

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



**U.S. Department of Education
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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 Hawaii (HI):

- The vocational rehabilitation (VR) program, established under Title I;
- The supported employment (SE) program, established under Title VI, Part B;
- The independent living (IL) programs, authorized under Title VII, Part B; and
- The Independent Living Services Program for Older Individuals Who Are Blind (OIB), established under Title VII, Chapter 2.

The Hawaii vocational Rehabilitation and Services for the Blind Division (VRSBD) is the agency that is responsible for the administration of the four programs cited above.

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

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

As a result of the review, RSA:

- identified promising practices;
- identified performance and compliance issues; and
- VRSBD developed performance and compliance goals and strategies related to selected issues;
- identified the technical assistance that it would provide to assist the agency to achieve the goals identified as a result of the review;
- made recommendations in those instances when VRSBD and RSA did not agree on issues; and
- identified potential issues for further review.

Strengths and Challenges:

The VR program is engaging in self-analysis that will lead to stronger performance and higher quality outcomes for Hawaii's disabled population. The fiscal management of the program is working to identify one-time expenditures to spend down the surplus carryover funds. This will enhance VRSBD's ability to pursue its primary goal of improving services to individual consumers.

One of the greatest challenges to the agency in the coming year will be achieving buy-in at all levels on the new focus on quality outcomes. VRSBD will need to institute concrete measures to ensure VR counselors and staff in all offices that this effort reflects the true values of the program. The high degree of autonomy among the branch offices will also be a challenge to ensuring unity of message and consistency of policy implementation across the islands.

Introduction

Section 107 of the Rehabilitation Act of 1973, as amended (Act), 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 vocational rehabilitation (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 its monitoring responsibilities, RSA:

- reviews the state agency's performance in assisting eligible individuals with disabilities to achieve high-quality employment and independent living outcomes;
- develops, jointly with the state agency, performance and compliance goals as well as strategies to achieve those goals; and
- provides technical assistance (TA) to the state agency in order to improve its performance, meet its goals, and fulfill its state plan assurances.

Scope of the Review

RSA reviewed the Hawaii Vocational Rehabilitation and Services for the Blind Division's (VRSBD's) performance and compliance in administering the following programs of the Act:

- the VR program, established under Title I;
- the supported employment (SE) program, established under Title VI, Part B;
- the independent living (IL) programs, authorized under Title VII, Part B; and
- the Independent Living Services Program for Older Individuals Who Are Blind (OIB), established under Title VII, Chapter 2.

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

The Title I basic support formula grant for vocational rehabilitation services is administered in Hawaii by the Vocational Rehabilitation and Services for the Blind Division (VRSBD), which is housed in the Department of Human Services under the directorship of Ms. Lillian Koller. VRSBD is the only dedicated VR agency in Hawaii and provides services to all eligible individuals with disabilities in the state. There are branch offices on each of the four main islands and administrative offices in Kapolei. There is a Deaf Services office in Honolulu and a Services for the Blind division that operates the Ho'opono adjustment to blindness training center

on Oahu. The Title VI chapter II grant for older individuals who are blind is administered by VRSBD and services are provided by the Ho'opono training center for the Blind.

In addition, RSA also reviewed VRSBD's progress on:

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

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

Appreciation

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

Chapter I: RSA's Review Process

Data Used During the Review

RSA's review of VRSBD 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 Hawaii state team:

- gathered and reviewed information regarding VRSBD's performance;
- reviewed state visit reports and prior years' Sec. 107 reports to identify outstanding issues;
- identified a wide range of VR and IL stakeholders, and invited them to provide input into the review process;
- conducted on-site review activities during the week of May 28-June 2, 2007 at which time RSA held multiple discussions with state agency staff, SRC members, SILC members, and stakeholders to share information, identify promising practices, and identify areas for improvement;
- provided technical assistance to VRSBD on both program and fiscal matters; and
- verified VRSBD 911 data by reviewing 36 case records of individuals who exited the VR program.

RSA Hawaii State Team Review Participants

The RSA review team consisted of at least one representative from each of the five functional units of the State Monitoring and Program Improvement Division (SMPID) of RSA. The review team was led by RSA's state liaison to Hawaii, Brian Miller (Vocational Rehabilitation Unit), and also included the following individuals: Regina Luster (Fiscal Unit), Darryl Glover (Fiscal Unit), Pamela Hodge (Independent Living Unit), Thomas Dolan (Technical Assistance Unit), Joan Ward (Data Unit), and Padma Soundararajan, who provided reader services.

Information Gathering

During FY 2007, RSA began its review of VRSBD by analyzing information including, but not limited to, data submitted by VRSBD to RSA, internally generated RSA performance summaries, the RSA state visit report from FY 2006, prior 107 monitoring reports, audit results, Hawaii's VR and IL state plans, and VRSBD's State Rehabilitation Council's (SRC's) Annual Report. After completing its internal review, the RSA team carried out the following information gathering activities with VRSBD and other stakeholders in order to gain a greater understanding of VRSBD's strengths and challenges:

- the RSA Hawaii state liaison conducted a series of individual teleconferences with the VRSBD administrator and his deputy administrators between November 2006, and May 2007;
- the RSA Hawaii state team conducted multiple teleconferences with the VRSBD management between December 2006 and May 2007;
- the Hawaii state liaison conducted a teleconference with the Hawaii client assistance program (CAP) manager in February;
- the RSA Hawaii state team conducted a teleconference with the SRC executive committee in March;
- the RSA Hawaii state liaison met with the VRSBD administrator and the SRC chair in April at the CSAVR conference in Bethesda Maryland to discuss proposed on-site monitoring activities and to identify final focus areas for the review;
- the RSA VR and IL state team specialists participated in several teleconferences with the Hawaii statewide independent living council (SILC) to introduce the monitoring process and solicit input;
- met with VR counselors and staff from all four branch offices while on-site in May 2007 – with many participating via video teleconference; and
- the RSA Hawaii state team solicited and received input from a variety of disability consumer groups, through e-mail, teleconferences, and individual phone calls.

Chapter 2: Vocational Rehabilitation and Supported Employment Programs

Program Organization

The Vocational Rehabilitation and Services for the Blind Division (VRSBD) is the sole designated state unit (DSU) in Hawaii to administer the Title I VR basic support formula grant. The DSU provides services through its four branch offices, one each on the four main islands. The VRSBD staff serves Molokai and Lanai from the Maui branch office. At the time of the review, there were approximately 119 total staff across all the island offices, and approximately 45 VR counselors to provide VR services directly to clients. VRSBD served more than 5,300 individuals in FY 2006 under the Title I program, with 667 individuals exiting the program with an employment outcome.

VRSBD is not under an order of selection, and is able to provide services to all individuals determined eligible.

VRSBD has contracts with community rehabilitation programs (CRPs) to provide vocational rehabilitation, supported employment, and assistive technology needs to over 700 individuals with supported employment needs each year.

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

**Table 1
FY 2005 and FY 2006 VRSBD VR and SE Program Highlights**

HAWAII	2002	2003	2004	2005	2006
Total funds used	\$10,995,890	\$11,915,535	\$13,172,739	\$12,871,498	\$14,392,917
Individuals served during year	4,243	4,635	5,061	5,124	5,399
Applicants	2,380	2,501	2,707	2,863	2,730
Closed after receiving services	1,004	1,003	1,463	1,187	1,332
Closed with employment outcomes	491	579	738	695	667
Employment outcomes without supports in an integrated setting	425	530	687	656	626
Average cost per individual served	\$2,591.54	\$2,570.77	\$2,602.79	\$2,512.00	\$2,665.85

HAWAII	2002	2003	2004	2005	2006
Average cost per employment outcome	\$22,394.89	\$20,579.51	\$17,849.24	\$18,520.14	\$21,578.59
Employment outcomes per \$million spent	44.65	48.59	56.02	54.00	46.34
Competitive employment outcomes per \$million spent	43.20	46.58	54.96	52.75	45.16
Average hourly earnings for paid employment outcomes	\$9.56	\$9.59	\$9.87	\$9.86	\$11.02
Average state hourly earnings	\$15.71	\$16.22	\$16.64	\$17.39	\$18.01
Average hours worked per week for paid employment outcomes	28.32	28.16	29.74	31.33	31.72
Percent of transition age served to total served	28.09	29.01	27.20	25.53	28.23
Employment rate for transition age served	47.52	52.58	42.21	57.10	43.62
Average time between application and closure (in months) for individuals with successful paid employment outcomes	33.00	28.60	25.00	24.30	26.20
Average number of individuals served per total staff	39.65	44.57	48.66	49.27	52.93

Provision of Technical Assistance During the Review Process

RSA provided the following technical assistance to VRSBD in a number of VR and SE program areas during the review process:

- verified the agency's RSA 911 case record data for FY 2004, FY 2005, and FY 2006;
- provided input to the VRSBD data specialist on case management systems including RSA data submission requirements, cost effectiveness, usability by counselors and staff, and implementation issues;
- assisted the VRSBD state plan coordinator with questions regarding the submission of the FY 2008 state plan;
- provided suggestions for how to improve program income while on-site in Honolulu; and
- demonstrated the RSA MIS (Management Information System). 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; and
- The team also showed the agency how to do ad hoc queries on the MIS to obtain information about their agency, and/or compare and contrast their agency against other similar agencies.

VR and SE Issues Identified by VRSBD and Hawaii Stakeholders During the Review Process

RSA's review process solicited input from VRSBD and other stakeholders in Hawaii about VR and SE performance and compliance issues. The following issues were identified:

- Improving the quality of the employment outcomes achieved by the VR program as measured by RSA's established standards and indicators;
- Purchasing an electronic case management system as part of the agency's effort to streamline the VR process, and to allow VR counselors more time to provide counseling and guidance;
- Implementing a five-year plan to better inculcate the value of quality outcomes driven by informed choice rather than cost effectiveness;
- Increasing the overall employment rate of individuals with disabilities in the state;
- Expanding VRSBD's ability to conduct follow-up activities for individuals who exit the VR program to understand the phenomenon of recidivism and to better ensure that all appropriate services are provided while the individual is in plan;
- Greater focus on job retention;
- Services to individuals on rural outer islands;
- Support for counselors to lighten the workload;
- Examining the heavy reliance by VRSBD on contracted services for placement;
- VR counselor shortages and cultural sensitivity in more traditional island neighborhoods.
- Lack of adequate transportation;
- Strengthening the scope and quality of services provided under VR to individuals who are deaf or hard-of-hearing;

- Training on the roles and responsibilities of the SILC;
- Increasing program income from social security reimbursements; and
- the substantial amount of unspent funds resulting from carry-over.

Following compilation and discussion with VRSBD about the issues, RSA worked with VRSBD 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 VRSBD agreed on the following performance goals, the strategies to achieve those goals, and the technical assistance that RSA would provide to assist VRSBD achieve each goal. These goals and strategies will be considered for inclusion in VRSBD's 's FY 2009 state plan and if they are included, progress on achieving these goals will be reported in VRSBD's FY 2011 annual state plan submission.

1. Quality employment outcomes

Issue: In February 2007, VRSBD established a steering committee as part of an effort by the agency to develop a long-range, five-year plan that would establish goals and priorities that reflect the agency's values and principles. One of the first goals identified was the need to refocus the agency's efforts toward achieving higher quality employment outcomes, as measured both by income and benefits, and maximized informed choice on the part of the consumers.

In FY 2007, VRSBD commissioned program and fiscal analyses of the VR program by outside consultants to identify issues that may impede such a focus. The final report, issued in May 2007, noted that the VRSBD culture is one that is steeped in the value of cost-containment and performance at the VR counselor level as measured only by the numbers of outcomes. Performance data, analysis of VRSBD policies, and a variety of anecdotal evidence gathered through numerous interviews with VR counselors and staff by the RSA VR program specialist, bears out this conclusion.

RSA compared VRSBD with three other similarly situated agencies. The comparative agencies for Hawaii (Vermont general, Alaska combined, and South Dakota general) were chosen based on total funds used: \$12,871,498 for Hawaii; \$13,406,720 for Vermont; \$12,863,920 for Alaska; and \$12,249,623 for South Dakota.

VRSBD's average time between application and closure (in months) for individuals with successful employment outcomes is decreasing. The number of months has gone from 34.9 in 2001 to 24.3 in 2005, approximately 30%. This is about two months shorter than the national average of 26 months. This measure indicates that individuals are spending less time in plan and this may be a factor in fewer individuals achieving high income, quality employment outcomes. The shorter time in plan, the less likely an individual's training will include post-secondary or two-year vocational education, two types of training often associated with higher performance on quality outcome indicators.

The increase in dollars between the average weekly earnings at application for individuals served by VRSBD with employment outcomes and the average weekly earnings at closure is \$16, which is the lowest for the comparative agencies. The highest is Alaska with an increase of \$84.

Conversations with VR counselors, para-professionals, and supervisors revealed that the agency has focused for years on the numbers of outcomes per counselor, and the cost per employment outcome. Prior years fiscal limitations dictated the emphasis on cost-containment. Currently the VR program has sufficient resources to support innovation and expansion, services to groups, or direct services to individuals.

Goal: To improve the quality of VRSBD's employment outcomes.

Strategies:

1. Define what it means by "quality outcomes" both in terms that are measurable (such as the average VR wage achieved), as well as other qualitative measures such as consumer satisfaction. The definition will be clear and functional, and will guide the activities of the steering committee and other efforts by the agency to implement policies and procedures to support this new focus.
2. Set short-term targets and medium to long-range goals that focus on quality outcomes.
3. Identify and implement practices and procedures that will assist VR counselors and staff to achieve any specific targets or broader goals set related to quality outcomes.
4. Clarify any existing service provision policies that clearly reflect old values of cost-containment or impede the ability of VR counselors and staff to assist consumers in pursuing vocational goals that embody the new value of quality.
5. Increased utilization of paraprofessionals in the VR process to relieve VR counselors of some of their administrative duties;
6. Implement an electronic case management system to further free up time for VR counselors to focus on counseling and guidance, and to reduce the need for supervisors to monitor for VR process compliance issues;
7. Reduce the emphasis on the numbers of outcomes as the sole measure for VR counselor performance;
8. Explore and adopt policies and practices of other VR agencies that have also moved toward a greater focus on quality outcomes; and/or
9. Reduce the focus on service policies as the primary factor determining whether a given service is included in an Individualized Plan for Employment (IPE).

Technical Assistance:

RSA will continue to provide a range of technical assistance to facilitate the implementation of this goal, including:

- reviewing service policy changes;
- providing input on the implementation of an electronic case management system;
- identification of promising practices by other agencies;
- assistance in interpreting performance data; and
- increasing availability of data and other reports produced by RSA on RSA's management information system (MIS) and the RSA website.

2. Internal and external quality assurance procedures

Issue: VRSBD has conducted various quality assurance efforts in recent years, mostly involving service record reviews on a quarterly basis. Branch administrators review 36 services records every quarter in order to identify technical assistance needs and training topics. However, there is no consistent protocol in place to ensure that these measures are systematic, rigorous, and on-going. Additionally, monitoring of service provision contracts remains inconsistent.

Goal: VRSBD will implement a set of internal and external quality assurances to track the quality of service provision and compliance with the Rehabilitation Act. Such a system will be rigorously designed, on-going, systematic, and useful for identifying VRSBD staff training needs and areas where the agency can improve the quality of its service provision to consumers.

Strategies:

1. Identify staff that will have primary responsibility for internal and external quality assurance.
2. Implement a regular case service review regimen in which service records are reviewed statewide at least twice a year.
3. Hire a consumer advocate to identify consumer concerns.
4. Establish liaison relationships with consumer advocacy groups.
5. Utilize input obtained from employee exit conferences to strengthen services to individual consumers and to improve the work environment for VRSBD staff.
6. Develop a contract review protocol to ensure quality provision of services to individuals by community rehabilitation programs.

Technical assistance: RSA will provide the following technical assistance to facilitate the implementation of this goal:

- RSA will share with VRSBD any review instruments it develops or collects from other VR agencies;
- RSA will review any draft monitoring protocols VRSBD prior to implementation;
- RSA will help identify any resources to meet the training or policy issues raised by any internal monitoring efforts; and/or,
- RSA will provide technical assistance with respect to issues raised by external contract monitoring.

3. Services to individuals who are deaf or hard-of-hearing

Issue: VRSBD provides services to individuals who are deaf or hard-of-hearing on Oahu through its deaf services office. The office has its own supervisor, staff, and VR counselor. All of the VR counselors in the Oahu deaf services office speak ASL, a requirement of that office. In 2006, there was concern among some in the deaf community that the deaf services office would be closed, which generated a good deal of feedback and to VRSBD. While it appears as though the office was not in jeopardy of closing, the issue raised awareness of broader and long-

standing concerns about the quality and scope of services provided to deaf individuals on the island.

Under the supervision of the branch administrators, general VR counselors typically serve deaf and hard-of-hearing individuals on the other islands. Sometimes these counselors have special training in deafness, such as ASL language skills, but it is not required that they do.

Through the course of the review, the RSA team received input from a variety of stakeholders with interest and experience in VR services for this disability population. The liaison also met with the Hawaii Deaf and Hard-of-Hearing Advisory Board on June 2 while on-site in Honolulu.

Some of the issues identified in the course of the review include:

- the need for comprehensive adjustment to deafness training;
- tailoring unique services to meet the needs of individuals who are hard-of-hearing, as opposed to deaf;
- disparity of services from island to island;
- reaching transition-aged deaf kids with a positive message about deafness, and informing kids and parents about the services available through the VR program;
- quality of employment outcomes for individuals who are deaf or hard-of-hearing;
- transportation;
- adequate literacy training for deaf individuals;
- job placement services, and good job readiness training, and
- availability of interpreter services.

Goal: Identify promising practices for the delivery of VR services to individuals who are deaf or hard of hearing in order to increase the number and quality of employment outcomes for these individuals.

Strategies:

1. Conduct a comprehensive assessment of the VR needs of the deaf community, including customer satisfaction survey data, as well as focus group sessions and other qualitative research methods.
2. Identify gaps in services and create a strategic plan for meeting these needs.
3. Strengthen the Hawaii Deaf and Hard-of-hearing Advisory Board by providing effective training that clarifies the role of the board and increases its ability to channel the voices of the deaf community.
4. Identify the key variables that lead to better employment outcomes for individuals who are deaf (for example: literacy training or more reliable interpreter services and so on).

Technical assistance

RSA will:

- Review any policy changes affecting services for the deaf and hard-of-hearing.
- Share promising practices from other states.

- Review and comment on the comprehensive assessment of deaf services.

4. Carryover Balances

Issue: VRSBD has extremely high year-end balances of unobligated federal grant funds in the VR Program. The table below provides information related to the amount of federal funds remaining on September 30 in FYs 2003 - 2006, and compares VRSBD's performance during this period with national data for all VR agencies and combined (or like) VR agencies.

Table 2
VRSBD VR Program Carryover – FYs 2003 - 2006

FY	VR Program Grant Amount	Total Federal Funds Carried Over	% of Federal Grant Carried Over	% National Average (All VR Agencies)	% Combined Agencies
2003	9,661,551	5,006,838	51.82	9.78	11.25
2004	10,211,208	5,300,729	51.91	11.42	11.21
2005	10,447,079	6,297,906	60.28	13.59	13.41
2006	10,749,158	6,222,597	57.88	(Unavailable)	(Unavailable)

To carryover unused federal funds and use them for allowable program costs in the next year, the matching requirement for these funds must be met by September 30 of the federal FY for which the funds are appropriated. VRSBD has met this requirement for all federal funds carried over from FYs 2003, 2004, and 2005 and has tentatively met the requirement for FY 2006. (Final expenditure reports have not been submitted for FY 2006.)

When compared to the national averages for *all* VR agencies and combined agencies, the federal funds carried over by VRSBD are considerably higher than both national averages in each fiscal year. In FYs 2003 and 2004, the agency carried over a little more than one-half of the grant received for each of these fiscal years. The carryover percentage increased to 60.28% in FY 2005 with VRSBD only spending 39.72% of the FY 2005 VR Program federal allotment before September 30 of this fiscal year. While FY 2006 carryover percentages were slightly lower, only 42.12 percent of funds received for this year were spent before year-end.

While VR agencies are encouraged to carryover a small percentage of their VR Program allotment each FY to have sufficient funds available for start-up costs associated with the succeeding fiscal year, or for special projects that the agency may be planning to fund, VRSBD's carryover percentage far exceeds national averages and is one of the highest in the nation.

With such a large percentage of federal funds consistently remaining at the end of each FY, RSA questions whether VRSBD:

- has a clear understanding of the fiscal resources available to the program and the purposes for which these funds can be utilized;

- has a plan for expending a considerable portion of the available carryover funds;
- has sufficiently analyzed VR Program needs in terms of the resources required to provided services to unserved or underserved populations or areas of the state; or
- should consider releasing surplus federal funds through the re-allotment process if these funds are in excess of the amount needed to administer the VR Program in Hawaii.

Goal: By the end of FY 2009, VRSBD will reduce the VR Program funds carried over to less than 20 percent of the federal funds made available to the state each FY.

Strategies:

- VRSBD will analyze, by December 31, 2007, the total amount of funds (federal and state) required to operate the VR program at existing levels for federal FYs 2008 and 2009. In completing this analysis, also include staff vacancies that the agency plans to fill.
- Compare resources available (federal allotment specifically for each FY and non-federal match) to determine the difference between available resources and anticipated expenditures.
- After completing this stand-alone analysis, VRSBD should be able to conclude that the federal funds made available for each fiscal year, along with the required matching funds are either, at the level required to operate the VR Program each FY, in excess of the amounts required, or, are less than the projected amounts required.
- If the analysis of the resources required to administer the VR Program in FYs 2008 and 2009 shows excess resources, instead of declining, the percentage of funds carried over will continue to grow. VRSBD will then have the option of expending some of the accumulated carryover for activities that will continue in future years, as well as one-time projects, i.e., updating the agency's case management system or computers.
- If the analysis of the resources required to administer the VR Program in FYs 2008 and 2009 shows that anticipated expenditures are greater that resources, this indicates that carryover funds will be utilized to continue operating the VR Program at the current level, but actions will have to be taken to reduce program expenditures (budget cuts) or increase revenues by the time that all carryover funds have been expended.
- If the analysis of the resources required to administer the VR Program in FYs 2008 and 2009 shows that anticipated expenditures are equal to projected revenues, the carryover should only be expended for one-time purposes.
- VRSBD will release any funds determined to be in excess of VR Program requirements for re-allotment to other State VR agencies having need for these funds.
- VRSBD will develop a plan for the reduction of carryover funds to meet the 20 percent threshold, with an interim goal established for the end of FY 2008.

Methods of Evaluation:

- By March 31, 2008, a plan for reducing carryover will be developed by VRSBD and shared with RSA.
- VRSBD will monitor adherence to the carryover expenditure plan quarterly throughout FYs 2008 and 2009.

- VRSBD and RSA will monitor the year-end FY 2008 carryover balance to determine if interim goals have been met or the need for adjustments to the carryover expenditure plan.
- At the end of FY 2009, VRSBD and RSA will meet to evaluate progress made toward achieving this goal and determine the need for future goals related to reducing carryover balances in the VR program.

Technical assistance:

RSA will provide the following technical assistance to facilitate the implementation of this goal:

- Upon completion of the resources analysis for FYs 2008 and 2009, RSA will meet with VRSBD to discuss the results of this analysis and provide technical assistance to the agency related to the development of a viable plan for expending (or releasing through the re-allotment process) excessive carryover funds.
- At the end of FYs 2008 and 2009, RSA will meet with VRSBD to review results and required adjustments to the carryover expenditure plan.
- Throughout this process, RSA is available to provide program and fiscal guidance to VRSBD as the agency develops and implements its carryover expenditure plan.

Chapter 3: Fiscal Review of the VR Program

RSA reviewed VRSBD's fiscal management of the VR program. During the review process RSA provided technical assistance to the state agency to improve its fiscal management and identified areas for improvement. RSA reviewed the general effectiveness of the agency's cost and financial controls, internal processes for the expenditure of funds, use of appropriate accounting practices, and financial management systems.

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 that it is compared to). Fiscal data related to administration, total expenditures, and administrative cost percentage are taken from the RSA-2.

Table 3
Fiscal Data for VRSBD for FY 2002 - FY 2006

Fiscal Year	Hawaii (C)				
	2002	2003	2004	2005	2006
Grant Amount	9,536,125	9,661,551	10,211,708	10,447,079	10,749,158
Required Match	2,580,933	2,614,880	2,763,779	2,827,481	2,909,238
Federal Expenditures	5,089,881	4,654,713	4,910,979	4,149,173	4,526,591
Actual Match	2,683,155	2,665,826	2,763,779	2,827,481	2,909,238
Over (Under) Match	102,222	50,946	0	0	0
Carryover	4,446,244	5,006,838	5,300,729	6,297,906	6,222,567
Program Income	194,019	146,666	157,457	300,669	167,684
Maintenance of Effort (MOE)	2,683,155	2,665,826	2,690,367	2,665,826	2,763,779
Administrative Costs	1,596,832	1,296,246	1,408,530	1,559,360	1,525,748
Total Expenditures	10,995,890	11,915,535	13,172,739	12,871,498	14,392,917
Percent Admin Costs to Total Expenditures	14.52%	10.88%	10.69%	12.11%	10.60%

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 Maintenance of Effort (MOE) penalties, reductions for grant funds voluntarily relinquished

through the re-allotment process, or additional grant funds received through the re-allotment 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 un-liquidated obligation information previously reported to substantiate the extent that 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 requirement 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 the VR Program regulations at 34 CFR 361.5(b)(2).

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

RSA provided fiscal technical assistance to VRSBD. RSA:

- provided a synopsis of each requirement and reviewed with financial staff RSA's assessment of the agency's compliance with specific financial requirements (i.e.; match, Maintenance of Effort (MOE), carryover, re-allotment, program income, liquidation of outstanding obligations and grant closeout);
- reviewed the internal control aspects of Hawaii's new purchasing system (P-card) to ensure the safeguarding of federal grant funds;
- discussed contractual arrangements, payment terms (milestones), evaluation and monitoring. Reviewed FY 2008 anticipated procurement policy and fee schedule changes;
- analyzed sufficiency of FYs 2007 and 2008 matching resources (a result, errors were noted in the preparation of the RSA-15 report that were discussed with agency and revised subsequent to RSA's onsite visit);
- discussed strategies for reducing the growing balance of federal funds available for carryover (e.g., agency's efforts to expand their ability to serve consumers in all areas of the island, automation of case management system, and increasing counselor resources).
- discussed requirements for transferring Social Security program income to other formula grant programs and the impact on VR Program;
- discussed with financial staff the status of missing financial reports, the requirement to finalize reports within 90 days after the end of the carryover period, and RSA-2 report discrepancies noted during the onsite review;
- discussed overall agency budget (funding sources), time distribution requirements, and salary charges to agency-administered programs;
- reviewed cash management (drawdown) procedures;

- discussed allowable innovation and expansion (I&E) authority expenditures – Using VR Program funds to support the funding of the State Rehabilitation Council (SRC) and the Statewide Independent Living Council’s resource plan;
- discussed staffing issues related to problems encountered in filling long-standing vacancies (i.e.; shortage of candidates who meet state requirements, restructuring positions, and issues encountered with contracting out program functions); and
- discussed agencies efforts to expand offices to better serve other areas of the island, automate its case management system, and increasing counselor resources.

Effective VR and SE Practices Identified by VRSBD and Stakeholders During the Review Process

P-Card Purchasing

The State of Hawaii has authorized purchase cards (P-cards/credit cards) that are issued to employees chosen by the head of the employing agency. It is mandatory to use this card for any purchase under \$1,500. However, the card may also be used for all small purchases under the \$25,000 threshold. This authority expedites the entire procurement process and enhances consumer choice since counselors use the card for consumer purchases as well as for official travel and office supplies.

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

Federal Reporting

1. Fiscal Reporting

Issue: Inaccuracies noted in RSA-2 reports submitted to RSA.

Goal: Improve the accuracy of the RSA-2 Report.

Strategies:

1. Department financial staff and VR will work together and thoroughly review each line item on Schedule II of this report to ensure that all expenditures and client counts are accurate.
2. Throughout the Departmental and Division review process, RSA will be consulted to clarify reporting requirements.
3. Upon completion of the aforementioned review, a teleconference will be held with RSA to discuss the review results and any corrections made to previously reported data.

Technical Assistance: RSA will conduct training with financial and program staff related to each aspect of the RSA-2 report.

Chapter 4: IL Program

Program Organization

Hawaii Vocational Rehabilitation Services for the Blind Division (VRSBD) divides its Part B funds between the Hawaii Statewide Independent Living Council and the Hawaii Centers for Independent Living. HCIL provides independent living services to consumers with disabilities such as information and referral, IL skills training, and advocacy.

HCIL is the only Part C-funded CIL in Hawaii. The center has several branches on other islands throughout the state.

Table 4
Sources and Amounts of Funding (FY 2006)

	Amounts of Funding
Part B Funds	301,477
Older Blind	225,000
Other Federal Funds	0
State Funds	77,450
Local Government	0
Private/Other Funds	0
Total	603,927

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

RSA provided technical assistance to the Hawaii Vocational Rehabilitation Services for the Blind Division in a number of IL program areas during the review process. RSA:

- provided technical assistance on Statewide Independent Living Council (SILC) and Center for Independent Living (CIL) communication;
- assisted with the understanding of funding and budget expenditures; and
- provided technical assistance on increasing performance and compliance issues.

IL Issues Identified by VRSBD and Stakeholders During the Review Process

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

- strengthening relationships between the Vocational Rehabilitation (VR) program, the Statewide Independent Living Council of Hawaii (SILCH), and the Hawaii Center for Independent Living (HCIL);

- provision of IL services on other islands; and
- services to older individuals who are blind.

Following the compilation of this list, RSA worked with VRSBD 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 VRSBD, and the Hawaii SILC agreed on the following IL performance goals, strategies to achieve those goals, and technical assistance that RSA will provide to assist HVRSD to achieve each goal.

1. Relationships between VRSBD, SILCH and HCIL

Issue: The three major components of the independent living community in Hawaii (VRSBD, the SILCH, and the HCIL) have not established effective procedures for communication, cooperation, and coordination. The relationship between these entities has been contentious and has caused delays in SPIL development, loss of contracts for service provision, and exceeded statutory authority. CFR364.26(A1-2) requires that steps be taken to maximize the cooperation, coordination, and working relationships among The SILS program, the SILC, centers and the DSU.

Goal: To improve communication, cooperation and coordination between the VRSBD, SILC, and HCIL, and also to create a more collaborative partnership for advancing independent living across the state.

Strategies:

- identify communication barriers; and
- develop and implement resolutions to identified barriers.

Technical Assistance: RSA will:

- provide training on SILC roles and responsibilities;
- provide training on the purpose of the SILC;
- clarify the Different roles of the SILC and HCIL;
- enhance Understanding of the SPIL development process.

2. Inability to conduct SILC business including appropriate expenditure of Part B funds

Issue: Despite being fully constituted, the SILCH is frequently unable to conduct business due the lack of a quorum at SILCH meetings. This may have led to an inappropriate expenditure of Part B funds over the last year. The Hawaii SILC hired a consultant to assist with the development of its new SPIL. The consultant was paid \$10,000. The FY 2005 – 2007 SPIL did not indicate in its goals and objectives the need to hire a consultant for SPIL development. The SPIL resource plan did not indicate any need to pay a consultant \$10,000 to develop the FY 2008 – 2010 SPIL nor was the resource plan amended and approved by RSA to include this

expenditure. Regulations at 34 CFR 364.21(i4) state that the SILC is responsible for the proper expenditure of funds and use of resources that it receives under the resource plan.

Goal: To conduct SILC business on a quarterly basis ensuring effective SILC daily operations through appropriate expenditure of funds.

Strategy: Recruit board members who will participate fully in all SILC meetings and business proceedings.

Technical Assistance: RSA will:

- RSA will provide training on how to properly conduct SILC business.
- RSA will refer to similar sized SILC's to review their business procedures.

IL Compliance Issues, Goals, Strategies, Methods of Evaluation, and Technical Assistance

RSA, the SILCH, and the VRSBD agreed on the following IL compliance goals, strategies to achieve those goals, method of evaluation to determine that the compliance issue has been resolved, and technical assistance that RSA would provide to assist the appropriate components of the independent living community to achieve each goal.

3. SILC Terms of Appointment

Issue: Members of the Hawaii SILC have served beyond their two three-year term limits as specified in 34 CFR 364.21(F)(3). This regulation requires that no member of the SILC may serve for more than two consecutive full terms.

Goal: To ensure that SILC members serve no more than two consecutive terms on the Council.

Strategy: The SILC will recommend to the governor individuals who meet the term limit requirement for appointment to the Council.

Method of Evaluation: RSA will review SILC member appointment dates on an annual basis to ensure compliance with term limit requirement.

Technical Assistance: RSA will provide training on SILC appointments.

4. SILC Duties

Issue: The Hawaii SILC had not monitored, reviewed, or evaluated its implementation of the SPIL during FY 2005 – 2007. During training conducted while on-site, RSA found that many SILC members were not familiar with the goals and objectives included in the SPIL and were unclear on their duties as SILC members. 34 CFR 364.21(G)(2) require that the SILC monitor, review and evaluate the implementation of the SPIL.

Goal: Ensure that the SILC monitors, reviews and evaluates the implementation of the SPIL in accordance with federal requirements.

Strategy: The SILC will establish timelines.

Method of Evaluation: The SILC will provide to VRSBD the results of the evaluation of the implementation of the SPIL on a quarterly and annual basis.

Chapter 5: Older Individuals who are Blind (OIB) Program

Program Organization

The Hawaii Title VI chapter II OIB Program is administered by VRSBD and is funded under Chapter two of the Rehabilitation Act. The program is administered by the Services for the Blind Division. Services are provided by rehabilitation teachers from the Ho'opono training center for the Blind in Honolulu. Ho'opono also supervises rehab teachers providing services directly to eligible individuals on the other islands.

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

RSA provided technical assistance to VRSBD in a number of OIB program areas during the review process. RSA conducted an open forum at the Ho'opono training center for the blind on Friday, June 1 to allow for public comment to RSA regarding services to eligible individuals under this formula grant, and for the review team to answer questions about the OIB program.

OIB Issues Identified by HVRSBD and Stakeholders During the Review Process

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

- timeliness of services;
- quality of services;
- communication of program policies and procedures to consumer groups; and
- response from program staff.

Following the compilation of this list, RSA worked with VRSBD and other IL partners 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 VRSBD agreed on the following: OIB performance goals, strategies to achieve those goals, and technical assistance that RSA will provide to assist VRSBD in achieving each goal.

1. Relationships with consumer groups

Issue: In 2003 VRSBD decided to administer the OIB grant through its Services for the Blind Division, providing direct services out of the Ho'opono training center for the blind on Oahu. Since that time, the numbers of individuals served by the program has grown and the range and scope of services provided has expanded. However, some consumer groups and individuals have expressed concern over the past years about a lack of clarity with respect to what kinds of services can be provided under OIB and what the eligibility requirements are. While Ho'opono

has made significant efforts to inform consumers about the OIB, some consumers remain uncertain about their rights and responsibilities when receiving services through this grant.

Goal: To increase awareness and understanding of the requirements of the Older Individuals who are Blind (OIB) program through community outreach efforts.

Strategies:

1. Increase efforts to reach out to various consumer groups to explain the way the OIB program works, as distinct from the VR program under Title I.
2. Clarify policies pertaining to equipment purchases under the program; with particular attention to small item purchases such as canes that are valued under \$200.
3. Produce a newsletter specifically addressing issues within the OIB program and disseminate it to all consumer groups with an interest in such services.
4. Conduct a focused customer satisfaction survey that can identify strengths and weaknesses in the delivery of program services.
5. Ensure that services are provided to individuals on other islands by conducting staff needs assessments and by including other islands in any customer satisfaction surveys.
6. Clarify the OIB budget, which due to the extra allotment in FY 2000, continues to be the cause of some confusion among some consumers.

Chapter 6: Progress on Issues Raised in Previous Reviews

As a result of the RSA review conducted with VRSBD in FY 2004, the agency developed a Corrective Action Plan (CAP).

Corrective Action Plan

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

- limitations on service provision, particularly with respect to vehicle repairs and purchases;
- revisions of fee schedules for medical and psycho-social evaluations and restorative services;
- adjustment to blindness training at the Ho'opono center for the blind, and the establishment of a residential training program; and
- documentation of eligibility determinations, and presumption of eligibility for SSI/SSDI recipients.

Chapter 7: Summary Conclusion

The VR program is engaging in self-analysis that will lead to stronger performance and higher quality outcomes for Hawaii's disabled population. The fiscal management of the program is working to identify one-time expenditures to spend down the surplus carryover funds. This will enhance VRSBD's ability to pursue its primary goal of improving services to individual consumers.

One of the greatest challenges to the agency in the coming year will be achieving buy-in at all levels on the new focus on quality outcomes. VRSBD will need to institute concrete measures to ensure VR counselors and staff in all offices that this effort reflects the true values of the program. The high degree of autonomy among the branch offices will also be a challenge to ensuring unity of message and consistency of policy implementation across the islands.

The table below summarizes the goals and recommendations resulting from this monitoring review:

**Table 5
Summarizes the Results of RSA's Review**

Agency: Hawaii Vocational Rehabilitation and Services for the Blind Division (VRSBD)		
Program: VR		
Goal	Strategies	Technical Assistance
1. To improve the quality of VRSBD's employment outcomes.	<ol style="list-style-type: none"> 1. Define quality out-comes 2. Set goals with targets 3. Identify and implement policies and procedures 4. Clarify existing service policies 5. Increased utilization of paraprofessionals in the VR process 6. Implement an electronic case management system 7. Reduce the emphasis on the numbers of outcomes as the measure for counselor performance 8. Explore and adopt policies and practices of other VR agencies that have made improvements 9. Reduce the focus on service policies 	<ol style="list-style-type: none"> 1. Review service policies 2. Provide input on case management system 3. Identify promising practices from other agencies 4. Interpret performance data 5. Increase availability of RSA data
2. VRSBD will implement a set of internal and external monitoring procedures to better track both the quality of service provision and compliance with the Rehabilitation Act and its implementing regulations. Such a system of self-monitoring should be rigorously designed, on-going, systemic in its approach, and	<ol style="list-style-type: none"> 1. Identify QA staff 2. Implement service record review 3. Hire consumer advocate 4. Liaison with consumer groups 5. Utilize employee exit conference data 6. Develop external contract 	<ol style="list-style-type: none"> 1. Share review instruments 2. Review draft monitoring protocols 3. Identify resources 4. Provide TA on contract reviews

useful for identifying VRSBD staff training needs as well as areas where the agency can improve the quality of its service provision to consumers.	review process	
3. Identify promising practices for the delivery of VR services to individuals who are Deaf or Hard-of-Hearing in order to increase the number and quality of employment outcomes for these individuals.	<ol style="list-style-type: none"> 1. Comprehensive assessment of Deaf needs 2. Feasibility study of adjustment center 3. Identify gaps in services 4. Strengthen advisory board 5. Identify key employment variables 	<ol style="list-style-type: none"> 1. Review any policy changes affecting services for the deaf and hard-of-hearing 2. Share promising practices from other states 3. Review and comment on the comprehensive assessment of deaf services
4. By the end of FY 2009, VRSBD will reduce the VR Program funds carried over to less than 20 percent of the federal funds made available to the state each FY.	<ol style="list-style-type: none"> 1. Analyze total amount of funds to operate the VR program. 2. Compare resources with anticipated expenditures. 3. Assess whether funds are adequate to operate the VR program. 4. Identify one-time expenditures to spend down any surpluses. 5. Develop plan to achieve 20% carry over goal. 	<ol style="list-style-type: none"> 1. Meet with VRSBD to discuss analysis of carry over
Program: Fiscal		
Goal	Strategies	Technical Assistance
4. Improve the accuracy of the RSA-2 Report	<ol style="list-style-type: none"> 1. Review each line item on Schedule II of this report to ensure that all expenditures and client counts are accurate. 2. RSA will be consulted to clarify reporting requirements. 3. A teleconference will be held with RSA to discuss the review results and any corrections made to previously reported data. 	<ol style="list-style-type: none"> 1. RSA will conduct training with financial and program staff related to each aspect of the RSA-2 report.
Program: IL		
Goal	Strategies	Technical Assistance
5. To improve communication, cooperation and coordination between the VRSBD, SILC, and HCIL, and also to create a more collaborative partnership for advancing independent living across the state.	<ol style="list-style-type: none"> 1. Identify communication barriers 2. Develop and implement resolutions to identified barriers 	<ol style="list-style-type: none"> 1. Training on SILC roles and responsibilities 2. Training on purpose of SILC 3. Clarify difference between SILC and HCIL 4. Enhance Understanding of the SPIL development process.
6. To conduct SILC business on a quarterly basis ensuring effective SILC daily operations through appropriate expenditure of funds.	<ol style="list-style-type: none"> 1. Recruit board members who will participate fully in all SILC meetings and business proceedings. 	<ol style="list-style-type: none"> 1. RSA will provide training on how to properly conduct SILC business. 2. RSA will refer to similar sized SILC's to review their business procedures.
7. To ensure that SILC members serve no more than two consecutive terms on the Council.	<ol style="list-style-type: none"> 1. The SILC will recommend to the governor individuals who meet the term limit requirement for appointment to the Council. 	<ol style="list-style-type: none"> 1. RSA will provide training on SILC appointments.
8. Ensure that the SILC monitors,	<ol style="list-style-type: none"> 1. The SILC will establish timelines. 	TBA

reviews and evaluates the implementation of the SPIL in accordance with federal requirements.		
Program: OIB		
Goal	Strategies	Technical Assistance
9. Increase outreach efforts to consumer groups	<ol style="list-style-type: none"> 1. Outreach programs 2. Clarify policies and procedures 3. Produce newsletter 4. Customer satisfaction survey 5. Strengthen services on other islands 6. Clarify OIB budget 	<ol style="list-style-type: none"> 1. RSA will provide whatever technical assistance VRSBD requests in the course of implementing the above stated goal.

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>