 137 in FY 2006 compared to a preliminary FY 2007 peer state average of 90.
- Counselors indicated concerns about caseload size which vary from 80 to 180, and lack of time to work with individuals on their caseloads and provide job placement assistance due to time involved in case documentation.

¹ Peer States include Arizona (C), Colorado (C), Maryland (C), and Mississippi (C) and were selected based on grant award size.

- Job placement is a contracted service with CRPs. They indicated that they have cut back on the number of staff, limited the areas that they are willing to travel due to travel expenses, and decreased their office locations in order to work within budgetary constraints. Such constraints could have a significant impact on ODRS' employment rate.
- ODRS has a specialized employment unit, the Business & Employment Services Team (BEST) to provide support services to DVR/DVS staff, individuals with disabilities, and businesses to increase quality employment outcomes and decrease non-employment outcomes. Employment specialists and employment consultants staff the unit. The total staff at the end of FY 2007 was 13. BEST maintains an active employer database using Microsoft Access and Statistical Package for Social Sciences (SPSS). The unit has developed a job readiness-training curriculum, agency marketing materials and is focused on serving job seekers and developing and maintaining employer relations. This program had shown measurable success. The reduction in staff has hindered its effectiveness and potential for meeting needs of employers, counselors or individuals with disabilities in OK. It is important to note that counselors indicated that they would benefit from a better understanding of the role of the employment consultant.
- The quality of employment outcomes in Oklahoma has been consistently maintained at a high level. ODRS has outpaced peer states in the number of hour's individuals with employment outcomes work, hourly earnings, and medical benefits paid by employers.

Recommendation 1

RSA recommends that ODRS develop and implement a strategic plan to meet or exceed Indicator 1.2. incorporating comprehensive strategies that include plans to:

- 1.1 significantly increase the number of successful employment outcomes for individuals with disabilities while maintaining the high level of quality in those outcomes;
- 1.2 re-engage individuals with disabilities whose cases remain open but whom have disengaged with the agency, toward a goal of successful closure that include supporting both the individual and the counselor with tools and resources;
- 1.3 engage potential partners, i.e., CRP's, BEST, Workforce development, to increase placement capacity; and
- 1.4 examine and refine staff roles and responsibilities that emphasize employment outcomes.

Agency Response: Although counselors voiced concerns about caseload size, data show that caseloads have significantly dropped since efforts were made in FY 2006 to close inactive cases. With priority groups closed, caseloads have continued to drop. Caseload sizes in FY 2006 averaged 185. In FY 2008 caseload sizes have dropped to an average of 119.7. Case

documentation has been cited in RSA monitoring as a weak area. Efforts have been increased to train and monitor counseling staff in this area of case management which may explain why counselors believe they are spending more time in case management.

[Note from RSA: ODRS requested that the following table be included in the Agency’s response to this observation.]

ODRS Employment Outcomes Compared to Peer States in FY 2007 on Number of Hours Worked, Hourly Earnings and Medical Benefits

Individuals whose cases were closed after receiving services.	OK - Combined 2007	AZ - Combined 2007	CO - Combined 2007	MD - Combined 2007	MS - Combined 2007	Peer Averages 2007
Percent closed with competitive employment at 35 or more hours per week	71.96%	61.82%	49.46%	51.63%	76.83%	62.34%
Percent closed with competitive employment at SGA level at 35 or more hours per week	65.82%	60.67%	48.93%	50.76%	71.12%	59.46%
Percent closed with competitive employment with employer-provided medical insurance	44.77%	38.73%	29.02%	23.98%	29.32%	33.16%
Percent employment outcomes with the ratio of hourly earnings at a level equal to or exceeding indicator 1.5	60.90%	53.63%	49.35%	44.11%	73.02%	56.20%
ODRS compared to Peers in FY 2007 on hourly earnings compared to state average wage and average hours worked						
Efficiency measure - hourly earnings	OK - Combined 2007	AZ - Combined 2007	CO - Combined 2007	MD - Combined 2007	MS - Combined 2007	Peer Averages 2007
Percent average hourly earnings for competitive employment outcomes to state average wage	60.57%	53.29%	49.90%	46.02%	70.58%	56.07%
Average hours worked per week for competitive employment outcomes	35.60	33.27	30.18	30.59	36.73	33.27

Technical Assistance: ODRS does not request TA

2. Transition-age Youths (TAYs)

VR Observations

While ODRS serves a relatively high percentage of TAYs, the number of successful employment outcomes it achieves and its employment rate with TAYs has been decreasing steadily for the last five years.

- OK has few transition specialty counselors and transition-age youths are routinely part of the general caseload composition.

- Counselors indicated that opportunities to obtain youth work experience while still in school have been hampered in schools where liability concerns have not allowed for off – campus participation.
- As indicated in Table 2.4, in FY 2006 OK served 32.06 per cent transition-age youths of the total individuals served while their peer state average was 27.92 per cent. In FY 2007 OK served 34.88 per cent transition-age youth compared to 27.25 per cent for the peer state average.

**Table 2.4
Percentages of Transition-age Youths by ODRS Compared to Served Peer States
in FY 2006 and FY 2007**

Percent of TAYs served of total served	OK - Combined	AZ - Combined	CO - Combined	MD - Combined	MS - Combined	Peer Averages
FY 2006	32.06%	32.38%	31.15%	25.65%	19.47%	27.92%
FY 2007	34.88%	31.25%	28.01%	24.64%	17.46%	27.25%

- As indicated in Table 2.5, the number of TAYs employment outcomes has decreased while the number of unsuccessful employment outcomes has increased from FY 2002 through FY 2007.

**Table 2.5
ODRS’ Employment Performance with TAYs whose Cases Were
Closed after Receiving Services from FY 2002 through FY 2007**

	2002	2003	2004	2005	2006	2007
With employment	832	665	672	663	697	622
Without employment	1,025	1,080	1,238	1,442	1,804	1,145
Employment Rate	44.80%	38.11%	35.18%	31.50%	27.87%	35.20%

- As indicated, the employment rate among transition-age youths in 2002 was 44.80 per cent dropping yearly to 27.87 per cent in FY 2006 and rising in FY 2007 to 35.20 per cent.

VR Recommendation 2: RSA recommends that ODRS:

- 2.1 conduct an evaluation of the reasons why its performance has worsened over last five years in regard to the employment outcomes for TAYs, including whether the agency is over-extended by serving such a high percentage of TAYs;
- 2.2 based on the evaluation, develop goals and strategies that will reverse the current trend; and
- 2.3 explore on a statewide basis with the OK Department of Education strategies to address local education agency liability concerns to foster school to work opportunities.

Agency Response: ODRS agrees that study of its transition program is needed, especially to address the issue of declining employment outcomes. ODRS is in process of hiring a statewide Transition Coordinator who will have responsibility for assessment of the data, policy and practice to recommend changes in the program.

Technical Assistance: ODRS does not request TA

3. Order of Selection (OOS)**VR Observations**

Managing the OOS has been a challenge for ODRS in forecasting how many consumers can be adequately served with available resources. The result has been that categories have been opened and closed multiple times through FY 2007 and at the time of this report all categories have been closed since February 2008. At the same time that ODRS was closing categories in its OOS and placing individuals on waiting lists for services, the agency was carrying over between 27 percent and 65 percent of its annual federal grant (see Fiscal observations).

- ODRS has been on an OOS for several years. In 2002 all categories were closed for 6 months due to budgetary constraints.
- In April 2008, the agency revised its OOS categories to be more aligned to national trends by re-labeling its categories to “Most Significantly Disabled,” “Significantly Disabled,” and “Non-Significant.”
- As indicated in Table 2.6 there has been substantial yearly variability on the number of individuals on the waiting list at the end of the federal fiscal year. In FY 2006 there were no individuals on the list at year’s end while in FY 2007 there were 1, 140.

Table 2.6
ODRS Number of Individuals on Waiting List at End of Year
from FY 2003 through FY 2007

	2003	2004	2005	2006	2007
Number on waiting list at the end of the year	2,379	558	632	0	1,140

- The agency implemented a web-based case management system in November 2007. The system provides management with report functions to allow it to track service costs, forecast expenditures, and manage case flow through the VR system.
- Management of OOS is monitored quarterly to determine how many individuals can be served with existing resources.
- ODRS would benefit from improved planning and forecasting the costs of providing services to any categories of eligible individuals with disabilities.
- In FY 2006 there were 632 individuals on the waiting list at the beginning of the year and 0 on the wait list at the end of the year. In FY 2007 preliminary reports show a total of 1,140 at the end of FY 2007.

VR Recommendation 3: RSA recommends that ODRS:

3.1 evaluate its management of its OOS plan;

3.2 develop strategies to effectively measure the capacity to serve all eligible consumers in Oklahoma; and

3.3 design and deliver training on determination of priority categories.

Agency Response: Effective July 1, 2008, the Priority Groups were changed to priority group 1, 2 and 3 and definitions for each category are consistent with the descriptions found in the Act . ODRS believes that the new definitions effective 7/1/08 will increase the accuracy of counselors in determining priority categories. ODRS agrees with the RSA recommendations.

Technical Assistance: ODRS may request TA on recommendation 3.2

4. Planning

VR Observations

ODRS' planning activities would benefit from increased use of data analysis, cross-division collaboration, and integration of fiscal and program planning.

- ODRS completed its most recent comprehensive statewide needs assessment in FY 2006. The agency reported this assessment was limited in scope and did not analyze the needs of the un-served and under-served populations in Oklahoma. This statewide assessment process is not incorporated into any strategic planning process.
- ODRS reported that separate strategic planning processes were completed for DVR and DVS in FY 2008. Each division completed the strategic planning process separately and without input from stakeholders or counselor staff. Both divisions outlined strategic themes in the areas of customer perspectives, internal perspectives, learning and growth perspectives, and financial perspectives.
- Each division has different objectives that are not focused on data-driven outcomes and are not measurable. Additionally, fiscal planning, program planning, and evaluation activities are not integrated.

VR Recommendation 4: RSA recommends that ODRS:

- 4.1 plan and execute a comprehensive statewide needs assessment that identifies unserved and underserved populations in Oklahoma served by DVR and DVS;
- 4.2 develop a methodology for using the comprehensive statewide needs assessment to plan services for the unserved and underserved populations served by DVR and DVS;
- 4.3 incorporate data-driven objectives and fiscal strategies into the plan resulting in measurable goals for both DVR and DVS; and
- 4.4 develop an agency-wide accountability system that provides linkages to CRP performance measures, vendor contractual arrangements, and agreements with external partners.

Agency Response: ODRS is developing a more comprehensive planning design and agrees with RSA observations and recommendations.

Technical Assistance: ODRS may request TA on recommendation 4.4

5. Communication

VR Observations:

ODRS would benefit from more consistent communication to improve the consistency of the implementation of policies and procedures, including formal systems for staff communication.

- Increased standardization of communication procedures would assist ODRS to enhance the understanding of the agency's goals and priorities among management and frontline staff.

- The experience and expertise that frontline staff possess could be further exploited by providing staff with a regular forum to share innovative ideas, experiences, and query each other for solutions to difficult service delivery issues.
- ODRS would benefit from increased and enhanced training of frontline staff on policies and procedures, particularly when a change occurs.

VR Recommendation 5: RSA recommends that ODRS:

- 5.1 evaluate the current communication processes used by ODRS to share information between management and frontline staff as well as between frontline staff;
- 5.2 based on that evaluation, develop and implement a communication plan to share concerns, effective practices, and improve the consistency of policy implementation; and
- 5.3 develop and implement effective training methods for policy interpretation and implementation.

Agency Response: ODRS has rules in place that address training on policy, but will monitor and measure supervisor accountability for improved performance. Program managers are assigned to train frontline staff when changes are made. The agency will monitor and measure the training process for improved performance. ODRS program managers have regular unit meetings where staffs from multiple offices are brought together for training and discussion of case related issues.

Technical Assistance: ODRS does not request TA

6. Quality Assurance

VR Observations:

ODRS created a dedicated quality control team in 2006 that became fully functional in late 2007. The quality assurance (QA) unit has a manager who is not involved in direct case review and four staff who routinely perform case reviews of approximately 800 cases per year. ODRS would benefit from the expansion of its QA activities to other parts of the agency's operation.

- Currently, the QA team reviews all closed cases and the QA process encompasses a case review system that is rooted in VR process requirements of the Act. The QA team developed a case review instrument that specifically analyzes assessment services, four elements of eligibility, and the types of documentation utilized to support counselor assignment to a priority category in the order of selection.
- The QA process at ODRS is single faceted. It analyzes quality in the case record and does not apply to other aspects of the service delivery system such as finance, data, independent living, or strategic planning. Further, there is not a standardized process for measuring the quality of services delivered by CRPs.

- Frontline staff indicated the current QA process does not add value to their work that results in better employment outcomes.

VR Recommendation 6: RSA recommends that ODRS:

6.1 expand the QA system to address all of those activities carried out by ODRS that would lend themselves to a QA paradigm, including but not limited to: the effectiveness of purchased and ODRS-provided services, CRP outcome performance, data collection and reporting, fiscal accounting and reporting, and evaluation of strategies to achieve ODRS' goals and priorities as established in the State Plan; and

6.2 develop an agency-reporting structure from the QA process that feeds back into the agency's State Plan process.

Agency Response: While a more comprehensive QA system is a goal to strive toward, ODRS must balance the need to refine the existing process against an interest in expanding the system. ODRS agrees with the recommendation to develop a feedback structure that provides data from the QA process for the state plan process. The formal QA process has only been fully implemented within the past year. There were delays in getting the unit fully staffed and trained. The process has not completely stabilized and has not completed one full cycle. It is not surprising that staff would be unaware of the benefit of the QA process since the feedback loop has not become fully functional.

Technical Assistance: ODRS requests TA on recommendation 6.1

7. Policy

VR Observations

Policies are implemented but not systematically reviewed to determine if they achieved the intended results. ODRS would benefit from a formal policy review timeline that incorporated evaluation tools to determine policy effectiveness.

- There is no feedback loop or evaluation process to ensure that new policies or implemented policy changes have been effective in produced desired outcomes. Policies are implemented but not systematically reviewed to determine if they achieved the intended results.
- Fiscal unit operational policies need to be updated to reflect current software applications
- ODRS completed the last review of its DVR and DVS policies in 2007. They became effective in April 2008 and ODRS has begun to train its staff on the policy changes. ODRS has initiated a committee to review policies from other VR agencies to identify policies that would improve employment outcomes.

VR Recommendation 7: RSA recommends that ODRS:

7.1 develop and implement a process to measure policy effectiveness; and

7.2 develop and implement a process to revise fiscal unit operational policies.

Agency Response: ODRS will complete revision of the fiscal unit operational policies. ODRS also agrees that a feedback mechanism should be implemented to evaluate the effectiveness of policies.

Technical Assistance: ODRS does not request TA

8. Case Management/Data Management and Report Functions**VR Observations:**

ODRS staff would benefit from more training on the agency's case management/database system that was fully deployed in November 2007.

- Seventy-three staff provided input on the functional requirements of the system.
- The program's report functionality is operational and the agency's management has access to reports. Staff indicated that a full array of reports and ad hoc queries are difficult to retrieve. Specialized groups within ODRS receive reports relevant to their function. There is an expectation that the number of standardized reports will be increased based on need and usage.
- Field staff commented that additional training in new program was needed. Staff indicated that the initial training was good and allowed them to utilize the case management system, but that there has not been agency provided training to increase their skills in using the program or problem-solve around day-to-day database issues. Also, some staff are more challenged by computer-based technology and may benefit from training.

VR Recommendation 8: RSA recommends that ODRS:

8.1 provide additional targeted technical or procedural training to counselors on the new system; and

8.2 incorporate the BEST's employer database into the new system while providing technical assistance counselors and supervisors as needed.

Agency Response: ODRS has undertaken a post-implementation review of the case management project to identify needs which will include an assessment of training needs

Technical Assistance: ODRS does not request TA.

9. Access to Services in Rural Areas

VR Observations:

There are significant challenges to serving consumers in rural Oklahoma, which include access to public transportation and the location of field offices serving sparsely populated areas. There are few vendors providing job placement and supported employment services. Individuals with disabilities may have to travel long distances to get to rural offices and some Native Americans eligible for services from the VR and AIVRS programs prefer to be served by tribal VR offices.

- Public transportation programs and para transit services have very limited availability in Oklahoma. ODRS has recognized the need for increased transportation expenditures to allow individuals with disabilities to attend training and to gain employment. As indicated in Table 2.7 in FY 2007 ODRS spent \$1,635,477, and in FY 2006 ODRS spent \$1,171, 637 on purchased transportation services. In FY 2005 ODRS spent \$891,174, and in FY 2004 ODRS spent \$552,553.

**Table 2.7
ODRS Transportation Expenditures
FY 2004 through FY 2007**

FY	ODRS		
	Total Expenditures	Transportation Expenditures	Percentage of Total Expenditure
2007	25,748,851	1,635,477	6.35%
2006	25,660,138	1,171,637	4.57%
2005	24,358,034	891,174	3.66%
2004	19,856,130	552,553	2.78%

- ODRS had set a goal for FY 2008 to expand the number of SE vendors by five for the year, in rural areas where vendors are currently unavailable. The agency has developed a Rural Employment contract designed specifically for rural parts of the state which only requires one Job Coach for the contract, but the agency has only been able to increase by one vendor due to lack of vendor availability.
- The Oklahoma Community-Based Providers, Incorporated (OCP) is a membership association of 112 service providers. 55 of these providers provide VR services in the areas of job placement and supported employment. OCP has the potential to provide enhanced job placement and supported employment services to ODRS consumers in rural areas where several members exist. A limited number of providers have vendor relationships with ODRS. Several provider representatives told RSA that ODRS had

difficulty providing consistent referrals, contract support, on-time payment for services, and counselor input to vended members of OCP.

- There is no process in place for tracking of eligible consumers co-served by ODRS/AIVRS programs. There is no integrated database shared by the combined AIVRS tribal offices, each tribal office maintains its own data. AIVRS funding is very limited and by tracking co-served consumers ODRS/AIVRS could maximize service dollars through co-staffing and case coordination and avoid duplication of services.

VR Recommendation 9: RSA recommends that ODRS explore partnership opportunities with agency members of the OK Association of Rehabilitation Facilities to increase services in rural areas.

Agency Response: The case management system is capable of tracking eligible consumers co-served by both the ODRS and AIVRS. If consumers advise counselors they are being served by both programs, then that information is entered in the system. If this information is discovered later in the case development, it can be added. There is currently no process for cross checking between AIVRS programs and ODRS to ensure all co-served consumers are being tracked.

Technical Assistance: ODRS does not request TA

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

RSA reviewed ODRS' 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 SF-269 report. The carryover data is taken from the unobligated balance of federal funds portion of the fourth quarter Financial Status Report (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 ODRS for FY 2003 through FY 2007**

Fiscal Year	2003	2004	2005	2006	2007
Grant Amount	37,933,986	38,442,555	39,104,131	39,001,716	40,564,976
Required Match	10,266,759	10,404,402	10,583,456	10,555,738	10,978,831
Federal Expenditures	37,933,986	38,442,555	39,104,131	39,001,716	33,245,488*
Actual Match	10,266,795	10,404,401	10,583,494	10,555,775	10,978,870
Over (Under) Match	36	(1)	38	37	39
Carryover at 9/30 (year one)	17,675,408	25,060,762	25,475,470	20,134,221	15,207,073
Program Income	1,435,162	669,347	508,029	937,640	1,442,293
Maintenance of Effort (MOE)	9,919,151	9,823,387	10,266,795	10,404,401	10,583,494
Administrative Costs	4,108,904	3,407,598	4,309,508	4,743,947	4,499,822
Total Expenditures**	39,967,814	41,871,862	49,677,167	55,881,036	56,772,486
Percent Admin Costs to Total Expenditures	10.28%	8.14%	8.68%	8.49%	7.93%

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

**Includes Supported Employment Program Expenditures.

Explanations Applicable to the Fiscal Profile Table

Grant Amount:

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

Match (Non-Federal Expenditures):

The non-federal share of expenditures in the State VR Services Program, other than for the construction of a facility related to a community rehabilitation program, is 21.3 percent, as established in the 1992 amendments to the Rehabilitation Act (act). A *minimum* of 21.3 percent of the total allowable program costs charged to each year's grant must come from non-federal expenditures from allowable sources as defined in program and administrative regulations governing the VR Program. (34 CFR 361.60(a) and (b); 34 CFR 80.24)

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

Carryover:

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

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

Program Income:

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

from the Social Security Administration for rehabilitating Social Security beneficiaries to other formula programs funded under the Act to expand services under these programs.

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

Maintenance of Effort (MOE):

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

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

Administrative Costs:

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

Fiscal Technical Assistance Provided to ODRS During the Review Process

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

- integrating the fiscal staff into the strategic planning process;
- managing carryover funds to ensure they are brought into acceptable levels;
- reviewing processes for purchasing services to ensure proper use of funds;
- providing checks and balances to avoid having the counselors order services and then approve its payment to the CRP;
- writing and maintaining financial policies and practices for consistency every year;
- proper reporting of the agency's administrative staffing and costs;

- contract administration, format, payment processing, and federal requirements in procurement; and
- writing more specific policies in governing the establishment of rates paid for all vocational rehabilitation services.

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

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

- there is a need to review the large carryover of funds and bring down those levels by increasing expenditures;
- fiscal staff need to be included in the annual planning process;
- fiscal staff need to continue to forecast for multiple revenue scenarios as part of the fiscal planning process; and
- there is a problem in properly reporting administrative staff and costs.

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

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

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

1. Carryover Funds

Observation 1: ODRS has carried over a significant percentage of its federal funds every year from FY 2002 through FY 2007. At the same time, the agency has placed individuals on waiting lists and closed OOS categories. This pattern suggests an absence of effective fiscal planning and coordination with service delivery components of the agency.

- As indicated in Table 3.2. below ODRS' carryover funds have significantly increased between FY 2002 and FY 2007.

- The national average for carryover funds is approximately 15 percent for all agencies.

Table 3.2
Carryover – Percentage of Total Federal Allotment from FY 2002 - FY 2007

Fiscal Years	FY 2002	FY 2003	FY 2004	FY 2005	FY 2006	FY 2007
Oklahoma Federal Allotment	\$36,787,678	\$37,933,986	\$38,442,555	\$39,104,131	\$39,001,716	\$40,564,976
Percent of Federal Grant Federal Funds Carried Over for Use in Year Two	27.01%	46.60%	65.19%	65.15%	51.62%	37.49%

- As indicated in Table 3.3 below, ODRS’ annual expenditures have remained fairly constant.

Table 3.3
Total Expenditures From FY 2002 – FY 2007

Fiscal Years	FY 2002	FY 2003	FY 2004	FY 2005	FY 2006	FY 2007
Oklahoma Total Expenditures 4 th Q	\$36,676,396	\$30,525,373	\$23,786,194	\$24,212,155	\$29,423,270	\$36,336,773
Total Expenditures – Final or Last Report	\$46,118,837	\$48,200,781	\$48,846,956	\$48,687,625	\$49,557,491	\$51,543,846

Recommendation 1: RSA recommends that DRS:

- 1.1 not utilize the level of carryover funds as a base for the long range program and fiscal planning;
- 1.2 monitor carryover funds and their use as part of overall fiscal planning;
- 1.3 begin to develop fiscal resource management plans to cover the costs of services currently being supported by carry-over funds;
- 1.4 handle fund management consistently across the state, which includes communicating to all field staff the agency’s fiscal management policies and practices; and
- 1.5 consider available cash balances in the carry-over when planning categories to be served in the OOS.

Agency Response: The Agency does have a long range perspective regarding the use of carryover funds. The long range planning incorporates the reduction of carryover funds from the view of adding to the program and not as base funding. The carryover ballooned during FY-2003 due to concurrent issues with project delays and State funding shortfalls. The Agency takes a measured approach to reducing the carryover by applying additional funding to client services. The balance that must be maintained is sufficient funding to serve the maximum level of clients without overburdening staff resources and to minimize extreme fluctuation in client levels. The methodology employed by the agency continues to show success. Carryover levels are going down while client service expenditures are increasing. Schedule II of the RSA-2, reflects that

the client service expenditures dropped during FFY-2003 and have steadily risen through FFY-2007. During the same period, the priority groups have opened and closed to maintain the balance between funding and to serve the maximum number of cases while maintaining reasonable caseload levels.

2. Checks and Balances

Observation 2: ODRS’ process to purchase and verify the delivery of purchased services would benefit from more fiscal controls.

- As indicated in Table 3.4 below, ODRS spends a significant percentage of its total expenditures on purchased services.

**Table 3.4
Purchased Services Percentage & Total Expenditures for FY 2002 -FY 2007**

Fiscal Years	FY 2002	FY 2003	FY 2004	FY 2005	FY 2006	FY 2007
Oklahoma Purchased Services	\$28,361,081	\$18,833,884	\$19,856,130	\$24,358,034	\$25,660,138	\$25,748,851
Percent of Purchased Services Compared to Total Expenditures	52.51%	47.12%	47.42%	49.03%	45.92%	45.35%

Under the current process:

- the counselors approve the services to be provided and identify the CRP that will provide the services;
- after the services are provided, the same counselor authorizes the payment to the CRP;
- the payment goes to another staff person to make the payment;
- the payment is processed based on the counselor’s approval;
- as a result, the agency process lacks the checks and balances in regard to securing and payment of services for consumers.

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

Agency Response: The Agency feels that sufficient controls are in place with regards to purchasing goods and services. Multiple people are involved in the authorization for service and the subsequent payment of the services. The Agency does recognize that these processes are currently initiated at the counselor’s request. The Agency’s fiscal staff will continue to be

diligent in evaluating the adequacy of checks and balances to minimize the risk based on current fiscal processes.

3. Contract Language – Required Documentation

Observation 3: The ODRS contracts that RSA reviewed would benefit from more clarity and internal consistency.

- One type of ODRS contract has a milestone payment entitled “Job Success Plan” but does not specify what the plan should include to qualify for payment.
- Under Contract Incentives, the contract reads: “The provider must meet the required cost per closure of \$3,800 to be considered for an incentive payment.” This is a conflict with the first incentive standard that states: “The provider’s average cost per closure for the contract year is at least 10% below the required average cost per closure, which is \$3,420.” This contradiction makes it contractually impossible to achieve both requirements for the incentive payment.

Recommendation 3: RSA recommends that DRS provide a more defined goal or explanation for what is to be included in the Job Success Plan.

Agency Response: ODRS agrees that a clearer explanation of the goal will improve the Job Success Plan.

CHAPTER 4: INDEPENDENT LIVING PROGRAM

Agency Information and Performance

In FY 2007, 912 individuals received independent living services from CILs with combined Parts B and C funds. ODRS does not retain any IL funds to serve consumers directly.

Table 4.1
IL Program Highlights for ODRS for FY 2006 and FY 2007

Funding, Performance, and FTEs	2006	2007
Funding: Title VII, Chapter 1, Part B	301,477	302,179
Funding: Total Resources (including Part B funds)	935,065	1,231,860
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	1.00	1.00
Staffing: Total FTEs with Disabilities	1.00	0.00

IL Program Administration and Service Delivery

The ODRS has primary fiduciary responsibility for and is the recipient of Part B funds. The Part B resources are passed through to the SILC to fund the resource plan and the CILs to support general operations.

In FY2007, Oklahoma applied \$302,179.00 of Part B funds as pass-through money to the SILC and the CILs toward operating expenses. There are a total of five CILs in Oklahoma; and, three centers receive Part B funds and include: Oklahomans for Independent Living, Progressive Independence, and the Sandra Beasley Independent Living Center. The SILC resource plan is funded with \$107,441.00 Part B, and \$33,497 state funds.

The Oklahoma SILC was established pursuant to state and federal law. In 2006, the SILC completed the Certificate of Incorporation to become a freestanding 501(c)(3). The IRS approved the application in May 2007. Utilization of the 501(c)(3) has been difficult, according to the SILC and DSU, due to changes in the way the DSU processes payments to the SILC. Prior to the current fiscal year, ODRS had a cost-reimbursement contract in place with the University of Oklahoma for administration of the SILC. Due to a state law in Oklahoma, all contracts with third-party entities are administered on a cost reimbursement basis.

The SILC met in October of 2007 and in January of 2008. Members of the SILC are often individuals with severe disabilities who cannot afford to spend funds to travel to a SILC meeting

and then wait to be reimbursed. The inability to access funds up front has rendered the SILC non-functional and created an inability to carry out SPIL activities.

Personnel

The DSU assigns one liaison to the Part B program. The DSU supplies administrative and support services in claims processing, accounting, contracting, and collaboration efforts. The DSU also aids in monitoring and the review of the CIL operations budget. No part B funds are expended for these functions. The Division Administrator or designee and/or the Agency Director or designees attend planning sessions with the SILC and the CILs. The DSU director either attends or sends designees to meetings, retreats, and special programs as offered by the SILC and the CILs.

The SILC employed an executive director until January 2007. Since that time, the SILC has chosen not to hire another executive director due to financial constraints.

Data Management

Currently, the SILC is not carrying out monitoring on implementation of SPIL activities due to its financial situation. The DSU completed the most recent 704 Part I annual performance report with input from the CILs.

Each of the five CILs in OK collects data through their individual data systems. These data are made available to RSA through each CIL's 704 Part II performance report.

Fiscal Management

The SILC receives Part B funds as well as its state match. Throughout the last year and a half, SILC funds have been under-utilized due to the fiscal issues and the lack of functioning as its own entity.

The CILs report regularly on the activity of their work. Included in the report is any documentation that substantiates any request for reimbursement of approved expenditures. The reports are reviewed upon receipt by the DSU IL Liaison, the IL accountant and bookkeeping office prior to going to the Division Administrator for approval.

The CILs create an invoice on letterhead for approved expenses with receipts attached and the DSU reimburses for expenses.

Quality Assurance

ODRS neither carries out quality assurance activities for the Part B program, nor conducts fiscal or program audits. ODRS requires Part B funded CILs to obtain fiscal audits annually in order to fulfill contract responsibilities to the agency.

Planning

The SPIL serves as the OK strategic plan for IL; however, SPIL activities are not being monitored or implemented at this time due to previously referenced issues.

IL Program TA Provided to ODRS, SILC and CILs During the Review Process

RSA provided the following IL program TA during the review process regarding:

- the respective roles of the DSU, the SILC, and the CILs in the administration of the Part B program;
- SILC appointments and term limits—two three-year terms; and
- SILC members' roles and responsibilities as well as SILC duties.

Observations of ODRS, SILC and CILs and Its Stakeholders about the Performance of the IL Program

RSA solicited input from a wide range of the stakeholders about the performance of the IL program. The stakeholders shared the observations below:

- there is a general lack of IL services, especially in the Northwest region of Oklahoma;
- there is little accessible transportation available to consumers and accessible, affordable housing is lacking; and
- there are few referrals between DRS and IL.

RSA discussed the observations of the stakeholders with ODRS and addressed them either directly or by consolidating them into broader issue areas.

IL Program Performance Observations and RSA Recommendations

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

1. Meetings of the SILC

Observation:

- Discussions with the DSU, SILC and CIL Directors indicate the program would benefit from improved communication and collaboration.
- According to SILC members, the SILC has not held a meeting since October 2007 because there has not been a quorum of members present due to increasing travel costs and health issues of individual members, and the SILC recently attained 501(c)(3) non-profit status. The latter has complicated the SILC's ability to function because, according to Oklahoma state law, funds under control of the state, including Part B IL funds, cannot be advanced to a non-profit entity except on a cost reimbursement basis. At this point, the SILC has ceased functioning until the funding situation is resolved.

Recommendation: RSA recommends that ODRS and the OK SILC collaborate to develop a solution to the problems created by the establishment of the SILC as a 501(c)(3), including researching the solutions that may have been developed by similarly situated entities elsewhere in the Oklahoma state government.

Agency Response:

- ODRS and the SILC are aware of the compliance issue with SILC membership. Leadership of both organizations have been in touch with the Governor's office to explain the need to take action quickly. We will work together to assure that the Governor has a list of nominees for membership and to urge the Governor to take action as quickly as possible.
- ODRS and the SILC agree with your points. Numerous meetings have been held in the past two years to resolve funding issues. Representatives from the Oklahoma Department of Central Services and Senate staff attended one of the meetings to assist in resolving the contracting issue between the agency and the SILC. Several options have been offered to the SILC to assist the group in becoming functional as a 501 (c) (3). ODRS is eager to resolve the situation and would welcome any technical assistance that RSA can offer.

Technical Assistance: ODRS is requesting RSA provide technical assistance regarding the organizational structure of the SILC.

IL Program Compliance Findings and Corrective Actions

RSA identified the following compliance finding and corrective action that ODRS is required to undertake. ODRS 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 RSA is available to provide TA to assist ODRS.

SILC Appointments

Legal Requirements:

Section 705(a) of the Act. To be eligible to receive financial assistance under this chapter, each State shall establish a Statewide Independent Living Council (referred to in this section as the "Council"). The Council shall not be established as an entity within a State agency.

Section 705(b)(6)(A)(B). Each member of the Council shall serve for a term of 3 years, except that (i) a member appointed to fill a vacancy occurring prior to the expiration of the term for which a predecessor was appointed, shall be appointed for the remainder of such term; and (ii) the terms of service of the members initially appointed shall be (as specified by the appointing authority described in paragraph (1) for such fewer number of years as will provide for the expiration of terms on a staggered basis. No member of the Council may serve more than two consecutive full terms.

Facts and Analysis:

ODRS is out of compliance with Section 705(b)(2) because it does not have a fully constituted SILC and Section 705(b)(6)(B) because SILC members are serving on the SILC after their terms have expired.

Finding:

ODRS is not in compliance with section 705(a) of the Act because at present it does not have a legally constituted SILC meeting the composition, qualification and terms of appointment requirements outlined in section 705(b) of the Act.

Corrective Action:

ODRS must take the necessary steps to ensure that the Governor appoints a full slate of SILC members who meet the composition, qualification and terms of appointment requirements in section 705(b)(1)-(7) of the Act by November 30, 2008.

RSA also recommends that ODRS:

- maintain a current SILC Board roster from the Governor's office to evaluate the number of vacancies and expired terms;
- develop and implement effective strategies for recruitment to the SILC Board;
- maintain the number of applications waiting appointment to the SILC and determine how to move the applications forward; and
- work with ILRU, RSA's independent living technical assistance provider, to access training on SILC duties, roles and responsibilities.

Agency Response: The agency will ensure that the Governor appoints a full slate of SILC members who meet the composition, qualification and terms of appointment requirements in section 705(b)(1)-(7) of the Act by November 30, 2008.

IL Issues for Further Review

RSA plans on gaining a better understanding of how ODRS monitors CILs funded under Part B.

CHAPTER 5: INDEPENDENT LIVING FOR OLDER INDIVIDUALS WHO ARE BLIND PROGRAM

Agency Information and Performance

In FY 2007, the ODRS/DVS OIB program served 934 individuals directly through designated staff. The OIB Program expended a total of \$2,408,570. The total of Title VII, Chapter 2 funds expended was \$380,832.

**Table 5.1
OIB Program Highlights for ODRS for FY 2006 and FY 2007**

Expenditures, Performance, and FTEs	2006	2007
Expenditures: Title VII, Chapter 2	389,102	380,832
Expenditures: Total (including Chapter 2)	1,746,423	2,408,570
Performance: Total Older Individuals who are Blind Served	1,046	934
Staffing: Total FTEs	10.90	10.90
Staffing: Total FTEs with Disabilities	4.60	4.60

OIB Program Administration and Service Delivery

The ODRS/DVS Director administers the OIB Program. This person is a member of the DSU management team. Services were provided to 934 consumers in FY 2007. 333 consumers were between the ages of 80 and 89, white females and considered legally blind. Macular degeneration was the predominant cause of blindness with 583 consumers reporting this disability. The primary source of referrals was through public service announcements with 169 referrals for OIB services.

Personnel

The OIB program is comprised of 10.9 FTEs and there are no contract staff. The 3.2 direct service staff are classified as rehabilitation teachers and orientation and mobility instructors. There are 18 volunteers and 5.2 support staff. Administrative staff is comprised of 2.5 individuals.

Data Management/Quality Assurance

ODRS/DVS collects data for the OIB program through its data collection system and completes the 7OB annual performance report for submission to RSA.

DVS is represented on the SILC and participates in the development of the SPIL. The OIB administrator networks on a continuing basis with organizations of, and for the blind as well as agencies providing IL services. This assists the administrator of the OIB to keep abreast of

independent living needs of the OIB population and monitors consumer response to service quality.

In addition, the OIB administrator participates in the development and implementation of the SPIL and this enables her to further evaluate and improve OIB services.

Fiscal Management

The procedures for OIB fiscal management are not specific to this program and are covered in general fiscal sections of this report.

Planning

The data management and QA topics that were covered above comprise the planning processes for the OIB program. Additionally, the OIB assistant director is a member of ODRS' management team and participates in annual strategic planning, including SPIL planning.

OIB Program Technical Assistance Provided to ODRS/DVS During the Review Process

RSA provided the following OIB program technical assistance to ODRS /DVS during the review process:

- Exploration of options for increasing staff to serve more consumers across the state; and
- suggestions on potential strategies to meet growing demands.

Observations of ODRS/DVS and Its Stakeholders about the Performance of the OIB Program

RSA solicited input from ODRS/DVS and a wide range of its stakeholders about the performance of the OIB program. The ODRS/DVS and its stakeholders shared the following observations:

- services are of an excellent quality; and
- there is a need for more staff to serve more areas in the state.

RSA discussed the observations of its stakeholders with ODRS/DVS and addressed as many of them as possible either directly or by consolidating them into broader issue areas.

CHAPTER 6: PROGRESS ON ISSUES RAISED IN PREVIOUS REVIEWS OF ODRS

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

Corrective Action Plan

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

- documentation of presumptive eligibility;
- documentation of the determination of significance of disability;
- determination of the VR needs of the consumers;
- identification of an employment outcome that was consistent with the individual's strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice; and
- assurance that VR services are available to assist the individual with a disability in preparing for, securing, retaining, or regaining an employment outcome that is consistent with the individual's strengths, resources, priorities, concerns abilities, capabilities, interests, and informed choice.

ODRS has not successfully resolved the compliance finding related to the following topic and continues to work toward its resolution.

1. Correct assignment of the appropriate priority category in the order of selection:

Throughout 2006, ODRS conducted statewide trainings to counselors on documentation in the service record concerning closure reason in the case narrative, documentation supporting determination of eligibility, and documentation concerning the priority of service categories.

Status: ODRS' quality assurance review team audited case records of status 26 and status 28 closures for the 2006 annual audit. ODRS found that 78.2% of the audited case records contained proper documentation, which is below the 90% mandated in the CAP.

APPENDIX: SOURCES OF DATA

VR and SE Program Highlights

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

- Percent average hourly earnings for competitive employment outcomes to state average hourly earnings – Average hourly earnings for competitive employment outcomes (above) divided by the Average state hourly earnings (above) multiplied by 100
- Average hours worked per week for competitive employment outcomes - Average hours worked in a week at closure (record position 167-168) for individuals where weekly earnings at closure (record position 163-166) > 0 and where the type of closure (record position 198) = 3 and competitive employment (record position 162) = 1
- Percent of transition age 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 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

IL 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”