

Archived Information

**COMMENTS RECEIVED AT THE
REHABILITATION SERVICES
ADMINISTRATION'S (RSA)
MONITORING REDESIGN INITIATIVE
(MRI) CONFERENCE**

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ATTENDEES

George Ackerman
Kent State University

Jameela Akbari
U.S. Office of Management and
Budget

Elizabeth Akinola
End-ependence Center of Northern
Virginia, Inc.

Roy Albert
Arkansas Rehabilitation Services

Cindie Alwood
National Training for Client
Assistance Programs, Northern
Arizona University

Richard Anderson
Rehabilitation Services
Administration, U.S. Department
of Education

Ed Anthony
Rehabilitation Services
Administration, U.S. Department
of Education

Roseann Ashby
Rehabilitation Services
Administration, U.S. Department
of Education

Wade Bailey
Kentucky Office of Vocational
Rehabilitation

Carol Baker
AHEDD

Mike Barrios
East San Gabriel Valley Independent
Living Center

Mark Barnes
Oklahoma Department
Rehabilitation Services

Valarie Barnum-Yarger
Michigan Statewide Independent
Living Council

Scott Barstow
American Counseling Association

Cheryl Bates-Harris
National Disability Rights Network

Gail Baum
Office of the General Counsel, U.S.
Department of Education

Ardis Bazyn
Randolph-Sheppard Vendors of
America

Patricia Beattie
National Industries for the Blind

Jane Bennett
Virginia Department of
Rehabilitation Services

James Billy
Rehabilitation Services
Administration, U.S. Department
of Education

Mary Boegemann
Commission on Accreditation of
Rehabilitation Facilities

Dennis Born
The Supported Employment
Consultation and Training Center

Dudley Bowers
Washington Division of Vocational
Rehabilitation

Katherine Brown
Ohio Rehabilitation Services
Commission

Debora Brown-Grant
New York General Vocational
Rehabilitation Program

Shelia Browning
Mississippi Department of
Rehabilitation Services

Lori Bruch
Rehabilitation Counseling Program,
University of Scranton

Melanie Brunson
American Council of the Blind

Larry Bryant
South Carolina Vocational
Rehabilitation Department

Pisnu Bua-Iam
West Virginia Division of
Rehabilitation Services

Kelly Buckland
Idaho State Independent Living
Council

David Burganowski
Region II Rehabilitation Continuing
Education Program, State
University of New York at Buffalo

James Carden
Alabama Department of
Rehabilitation Services

Raymond Carroll
Rhode Island Office of
Rehabilitation Services

Brian Charlson
Carroll Center for the Blind

Laurie Collins
Office of Planning, Evaluation and
Policy Development; U.S.
Department of Education

John Connelly
Ohio Rehabilitation Services

Joe Cordova
Rehabilitation Services
Administration, U.S. Department
of Education

Anisio Correia
The Iris Network

Rebecca Cort
Office of Vocational and
Educational Services for
Individuals with Disabilities, New
York State Education Department

Deborah Cotter
American Psychological Association

Alan Coulter
National Center for Special
Education

Beverly Crawford
U.S. Government Accountability
Office

Brenda Curtiss
Ohio State Independent Living
Council

Diane Dalmasse
Vermont Division of Vocational
Rehabilitation

Annette D'Amico
Colorado Division of Vocational
Rehabilitation

Beth Danielson
Association of Colorado Centers for
Independent Living

Peter Darling
Granite State Independent Living

Vito De Santis

New Jersey Commission for the
Blind and Visually Impaired

Loerance Deaver

Rehabilitation Services
Administration, U.S. Department
of Education

Robert Demichelis II

Brain Injury Association of America

Donald Dew

Department of Counseling / Human
and Organizational Studies,
George Washington University

Carol Dobak

Rehabilitation Services
Administration, U.S. Department
of Education

Marjorie Donaldson

North Carolina Division of
Vocational Rehabilitation

Pamela DonAroma

Directions, Inc

Michael Donnelly

Disability Rights Center of Kansas

Patricia Dowse

New York State Rehabilitation
Association

Pat Doyle

The Legal Center for People with
Disabilities

Thomas Draghi

Lac Courte Oreilles Vocational
Rehabilitation Project

Jill Duson

Maine Bureau of Rehabilitation
Services

John Eckley

Occupational Development Center

Theda Ellis

Autism Society of Delaware

Ron Elller

North Carolina Office of the Blind

Richard Ensor

Employment and Training
Administration, U.S. Department
of Labor

Mel Fajkus

Texas Department of Assistive and
Rehabilitation Services

Marsha Farrow

Blind and Low Vision Services of
North Georgia

Michael Fester

Missouri Rehabilitation Services for
the Blind

Barbara Fields

Oregon Advocacy Center

Linda Fischer

Arizona Center for Disability Law

Anne Forrest

Brain Injury Association of America

Marilyn Fountain

Rehabilitation Services
Administration, U.S. Department
of Education

Marian Fuller

Rehabilitation Services
Administration, U.S. Department
of Education

Nicky Gacos

Colorado Cafe Associates

Michael Gandy

Mississippi Department of
Rehabilitation Services

Martha Garber

Rehabilitation Services
Administration, U.S. Department
of Education

Cindy Gardner

Tennessee Protection and Advocacy,
Inc.

Paula Goldberg

Parent Advocacy Coalition for
Educational Rights (PACER)
Center

Linda Gonzales

Association of Programs for Rural
Independent Living

Gerry Gordon-Brown

Kentucky Client Assistance Program

Donna Graham

Service Center for Independent
Living, California Department of
Rehabilitation

Michael Graham

Idaho Division of Vocational
Rehabilitation

Rob Groenendaal

Rehabilitation Engineering and
Assistive Technology Society of
North America

Annette Grove

MERS/Goodwill

John Halliday

Institute for Community Inclusion,
University of Massachusetts
Boston

Charles Harles

Inter-National Association of
Business, Industry and
Rehabilitation

Helen Harper

Delaware Division for the Visually
Impaired, Delaware Health and
Social Services

Linda Harrington

North Carolina Department of
Vocational and Rehabilitation
Services

Allen Harris

Iowa Department for the Blind

Erin Hassing

U.S. Office of Management and
Budget

Ryan Hess

The Employment and Training
Reporter

Dan Hopkins

Dan Hopkins and Associates, Inc.

Jolene Horsman

Iowa Department for the Blind

Kimberly Hudak

Ohio Rehabilitation State Council

Jeff Hughes

Progressive Independence Center
for Independent Living

Thomas Hughes

Association for Persons in
Supported Employment,
Westchester ARC

Fred Isbister

Rehabilitation Services
Administration, U.S. Department
of Education

Doug James

Virginia Department of
Rehabilitation Services

Malisa Janes

Texas State Rehabilitation Council

Thomas Jennings

New Jersey Division of Vocational
Rehabilitation Services

Kenda Jochimsen

Iowa Vocational Rehabilitation
Services

Kelly Johanessen

Life's WORC, Inc. / United
Cerebral Palsy of East Central
Florida

Dacia Johnson

Oregon Commission for the Blind

Gil Johnson

American Foundation for the Blind

Patrick Jonas

Cerebral Palsy Research Foundation

Don Kay

Division of Vocational
Rehabilitation, Washington
Department of Social and Health
Services

Billie Jean Keith

ENDependence Center of Northern
Virginia

Joseph Kelley

Central Louisiana Intertribal
Vocational Rehabilitation

Thomas Kelley

Rehabilitation Services
Administration, U.S. Department
of Education

Grady Kickul

South Dakota Division of
Rehabilitation Services

Marc Kilmer

American Congress of Community
Supports and Employment
Services

Darlo Koldenhoven

Vocational Rehabilitation Program,
Georgia Department of Labor

Lisa Koop

New York State Rehabilitation
Council

Tim Kopczynski

Idaho State Rehabilitation Council

Jerry Koret

Connecticut Rehabilitation Council

George Kosovich

Rehabilitation Services
Administration, U.S. Department
of Education

Manuela Kress

Michigan Protection and Advocacy
Service, Inc.

Dorothy Kret

Dorothy Kret and Associates, Inc

Allen Kropp

Rehabilitation Services
Administration, U.S. Department
of Education

Carol Lane

East San Gabriel Valley Independent
Living Center

Leeda Laykasek

Division for Rehabilitation Services,
Texas Department of Assistive
and Rehabilitative Services

Patricia Leahy

National Rehabilitation Association

Deborah Leuchovius

Parent Advocacy Coalition for
Educational Rights

Charlie Levine

Iowa Vocational Rehabilitation
Services

Anil Lewis

Georgia Client Assistance Program

Ruth L'Hommedieu

Governor's Committee on
Employment and Rehabilitation of
People with Disabilities, Alaska
State Rehabilitation Council

Bonnie Linquist

Iowa Department for the Blind

Deon Locklin

Program for Rehabilitation
Leadership

Paul London

Office of Vocational Rehabilitation,
Pennsylvania Department of
Labor and Industry

Mary Lovley

Rehabilitation Services
Administration, U.S. Department
of Education

Jeanne Loyd

Missouri Division of Vocational
Rehabilitation

John Lui

Stout Vocational Rehabilitation
Institute, University of Wisconsin-
Stout

Regina Luster

Rehabilitation Services
Administration, U.S. Department
of Education

Barbara Lybarger

Massachusetts Client Assistance
Program, Massachusetts Office on
Disability

Charrisse Lyons

Goodwill Industries

Catriona MacDonald

National Council of State Agencies
for the Blind; American
RehabACTION Network

Marlene Malloy

Michigan Rehabilitation Council

Paul Marchand

Disability Policy Collaboration

Rita Martin

Council of State Administrators of
Vocational Rehabilitation

Joe Mathews

Montana Vocational Rehabilitation

Kathe Matrone

Region X Rehabilitation Continuing
Education Program

Roxann Mayros

National Council of Private Agencies
for Blind and Visually Impaired

Morgan McMahon

Rehabilitation Services
Administration, U.S. Department
of Education

Butch McMillan

Mississippi Department of
Rehabilitation Services

Celane McWhorter

APSE: The Network on
Employment

Mark McWilliams

Michigan Protection and Advocacy
Service, Inc.

Ann Meadows

West Virginia Statewide
Independent Living Council

Krista Merritt

American Council of the Blind

Bob Michaels

National Council on Independent
Living

Brian Miller

Rehabilitation Services
Administration, U.S. Department
of Education

Lee Miller

Georgia Commission on
Employment of People with
Disabilities, Inc.

Sarah Mitchell

New Jersey Protection and
Advocacy, Inc.

Suzanne Mitchell

Rehabilitation Services
Administration, U.S. Department
of Education

Linda Mock

Oregon Commission for the Blind

Kenneth Musteen

Arkansas Rehabilitation Services

Mary Naifeh

Rehabilitation Services
Administration, U.S. Department
of Education

Gary Neely

Mississippi Department of
Rehabilitation Services

Bob Niemiec

Community Involvement Programs

Noel Nightingale

Rehabilitation Services
Administration, U.S. Department
of Education

William Noone

Massachusetts Rehabilitation
Commission

Patty Nunez

Commission on Rehabilitation
Counselor Certification

Lisa Ochs

Advocate

Eric Olson

Goodwill Industries International

Lou Oma Durand

Washington Department of Services
for the Blind

Laura Owens

Creative Employment
Opportunities, Inc., University of
Wisconsin-Milwaukee

Ralph Pacinelli

Rehabilitation Services
Administration, U.S. Department
of Education

Bronwyn Palmer

Special Education Transition Unit,
Arkansas Department of
Education

William Palmer

Florida Division of Vocational
Rehabilitation

Stephaine Parrish Taylor

Nebraska Office of Vocational
Rehabilitation

Jeanne Patterson

National Council on Rehabilitation
Education

Sue Payne

Idaho Division of Vocational
Rehabilitation

Michael Peluso

New York State Commission on
Quality Care

Joe Pepin

Rehabilitation Services
Administration, U.S. Department
of Education

Blaine Petersen

Utah State Office of Rehabilitation

Bob Philbeck

North Carolina State Rehabilitation
Council

James Pierce

Independence Association, Inc.

Jamie Pope

American Association of the Deaf-
Blind

Randall Pope

American Association of the Deaf-
Blind

Paula Pottenger

Rehabilitation Continuing Education
Program, University of Arkansas

Gwendolyn Powell

Work-Able, Inc.

Susan Prokop

Paralyzed Veterans of America

Stephen Pruitt

Tennessee Protection and Advocacy,
Inc.

Cheryl Quimba

Rehabilitation Services
Administration, U.S. Department
of Education

Sue Rankin-White

Rehabilitation Services
Administration, U.S. Department
of Education

Jamie Ray

Pennsylvania Client Assistance
Program

Sallie Rhodes

National Collaborative on
Workforce and Disability for
Youth

Jenn Rigger

Rehabilitation Services
Administration, U.S. Department
of Education

Treva Roanhorse

Navajo Nation Office of Special
Education and Rehabilitation
Services

Pedro Romero

Rehabilitation Services
Administration, U.S. Department
of Education

Ron Rucker

Via of the Lehigh Valley

Jamie Ruppman

TASH

Christy Russell

Projects With Industry

Charles Sadler

Rehabilitation Services
Administration, U.S. Department
of Education

Melissa Salas

East San Gabriel Valley Independent
Living Center

Albert SanAgustin

Guam Division of Vocational
Rehabilitation

William Sandonato

Service Source Network

Ardis Sandstrom

Brain Injury Association of
Minnesota

Fredric Schroeder

National Council of State Agencies
for the Blind

Mark Seifarth

National Council on Disability

Melissa Shahan

United Cerebral Palsy

Michael Shea

Westat

Steve Shivers

Alabama Department of
Rehabilitation Services

James Sirmans

Oklahoma Office of Handicapped
Concerns

Edward Smith

Rehabilitation Services
Administration, U.S. Department
of Education

Harry Smith

MARO Employment and Training
Association

Mavis Smith

ARC of Washington-Holmes
Counties

Nancy Smith

Division of Vocational
Rehabilitation, Colorado
Department of Human Services

Bruce Snethen

Iowa Department for the Blind

Randy Sorensen

Options Interstate Resource Center
for Independent Living

Peg Spencer

Kansas Rehabilitation Services

Elizabeth Spiers

American Association of the Deaf-
Blind

Beverlee Stafford

Rehabilitation Services
Administration, U.S. Department
of Education

Karen Stanfill

Advocacy, Inc.

Robert Stodden

Center on Disability Studies

Pam Stratton

Alaska Client Assistance Program

Jacqueline Stuckey

Rehabilitation Services
Administration, U.S. Department
of Education

Carl Suter

Council of State Administrators of
Vocational Rehabilitation

Milton Taylor

Utah State Office of Rehabilitation

Karen Tefelski

vaACCSES

Jacquelyn Tellier

Massachusetts Rehabilitation
Services Administration

Leon Thornton

Rocky Mountain Technical
Assistance and Consulting

Suzanne Tillman

Rehabilitation Services
Administration, U.S. Department
of Education

Al Tolbert

Southern Indiana Center for
Independent Living

Patricia Tomlinson

New Jersey Statewide Rehabilitation
Council

Steven Tunstall

Interwork Institute, San Diego State
University

Brad Turner-Little

Easter Seals, Inc.

Clarinda Unger

Missouri Division of Vocational
Rehabilitation

Pearl Van Zandt

Nebraska Commission for the Blind
and Visually Impaired

Christina Venable

Muskogee Vocational Rehabilitation

Julie Ward

The Arc and United Cerebral Palsy,
Disability Policy Collaboration

Caroline Wilde

American Rehabilitation Counseling
Association

Michelle Wilson

The Chickasaw Nation Vocational
Rehabilitation Department

Philip Wilson

Louisiana State University Health
Sciences Center, School of Allied
Health Professions, Human
Development Center

Thomas Wilson

National Rehabilitation Counseling
Association

Linda Winslow

National Rehabilitation Association

Rebecca Wright Brizee

NISH; Easter Seals

John Wyvill

Arkansas Rehabilitation Services

Judy Young

Abilities, Inc.

William Zappini

Office of Vocational Rehabilitation,
Pennsylvania Office of Vocational
Rehabilitation

Janet Zeller

New Hampshire State Rehabilitation
Council

DAY 1:
RESPONSES TO QUESTIONS FOR STAKEHOLDERS

STATE VOCATIONAL REHABILITATION (VR) AGENCIES SESSION

1. What key characteristics or qualities do you want the Rehabilitation Services Administration (RSA) monitoring system to have?

- Monitoring activities should focus on current year operations—what is happening now, versus a review of previous year events and performance.
- Monitoring findings and reports detailing those findings should be available to state vocational rehabilitation (VR) agencies, State Rehabilitation Councils (SRCs) and other stakeholders in a timely way. Participants requested a 60-day timeframe.
- RSA should involve state VR agencies as partners in monitoring and program review activities. States contribute funds to operate the public VR program and should work in partnership with RSA to ensure that the program is accountable and focused on continuous improvement.
- Open communication is critical. Monitoring activities should involve state agencies in an ongoing way, through continuous communication and via an open dialogue.
- RSA staff with responsibility for conducting monitoring and program reviews must have subject matter expertise, including in-depth knowledge of the *Rehabilitation Act*, other relevant federal legislation, disability and employment. In-depth knowledge and understanding of the unique circumstances and operating environment of each state VR agency is equally as important.
- The on-site review required under Section 107 of the *Rehabilitation Act* (Section 107) should not just examine what occurred or did not occur, rather it should foster a dialogue on emerging issues and trends and their potential impact on the program.
- There should be an annual on-site visit from RSA to foster communication and open dialogue—at least initially under the new structure. The full set of requirements for the Section 107 periodic on-site review could be addressed every few years.
- Monitoring and review activities should be strength-based and focus on what is working well. Findings should identify evidence-based, effective practices and lessons learned which could be disseminated to VR agencies and stakeholders to foster innovation.
- Findings of RSA monitoring and review activities should not end with the identification of problems or corrective actions. They should foster agreement between RSA and the state agency regarding opportunities for program enhancement and drive the development and provision of technical assistance (TA) and training to the state.
- The new monitoring system should have a continuous aspect. It should include components of self-evaluation and self-audit that the individual agency can implement to continuously assess performance and upon which RSA can establish a baseline for understanding performance and initiating program reviews.

- The monitoring process should examine nontraditional measures of success in the VR program. For example, the impact of the program on individuals that did not achieve an employment outcome.
- The new system must strike an appropriate balance between achieving more active involvement of stakeholders in monitoring and review activities, ensuring consumer confidentiality and protecting against conflicts of interest.
- The redesigned process should include an evaluation component through which state VR agencies and stakeholders participating in monitoring activities can provide feedback to RSA on value-added aspects of the process, as well as opportunities for improving the monitoring and review process.
- The monitoring system redesign should be grounded in the unique characteristics of the public VR program. Other processes in use by other agencies to monitor grantees, for example, the Office of Special Education Programs (OSEP) monitoring and program review system, would not capture the unique nature of VR program operations.
- The principles developed for the new monitoring system by the Council of State Administrators of Vocational Rehabilitation (CSAVR) should be incorporated into the final design.

2. What specific outcomes do you want RSA’s monitoring process to accomplish?

- Maintain program integrity and defend state VR agency dedicated resources.
- Identify effective, evidence-based practices, as well as lessons learned which could be quickly disseminated to state VR agencies and stakeholders to foster innovation and enhance programs.
- Examine key issues and emerging trends in the state and effectively translate that information through open dialogue between RSA and the state agency into state-level policy or programmatic changes and RSA-provided TA, training and guidance.
- Provide timely access to national and local TA and training expertise to support opportunities for program enhancement, especially those identified through RSA monitoring and program review activities.
- Lead to agreements between RSA and the state agency regarding opportunities for enhancing programs; does not require a written program improvement plan if the VR agency is in compliance with assurance in its state plan and the Title I standards and indicators.

3. What can RSA do to promote communication with parties interested in the monitoring process and its outcomes?

- Make the RSA-state VR agency partnership a top priority. Accomplish this through well-established, structured opportunities for open dialogue and ongoing communication. Specific recommendations for building communication and initiating the dialogue include:
 - RSA state teams should conduct annual on-site visits in each state to build understanding of state-specific circumstances and operating environment—at least initially under the new structure.
 - Quarterly conference calls should be conducted between RSA and each state agency to build the partnership and expand the state team knowledgebase.
 - Face-to-face meetings each year should be convened between RSA, agencies within a geographic region and representative SRCs, Rehabilitation Continuing Education Programs (RCEPs), Client Assistance Programs (CAPs) and other stakeholders, to maintain a regional approach to addressing issues and concerns.
 - State VR agencies should be included in discussions to revise the Title I standards and indicators.
 - RSA should initiate an RSA-state VR agency dialogue to establish clear transition-related expectations.
- Establish a specific process for including the American Indian Vocational Rehabilitation Services (AIVRS) Program in the expanded communication and RSA-state VR agency partnership.
- Reduce clearance delays associated with getting information out to the field or responding to state VR agency questions or TA requests—particularly in relation to agency requests for time-sensitive TA or federal intervention.
- Provide state VR agencies with access to “live” RSA expertise—both outside the normal eight-hour business day and across all U.S. time zones.
- Better utilize the RSA Web site to post up-to-date information across wide audiences. Improve both the utility of and access to information on the Web site.
- Ensure all RSA-sponsored meetings are designed to present clear information, and make that information immediately available and accessible to all interested parties.

4. What special focus areas or specific issues do you want RSA to consider for monitoring?

- An immediate recommendation for special focus is Evaluation Standard 1—Performance Indicator 1.5. RSA stated at the conference that this indicator has been problematic for state agencies. Future monitoring activities could examine why.
- Another recommended focus area is the impact of VR participation in state workforce investment efforts—monitoring reviews could assess both fiscal and resource implications.

- There needs to be a structured process for evaluating potential special focus areas to ensure they are valid, substantive and worthy of investigation.
- RSA-established focus areas should be developed in partnership with state agencies, CSAVR and National Council of State Agencies for the Blind (NCSAB), as well as include the input of key stakeholders.
- Special focus areas should be utilized in monitoring and review activities to identify state agency technical assistance (TA) and training needs—not establish punitive or corrective actions.

5. What technical assistance should RSA provide and how should it be delivered in order to 1) improve performance and 2) address compliance issues?

- State agencies need immediate turnaround on high-priority, time-sensitive TA requests. Participants requested 24 hour turnaround, and on-site RSA presence if needed, for requests related to protecting program integrity or the need for federal intervention
- RSA expertise and TA must be available to address national needs, regional needs, like-state needs and state-specific circumstances. For example:
 - National needs should include understanding the *Rehabilitation Act*, Title I standards and indicators, concepts of informed choice and participation in the *Workforce Investment Act* (WIA).
 - Regional issues should address transportation, geography and sharing service providers.
 - Like-state needs include issues shared by states, for example TA directed at states operating under an order of selection, or TA developed for big states such as New York, Texas or California that provide services over a wide geographic area to a large population. RSA could develop TA and training targeted to these needs and provide that TA in ways that link states dealing with similar issues.
 - State-specific needs include navigating the state procurement system or working through state-specific fiscal constraints.
- RSA TA and training expertise must be accessible through a “live” person and across all U.S. time zones.
- There needs to be a strong link between RSA monitoring and TA and training activities. Monitoring findings, including evidence-based practices and lessons learned, should be the primary driver of the development and provision of solution-based TA and training to states.
- Training and TA should be proactive and responsive to trends, projections and emerging issues identified through monitoring and review activities; are in response to changes in legislation; or address issues related to the particular environment in which the state agency operates.

- RSA TA and training should include nontraditional components, such as self-assessment tools and peer review modules. These components should be focused on fostering continuous improvement and sharing best practices versus driven by punitive action.
- RSA will need to establish appropriate guidelines and protocols to ensure that TA purchased by state agencies is acceptable and supported as valid, accurate and reliable.
- Specific topics identified by participants for future TA and training included:
 - Maximizing the use of technology in all aspects of program management and service delivery.
 - Brokering relationships across federally funded and state-operated programs to improve access and outcomes.
 - Accessing and utilizing data collected and maintained by other federally funded or national programs that is relevant to providing services to consumers of VR services.
 - Working within a diverse environment—cultural, ethnicity, gender, age and disability.
 - Providing TA and training for stakeholders involved in future RSA monitoring and program review activities.
 - Providing TA and training for SRCs to fulfill their mission, role and function, as articulated in the *Rehabilitation Act*.
- TA delivery strategies to be explored include:
 - A database of available expertise—nationally, regionally and state-by-state.
 - A listserv that posts answers to state VR agency questions or requests for TA and training so other states dealing with similar issues or concerns can benefit.
 - Interactive information sharing mechanisms, including blogs, to facilitate two-way dialogue between RSA and state VR agencies, and among state agencies dealing with similar issues.

OTHER ISSUES IDENTIFIED BY STATE AGENCIES

Building the RSA- State VR Agency Partnership

- Success of the VR program will require a strong partnership between RSA and state VR agencies. This partnership must be forged through open communication, trust and mutual respect.
- True program improvement in the public VR program will be achieved through an open dialogue and mutual agreement between RSA and its state partners with regard to issues and priorities.
- To achieve a true partnership, state VR agencies should be involved at the front end of major RSA policy and planning efforts.

Recommendations Regarding the Restructuring

- RSA should make state liaison and state team assignments a top priority and should communicate to state VR agencies as soon as possible who they should contact starting Oct. 2.
- RSA should establish cross-training, or other appropriate mechanisms, to ensure the institutional knowledge of the regional office staff is not lost, particularly with regard to regional issues and state-specific knowledge. Steps will also need to be taken to build the credibility and leverage of newly assigned RSA staff within the state political environment.
- RSA should establish a transition plan for moving to the new structure that includes specific timelines for staff assignments and conducting next year monitoring activities. This plan should include guidance for providing access to RSA expertise from a centrally based, Washington, D.C., location and across all time zones.
- RSA should explore alternative work settings, including telecommuting and flexible work schedules, to ensure state access to staff expertise across the nation. The agency should also assess opportunities for retaining the regional staff expertise—if not within the old structure, then as a bridge to the new structure.
- RSA should be realistic and not guarantee more than it can deliver under the new structure.

STATE RESOURCE COUNCILS (SRCs)

1. What key characteristics or qualities do you want the RSA monitoring system to have?

- The monitoring system should have credibility and “teeth” so that when action is taken, consequences occur.
- Application of policy should be consistent.
- Communication with RSA should be consistent.
- Monitoring criteria should be objective rather than subjective.
- The monitoring system should allow responsiveness to issues in the state with both sufficient flexibility and predictability.
- Roles and responsibilities should be clearly defined.
- The monitoring system should be free of conflicts of interest.
- Partner involvement should be consistent.
- The monitoring system should have adequate resources and should be characterized by professionalism.
- There should be real and true partnering.
- The monitoring system should have a problem-solving orientation.
- The monitoring system should be straightforward.
- The monitoring system should include a regular training component or program.
- There should be a predictable work plan produced by RSA.
- Reports on monitoring results should be timely—60 days or less.
- Monitoring should be used as a learning process, rather than as a judgmental and punitive process.
- The monitoring system should be constructed to ensure confidentiality at all levels.

2. What specific outcomes do you want RSA’s monitoring process to accomplish?

- The monitoring process should lead to increased VR consumer involvement.
- The monitoring process should contribute to increased effectiveness and efficiency of services.

- Reports should be better at identifying successes—marketing the accomplishments of the system.
- There should be a strong tie between monitoring outcomes and results and future strategic state plan and planning.
- Findings should be communicated to SRCs in a timely manner.
- Technical assistance (TA) needs will routinely be identified.
- Specific barriers in the VR system, such as policies and management, faced by SRCs will be identified.
- Enforcement of outcomes should be consistent and universal, both in the understanding of the requirements and in the application of remedies.
- Data and input will be gathered to guide the modification of service delivery.
- The monitoring process will lead to proper application of state fiscal resources.
- The monitoring process will lead to early identification of problems.
- The monitoring process will help identify SRC structural and professional participant needs.
- The monitoring process will identify standards.
- The monitoring process will lead to placement of more people with disabilities into quality employment.

3. What can RSA do to promote communication with parties interested in the monitoring process and its outcomes?

- Improve its Web site by increasing the availability of reports, continuing to assure the Web site Section 508 compliant, providing a better search function and making state reports and plans—911 data that RSA collects about state agencies—more accessible.
- Identify expectations using clear straightforward language. Every report from RSA should include a brief executive summary along with any policy recommendations.
- Assign and establish a personal responsive point of contact with RSA.
- Set up a listserv for SRCs.
- Be responsive and professional with contacts, and return phone calls promptly.
- Maintain the regional culture and communication links from the original regional structure, blended with the new national structure.

- Conduct regular regional teleconferences and summarize content and outcomes on the Web site.
- Conduct an annual national SRC conference.
- Make more reports available on the Web site.
- Communicate with governors on appointments to SRCs.
- Use clear, straightforward language in all forms of communication (e.g., minimal use of acronyms, shorthand terms and other “insider” language).
- Provide secondary contacts at RSA.

4. What special focus areas or specific issues do you want RSA to consider for monitoring?

- Seek to identify the impact of transition on standards and indicators.
- Take a closer look at unsuccessful closures.
- Focus on minority outreach and access—including women.
- Calculate the percentage of a state VR budget that goes to services.
- Identify strategies to ensure that consumer’s informed choice regarding their Independent Plan for Employment (IPE) is facilitated and honored by state agencies.
- Develop contingency plans and strategies to deal with all categories of disability in anticipation of and during order of selection.
- Revisit standards and indicators to ensure that they are optimal.
- More clearly define “success” in terms both of quality and quantity.
- Focus on performance standards for SRCs.
- Consider whether RSA should reimburse SRCs for the duties they perform.
- Consider the impact of economics on cost of living—urban vs. rural (indicator 1.5).
- Consider the definition of functional limitations under order of selection.
- Identify issues that may arise from complaints about community providers and vendors.
- Consider the issue of presumptive eligibility recoupment of SSA funds.
- Consider whether RSA should monitor VR SRC budgets, activities and administrative resources to ensure that states are spending an appropriate amount on services.

- Make best practices public (e.g., through the Web site).
- Calculate what percentages—by demographics and by disabilities—of the population are being served.

5. What technical assistance should RSA provide and how should it be delivered in order to 1) improve performance and 2) address compliance issues?

- Training on every portion of the law.
- Tools needed at the time of each monitoring occasion to do the job.
- Web-based modules.
- Distribute CDs; make sure they are labeled clearly.
- Curriculum for SRC chairs to mentor successors.
- Timeline for what SRCs need to do before monitoring (include specific dates and milestones).
- Advocacy with state VR agencies on how to use SRCs.
- National contracts for vendor products.
- TA in funding and the role of being an advocate.
- Orientation CD introducing “What SRCs are.”
- Teaching vendors and DSVs how to do business with RSA.
- TA on designing customer satisfaction feedback instruments that are flexible to needs.
- Needs assessments by state agencies.

CONSUMERS AND ADVOCATES

1. What key characteristics or qualities do you want RSA's monitoring system to have?

- The system should:
 - Be supportive not punitive ... but have enough “teeth” in it to ensure accountability on the part of the programs.
 - Have sufficient clarity so that the monitors can communicate exactly what they are looking at and the criteria by which these things will be assessed.
 - Have unambiguous commitment to the outcomes of the VR process (Section 106 of the *Rehabilitation Act*).
 - Be public and compare one agency's program to programs of other agencies.
- Other system characteristics include:
 - Credibility.
 - Consistency.
 - Objectivity.
- The monitoring teams should be:
 - Well trained.
 - Knowledgeable about the programs.
 - Representative of the consumers and their families.
 - Diverse.
 - Inclusive of current consumers of VR services.
- The monitoring process should:
 - Be collaborative and involve representatives of all stakeholders.
 - Be conducive to openness and honesty.
 - Be based on tools that have structural integrity.
 - Have specific timelines for feedback and correction.
 - Monitor all states based on the same core criteria—it should be consistent but flexible.
 - Have clear and effective enforcement of outcomes that are carried out in a timely manner.
 - Solicit information from consumers regarding every level of service delivery.
- Recommendations and suggestions:
 - RSA should review the American Indian Vocational Rehabilitation Services (AIVRS) projects that serve more than one state and monitor those AIVRS programs only once to reduce duplication.
 - RSA should consider a peer-review component to promote cross-state sharing of best practices.

- Information gathered from consumers should be aggregated and disseminated at the national level.

2. What specific outcomes do you want RSA's monitoring process to accomplish?

- Outcomes of the monitoring system should include:
 - A mechanism to deal with consumers who go through a program, get a job, lose the job and then come back into the program—these consumers shouldn't have to start over.
 - An effective method of measuring success that is not based on the number of cases that closed in 90 days, because 90 days is not a good measure of success by any means.
 - A way to ensure that VR services are provided equitably to all consumers, including minorities and people with different skill levels.
 - A mechanism for sharing best practices.
 - A method of tracking results to determine why those who did not get jobs didn't get jobs, and what happened to them afterward.
 - An effective way to measure or demonstrate consumer choice.
 - The ability to demonstrate consumer-driven employment so that people get (and keep) jobs that they actually want.
 - Good data that is accurate, complete and broad-based and can be manipulated so that it can be used in different ways with different groups to allow for comparisons within a state.
 - States being held accountable for fulfilling their responsibilities under Title I.
 - Measurement of the number of individuals with the most significant disabilities served or excluded as compared to other groups.
 - Sensitivity of the intake process to determine whether it is assessing people properly.
- Additionally, the system needs to:
 - Track all money spent including those of community organizations.
 - Show the ratio of numbers of people who are not served to those served, as well as the number who do not complete the process.
 - Show increased consumer and family satisfaction.
 - Have good data that are usable by all organizations with a stake in the process.
 - Be clear and up-front about what the system will monitor because what gets measured informs what gets done.
 - Consider informed choice.

3. What can RSA do to promote communication with parties interested in the monitoring process and its outcomes?

- A list of presenters and participants from this conference should be provided so that communication can begin! This can be on the Web site or e-mailed.
- Public VR-related Web sites should have links to each other.

- Data on the Web site should be current and the site should be user-friendly.
- Any information that goes to a designated unit should also go to the stakeholders (e.g., SRCs, Statewide Independent Living Councils (SILCs), Parent Training and Information Centers (PTIs) and CAPs).
- Conferences should be widely publicized.
- All materials and logistics at conferences and meetings should be accessible.
- Stakeholders should include businesses, advocacy groups, the hard of hearing and the deaf-blind community and direct service staff. Should ensure that no disability group is missing.
- Reports should be broadly distributed and a forum should be available to discuss them.
- Public hearings should be held with monitoring visits. They should be open to everyone; not restricted to specific invitees.
- More than one meeting should be held in a state in order to go where the consumers are.
- Reports should be provided in a timely manner.
- States should be required to develop communication plans that include elements that are standard across all states and develop one at the national level.
- Wide ranging information should go up on the Web site. E-mailed alerts should be used to publicize new content.
- A “chat-room” type of option should be put on the Web site so that stakeholders can communicate with one another.
- RSA should answer questions in writing (on the Web site) in a timely manner and also consolidate existing guidance. Archive questions on the Web by subject matter and not by number.
- RSA should ensure a transparent system in order to build trust in the system.
- The confidentiality of those providing input should be assured. Conduct interviews without state agency representatives present and hold focus groups in small group settings.

4. What special focus areas or specific issues do you want RSA to consider for monitoring?

- Provide ongoing support (e.g., tech upgrades, job coaching) including technology to help a consumer maintain employment and independence.
- Institute interagency collaboration when working with people from the juvenile or adult correctional system.

- Develop one national standard for the most significant disabilities.
- Ensure access to supported employment for the group of people with the most significant disabilities.
- Focus on enforcement and promotion of VR counselors' involvement in the transition process regarding school-to-work or higher education; increase the overall awareness of available transition services by parents and students.
- Ensure that monitoring informs special education regarding transition curriculum.
- Ensure that people who are deaf/blind are included in all RSA services and that training is provided for staff members who interact with this population.
- Look at how agencies have addressed their under-served and un-served populations based on their state plans. What happens to these targeted groups once the focus is off them in three years?
- Raise the bar to focus on careers and not just jobs.
- Ensure informed choice and consumer control.
- Look for illegal practices and procedures used to restrict case services expenditures to avoid an order of selection.
- Do not simply focus on numbers without looking at the quality of services during evaluations.
- Focus on the VR role and participation and involvement in transitioning.
- Pay attention to the VR relationship to or support of sheltered workshops or Certified Rehabilitation Organizations (e.g., in setting rates and fees for service).
- Pay attention to the extent to which VR supports and encourages self-employment.
- Look at careers rather than jobs.
- Look at collaboration between VR and businesses, as well as VR and schools.
- Assure that programs must have adequate and qualified staff.

5. What technical assistance should RSA provide and how should it be delivered in order to: (1) improve performance and (2) address compliance issues?

- Provide training and technical assistance (TA) to SRCs to ensure they understand their roles, responsibilities and authority and ensure that they have the support to carry them out.
- Provide a definition for “periodically.”

- Conduct RSA-sponsored regional workshops where all disability organizations can come and exchange information.
- Maintain rehabilitation counselor credentialing.
- Provide more training to people with disabilities so they can move into rehabilitation counseling positions.
- Start a help-desk to provide callers with accurate information.
- Conduct a TA conference to give stakeholders an opportunity to share best practices.
- Tie TA to the results of monitoring and make TA state-specific.
- Avoid conflicts of interest between those doing TA and those doing monitoring.
- Try to expand the base of contractors used for TA.
- Develop criteria for TA that enhances the ability of the consumer to achieve timely, quality employment outcomes.
- Provide TA to build relationships with consumer organizations.
- Provide TA to assist in carrying out compliance duties.
- Provide staff training.
- Provide assistance with resources to aid in carrying out duties.
- Provide TA to improve performance and compliance.
- Develop Web-based archives of questions and responses.
- Ensure a commitment to the recruiting, hiring and training of qualified people with disabilities.
- Provide recruiting and other appropriate TA to ensure a diverse SRC and VR staff (disability, race, ethnicity and gender).
- Provide guidance and models on how to develop collaborative partnerships for the greater good.
- Provide TA on how to work with special populations such as ex-offenders or persons with mental illness.
- Develop a national clearinghouse that is accessible for training and TA materials, curricula, best practices, etc.

- Offer training in:
 - Transition for various partners and stakeholders.
 - Diversity
 - Minority outreach.

- Offer training for:
 - Collaborative partners
 - Consumer organizations.
 - Rehabilitation counselors.

COMMUNITY PARTNERS (CPS)

1. What key characteristics or qualities do you want RSA's monitoring system to have?

- Data reported to RSA must be validated.
- Monitoring should be congruent with the ways programs operate, e.g., identify and classify costs and interpretation of regulations and guidance. It should also take into account and address differences in how states and programs operate.
- Reports of findings should be timely in terms of weeks and months, not years
- There needs to be full accountability in the system. Previously, there have been no “teeth” in the system in terms of enforcement of compliance.
- Monitoring should have an independent role based on objective standards not reflecting any biases or conflicts of interest.
- Monitoring results must be accessible to the public, not just an audience determined by RSA.
- Data should be collected from people who apply for or intend to apply for services.
- Monitoring should not only address order of selection but also job retention.
- RSA should react appropriately to both positive and negative results.
- The objective is not just compliance but continuous improvement.
- There should be active involvement of community providers in the monitoring and review process.
- Monitoring should create and build new relationships and partnerships between community providers and VR statewide and nationwide.
- VR monitoring should align with the broader workforce performance measurement system.
- The monitoring system should be aligned with other federal agencies and the OMB common measures in order to strengthen VR's position to advocate on the part of its constituents.
- Federal and state staff should be trained to understand the VR system, its unique standards and indicators and how to interpret data on all levels.
- There needs to be an independent nongovernment evaluation component of the review process. Such an evaluation should look at the review process itself and see if it is doing a good job two or three years from now.
- The monitoring system should provide clarification on the role of the Commission on Accreditation of Rehabilitation Facilities and other third party accreditation entities.

- The overall system should ensure timely TA when deficiencies are identified.
- Federal staff needs to insist that states track performance of vendors and provide that information to consumers.
- Services provided need to be more customer-friendly.
- Customers' feedback needs to be sought whether services provided are good or bad.

2. What specific outcomes do you want RSA's monitoring process to accomplish?

- The monitoring system needs to address demographics and definitions; there must be consistency between the workforce and VR systems.
- The monitoring system should address how factors such as specific disability as well as age, gender, homelessness, transportation, drug use, limited English proficiency, racial-ethnic minority status, past job experience, education and family support affect one's access to programs and ability to get jobs.
- The monitoring system should avoid unintended outcomes. For example, people with severe disabilities could be considered by providers to be unemployable and, therefore, forced to rely on private funding and programs to find employment.
- Individuals should not be screened out. It is important that one's disability and the significance of that disability not be construed as a barrier to meeting a performance measure.
- The monitoring system should restrict monitoring to outcomes of federal and state funds, and not the outcomes achieved with the assistance of leveraged private resources.
- The monitoring system should help equip the government to recognize how its programs can get the best value for its expenditures.
- The overall process should identify promising and effective practices and share that information with the entire VR system.
- The monitoring process should measure the impact of interventions that are derived from evidence-based research.
- The review process should lead to better annual performance of the system, which means:
 - Participants secure more jobs.
 - Participants move up the career ladder.
 - Programs make gains in the quality of service delivery.
 - Perspective of the VR system will include the macro-level.
- The monitoring system should be about not just compliance but, rather, continuous improvement.

- Customer satisfaction should improve.
- The monitoring process should allow the State Rehabilitation Councils (SRCs) to feel and demonstrate they are more involved in significant ways.
- The process should clarify how frequently an outcome is measured, e.g., every three or six months.
- The system should generate report cards to compare outcomes to previous years—this review should lead to projections that are more realistic.
- The system should move to setting higher goals and higher standards.
- The system should consider awarding bonuses to states, which are doing well.
- Expectations should be used to leverage outcomes that the VR system desires. What gets measured drives behavior and performance.
- The monitoring process should disclose how many are considered ineligible for VR funds but are served through private funds.
- The monitoring process should assist in finding placements and employment for individuals in their hometowns; they should not have to be moved to other states or cities. Allow the individuals served to have that choice.
- The monitoring system should draw attention to and enhance the diversity of placement.
- The system should correlate independent living and other outcomes with state agencies' outcomes, such as employment outcomes. This would provide an easy way to compare states and see outcomes for all states.
- Outcomes for intermediate transition-aged students need to be established now and not until they graduate. Make sure that VR is credited for its contributions to outcomes, such as work experience, internship and postsecondary education.
- The monitoring process should lead to modification of evaluation standards and performance measures indicators (e.g. minimum wage). Currently, this does not make complete sense. There need to be sub-state level measurements. There are alternative (better) models currently available, and RSA should use those models.
- The overall monitoring process should elevate the concept of quality outcomes:
 - Living wage.
 - Part-time employment outcomes.
 - Fringe benefits (e.g., medical care).
- The monitoring process should lead to a standardized definition of placement and consistent accountability standards and structures.

- The monitoring process should lead to more consistent definitions of fringe benefits across states.
- The monitoring process should draw attention to cultural diversity (e.g., rate of disabilities in different cultural groups).
- The monitoring process should be sensitive to the economy (e.g., attention to industry-specific factors).
- Shifts in the labor market need to be identified and addressed as part of state plans (e.g., differences between year-round and seasonal employment need to be considered).

3. What can RSA do to promote communication with parties interested in the monitoring process and its outcomes?

- Disseminate, via e-mail, information about what is posted on the Web site.
- Expand audience beyond SRCs.
- Offer non-Web access, as well and make Web site more user-friendly.
- Make query and search formats more usable and accessible for all. There needs to be a query format that allows asking questions. Make the format consistent throughout and make accessibility a performance indicator. Entities need to be held accountable regarding whether their Web sites are accessible.
- Add key stakeholders to the RSA organizational structure chart used in monitoring.
- Improve timely delivery of findings and important communication from RSA:
 - Within 30 days.
 - Posted on a Web site.
 - Accessible to the public.
- Develop a plan and enforce it.
- Let public and private groups access the state's plan.
- Meet with stakeholders at least once per year.
- Convene a stakeholder meeting within each state to review monitoring results.
- Make information available in other languages.
- Be especially sensitive that communication regarding monitoring reaches all interested groups.
- Invite the national organizations to participate in national and state-level meetings.

- Get involvement in the monitoring process from non-SRC representatives (other stakeholders).
- Add a component to the monitoring process that allows submission of feedback on state activities from consumers and stakeholders.
- Provide a report of findings and results to the people who provide input into the monitoring process.

4. What special focus areas or specific issues do you want RSA to consider for monitoring?

- Consider overall monitoring-process issues:
 - The need to be held accountable to expend the full value of their grants on service delivery to customers.
 - The need to include the private sector among stakeholders (e.g., consumer and community groups) who contribute input to the monitoring process.
 - The need for the monitoring process to be measured and evaluated by an independent evaluator.
- Review how state VR is leveraging additional resources (e.g., funding, groups, services, etc.).
- Look comprehensively at VR services of all that are available in a state.
- Establish or improve VR counselor education and training certification.
- Review how state umbrella agencies are using money and resources to achieve their outcomes.
- Look at how specific interest groups utilize third party funding. How is service provision affected and matched through these means?
- Study the impact of counselor bias for or against external services (e.g., not providing complete or accurate information to an individual).
- Consider tracking special education students into adult life.
- Track what happens to kids who have received services.
- Consider probing how effectively someone is able to use assistive technology and equipment without training.
- Consider the role of consumer choice when determining:
 - Individualized Plan for Employment (IPE).
 - How they receive information about various providers.
 - What services and training they use.
 - Who is involved in providing information to consumers about providers.

- Consider order of selection and those who are not receiving services.
- Consider eventual outcomes for VR customers who receive English language learners (ELL, formerly ESL) and GED services.
- Consider if tracking 90-day retention addresses the issue of quality.
- Consider how should quality be measured when individuals are receiving services as there is a need to collect and have access to data on individuals who have open cases.
- Track recidivism.
- Do not focus just on high school transition but also on how interagency collaboration may lead to increased employment opportunities.
- Look at how certain supports such as Medicaid and Social Security affect people who don't have health insurance or a co-payment health plan. Need to include health insurance as an outcome for successful rehabilitation.
- Look at services to youths transitioning from high school to postsecondary and at services for high school dropouts.
- Look at methods of partnering with private providers and impacts on outcomes.

5. What technical assistance should RSA provide and how should it be delivered in order to 1) improve performance and 2) address compliance issues?

- Make TA national, consistent, uniform, frequent, understandable and open.
- Consider using Rehabilitation Continuing Education Programs (RCEP) (or other outside or third party resources) to provide TA and training to SRCs and VR agencies.
- Identify transition programs with high success indicators and use these as models.
- Establish consistent training nationwide of rehabilitation councils; it should not be wholly incumbent upon states to provide training.
- Provide TA on small business ownership and self-employment.
- Provide TA on best practices and disseminate information on best practices that could contribute to continuous improvement.
- Provide TA on how an agency can get out of trouble if problems are discovered through monitoring or how to stay out of trouble if monitoring yields a very positive report. RSA needs to hold accountable the programs that they are funding. States can learn from other states' experiences.

- Consider the work that regional staff has performed, what TA has proven beneficial to regional staff and how to provide similar resources to those who will assume those tasks.
- Provide TA to the offices of the governors (decision-makers on the state level), educating them on the *Rehabilitation Act*.
- Provide TA on the redesigned monitoring process and how it will work under the new structure. Information about that process needs to be shared with the public in layperson's terms. The whole process should be made transparent.
- Develop, from the RSA level, a common process tool for data gathering or reporting in addition to providing TA on gathering data. It may be better to lead in building the system rather than just providing financial assistance.

OTHER ISSUES IDENTIFIED BY COMMUNITY PARTNERS

- Determine the appropriate role of community providers in the RSA monitoring process.
- Look at how cultural diversity is addressed and how VR agencies are improving practices nationwide.
- Expand and clarify the dissemination of stakeholders' information. It is not just SRC's role but how SRCs can play a role.
- Examine whether or not adequate funding is available to RSA for the new monitoring process, e.g., funds for travel resources.
- Provide access to RSA staff for non-Eastern Standard Time states and territories (e.g. Guam, AK, CA) in the new monitoring system,
- Address the issue of VR counselors' certification (e.g., standards, what is required, and what needs to be changed in the new monitoring system).
- Have program outcomes attached to dollars.
- Provide definition of significant disabilities.
- Examine community partner concerns about the role of private funding.
- Do not evaluate agencies positively or negatively on account of abundant or scarce supplemental private funding.
- Identify funding sources for service provision.
- Show how calculation of costs is done as it needs to be clarified and shared throughout the system.

- Ascertain what RSA will do with the positive results of the monitoring process as it relates to TA, demonstration projects.
- Ascertain how VR outcome measures will relate to One-Stop outcome measures for people with disabilities.
- Ascertain what happens if accountability doesn't occur? RSA needs to have a plan B in place.
- Examine the consistency of reimbursement payments and levels as part of the monitoring system.

DAY 2:

CROSS-GROUP REPORTING SESSIONS

Representatives from each of the stakeholder groups—state VR agencies, State Rehabilitation Councils (SRCs), consumer advocates and community partners—were present in each of the Cross-Group Reporting sessions.

CROSS-GROUP REPORTING: KAREN DAHMS, FACILITATOR

1. Recommendations for Professionals Involved in the Monitoring Process

- Monitoring and program reviews should be conducted by knowledgeable RSA staff members who have an in-depth understanding and expertise on the *Rehabilitation Act*, VR programs and state-specific issues. Providing this training to RSA staff assigned with monitoring and review responsibilities is a high priority and should include components to build state-specific knowledge and understanding.
- RSA staff will require ongoing support in terms of resources, technical assistance (TA) and training to fulfill the responsibilities associated with conducting compliance monitoring and on-site reviews, as well as working with state agencies to respond to findings from those reviews.
- RSA staff must be available to troubleshoot problems and provide necessary TA and intervention, as needed. Quick RSA turnaround and feedback on time-sensitive issues is a high priority and must be available to states in all time zones.
- TA and training should be provided for SRCs and other stakeholders that will participate in monitoring activities.

2. Recommendations for the Monitoring Redesign

- Monitoring and program review activities should be conducted in partnership with state agencies, should involve stakeholders and should focus on program improvement. Clear roles and responsibilities for all levels of participants must be established at the outset.
- Monitoring and review activities should be based on a valid, consistent, relevant and objective set of standards and rules that are reviewed and updated over time.
- Monitoring reviews need to take into account the unique circumstances and the operating environments of state VR agencies.
- The monitoring process must be accountable and credible with commensurate consequences.
- It is important that monitoring and program reviews be timely. Reviews and on-site activities should assess current activities and operations, and reports detailing findings should be developed within 60 days and disseminated widely to state agencies, SRCs, stakeholders and other interested parties.
- Monitoring should include a component that looks at emerging issues and trends, versus just a “snapshot” of the current circumstances and performance levels.

- The process should examine state agency performance against relevant standards and indicators as well as nontraditional measures of success and program impact. These measures should be developed with input of state agencies and stakeholders
- Monitoring and program review processes should be strength-based and focus on what is working. Reviews should seek to identify evidence-based practices, lessons learned and innovative approaches. These should be widely disseminated to state VR agencies and stakeholders to foster program improvement.
- Reviews should result in the identification of state-specific opportunities for enhancing the effectiveness and efficiency of services.
- Reviews should also seek to identify impediments and disincentives to achieving successful outcomes in the VR system (e.g., fair and equitable access to services, order of selection, services to individuals with significant disabilities, etc.)
- The RSA monitoring system should ensure the confidentiality of consumers, and should protect against conflicts of interest on the part of stakeholders participating in review activities.
- Monitoring and review activities should be continuous: they should include components of self-evaluation and self-audit that individual state VR agencies can implement to continuously assess and improve performance.
- Findings should be translated into policy changes, TA, training and guidance.
- The new monitoring and review process should also include an evaluation component, conducted by an outside evaluator, designed to solicit feedback from state agencies and stakeholders and focused on assessing and improving the effectiveness and impact of monitoring activities.

3. Communication is critical

- Ongoing communication and open dialogue between RSA, state VR agencies and stakeholders across the nation is a top priority.
- To build communication, state agencies and stakeholders should have the opportunity to provide input at the beginning of major RSA planning and policy activities
- All monitoring-related activities should be publicized in advance to agencies, stakeholders and other interested parties. Results should be widely disseminated and available to interested parties in alternative formats.
- RSA should maximize the use of technology to disseminate information. The RSA Web site should be refined to be user friendly, provide better access to and utility of data and ensure continued Section 508 compliance.

- RSA should establish and clearly communicate to partners and stakeholders its plan to transition to the new organizational structure and new monitoring system, including specific timeframes.

4. Recommendations for Programmatic Focus Areas

- A recommended focus area is the impact of VR participation in state workforce investment efforts—monitoring reviews should assess both fiscal and resource implications.
- Monitoring activities should focus on different demographics including gender, age, race, cultural background, living location and how the activities affect service delivery, program performance and consumer outcomes.
- It is important that RSA maintain its focus on qualified VR counselors.
- RSA should also continue its programmatic focus on transition and identify measures to assess services, collaborative agreements and costs.
- Another focus area might address the population of individuals from adult and juvenile correction institutions returning to the community.
- Focus areas should be identified in partnership with the state agencies and stakeholders and should be established in areas that are valid, relevant and worthy of investigation.

5. Recommendations for Technical Assistance (TA) and Training

- There should be consistent, uniform, frequent and understandable TA and training available to state agencies, SRCs and stakeholders.
- TA and training must be available in response to time-sensitive issues and requests for RSA assistance, as well as to support ongoing program improvement.
- TA should focus on shared information needs, for example, the *Rehabilitation Act*, Title I Standards and Indicators, new policies or procedures, etc. Equally important is the availability and provision of TA and training to support state-specific needs.
- There should be established, reliable timeframes for RSA responses to time-sensitive requests for TA. Participants recommended turnaround within 24 hours on high-priority requests for assistance, with on-site RSA presence available when needed, also within 24 hours.
- Training and TA should be available nationally, regionally and locally, including across all time zones.
- TA and training should be designed for regionally based focus areas, or for states facing similar issues. One might be states operating under an order of selection.

- Specific TA and training should be targeted to SRCs to achieve their mission and role under Section 105, and for state VR agencies on how to more effectively leverage and use their SRCs.
- TA should also focus on establishing more effective, collaborative partnerships between state VR agencies and consumer and advocacy groups.
- Another TA and training need is to ensure working with culturally and ethnically diverse populations, both within the state agency workforce and in relation to the population in the state.

OTHER RECOMMENDATIONS

- Participants requested that RSA develop guidance for appropriate usage of categories by state VR agencies. Examples of discrepancies across states included order of selection and individuals categorized as too severe to benefit. RSA will need to collect and analyze data to understand these discrepancies and how they affect consumer access to services.
- Participants also recommend RSA fund a longitudinal study designed to track consumers attaining employment three years after exiting the program.

CROSS-GROUP REPORTING: LOUISA FULLER, FACILITATOR

1. What key characteristics or qualities do you want RSA's monitoring system to have?

- Objective criteria (qualitative, quantitative, satisfaction demographics) should be developed to look at trends and patterns and develop new criteria (nontraditional).
- Communication should be two-way, timely and accurate.
- The monitoring system should be characterized by accountability, credibility and consistency.
- The monitoring system should receive adequate financial and human resources.

2. What specific outcomes do you want RSA's monitoring process to accomplish?

- Quality jobs should be achieved for people with disabilities.
- Monitoring results should play an important role in the development of future plans.
- The monitoring process should keep the consumer's perspective in mind. There is a need to monitor practices that prevent or impede people with disabilities from moving through the VR system and securing quality jobs.

3. What can RSA do to promote communication with parties interested in the monitoring process and its outcomes?

- Use clear, straightforward user-friendly language.
- Make all information available in accessible formats on the Web site in a timely fashion.
- Ensure that all parts of the Web site continue to be Section 508-compliant.
- Link the RSA Web site to state sites or vice versa.
- Consider use of webcasting as a communication tool.
- Disseminate information to the broadest audiences, as appropriate.
- Structure communication opportunities for getting information out to more stakeholders. It would include:
 - Quarterly conference calls between RSA and state agencies.
 - Annual RSA on-site visits.
 - Quarterly or biannual, regionally based meetings with RSA, state agencies, SRCs, CAPS and SILCs.

- Maintaining existing relationships with distinct cultural groups, an annual SRC conference.
- Providing non Web-based access to information.
- Involve VR Agencies' partners and stakeholders at the beginning of RSA planning, policy development and big changes.
- Establish better customer service:
 - Identify a personal point of contact within RSA and a designated secondary contact; especially for after Oct. 2.
 - Return phone calls expediently; acknowledge any inquiry when it is received.
 - Be professional in all interactions.
 - Conduct comprehensive reporting of all state agency issues to the SRC.
 - Ensure state agencies have access to RSA expertise and support in a timely way.
- Ensure confidentiality in the monitoring process.
- Ensure that all disability groups are included and represented among stakeholders.

4. What special focus areas or specific issues do you want RSA to consider for monitoring?

- Review transition issues for all disability sub-groups (i.e. school-to-work, school-to-postsecondary, institution-to-work, return-to-work).
- Revisit standards and indicators (Are they good measures? What is the effect of transition?)
- Focus on accountability in relation to individual issues.
- Identify the percentage of a state's budget devoted to services.
- Ensure that customers are equipped to make informed choices.
- Review American Indian Vocational Rehabilitation Services (AIVRS) issues.

5. What technical assistance should RSA provide and how should it be delivered in order to 1) improve performance and 2) address compliance issues?

- Provide training to many groups, on many topics to meet across-the-board needs.
- Provide technical assistance (TA) related to compliance.
- Address other issues, concerns and considerations identified by this group:
 - Concern about RSA's staff capacity to meet the increased communication and other expectations.
 - Concern about slow clearance of materials, which impedes the monitoring process.

- A consideration for RSA should be the need to have the diversity of the disability community considered before implementation and during implementation.
- Concern that RSA-monitoring should be supplemented with a third-party evaluation of RSA monitoring itself, as well as the change process underway at RSA.
- Concern about receiving communication and correspondence in a timely manner.
- Concern that, with the movement from a regional to a national-level structure, communication will be adversely impacted (e.g., by the range of time zones and corresponding differences in working hours).
- Concern about the decision-making process, who makes decisions, the timeliness of response and the appeals process.
- Concern about issues around training of RSA state monitoring teams, given that state administrative structures and procedures, as well as regulations, vary.
- Concern about ensuring the role of community private provider groups, SRCs and consumer advocacy groups (all interested stakeholders) in the monitoring process.

CROSS-GROUP REPORTING: BEN GUSTAFSON, FACILITATOR

1. What key characteristics or qualities do you want RSA's monitoring system to have?

- RSA's monitoring system should have uniform, objective, evidence-based standards and definitions that are applied based on state needs and culture.
- RSA's monitoring system should provide timely assessment of current data and performance and timely feedback (60 days).
- RSA's monitoring system should have resources and funding adequate to hire and train qualified staff, as well as provide appropriate technical assistance (TA).
- RSA's monitoring system should have meaningful participation by consumers, SRCs, VR, CAPs, providers, SILCs, ILCs, etc.
- RSA's monitoring system should have third party, independent evaluation of the monitoring system.

2. What specific outcomes do you want RSA's monitoring process to accomplish?

- Policy changes, TA, training and guidance should produce increased effectiveness and efficiency of services.
- RSA's monitoring process should identify emerging issues and successes.
- RSA's monitoring system should present data and innovative practices that lead to effective marketing by RSA, state VR agencies, SRCs and stakeholders.
- RSA's monitoring process should ensure accountability of the VR system to the letter and spirit of the law.
- Feedback and follow-up should occur in a timely manner with a specific timeline.

3. What can RSA do to promote communication with parties interested in the monitoring process and its outcomes?

- Provide better customer service from RSA, including a specific point of contact (and a back-up), timely responses (within 24 hours) and written follow-up in clear, simple language.
- Develop a more user-friendly Web site that continues to be Section 508-compliant and includes an improved search function, archived Q&A by subject and current information.
- Develop a communication plan that includes broad, timely notice to partners and stakeholders about available information.

4. What special focus areas or specific issues do you want RSA to consider for monitoring?

- Equity in service provision across disability groups and ethnicities, by individual needs.
- Monitoring practices, policies and procedures for order of service that ensure no disparate impact.
- Informed choice and consumer control.
- Improved partner communication.

5. What technical assistance should RSA provide and how should it be delivered in order to 1) improve performance and 2) address compliance issues?

- Content Issues—technical assistance (TA) should address:
 - The *Rehabilitation Act*, regulations and sub-regulatory guidance.
 - The provision of guidance for leveraging related service systems.
 - The empowerment of rehabilitation councils to fulfill their function.
 - Other laws affecting consumers.
 - The professional development needs of counselors to improve their skills and qualifications.
 - The provision of TA regarding ways to improve customer success and satisfaction.
- Method Issues—TA should be:
 - Current, using current data and information.
 - Accessible, both for people with disabilities and culturally competent.

CROSS-GROUP REPORTING: EILEEN KEEFE, FACILITATOR

1. What key characteristics or qualities do you want RSA's monitoring system to have?

- Three major characteristics were noted a number of times: accountability, flexibility and timeliness. Timeliness refers not only to the monitors' reports being made available to the program while the information is still "fresh" but also in terms of "timelines" for monitoring, as well as for corrective action to be implemented.
- The group suggested the system have a carrot-and-stick approach. A system that is supportive—not punitive—but that has enough "teeth" in it to ensure accountability on the part of the programs.
- Other desired system characteristics included credibility, consistency and objectivity.

2. What specific outcomes do you want RSA's monitoring process to accomplish?

- The monitoring system should ensure continuous improvement. It should recommend, plan, take action, follow-up and provide rewards, as well as sanctions. The process should not be geared exclusively toward compliance.
- The monitoring system must be transparent, uniform and consistent across states, and have established timelines.
- Additionally, the monitoring system needs to:
 - Acknowledge all monies spent, including those of community organizations.
 - Recognize the demographic and other differences that make monitoring in every state a little different.
 - Show the ratio of numbers of people who are not served to those served, as well as the number who do not complete the process.
 - Show increased consumer and family satisfaction.
 - Have good data that is usable by all organizations with a stake in the process.
 - Ensure up-front what the system will monitor, because what gets measured gets done.
 - Consider informed choice.
- Other concerns were also expressed included of order of selection, 90 days is not a true measure of success (this should be increased to nine months or a year), and the system has to look at the quality as well as the length of placement.

3. What can RSA do to promote communication with parties interested in the monitoring process and its outcomes?

- Develop a national communication plan and have the states develop a state communication plan.

- Update the RSA Web site and include policy issues and other information in a timely manner.
- Develop a listserv.
- Put a chat room option on the Web site so that stakeholders can communicate with one another.
- Make the Web site user-friendly for all audiences.

4. What special focus areas or specific issues do you want RSA to consider for monitoring?

- Focus on transition needs and include families and counselors.
- Focus on placement and employment, as well as transition.
- Ensure that VR counselors receive “credit” for transition planning, as well as for jobs.
- Look at careers rather than jobs and at collaboration between VR and businesses as well as VR and schools.
- Ensure that programs must have adequate and qualified staff.

5. What technical assistance should RSA provide in order to 1) improve performance and 2) address compliance issues?

- Provide training and technical assistance (TA) to SRCs to ensure they understand their roles, responsibilities and authority and ensure that they have the support to carry them out.
- Provide TA to develop collaborative partnerships and build relationships with consumer organizations.
- Develop a national clearinghouse that is accessible for training and TA materials, curricula, best practices, etc.
- Offer training:
 - In transition for various partners and stakeholders.
 - For collaborative partners and consumer organizations.
 - For rehabilitation counselors.
 - In diversity and minority outreach.

CROSS-GROUP REPORTING: CHRISTINA TECHICO, FACILITATOR

The following are some of the common themes and priorities that the group distilled from the various stakeholders' input.

1. What key characteristics or qualities do you want RSA's monitoring system to have?

- It usually takes three to four years to become knowledgeable. Many SRC members are leaving their boards. For SRCs to assume a larger role, significant additional resources are required. Some SRC members or staff should probably be salaried if we are now expecting so much more than we formerly expected from all volunteers.
- SRC needs to have the staff and budget to carry out responsibilities.
- Resources need to be provided to stakeholders in terms of training and communication.
- There is a concern that, with the new monitoring structure, there may not be enough RSA staff to provide the type of monitoring, review and follow-up technical assistance (TA) that will be required. There needs to be clearer definition of tasks, resources and deliverables.
- Communication should not have any boundaries and should provide candid responses.
- Clear role definitions are needed from the federal RSA level down to consumers.
- SCRs need training for new roles, responsibilities and resources. Training support is needed and may require funding from RSA.
- Training needs to be provided to state agencies on such topics as state services, regulations and policies.
- How what is being done will be measured will need to be Address (i.e., key performance indicators). Do they need to be revisited? How will it be done?
- The partnership roles of different stakeholders need to be clarified.
- RSA monitoring responsibilities should be consistent with the Rehab Act.
- The practices will be for conducting business among partners need to be developed.
- The concern that some partners appear to be “more equal than others” and that consumers are underutilized will need to be addressed.
- Technology needs to be used to engage and stay in communication with partners.
- The need to provide early notification of monitoring and review (as early as three months).
- Deadlines need to be clearly communicated for when things need to be done—especially for groups outside state agencies (e.g., consumers).

- Feedback should come back from entire groups, not just a few selected constituents.
- Timeliness of feedback should be developed and all the information should be used more constructively.
- Alternative plans should be put into place so that rather than reducing funding, transfer funding to alternative providers.
- Timely consequences should be established for failing to meet timelines.
- Positive consequences should be established for situations when a good job is done.
- All parties involved in the monitoring process, including RSA, should be held accountable for meeting their responsibilities.

2. What specific outcomes do you want RSA's monitoring process to accomplish?

- Advertise success and consider nontraditional ways of publicizing those successes.
- Pay attention to the consumers' perspective, which has been underutilized; help consumers to know about successes.
- Involve employers and ensure that publicity about success reaches legislative decision-makers and leadership.
- Highlight what VR is doing, the value of the VR program and the profitable return on investment.
- Identify innovation and best practices that can be shared across the states.
- Develop strategies for advertising to different stakeholder groups.
- Use consumer groups to broadcast successes.
- Take into account multiyear trends and unusual circumstances.

3. What can RSA do to promote communication with parties interested in the monitoring process and its outcomes?

- Institute some form of regional structure because there is a historical cultural cohesiveness among some of the regions that should be recognized.
- Ensure accessible information, methodologies and materials in language people understand so that it can be conveyed to a wide range of people.
- Do not limit communication solely to a Web site.

- Assure that RSA's Web site:
 - Maintains Section 508 compliance and screen-reader friendliness.
 - Installs better search engines.
 - Develops an e-mail feedback component.
 - Reflects professional standards and involves a professional Web support team.
 - Provides technology enhancers.
 - Is updated frequently.
 - Is maintained by dedicated staff.
 - Is easier to navigate.
 - Attends to customer-specific information.
 - Establishes links between state, federal and local Web sites.

4. What special focus areas or specific issues do you want RSA to consider for monitoring?

- Identify effective practices within a state (with input from consumers) including:
 - Including plans for employment.
 - Providing a selection of service providers.
 - Enabling consumers to make better choices.
- Highlight successful implementation of programs and VR.
- Look at state plans and programs over time not just three years. Resist uncritical comparison of states with each other.
- Look at the individual states own objectives and continue to work on objectives over time.
- Compare a state's performance in one year to its performance in previous years.

5. What technical assistance should RSA provide and how should it be delivered in order to 1) improve performance and 2) address compliance issues?

- Technical assistance (TA) on laws and regulations to individual states and across states (where there are common themes, grouping).
- System resources should be provided.
- Training should be commensurate with knowledge of individuals; not one size fits all.
- TA and training should be provided to SRCs.