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

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Executive Summary

The Rehabilitation Services Administration (RSA) reviewed the performance of the following programs of the Rehabilitation Act of 1973, as amended (the Act) in the state of Alabama (AL):

- the Vocational Rehabilitation (VR) Services Program, established under Title I;
- the Supported Employment (SE) Services Program, established under Title VI, Part B;
- the Independent Living (IL) Services Program, authorized under Title VII, Chapter 1, Part B; and
- the Independent Living Services Program for Older Individuals Who Are Blind (OIB), established under Title VII, Chapter 2.

In Alabama, one state agency, Alabama Department of Rehabilitation Services (ADRS), is responsible for administering the VR, SE and OIB programs. ADRS and the statewide independent living council (SILC) jointly administer the IL program under Title VII, Chapter 1, part B.

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

- gathered and reviewed information regarding each program's performance;
- identified a wide range of VR and IL stakeholders and invited them to provide input into the review process;
- conducted two on-site visits, and held multiple discussions with ADRS staff, members of ADRS' state rehabilitation council (SRC), staff and members of the SILC, and stakeholders to share information, identify promising practices and areas for improvement;
- provided technical assistance (TA);
- worked with ADRS and stakeholders to develop goals, strategies, and evaluation methods to address performance issues; and
- identified the TA that RSA would provide to help improve program performance.

As a result of the review, RSA:

- identified promising practices;
- identified performance issues;
- and ADRS developed performance goals and strategies related to selected issues;
- identified the TA that it would provide to assist the agency to achieve the goals identified as a result of the review;

- made recommendations; and
- identified potential issues for further review.

Specifically, at the end of the review process, ADRS developed strategies to achieve the following goals:

In the VR and SE programs, ADRS will:
- stabilize overall agency performance expectations and reduce counselor caseload size;
- increase the rehabilitation rate from 70 percent to 74.5 percent by FY 2010;
- further develop the overall SE system in AL to provide the foundation for increasing the number of individuals who appropriately achieve SE outcomes; and
- increase the strategic use of data.

In the IL program, ADRS, SILC, CILs and IL providers will:
- strengthen the capacity of the SILC to provide the independent living leadership envisioned by Title VII of the Rehabilitation Act;
- ensure that all SAILS policies and practices are fully consistent with the IL philosophy; and
- obtain or leverage additional resources for the Alabama IL programs by maximizing collaborative efforts among all ADRS divisions.

In the OIB program, ADRS and the IL stakeholders will:
- increase funding beyond the federal allotment;
- leverage resources through increased collaboration; and
- increase the number of qualified RT and O&M candidates on the state personnel register, and to encourage them to consider joining ADRS.

Introduction

Section 107 of the Rehabilitation Act of 1973, as amended, requires the Commissioner of the Rehabilitation Services Administration (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 Supplement for Supported Employment under Title VI 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 it's 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 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's reviewed the performance of the following programs of the Act:

- the Vocational Rehabilitation (VR) Services Program, established under Title I;
- the Supported Employment (SE) Services Program, established under Title VI, Part B;
- the Independent Living (IL) Services Program, authorized under Title VII, Chapter 1, Part B; and
- the Independent Living Services Program for Older Individuals Who Are Blind (OIB), established under Title VII, Chapter 2.

In addition, RSA also reviewed ADRS' progress on:

- the agency's Corrective Action Plan (CAP) that was established as a result of findings from RSA's FY 2004 Section 107 monitoring review; and
- the assurance that ADRS made to RSA in conjunction with its FY 2007 state plan.

<u>Alabama Administration of the VR, SE, IL, and OIB Programs</u>

ADRS is governed by the AL Board of Rehabilitation Services and reports through the Board to the Governor of Alabama. ADRS is a state agency that is primarily concerned with vocational and other rehabilitation needs of individuals with disabilities and is designated as the sole state agency to administer the VR state plan. ADRS is the designated state agency (DSA) for Alabama. ADRS operates as a combined state VR agency. There is no designated state unit or separate agency for the blind in Alabama.

ADRS is organized into five divisions: Vocational Rehabilitation Service, Early Intervention, Children's Rehabilitation Service, State of Alabama Independent Living (SAIL)/Homebound, and Administration. ADRS provides VR, SE and OIB services through its Vocational Rehabilitation Service Division. IL Part B services are part of the Independent Living Services Program, one of three components SAIL.

For the four programs listed above, this report describes RSA's review of ADRS, provides information on the agency's performance, identifies promising practices, identifies performance issues, and identifies the related goals, strategies, and TA that RSA will provide to ADRS to address each of the issues identified during the review.

<u>Appreciation</u>

RSA wishes to express appreciation to the representatives of the ADRS, the SRC, the SILC, and the stakeholders who assisted the RSA monitoring team in the review of the AL VR, SE and IL programs.

Chapter I: RSA's Review Process

Data Used During the Review

RSA's review of the AL VR, SE, and IL programs began in the fall of 2006 and ended in the summer of 2007. RSA's data collections are finalized and available at different times throughout the year. During this review, RSA and the state agency used the most recent data that was available from the FY 2005 and FY 2006 collections. As a result, this report cites data from FY 2005 and FY 2006.

Review Process Activities

During the review process RSA's AL state team:

- gathered and reviewed information regarding ADRS' performance;
- identified a wide range of VR and IL stakeholders and invited them to provide input into the review process;
- conducted two on-site visits, and held multiple discussions with ADRS staff, SRC members, SILC members, and stakeholders to share information, identify promising practices and areas for improvement;
- provided TA to ADRS;
- worked with ADRS to develop goals, strategies, and evaluation methods to address performance issues;
- made recommendations to ADRS;
- identified potential issues for further review; and
- identified the TA that RSA would provide to help improve the performance of the AL VR, SE and IL programs.

RSA Alabama State Team Review Participants

Members of RSA's AL state team included representatives from each of RSA's State Monitoring and Program Improvement's (SMPID's) five functional units. The RSA AL state team was led by RSA's state liaison to AL, Regina Luster (fiscal unit) and included: Jeff Clopein, co-liaison (vocational rehabilitation unit), Joe Doney (technical assistance unit), Felipe Lulli (independent living unit), and Steve Zwillinger (data unit). Jerry Elliott (Office of Policy and Planning) also provided assistance throughout the review process.

Information Gathering

During FY 2007, RSA began its review of the AL VR, SE and IL programs by analyzing information including, but not limited to, RSA's various data collections, ADRS' VR state plan, AL's state plan for independent living, and ADRS' SRC's Annual Report. After completing its internal review, the RSA team carried out the following information gathering activities with ADRS and

stakeholders in order to gain a greater understanding of the strengths and challenges of the AL VR, SE, and IL programs:

- conducted a series of teleconferences with VR and IL stakeholders;
- conducted four teleconferences with the ADRS management beginning in February 2007;
- conducted an on-site monitoring visit during the week of April 16-20, 2007 and met with staff/representatives of ADRS, community rehabilitation programs (CRPs), ADRS Board and SRC, stakeholders, and the Deaf Advisory Council;
- conducted an on-site monitoring visit during the week of June 25-29, 2007 and met with staff of ADRS, CRPs, employers, Veteran's Administration Vocational Rehabilitation and Employment Program, Client Assistance Program, Protection and Advocacy of Individual Rights Program, CIL, ADRS Board, and AL Council for Developmental Disabilities;
- held several teleconferences and on-site meetings focused on the SRC and IL services, including the development of the SILC; and
- conducted teleconferences and held on-site meetings with the SILC chairperson as well as potential members to the SILC.

Chapter 2: Vocational Rehabilitation and Supported Employment Programs

Table 1, on the page that follows, provides fiscal and program data for fiscal years 2002 through 2006. This data provides an overview of the VR program's costs, outcomes, and efficiency. The table identifies the amount of funds used by the agency, the number of individuals who applied, and the number who received services. It also provides information about the quality of the agency's employment outcomes and its transition services.

Table 1. ADRS Program Highlights, 2002 – 2006

ALABAMA	2002	2003	2004	2005	2006
Total funds used	$69,396,514	$70,479,027	$66,901,539	$73,902,629	$80,518,335
Individuals served during year	35,755	37,127	37,286	38,383	39,629
Applicants	17,559	16,746	15,656	17,364	17,422
Closed after receiving services	10,570	10,898	11,070	10,927	11,640
Closed with employment outcomes	7,699	7,705	7,710	7,717	7,792
Employment outcomes without supports in an integrated setting	7,053	7,118	7,067	7,198	7,193
Average cost per individual served	$1,940.89	$1,898.32	$1,794.28	$1,925.40	$2,031.80
Average cost per employment outcome	$9,013.70	$9,147.18	$8,677.24	$9,576.60	$10,333.46
Employment outcomes per $million spent	110.94	109.32	115.24	104.42	96.77
Competitive employment outcomes per $million spent	104.65	105.86	112.09	102.51	95.07
Average hourly earnings for paid employment outcomes	$7.70	$7.84	$7.92	$8.29	$8.41
Average state hourly earnings	$14.98	$15.50	$15.83	$16.56	$17.20
Average hours worked per week for paid employment outcomes	34.92	34.67	34.30	34.43	34.34
Percent of transition age served to total served	43.11	41.37	43.32	42.59	43.25
Employment rate for transition age served	75.95	75.29	72.56	76.17	71.83
Average time between application and closure (in months) for individuals with successful paid employment outcomes	23.90	23.70	25.00	25.90	25.60
Average number of individuals served per total staff	56.57	57.83	62.56	62.92	67.17

<u>Provision of Technical Assistance to the VR and SE Programs During the Review
Process</u>

Throughout the review process RSA staff:

- provided TA regarding general ADRS program performance based on data
  tables from FY 2005 and discussion during the RSA Data Overview
  session, including topics related to comparative performance, counselor
  workloads, resource use and staffing patterns, service patterns, and
  number and quality of employment outcomes;
- provided TA regarding SE activities, including review of the SE program
  structure, SE performance data (based on RSA 2006 data and data
  supplied by ADRS staff), mental retardation outcome data (RSA, FY
  2006), sources of extended funding support, SE vendor contract content,
  and discussion of SE data quality issues. This TA occurred as part of
  three meetings: a meeting with DD Council staff, a meeting with Greater
  Birmingham United Cerebral Palsy as a provider who served individuals
  using Medicaid waivers, and a specific SE discussion with ADRS
  management;
- provided TA regarding transition, including discussion of general
  transition activities, transition staffing patterns, transition performance
  data (RSA, FY 2006), specific learning disability performance data (RSA,
  FY 2006), and consumer intake patterns resulting from transition
  activities;
- verified ADRS RSA-911 data while on site;

  This verification process consisted of using a custom computer application
  to compare the data reported on the RSA-911 Case Service Report
  submitted to RSA by ADRS to the actual case files including the original
  application to the agency and the Individual Plan for Employment. The
  verification process focused on 42 data elements reported on the RSA-911
  Case Service Report. The 42 data elements included the date of
  application, gender, date of birth, race, ethnicity, source of referral,
  impairment code and cause of impairment for both primary and secondary
  impairments, weekly earning at application and closure, hours worked in a
  week at application and closure, primary source of support at application
  and closure, level of education attained at application and closure,
  employment status at application and closure, type of public support at
  application and closure, date of eligibility determination, date of
  individualized plan for employment, date of closure, and type of closure;

- reviewed a non-statistical sample of 15 case files;

  Six of the records were closed in FY 2006; seven were closed in FY 2005;
  and two of the records were closed in FY 2004. For each year both
  successful and unsuccessful closures were reviewed. So much of the

ADRS is automated that only those data elements that were reported on paper documents were verified.
(No significant issues were identified. Minor inconsistencies between original case file data and final reported data (for example, a consistent one day delay between signing an IPE and the date it was entered into the case management system) were identified and explained.);

- demonstrated the RSA Management Information System (MIS) to agency staff;

  The demonstration included how to locate 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 team also showed agency staff how to do ad hoc queries on the MIS to obtain information about ADRS, and/or compare and contrast ADRS against other similar agencies.

- provided staff with a general overview of QA processes, focusing on:
  - use of performance goals and evaluative techniques;
  - other agencies' methods for approving and monitoring community rehab providers;
  - communication techniques in developing and monitoring QA at all staff levels;
  - methods of staff buy-in to QA systems and continuous quality processes;
  - methods for developing a coordinated QA program that involves staff, stakeholders, consumers, and community partners;
  - QA report dissemination;
- provided feedback to the agency on its case management system; and
- reviewed and assessed selected FY 2007 State Plan attachments to prepare for the submittal of the FY 2008 State Plan.

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

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

1. College Preparation Programs

ADRS operates its College Preparation programs in 7 areas of the state. Individuals with disabilities are referred by their VR Counselor based on many factors, one of which is a previous vocational evaluation indicating the potential for college success. The College Preparation programs are held on local 2 or 4-year college campuses throughout the state. The collaborative effort involves partnerships with Disability Service Providers at the various post-secondary

institutions, CRPs, and university professors, with a focus on assisting the student in developing skills to help them succeed in college. The curriculum includes study strategies, time management skills, use of accommodations, and education on issues related to college life, technology and the college classroom. Over 400 students attended the 2-week summer programs across the state and successfully began college at the completion of this summer program.

2. Career Preparation and Training Initiative (CPTI)

ADRS in partnership with local school systems, transportation agencies, local colleges and employers, conducts a 2-week training session each summer focusing on seniors with disabilities planning to enter the work force following high school. Some of these individuals will choose to enter technical training. These consumers with disabilities are introduced to the world of work through team building activities, employment site tours, potential employer visits, 2-year college tours, socialization activities, and discussion topics focusing on the soft skills associated with getting and keeping a job. This program is community and classroom based with an emphasis on developing these students into future workforce participants. This is the fourth summer the program has been held with a record-high 114 referrals processed.   One key factor in CPTI's success is that each consumer's VR counselor is required to participate, along with the consumer, in all activities.   ADRS plans to expand this service next summer to more students. This program is being piloted in the Birmingham and surrounding areas, with plans being made to replicate its success in other areas of the state.

3. Business Relations Program

For more than 25 years, ADRS has formally operated a business relations program in concert with its philosophy of "dual customer," i.e., individuals with disabilities and employers. To that end, a customized program for private and public sector businesses has been designed, delivered and tracked under a structured employer account system that includes an agency-developed employer database. Seventeen specialty staff of employer development coordinators (EDCs) implements this program at the local level with the initiative spearheaded by a state coordinator of business relations who also serves on the ADRS Executive Leadership Team. In support of the business relations program, ADRS conducts in-service training for staff and affiliates (e.g. CRPs) via its annual "Employment Institute," along with extensive specialty training for all EDCs. It also operates under a "Strategic Plan for Collaboration of Employment Resources" so that there is coordinated outreach to the business community by ADRS and its affiliates.

Acting on the philosophy of business-as-customer, ADRS incorporates business partners from the private sector in many areas of leadership: the ADRS Board, SRC, several advisory committees, and through the Alabama Business Leadership Employment (ABLE) Network. In this capacity, employer partners directly advise ADRS on, and participate in, the design and implementation of services to

business based on their disability-related and employment needs. These services include: *recruitment services* (pre-screening, real-time electronic recruitment of VR consumers via ABLE, job site training, post-hire follow up, no obligation tryouts, outplacement); *technical assistance* (functional capacity assessments, workplace modification, ergonomics, job task analysis, product modification, accommodation implementation); *employer training* (accommodation dialogue and solutions, interviewing do's and don'ts, disability etiquette, identifying essential functions, disability awareness); *disability management* (retention services for employees whose job is affected by illness, injury or disability); *ADA resources* (employment mandates, interviewing issues, reasonable accommodations, undue burden, resources, accessibility reviews); and *financial incentives* (assistance with tax credits and tax deductions). Soon to be added to the list of services will be *emergency preparedness for customers and employees with disabilities.* Annually the ADRS EDC team of 17 works directly with more than 850 companies providing in excess of 5,500 services to them statewide.

4. Adaptive Driving Training Program

ADRS employs a Certified Driver Rehabilitation Specialist (CDRS) to work with individuals with physical disabilities requiring adaptive equipment to drive independently. In addition, consumers with cognitive disabilities are served based on need and specific disability issues. The ADT program operates a four tier program with 4 ADRS owned vehicles equipped with varying levels of modifications.

The first tier is evaluation, where the CDRS provides off the road and on the road assessment of a consumer's needs as it relates to driving. Initial assessments assist the CDRS in planning for further services.

The second tier is training. Provided the consumer moves through the assessment process successfully, a prescriptive number of hours are recommended for training.

The third tier is licensure where those consumers who require updated licensing or new licensing will complete the licensure requirements through a partnership with Alabama Department of Public Safety and ADRS. ADRS actually conducts the road test with the consumer in the adapted vehicle and issues a report that is accepted for licensing purposes by the Alabama Department of Public Safety. ADRS staff is trained to provide the same road test and driving activities required of all other license applicants.

The fourth tier is modification where the consumer's vehicle is equipped, reviewed and finalized by the CDRS. While ADRS does not purchase vehicles, ADRS has relationships with auto manufacturers in which the vehicle can be ordered with features like dropped floors and overhead wiring, significantly reducing the costs of structural modifications to the vehicle. ADRS also

negotiates fee schedules for modifications with vendors each year, making costs more predictable.

Services through this program are provided statewide in the consumer's home area. RSA staff believes that the relationships with manufacturers, negotiated vendor fees, and the relationship with the Alabama Department of Public Safety are particularly noteworthy.

<u>VR and SE Issues Identified by ADRS and Stakeholders During the Review Process</u>

RSA's review process solicited input from ADRS and stakeholders about VR and SE performance and compliance issues. The following issues were identified throughout the review process:

- The anticipated or realized impact on consumers of losing experienced VR counselors.

- Dealing with emerging disabilities (e.g., autism), serving underserved populations (e.g., latinos), and providing services to an aging population.

- The role of Quality Assurance (QA) needs to be strengthened, starting by examining the tools and systems utilized by other state agencies in expanding the traditional role of QA throughout the VR process.

- Expansion of outreach efforts is needed in the medical community for VR and IL programs to ensure reaching all potential consumers exiting hospitals in all areas of the state.

- Expansion of SE services for students reaching the age of 21 and the connection to resources and ongoing support for clients exiting the school system; ADRS needs consistent connection and outreach to community resources beyond the existing supported employment projects; funding to serve the most severe clients in need of SE services; and consistent interagency coordination across the state.

- The need to serve more consumers who are in the most severe category in order to address the impression that to meet yearly goals, counselors prefer to work with job ready clients only; significant cognitive services are not available in the communities; autism cases/numbers are increasing and concerns were raised that services are unavailable and/or limited.

- VR counselor caseloads are too large (250 +) for counselors to effectively work with consumers and there are not enough support services throughout the state.

- Concerns were raised related to the quality of job placement services for consumers completing college degree programs.

- There is a need for basic sign language training and more certified interpreters on ADRS' staff.

- Consumers need more opportunities for federal and state placements and internships with employers.

- The timeliness of obtaining equipment or van modifications.

Following compilation and discussion with ADRS about the issues, RSA worked with ADRS to address as many of these issues as possible either directly or by consolidating the issue into a broader issue area.

VR and SE Performance Issues, Goals, Strategies, and Technical Assistance

RSA and ADRS agreed on the following performance goals; strategies to achieve those goals, and TA that RSA would provide to assist ADRS achieve each goal. These goals and strategies will be considered for inclusion in ADRS' FY 2009 state plan and if they are included, progress on achieving these goals will be reported in ADRS' FY 2011 annual state plan submission.

1. ADRS Resources

Issue: In general, ADRS takes more applications, serves more individuals and achieves more employment outcomes than other general and combined agencies, taking into account state population and funds available. See the Table 2.

Table 2. ADRS Outcomes (FY 2006)

Measure	ADRS	Mean for all general and combined VR agencies	Median for all general and combined VR agencies
Applicants/million population	3,371	2,363	2,325
Applicants per million dollars spent	208	188	189
Competitive Employment outcomes per million population	1,662	805	685
Competitive Employment Outcomes per million dollars spent	103	62	60
Eligible cases on hand per million population	6,233	3,462	3,221
Number receiving services under an IPE during the year per million dollars spent	519	302	292

These outcomes are compelling, however, they appear to be straining the service delivery system. This appears to be true for the basic VR field program in terms of the VR counselor caseloads as well as for the programs that provide services to the individuals on the caseloads, such as the rehabilitation engineering services, the employer development program, vocational evaluation services, and others.

This effect is most easily documented for VR counselors. While RSA data indicates that the average AL VR counselor (VRC) served 189 cases, actual caseload size varies greatly by the type of assignment and the location of the position. Most VR counselor caseloads were described as being between 250 and 350 per counselor, with the highest in the state at the time we visited at over 600 cases. These numbers are extremely high. The average caseload size for general and combined agencies is a little over 100 cases per counselor, although there is considerable variation within a state and between states. Likewise, ADRS has very high expectations of counselors in terms of employment outcomes and cases served. Counselors frequently cited employment outcome expectations of more

than 50 per year. Such goals (and even higher expectations) were not uncommon prior to and shortly after the passage of the Rehabilitation Act of 1973. However, agency expectations for employment outcomes for counselors are more commonly in the 20's and 30's and occasionally the 40's under the provisions of the Rehabilitation Act.

It is likely that the caseload size affects the timeliness and quality of case services. Comments to this effect were occasionally made by stakeholders, and during the review some students in the college prep program told the review team that that they either did not know their counselor or had very little contact with them. Counselors and supervisors acknowledged in interviews that the workload was overwhelming.

Counselors and supervisors indicated that the large workload could inadvertently complicate aspects of the service delivery system. For example, one counselor opened her transition caseload students in the tenth grade rather than the more common practice of opening formal cases for students in the eleventh grade because of the one to two year wait to get a vocational evaluation from Lakeshore Rehabilitation Facility. The counselors perceived few quality vocational evaluation resources outside of Lakeshore Rehabilitation Facility and Easter Seals of Homewood, especially in the rural areas of the state, and the six vocational evaluators were scheduled for years in advance with some, but relatively little, flexibility for emergencies. Similar stories were told relative to the ADRS employment program and the rehabilitation-engineering program. Overload in the support programs cannot be corroborated through RSA data, as the national databases lack sufficient detail, but there was consistent agreement about the difficulty in getting these kinds of support services. For this reason, RSA suggests that the general process that is applied below to stabilize and reduce counselor caseload size be considered for determining the need for other service delivery program staff as well.

One of the reasons that it may be possible for Alabama to have some impact on reducing the overloaded system is that ADRS does have a significant number of FTEs, currently a total of 610. Of these, 241 are reported as counseling and guidance staff, but only about 163 are actually caseload carrying counselors. The FY 2005 RSA-2 report showed 325 support staff. Reviewing the current use of staff resources may show some areas where resources could be redirected to the field program.

Goal: Stabilize overall agency performance expectations and reduce counselor caseload size.

Strategies:

- study the current counselor staffing structure with respect to caseload size, employment outcome expectations, and the effects of type of caseload assignment and location of assignment on workload.

- review the current agency staffing pattern to determine if the current staff allocations are still appropriate, and if not appropriate, identify resources that could be redirected to the field program.
- hire additional counselors through SMART BUDGET appropriations requests. (2 VRC positions were requested and approved in the FY 2008 budget, and 10 will be requested in the FY 2009 budget request).

Methods of Evaluation:

- Develop a plan for distribution or redistribution of staff resources, taking into account resources currently available for redistribution and any additional positions approved by December 31, 2007. This plan should contain specific steps, timelines and measurable objectives for the implementation of resource distributions that would increase counselor positions in the field, maintain but not increase the current level of ADRS performance, and decrease the overall performance expectations for individual counselors commensurate with the increase in resources.
- Add specific steps, timelines and measures to the FY 2009 State Plan submission for RSA and ADRS monitoring purposes.

Technical Assistance:

- RSA staff can assist with the development of models to readjust performance expectations and project how performance might change as staff is added.
- RSA can help identify if there are other agencies that have gone through similar processes or are particularly good at taking into account multiple variables in estimating performance outcomes.

2. Rehabilitation Rate

Issue: Improve the percentage of individuals receiving services under an IPE who achieve an employment outcome (the rehabilitation rate).

ADRS has historically had a rehabilitation rate that exceeded 70 percent. This rate exceeds the national average by about 10 percent. However, ADRS has set for itself the challenging goal of increasing an already high rehabilitation rate and is committing itself to this goal through the State of Alabama's SMART BUDGET process. If ADRS is successful in reducing the very large counselor caseload size as discussed in issue 1 above, it is possible that the additional time that becomes available to counselors can be used for better planning and increased follow-up so that a general decrease in the number of cases served per counselor could lead to a higher success rate with the individuals served by each counselor.

There are several reasons that ADRS gives for selecting this goal. Foremost is that individuals who do not achieve an employment outcome after receiving

services under an IPE are individuals with whom the agency has established a relationship and has invested time and resources toward achieving an employment outcome, and the job is not done. In addition to being the right thing to do for the individual, it is also the right thing to do to maximize the effectiveness and efficiency of the VR program by maximizing the investment already made in the individual. Finally the rehabilitation rate is one of the RSA performance indicators (indicator 1.2) under Section 106 of the Rehabilitation Act.

Goal: Increase the rehabilitation rate from 70 percent to 74.5 percent by FY 2010.[1]

Strategies:

- Review status 28 closures to identify reasons for unsuccessful outcomes, and continue to review these cases as part of QA activities.
- Consider requiring one or more process requirements such as supervisory review of 28 cases prior to closure, requiring multiple contact numbers at application to provide more points of contact if the individual cannot be located at the primary address, or establishing minimum requirements for regular personal contact. The particular type of process requirement should be determined by the status 28-closure review discussed above.
- Identify population needs of groups more likely to be unsuccessful in achieving an employment outcome and provide staff training and/or services to address needs. Possible examples might be to develop training and services for emerging disability populations such as autism, culturally relevant approaches to the growing Hispanic population, and development of a focus on serving older workers who do not wish to retire but are aging into disability.
- Reduce caseload size using approach outlined under the goal of reduction of caseload size and performance expectations.

Method of Evaluation:

- Overall method of evaluation is the achievement of a rehabilitation rate of 74.5 percent in FY 2010 based on the results of ADRS casework activity as reported on the RSA 113 report.

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[1] RSA notes the potential conflict between Goal 1 and Goal 2, i.e., Goal 1 is premised on the observation that the current high performance targets are straining the service system, and Goal 2 raises a performance target for the rehabilitation rate. While Goal 2's intent is laudatory, RSA advises ADRS that if Goal 1 in not accomplished, pursuing Goal 2 may further strain the service system. Conversely, accomplishing Goal 1 is likely to increase the likelihood of achieving the Goal 2 targets.

- To develop measurable intermediate steps related to the particular strategies outlined above, develop by March 31, 2008, a plan for implementing these strategies that should include a description of the main reasons found for unsuccessful employment outcomes; any process requirements that will be implemented and the timeframes and measurable results expected from the implementation of the requirement; and, identification of particular groups of individuals for which staff training or customized services are needed to improve outcomes, including the timelines for implementation and outcome improvement expectations for the activities. These measurable objectives should be included in the ADRS FY 2009 state plan submission.

Technical Assistance:

- RSA staff can assist with the development of information about rehabilitation rates for groups that can be identified on the RSA-911 to determine populations found to be at risk in the national data.
- RSA can help identify other agencies that have implemented activities similar to those being considered by ADRS to improve the rehabilitation rate, or, that appear to be successful with particular groups of individuals.

3. Supported Employment

Issue: Efforts need to be made to improve the Alabama SE system in order to expand the availability of extended employment support services and as a result improve ADRS' provision of SE services.

Alabama serves a high proportion of individuals with cognitive impairments, 3,215 of 7,792, or 40.55 percent of employment outcomes are individuals with cognitive impairments, while the national average is 27.28 percent. Individuals with mental retardation comprise 33 percent (1,083) of the cognitive impairment group. Individuals with psychosocial impairments made up 13.85 percent (1,079 of 7,792) of employment outcomes and individuals with other mental disorders made up 9.21 percent (718 of 7,792) of employment outcomes.

These groups are more likely to need supported employment than other disability groups. However, RSA 911 data reported by ADRS indicates that only 280 individuals were closed with an SE outcome in FY 2005. This is a relatively small number, considering the high number of individuals served who have mental retardation or psychosocial impairments as disabling conditions, and considering that 2,244 individuals received on-the-job support services as part of their IPE.

In discussion, ADRS indicated that they had data showing higher numbers of individuals with SE outcomes, and provided numbers ranging from just under 400 to about 450 individuals who achieved a supported employment outcome.

Various factors relating to how these counts were obtained were discussed. However, even accepting the highest value, ADRS SE outcomes are relatively low.

One reason for this appears to be a relatively undeveloped system of long-term support after VR services in Alabama since Alabama uses the Medicaid waiver option, but only for individuals with mental retardation. The state does not extend the waiver to other individuals with developmental disabilities or to individuals with severe and chronic mental illness.

Goal: Further develop the overall SE system in AL to provide the foundation for increasing the number of individuals who appropriately achieve SE outcomes.

Strategies:

- Resolve data discrepancies and consistently count and report SE outcomes.
- Meet with senior management of the state developmental disability and mental health agencies for the purpose of discussing the current employment programs of these agencies and to determine how these agencies use supported employment with their populations, including identification of barriers to supported employment for their populations.
- Meet with the state Medicaid agency to make inquiries about and/or advocate for the extension of the Medicaid waiver to groups other than those with mental retardation that would be likely to benefit from supported employment services.

Method of evaluation:

- Provision of information to RSA that identifies discrepancies in counting SE employment outcomes and provides a plan to make SE outcome reporting consistent across reporting systems.
- Document contacts made with, at minimum, the Alabama DD agency, the Alabama mental health agency, and the Alabama Medicaid agency regarding possible use of Medicaid waivers for extended support for individuals needing employment supports.
- Other contacts should be documented as necessary to investigate the possibility of waiver extension.

4. Strategic Use of Data

Issue: ADRS manages a diverse and complex enterprise. ADRS reviews, analyzes and reports to stakeholders ADRS' outcomes, progress and goals. ADRS lacks a consistent process to graphically depict data as a common tool in managing programs and processes.

ADRS faces the challenge of transforming large amounts of data into readily usable information.

ADRS will benefit from enhancing their analysis and reporting (including graphical reporting) of program data. With enhanced data procedures, including the appropriate use of graphs and tables to highlight data, it will be easier for ADRS to compile data, to gain increased understanding from data and to use data to help effective decision-making.

Goal: Increase the strategic use of data.

In order to increase agency effectiveness in presenting data to external and internal audiences, ADRS may wish to consider the following:

- Identify key stakeholders and the types of information and the presentation format they need.
- Create standardized data reporting tools and formats across ADRS programs so that:
  - reporting formats are consistent across agency activities; and
  - reporting formats are appropriate to the specific purpose being addressed.
- Use standardized agency measures for tracking agency progress and program progress.
- Develop evaluation strategies and models using program outcome data to compare ADRS programs' results over time and with other ADRS programs.
- Create a standard template for reporting to state government offices.

The use of a standardized set of report templates may ease staff burden in creating custom charts and tables for reporting program outcomes.

Strategies:
- Develop report templates, including graphics, for ADRS program reporting.
- Develop report templates, including graphics, for ADRS agency level reporting.
- Develop a multi-year plan for staff development for providing ADRS staff with skills and tools for analyzing and graphically presenting data to aid decision-making and to guide program improvement decisions.

Technical Assistance:
- ADRS will explore local resources for staff development.

- RSA will provide TA in data quality including reporting and analytical techniques to support agency operations.

VR and SE Issues for Further Review

RSA plans on conducting further review of the following SE issues:

Issue: The SE Milestone CRP contracts.

As mentioned in the section relating to the goal of increasing SE outcomes, ADRS appears to get relatively few SE employment outcomes, even accounting for data reporting discrepancies. Alabama can use the Medicaid waiver option only to provide employment support to individuals with mental retardation, and does not provide extended support to individuals with other developmental disabilities or severe and chronic mental illness.

ADRS contracts with CRPs to provide SE services and obtain SE employment outcomes through the Milestones Program, which is essentially a performance-based contract system where payments are made when particular benchmarks (called milestones) are reached. The definition of each milestone and the expectations of the parties are well defined and clearly laid out in the contract.

However, Title I regulations at 34 CFR 361.46(b)(3) and Title VI regulations at 34 CFR 363.20(g)(3)(i) both require the following, quoted from 34 CFR 361.46(b)(3).

> An IPE for an individual with a most significant disability for whom an employment outcome in a supported employment setting has been determined to be appropriate must--…
>
> *"(3) Identify the source of extended services or, to the extent that it is not possible to identify the source of extended services at the time the IPE is developed, include a description of the basis for concluding that there is a reasonable expectation that those sources will become available…"*

ADRS includes in the Milestone contract related to SE services a provision that CRPs are responsible for finding the source of extended support. This provision appears to pass the requirement that the state VR agency identify the actual or possible sources of extended support to CRPs.

RSA will review the appropriateness of meeting the regulatory requirements of identifying a reasonable likelihood of the availability of extended support services through a contract that requires CRPs to provide extended services, possibly without reimbursement.

Chapter 3: Fiscal Review of the VR Program

RSA reviewed ADRS' fiscal management of the VR program. During the review process RSA provided TA 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.

The data in the following table, taken from fiscal reports submitted by the state agencies, speak to the overall fiscal performance of the agency. The data related to matching requirements are taken from the fourth quarter of the respective fiscal year's SF-269 report. The maintenance of effort (MOE) requirement data are taken from the final SF-269 report of the fiscal year (two years prior to the fiscal year to which it is compared). Fiscal data related to administration, total expenditures, and administrative cost percentage are taken from the RSA-2.

Table 3

Fiscal Data for ADRS for FY 2002 through FY 2006

Alabama (C)

Fiscal Year	2002	2003	2004	2005	2006
Grant Amount	52,055,981	52,930,173	54,054,418	55,445,837	55,857,717
Required Match	14,088,849	14,325,447	14,629,722	15,006,307	15,117,781
Federal Expenditures	50,440,964	51,263,359	47,182,542	49,070,045	54,862,474
Actual Match	14,213,849	14,450,447	14,754,722	14,671,205	15,242,781
Over (Under) Match	125,000	125,000	125,000	(335,102)	125,000
Carryover	1,615,017	1,666,814	6,871,876	6,375,792	995,243
Program Income	2,260,873	1,058,029	1,788,021	1,138,857	2,003,725
Maintenance of Effort (MOE)	13,406,992	13,699,847	14,213,849	14,450,447	14,754,722
Administrative Costs	3,448,425	3,982,241	4,074,406	4,332,566	5,071,650
Total Expenditures	69,396,514	70,479,027	66,901,539	73,902,629	80,518,335
Percent Admin Costs to Total Expenditures	4.97%	5.65%	6.09%	5.86%	6.30%

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 reallotment process, or additional grant funds received through the reallotment process.

Match (Non-Federal Expenditures): The non-Federal share of expenditures in the Basic Support Program, other than for the construction of a facility related to a community rehabilitation program, was established in the 1992 Amendments to the Rehabilitation Act at 21.3 percent. As such, a minimum of 21.3 percent of the total allowable program costs charged to each year's grant must come from non-Federal expenditures from allowable sources as defined in program and administrative regulations governing the VR Program. (34 CFR 361.60(a) and (b); 34 CFR 80.24)

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

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

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

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

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

Maintenance of Effort (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).

Provision of Technical Assistance to the VR and SE Programs During the Review Process

As part of the fiscal review of ADRS, RSA:
- provided a synopsis of each requirement and reviewed with financial staff RSA's assessment of the agency's compliance with specific financial requirements – match, maintenance of effort (MOE), carryover, reallotment, program income, liquidation of outstanding obligations and grant closeout;
- conducted 1 day of intensive financial management training with new financial staff (including ADRS' internal auditor), with topics covering: the VR Program formula, the allotment process and program cost of living increases, match/overmatch, maintenance of effort, carryover, grant period, liquidation of obligations, grant closeout, prior approval requirements, program income, allowable costs, guidance and reference materials, financial reports, reallotment and establishment authority;
- reviewed the State of Alabama's SMART budget process, ADRS' goals for FYs 2007 – 2009 and ADRS' designation as a high-performing agency, resulting in ADRS receiving an additional $524,124 in FY 2008 for the salaries and case services budgets for two additional rehabilitation counselors, with a goal to raise the rehabilitation rate from 70 to 75 percent;

- RSA also discussed formulating measurable goals and strategies for using the SMART budget process for additional VR Program funding and program expansion activities;
- reviewed sources and sufficiency of FY 2007 match and projected resources for FY 2008 and reviewed strategies for managing the maintenance of effort requirement;
- determined the level of additional funds that can be matched if requested and received through the reallotment process;
- provided an overview of RSA's Management Information System and reviewed with staff the status of all formula grant program report submissions for FYs 2003 – 2007;
- Approved complete reports;
- toured the new state office complex and reviewed with financial staff the projected costs associated with ADRS' upcoming move, funding sources for the purchase of the new complex, renovation and equipment requirements and costs, allowable costs that can be borne by the VR Program, and the anticipated impact on the agency's service delivery budget over the next two fiscal years; and
- reviewed expenditures reported on the RSA-2, "Annual Vocational Rehabilitation Annual Program/Cost Report", with specific emphasis on administrative costs (Note: ADRS' overall administrative costs are considerably lower than the national averages for all VR agencies and combined agencies [4-5 percentage points] and these costs appear to be reported correctly and may be the result of ADRS being a free-standing agency, with minimal additional state government overhead layers being charged to RSA-funded programs.)

Chapter 4: IL Services Program

Program Organization

ADRS received $301,477 in Part B funds for its FY 2007 State of Alabama Independent Living Services (SAILS) program. ADRS provides IL services in Alabama directly, utilizing a combination of Part B federal funds and state funds. The SAILS program provides IL services in all 67 counties in Alabama through seven IL specialists housed at ADRS field offices. Because of the rural nature of the state, the IL specialists provide services on an itinerant basis, mostly at the individuals' homes and communities.

In addition to the Part B IL program, ADRS manages the IL Homebound program and the Medicaid Waiver Programs, two state programs that assist Alabama's citizens with the most significant disabilities to live in their homes through the provision of personal assistance services, counseling services, home modifications, medical supplies and durable medical equipment.

Table 4
FY 2006 ADRS IL Program Highlights

	Amounts of Funding
Part B Funds	301,477
Older Blind	498,782
Other Federal Funds	0
State Funds	0
Local Government	33,497
Private/Other Funds	0
Total	833,756

Provision of Technical Assistance to the IL Program During the Review Process

RSA provided TA to ADRS in a number of IL program areas during the review process, including:

- SILC membership and composition requirements;
- ADRS and Alabama SILC roles and responsibilities;
- State Plan for Independent Living (SPIL) development; and
- Annual Performance (704) Report development.

At the start of the review RSA found that the SILC was not fully constituted in accordance with the Act. The SILC members' terms had expired and the governor had not reappointed them. The review team immediately informed ADRS and the SILC that RSA could not accept or approve Alabama's SPIL if the

SILC were not fully constituted. With TA, the required SILC appointments were secured and the SPIL was duly submitted by ADRS and a fully constituted SILC.

RSA provided TA regarding SPIL goals and objectives, outreach to unserved and underserved areas; input from centers for independent living (CILs) and the general public; statewide IL needs assessment; SILC resource plan; and the SPIL evaluation plan.

<u>Promising IL Practice Identified by ADRS and Stakeholders During the Review Process</u>

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

ADRS' seven independent living specialists are able to cover the whole state of Alabama, including large rural areas, through an entrepreneurial service provision approach. IL specialists leverage their fixed annual service provision budget by generating local donations of additional goods and services for their consumers. A total of $527,000 in donated goods and services were reported in FY 2006. Additionally, IL specialists promote the IL philosophy and promote awareness about IL issues and services through public appearances and relationship-building activities involving local community organizations, state agencies, hospitals, rehabilitation facilities, individual families and CILs.

<u>IL Issues Identified by ADRS and Stakeholders During the Review Process</u>

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

- Federal IL funding is not keeping up with growing demands for IL services.
- ADRS and the CILs face challenges in providing access to IL services in the large rural areas of the state.
- ADRS faces challenges in recruiting and retaining IL specialists due to limited funding;
- The SILC has experienced challenges in recruiting and maintaining the active involvement of members.

Following compilation of this list, RSA worked with ADRS to address as many of these issues as possible either directly or by consolidating the issue into a broader issue area.

IL Performance Issues, Goals, Strategies, and Technical Assistance

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

1. SILC Leadership

Issue: RSA found that the Alabama SILC was not fully exercising its leadership role due to an incomplete understanding of the SILC's statutory roles and responsibilities and the difficulty in maintaining adequate levels of member involvement in SILC activities.

Goal: To strengthen the capacity of the SILC to provide the independent living leadership envisioned by Title VII of the Rehabilitation Act.

Strategies:

- The SILC will assess its training needs by using the self-assessment tool, "What Every SILC Member Should Know," at least once a year.
- ADRS and the SILC will provide the SILC with training on the IL philosophy and the law regarding independent living, especially for newly appointed members.
- ADRS and the SILC will explore ways to increase attendance at SILC quarterly meetings.
- The SILC will make suggestions regarding the creation of a co-chair or vice-chair position to act on behalf of the chair when absences occur.
- The SILC will develop and implement systems for tracking members' term dates and appointment status and for identifying and nominating prospective SILC members.
- ADRS and the SILC will establish a mechanism for periodically assessing the SILC's funding needs to ensure that the SILC resource plan adequately addresses the resource needs of the SILC for the fulfillment of its statutory roles and responsibilities.

Methods of Evaluation:

- A subcommittee will develop a SILC resource reassessment plan, including evaluation criteria and timelines, by December 31, 2007. The mechanism will take into account the timelines for public hearings if the reassessment were to result in a SILC resource plan modification requiring a SPIL amendment.
- The SILC will complete the review and revision of its SILC by-laws, policies and procedures by December 31, 2007.
- The SILC will complete the assessment of SILC training needs and available training resources by December 31, 2007.

- A subcommittee will complete the review and revision of the SILC's promotional materials by June 30. 2008.
- SILC membership will increase from 17 to 22 members by September 30, 2008**.**

Technical Assistance: RSA will provide training and TA as needed, including reviewing any draft revised SILC by-laws, policies, procedures and public information materials.

2. SAILS program consistency with the IL philosophy

Issue: SAILS' policies, procedures and case management practices are largely consistent with the IL philosophy and the four core services. During the on-site review, however, RSA discussed with ADRS staff specific areas for improving the wording of certain policy and procedures statements and of certain IL goal setting and case closure practices in the consumer service records.

Goal: To ensure that all SAILS policies and practices are fully consistent with the IL philosophy.

Strategies:

- Review and revise SAILS' policies, procedures and practices, as necessary.
- Provide ADRS IL specialists with the corresponding training, as necessary.
- Review and enhance SAILS' QA system for IL services.

Methods of Evaluation:

- ADRS will complete the review and revision of the SAILS policies, procedures and practices by March 31, 2008.
- All IL specialists will be trained on the revised policies and procedures by June 30, 2008.

Technical Assistance: RSA will provide training and TA as needed, including reviewing any draft policies and procedures revisions.

3. Resource development

Issue: ADRS and other stakeholders told RSA that federal funding for the IL program is not keeping up with growing demands for IL services in Alabama, especially in the context of the aging population and the state's large rural areas. Alabama's FY 2008-2010 SPIL includes an objective for identifying three new funding sources for the IL programs.

Goal: Obtain or leverage additional resources for the Alabama IL programs by maximizing collaborative efforts among all ADRS divisions.

Strategies:

- Provide cross-training for EDCs and work collaboratively with the EDCs and job coaches to identify consumers who would benefit from IL available services in support of their employment goals.
- Develop strategies with VR, Older Alabamians System of Information and Services (OASIS), Early Intervention (EI) and Children's Rehabilitation (CRS) staff to provide services to unserved and underserved populations.
- Provide education to VR counselors, EI staff, and CRS staff at the local levels to increase knowledge of IL services available through the SAIL program.
- Promote collaboration on youth transition by continuing to attend Teen Transition Clinics routinely at all locations throughout the state and by establishing contacts at local education agencies that will allow for provision of IL services to students in transition.
- Explore the possibility of developing and presenting any of these joint strategies or activities as an innovative pilot project for possible funding through the SMART budget process.
- Involve the CILs in the applicable strategies and activities discussed above, as appropriate.
- Provide SAIL, OASIS and CIL staff cross training for implementing the joint strategies and activities.

Method of Evaluation: A workgroup consisting of representatives from SAILS, OASIS, CILs, the SILC and other ADRS divisions will present its recommendations for new collaborative initiatives, including a possible SMART budget pilot project proposal, by June 30, 2008.

Technical Assistance: RSA will provide the Alabama IL partners with TA upon request and may propose additional collaborative opportunities in areas such as pre-vocational skills training, assistive technology and transition from institutions.

Chapter 5: OIB Program

Program Organization

ADRS received $498,782 in OIB funds for its FY 2006 OIB program, the OASIS. ADRS' Deaf and Blind Services (DBS) manage the program. Rehabilitation teachers (RTs) and Orientation and Mobility (O&M) specialists provide IL services primarily at consumers' homes and communities, based on an itinerant model of service delivery. This model enables the RTs and O&M specialists to reach blind and visually impaired consumers in rural areas of the state where public transportation options are especially limited. In addition to serving individual consumers, the RTs cultivate relationships with local leaders and organizations to leverage community resources and to increase awareness about OASIS program.

Provision of Technical Assistance to the OIB Program During the Review Process

RSA provided TA to ADRS in a number of OIB program areas during the review process, including:

- alternative resource development and leveraging strategies;
- collaborative ideas involving the OASIS, SAILS and CILs programs; and
- State Plan for Independent Living (SPIL) development and evaluation.

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

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

1. Quality Assurance: OASIS monitors, evaluates and ensures quality OIB services and outcomes through a variety of integrated approaches and tools such as:
   - an annual third-party evaluation conducted by Mississippi State University (MSU) and consumer satisfaction survey provided automatically to every OASIS consumer upon case closure. (The survey has a completion rate of 25 percent and is distributed and tabulated by MSU); a new, DBS-wide QA/supervision program focusing on quality outcomes and best practices, rather than on compliance issues exclusively; a discipline-specific self-assessment and training acquisition tool for RTs and O&M specialists; and an accessible computerized case tracking and management system.

2. Peer Support: RTs and O&Ms have established 23 support groups in different areas of the state. Additionally, OASIS has trained 90 consumer volunteers to provide individualized peer support services. Generally, the support groups are started by OASIS staff, but are intended to be self-sustaining and led by

the members themselves. OASIS provides ongoing support to the groups, including peer counseling and leadership training, wherever possible. Most of the groups are in the northern, more populated areas of the state, though efforts are underway to expand the network into the rural areas.

3. Collaboration: DBS is implementing and further developing a comprehensive approach to leverage resources, including: a statewide collaborative network involving Area Agencies on Aging, Alabama Institute for the Deaf and Blind (AIDB) regional offices, senior centers and CILs as part of OASIS' "center-based" service provision model; cooperative agreement with AIDB involving shared office space, shared RT and O&M specialists and other collaboration; underserved populations outreach strategies involving CRPs and other community organizations; and close collaboration among VR and IL specialists through DSB's "joint service" staffing model.

OIB Issues Identified by ADRS and Stakeholders During the Review Process

RSA's review process solicited input from ADRS and stakeholders about OIB performance and compliance issues. The following issues were identified:

- rising cost of assistive technology, especially Closed Circuit Televisions (CCTVs);
- rapidly increasing demand for OASIS services due to the demographic trends related to the aging population and increasing incidence of non-visual, age-related disabilities among older individuals;
- federal and state funding streams for OASIS have not kept up with the increasing demand and assistive technology costs;
- OASIS is experiencing difficulties in recruiting and retaining RTs and O&M specialists; and
- these factors pose significant service delivery challenges, especially with regard to the underserved areas and populations in the state.

Following compilation of this list, RSA worked with ADRS to address as many of these issues as possible either directly or by consolidating the issue into a broader issue area.

OIB Performance Issues, Goals, Strategies, and Technical Assistance

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

1. Resource development

Issue: ADRS and OIB stakeholders agreed that there is a growing gap between the demand for OASIS services and the availability of OASIS resources. OASIS

has been able to secure additional funding on an ad hoc basis, for example, $35,000 from the state's Assistive Technology Act program. But OASIS has thus far been unable to secure a stable, ongoing funding stream other than its current federal and state match funding sources.

Goal 1: To increase funding beyond the federal allotment.

Strategies:

- Write a resolution for the Silver Hair Legislature for $300,000 and present it to the Alabama state legislature.
- Request state funding for an innovative collaborative project in the governor's SMART budget.
- Engage RTs and O&M specialists in concerted efforts to seek local opportunities for additional funding and in-kind products and services for OASIS consumers.

Goal 2: To leverage resources through increased collaboration.

- Collaborate with AIDB, VR, SAIL and CILs to expand OASIS' center-based service provision model.
- Develop strategies with VR, SAIL and CILs to provide services to unserved/ underserved populations, including the expansion of center-based services provision.
- Implement a cross disability peer support group in collaboration with the Birmingham CIL as a pilot project for addressing the needs of older individuals with non-visual disabilities.
- Enhance collaboration between DSB and the CILs through greater mutual participation on the statewide OASIS Advisory Council and the SILC.
- Provide more cross training opportunities for OASIS, SAIL and CIL staff.
- Collaborate more closely on the formulation and evaluation of the SPIL.

Methods of Evaluation:

- Present the Silver Hair resolution to the Alabama State Legislature by October 2007.
- Request state funding in the SMART Budget by October 2007.
- Establish a workgroup of OASIS, SAIL and CIL representatives by January 2008 to discuss collaborative initiatives. Present workgroup recommendations by October 2008.

2. OASIS service delivery staff recruitment and retention.

Issue: ADRS' difficulty in recruiting and retaining service delivery staff is due to the relatively small pool of qualified RT and O&M candidates from which to

draw, as well as the fact that other institutions such as the Veterans Administration are able to offer higher salaries.

Goal: To increase the number of qualified RT and O&M candidates on the state personnel register, and to encourage them to consider joining ADRS.

Strategies:

- Develop a recruitment plan to attract rehabilitation teachers and orientation and mobility candidates, including assigning a dollar amount on benefits package.
- Utilize the ADRS' paid internship program.
- Perform a comparative market review on salary schedules for RTs and O&M specialists, and proposed any appropriate salary schedule revisions to the ADRS human resources department and the state personnel department.
- Develop a recruitment strategy directed at undergraduate programs, including a plan to promote the tangible and intangible benefits of the RT and O&M careers.

Method of Evaluation:

- Fifty percent increase in qualified RT and O&M candidates on the state personnel register by October 2009.

Chapter 6: Progress on Issues Raised in Previous Reviews

As a result of the RSA monitoring reviews conducted in FYs 2003 and 2004, ADRS developed a Corrective Action Plan (CAP) to address findings and recommendations and the corrective action to be taken to ensure compliance with VR Program requirements. Two findings from these reviews remained open at the beginning of FY 2007.

Corrective Action Plan

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

1. Institutions of High Education (IHE) Agreements; and
2. Closing Records.

Chapter 7: Summary Conclusion

Strengths

- ADRS takes many more applications, serves many more individuals and achieves many more employment outcomes than other general and combined agencies taking into account state population and funds available.

- ADRS has developed partnerships with community providers, school systems, other government agencies, stakeholders, and employers within the State of Alabama.

- The IL program promotes the IL philosophy and awareness about IL issues and services through outreach efforts to all communities in Alabama.

- Through community support, a total of $527,000 in donated goods and services was provided in FY 2006 in support of this program.

- The OIB program received solicited input from ADRS and stakeholders. Promising practices were identified in 3 areas: QA, peer support, and collaboration.

Challenges in the VR and SE programs include:

- stabilizing overall agency performance expectations;
- reducing counselor caseload sizes;
- increasing the rehabilitation rate;
- further developing AL's SE system, leading to an increase in consumers receiving services under this program; and
- increasing the strategic use of data.

Challenges in the IL programs include:

- strengthening the leadership capacity of the SILC;
- ensuring that SAILS's policies and practices are consistent with IL philosophy;
- obtaining additional resources for IL programs;
- increasing the number of qualified RT and O&M recruited and eventually hired by ADRS; and
- performance related to VR standards and performance indicators: although ADRS has passed standards 1 and 2 since FY 2000, the agency has not met indicator 1.5, the average wage rate of their competitive closure to the state average wage rate, since FY 2003.

Table 5, beginning on the following page, summarizes the results of RSA's review.

Table 5
Summary of the Results of RSA's Review

Alabama Department of Rehabilitation Services		
Program: VR		
Goal	Strategies	Technical Assistance
1. Stabilize overall agency performance expectations and reduce counselor caseload size.	• Study the current counselor staffing structure with respect to caseload size, employment outcome expectations, and the effects of type of caseload assignment and location of assignment on workload. • Review the current agency staffing pattern to determine if the current staff allocations are still appropriate, and if not appropriate, identify resources that could be redirected to the field program. • Hire additional counselors through SMART Budget appropriations requests. (2 VRC positions were requested and approved in the FY 2008 budget, and 10 will be requested in the FY 2009 budget request).	•RSA staff can assist with the development of models to readjust performance expectations and project how performance might change as staff is added. •RSA can help identify if there are other agencies that have gone through similar processes or are particularly good at taking into account multiple variables in estimating performance outcomes.
2. Increase the rehabilitation rate from 70 percent to 74.5 percent by FY 2010.	• Review status 28 closures to identify reasons for unsuccessful outcomes, and continue to review these cases as part of QA activities. • Consider requiring one or more process requirements such as supervisory review of 28	• RSA staff can assist with the development of information about rehabilitation rates for groups that can be identified on the RSA-911 to determine populations found to be at risk in the national data, and look at the national data in other

	cases prior to closure, requiring multiple contact numbers at application to provide more points of contact if the individual cannot be located at the primary address, or establishing minimum requirements for regular personal contact. The particular type of process requirement should be determined by the status 28-closure review discussed above. • Identify population needs of groups more likely to be unsuccessful in achieving an employment outcome and provide staff training and/or services to address needs. Possible examples might be develop training and services for emerging disability populations such as autism, culturally relevant approaches to the growing Hispanic population, development of a focus on serving older workers who do not wish to retire but are aging into disability, etc. • Reduce caseload size using approach outlined under the goal of reduction of caseload size and performance expectations.	ways that ADRS might find helpful, as needed. • RSA can help identify other agencies that have implemented activities similar to those being considered by ADRS to improve the rehabilitation rate, or, that appear to be successful with particular groups of individuals.
3. Make efforts to further develop the overall SE system in AL to provide the foundation for increasing the number of	• Resolve data discrepancies and consistently count and report SE outcomes. • Meet with senior	• RSA will provide TA upon request.

individuals who appropriately achieve SE outcomes.	management of the state developmental disability and mental health agencies for the purpose of discussing the current employment programs of these agencies and to determine how these agencies use supported employment with their populations, including identification of barriers to supported employment for their populations. • Meet with the state Medicaid agency to make inquiries about and/or advocate for the extension of the Medicaid waiver to groups other than those with mental retardation that would be likely to benefit from supported employment services.	
4. Increase the strategic use of data.	• Develop report templates – including graphics - for ADRS program reporting. • Develop report templates – including graphics - for ADRS agency level reporting. • Develop a multi-year plan for staff development for providing ADRS staff with skills and tools for analyzing and graphically presenting data to aid decision-making and to guide program improvement decisions.	• ADRS will explore local resources for staff development. • RSA will provide TA in data quality including reporting and analytical techniques to support agency operations.
ARDS Issues for Further Review		

Possible compliance issue with SE Milestone CRP contracts. RSA will be reviewing with the Department of Education's Office of General Counsel and others the appropriateness of meeting the regulatory requirements of identifying a reasonable likelihood of the availability of extended support services through a contract that requires CRPs to provide extended services, possibly without reimbursement.	

ADRS Promising Practices

1. College Preparation Programs – ADRS operates its College Preparation Programs in 7 areas of the state. Over 400 students attend the 2-week summer programs across the state.

2. Career Preparation and Training Initiative – FY 2006 is the fourth year of this pilot 2-week career preparation training program, and a partnership with local school systems, transportation agencies and local colleges and employers. A record number of 114 referrals were processed for FY 2007.

3. Business Relations Program - For more than 25 years, ADRS has formally operated a business relations program in concert with its philosophy of "dual customer", i.e. individuals with disabilities and employers. Annually the ADRS EDC team of 17 works directly with more than 850 companies providing in excess of 5,500 services to them statewide.

4. Adaptive Driving Training Program – Services through this program are provided statewide in the consumer's home area. Relationships with manufacturers, negotiated vendor fees, and the relationship with the Alabama Department of Public Safety are particularly noteworthy.

Program: Part B IL Program

Goal	Strategies	Technical Assistance
1. To strengthen the capacity of the SILC to provide the independent living leadership envisioned by Title VII of the Rehabilitation Act.	• The SILC will assess its training needs by using the self-assessment tool, "What Every SILC Member Should Know," at least once a year. • ADRS and the SILC will provide the SILC with training on the IL philosophy and the law regarding independent living, especially for newly appointed members. • ADRS and the SILC will explore ways to increase attendance at SILC quarterly meetings. • The SILC will make suggestions regarding the creation of a co-chair or vice-chair position to act	RSA will provide training and TA as needed, including reviewing any draft revised SILC by-laws, policies, procedures and public information materials.

	on behalf of the chair when absences occur. • The SILC will develop and implement systems for tracking members' term dates and appointment status and for identifying and nominating prospective SILC members. • ADRS and the SILC will establish a mechanism for periodically assessing the SILC's funding needs to ensure that the SILC resource plan adequately addresses the resource needs of the SILC for the fulfillment of its statutory roles and responsibilities.	
2. To ensure that all SAILS' policies and practices are fully consistent with the IL philosophy.	• Review and revise SAILS' policies, procedures and practices, as necessary. • Provide ADRS IL specialists with the corresponding training, as necessary. • Review and enhance SAILS' QA system for IL services.	RSA will provide training and TA as needed, including reviewing any draft policies and procedures revisions.
3. Obtain or leverage additional resources for the Alabama IL programs by maximizing collaborative efforts among all ADRS divisions.	• Provide cross training for IL Specialists and Economic Development EDCs and work collaboratively with the EDCs and job coaches to identify consumers who would benefit from IL available services in support of their employment goals. • Develop strategies with VR, OASIS, EI and CRS	RSA will provide the Alabama IL partners with TA upon request and may propose additional collaborative opportunities in areas such as pre-vocational skills training, assistive technology and transition from institutions.

	staff to provide services to unserved and underserved populations. • Provide education to VR counselors, EI staff, and CRS staff at the local levels to increase knowledge of IL services available through the SAIL program. • Promote collaboration on youth transition by continuing to attend Teen Transition Clinics routinely at all locations throughout the state and by establishing contacts at local education agencies that will allow for provision of IL services to students in transition. • Explore the possibility of developing and presenting any of these joint strategies or activities as an innovative pilot project for possible funding through the SMART budget process. • Involve the CILs in the applicable strategies and activities discussed above, as appropriate. • Provide SAIL, OASIS and CIL staff cross training for implementing the joint strategies and activities. Method of Evaluation: • A workgroup consisting of representatives from SAILS, OASIS, CILs, the SILC and other ADRS divisions will present its recommendations for new	

	collaborative initiatives, including a possible SMART budget pilot project proposal, by June 30, 2008.	
IL Promising Practices		
ADRS' seven independent living specialists are able to cover the whole state of Alabama, including large rural areas, through an entrepreneurial service provision approach.		
Program: OIB		
Goal	Strategies	Technical Assistance
1. To increase funding beyond the federal allotment.	• Write a resolution for the Silver Hair Legislature for $300,000 and present it to the Alabama state legislature. • Request state funding for an innovative, collaborative project in the governor's SMART budget. • Engage RTs and O&M specialists in concerted efforts to seek local opportunities for additional funding and in-kind products and services for OASIS consumers.	RSA will provide TA upon request.
2. To leverage resources through increased collaboration.	• Collaborate with AIDB, VR, SAIL and CILs to expand OASIS' center-based service provision model. • Develop strategies with VR, SAIL and CILs to provide services to unserved/ underserved populations, including the expansion of center-based services provision. • Implement a cross disability peer support group in collaboration with the Birmingham CIL	RSA will provide TA upon request.

	as a pilot project for addressing the needs of older individuals with non-visual disabilities. • Enhance collaboration between DSB and the CILs through greater mutual participation on the statewide OASIS Advisory Council and the SILC. • Provide more cross training opportunities for OASIS, SAIL and CIL staff. • Collaborate more closely on the formulation and evaluation of the SPIL.	
3. To increase the number of qualified RT and O&M candidates on the state personnel register, and to encourage them to consider joining ADRS.	• Develop a recruitment plan to attract rehabilitation teachers and orientation and mobility candidates, including assigning a dollar amount on benefits package. • Utilize the ADRS paid internship program. • Perform a comparative market review on salary schedules for RTs and O&M specialists, and proposed any appropriate salary schedule revisions to the ADRS human resources department and the state personnel department. • Develop a recruitment strategy directed at undergraduate programs, including a plan to promote the tangible and intangible benefits of the RT and O&M careers.	RSA will provide TA upon request.

OIB Promising Practices		
1. Quality Assurance: OASIS monitors, evaluates and ensures quality OIB services and outcomes through a variety of integrated approaches and tools.		
2. Peer Support: RTs and O&Ms have established 23 support groups in different areas of the state.		
3. Collaboration: DBS is implementing and further developing a comprehensive approach to leverage resources, including a statewide collaborative network.		

Please take a moment to participate in a survey about RSA's performance on the FY 2007 monitoring of Vocational Rehabilitation agencies.

Visit http://www.ed.gov/rschstat/eval/rehab/107-reports/2007/survey.html