

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



**U.S. Department of Education
Office of Special Education and
Rehabilitative Services
Rehabilitation Services Administration
September 7, 2007**

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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 Nebraska (NE):

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

In NE, the Nebraska Vocational Rehabilitation (NVR) and the Nebraska Commission for the Blind and Visually Impaired (NCBVI) are jointly responsible for the first three programs listed above, while NCBVI is solely responsible for the OIB program.

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

- gathered and reviewed information regarding each programs 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 state agency staff, NVR's State Rehabilitation Council (SRC) members, NCBVI's Commission Board members, Client Assistance Program (CAP) staff, Statewide Independent Living Council (SILC) members, and stakeholders to share information and to identify promising practices and areas for improvement;
- provided technical assistance (TA);
- worked with NVR, NCBVI, 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;
- worked with NVR and NCBVI to develop performance goals and strategies related to selected issues;
- identified the TA that it would provide to assist the agencies to achieve the goals identified as a result of the review;
- made recommendations in those instances when NVR or NCBVI and RSA did not agree on issues; and
- identified potential issues for further review.

Specifically, RSA, NVR, NCBVI, and their stakeholders developed strategies to achieve the following goals by September 30, 2008:

In the VR and SE programs, NVR will:

- develop a system for measuring success of transition-age youths;
- create a minimum of 30 employer scholarships statewide for transition students with a minimum of 14 employers offering scholarships;
- establish long-term relationships with a minimum of 14 targeted employers;
- develop methods for assessing consumer satisfaction while consumers are in the VR process;
- identify and implement strategies and processes to achieve an employment rate at or above 65 percent; and
- establish a process to monitor the Employment Warranty program statewide.

In the VR and SE programs, NCBVI will:

- achieve a full-time (31 or more hours per week) competitive employment rate of at least 52 percent;
- achieve a ratio of average hourly earnings of clients who become employed compared to average hourly earnings in the state of at least 0.72;
- achieve an employment rate for transition-age clients of at least 40 percent; and
- improve its quality assurance system.

In the IL programs, NVR, NCBVI, NE SILC, CILs, and IL providers will:

- improve communication and collaboration between NE SILC, CILs, NVR, NCBVI, and IL service providers that will result in maximizing existing resources, identifying opportunities for expansion, and increasing access to IL services.

In the OIB program, NCBVI and the IL stakeholders will:

- leverage resources to increase the number of older blind Nebraskans served by the OIB program.

Introduction

Section 107 of the Rehabilitation Act of 1973, as amended (the Act), requires the Commissioner of RSA to conduct annual reviews and periodic on-site monitoring of programs authorized under Title I of the Act to determine whether a state VR agency is complying substantially with the provisions of its state plan under Section 101 of the Act and with the evaluation standards and performance indicators established under Section 106. In addition, the Commissioner must assess the degree to which VR agencies are complying with the assurances made in the state plan supplement for SE under Title VI of the Act and the degree to which 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 IL 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 reviewed the performance of the following programs of the Act:

- the VR program, established under Title I;
- the SE program, established under Title VI, part B;
- the IL program, authorized under Title VII, part B; and
- the OIB program, established under Title VII, Chapter 2.

In addition, RSA also reviewed NVR's and NCBVI's progress on:

- both agencies' Corrective Action Plans (CAPs) that were established as a result of findings from RSA's FY 2004 Section 107 monitoring reviews;
- NVR's Program Improvement Plan (PIP) that was established as a result of the fact that NVR did not meet performance standards for Indicators 1.1, 1.2, and 1.6 for FY 2004; and
- the assurances that NVR and NCBVI made to RSA in conjunction with each of their respective FY 2007 state plans.

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

In NE, NVR is the designated state unit (DSU) responsible for administering the VR, SE, and IL programs (except the OIB program). NVR is located within the NE Department of Education,

which is the designated state agency (DSA). NCBVI, an independent consumer-controlled commission, is the DSA responsible for the VR, SE, and IL programs serving individuals who are blind as well as the OIB program.

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

Appreciation

RSA wishes to express appreciation to the representatives of the NVR; the NE Department of Education, NVR's DSA; NVR's SRC; NCBVI; the NCBVI Commission Board; the CAP; the SILC; and the stakeholders who assisted the RSA monitoring team in the review of NVR and NCBVI.

Chapter 1: RSA's Review Process

Data Used During the Review

RSA's review of NVR and NCBVI 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 NE state team:

- gathered and reviewed information regarding NVR's and NCBVI'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 state agency staff, NVR's SRC members, NCBVI's Commission Board members, CAP staff, SILC members, and stakeholders to share information, identify promising practices and areas for improvement;
- provided TA to NVR and NCBVI during the review;
- worked with NVR and NCBVI to develop goals, strategies, and evaluation methods to address performance issues;
- reviewed the goals and strategies developed with the two state agencies at on-site meetings of their stakeholders;
- made recommendations to NVR and NCBVI in those instances when either NVR or NCBVI and RSA did not agree on issues; and
- identified potential issues for further review; and
- identified the TA that RSA would provide to help NVR and NCBVI improve their performance.

RSA NE State Team Review Participants

Members of RSA's NE state team included representatives from each of RSA's State Monitoring and Program Improvement Division's (SMPID) five functional units. The RSA NE state team was led by RSA's interim state liaison to NE, RoseAnn Ashby, of the RSA/NIDRR Policy Team in the Office of Special Education and Rehabilitative Services (OSERS), and the following RSA NE team members: Terry Martin, VR Unit; Sue Rankin-White, TA Unit; Elizabeth Akinola, IL Unit; Jean Yan, Data Unit; and Regina Luster, Fiscal Unit.

Information Gathering

During FY 2007, RSA began its review of NVR and NCBVI by analyzing information including, but not limited to, RSA's various data collections, NVR's and NCBVI's VR and IL state plans, NVR's SRC's annual report, and NCBVI's annual report. After completing its internal review,

the RSA team carried out the following information gathering activities with NVR, NCBVI, and stakeholders in order to gain a greater understanding of NVR's and NCBVI's strengths and challenges:

- the RSA NE state team conducted an initial teleconference with the NVR management to identify issues to be reviewed;
- the RSA NE state team conducted an initial teleconference with the NCBVI management to identify issues to be reviewed;
- the RSA NE state team held an initial teleconference with stakeholders to gather input on the performance of NVR's and NCBVI's VR and IL programs;
- the RSA NE state liaison conducted a series of individual teleconferences with both NVR's and NCBVI's management team as well as stakeholders, particularly those stakeholders who were unable to participate in the initial teleconference;
- the NE state liaison reviewed the drafts of both the NVR and NCBVI VR state plans and talked to management of both agencies about the linkage between monitoring goals and state plan goals;
- the NE state liaison reviewed NVR's and NCBVI's service policies and training materials to better understand the VR program as it is administered in NE;
- the TA Unit and IL Unit members of the NE team reviewed the current state plan for independent living (SPIL), contracts with the Assistive Technology Project (ATP), the Part B service provider, ATP's IL service provider policies, and the 704 Part I annual performance report for FY 2006;
- RSA conducted two on-site monitoring visits: the first monitoring visit was conducted from March 19-23, 2007, and the second monitoring visit was conducted from May 21-25, 2007;
- the RSA NE team conducted teleconferences and on-site meetings with the NE IL constituency, including staff and members of the SILC, centers for independent living (CILs), staff of the OIB program, staff of ATP, NVR, and NCBVI; and
- the RSA NE state liaison also held several teleconferences focused on further defining VR monitoring goals, both before and after the on-site visits.

Chapter 2: Nebraska Vocational Rehabilitation: Vocational Rehabilitation and Supported Employment Programs

Program Organization

NVR is located within the NE Department of Education. NVR’s stated mission is “Quality Employment Solutions” for individuals with significant disabilities. NVR has chosen an innovative staffing structure in which counselors and supervisors are organized into fourteen teams across the six areas of the state. The team structure is a service delivery model that places the consumer at the center. Through this organization, NVR strives to provide a broad range of services to consumers who will have ready access to NVR staff at all times.

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
NVR Trend Data

NEBRASKA	2002	2003	2004	2005	2006
Total funds used	\$15,359,250	\$17,497,671	\$17,576,239	\$18,442,954	\$19,103,760
Individuals served during year	5,429	5,455	5,520	5,784	5,591
Applicants	4,319	4,444	4,840	4,535	4,393
Closed after receiving services	2,351	2,498	2,288	2,616	2,387
Closed with employment outcomes	1,490	1,436	1,266	1,418	1,498
Employment outcomes without supports in an integrated setting	1,258	1,216	1,089	1,221	1,259
Average cost per individual served	\$2,829.11	\$3,207.64	\$3,184.10	\$3,188.62	\$3,416.88
Average cost per employment outcome	\$10,308.22	\$12,185.01	\$13,883.29	\$13,006.31	\$12,752.84
Employment outcomes per \$million spent	97.01	82.07	72.03	76.89	78.41

Table 1 Continued
NVR Trend Data

NEBRASKA	2002	2003	2004	2005	2006
Competitive employment outcomes per \$million spent	92.91	79.21	69.58	74.83	78.26
Average hourly earnings for paid employment outcomes	\$8.23	\$8.37	\$8.46	\$8.61	\$9.05
Average state hourly earnings	\$14.16	\$14.61	\$14.93	\$15.49	\$16.11
Average hours worked per week for paid employment outcomes	34.82	34.39	34.51	32.42	33.81
Percent of transition age served to total served	32.96	32.67	33.30	33.75	31.13
Employment rate for transition age served	66.06	60.05	60.10	58.21	65.95
Average time between application and closure (in months) for individuals with successful paid employment outcomes	23.10	20.00	20.50	18.70	18.80
Average number of individuals served per total staff	31.20	29.49	30.50	31.43	29.90

Table 2

Five-Year Summary of Results of Standards 1 and 2											
NVR											
	RSA Minimum Performance Level	Computational Data & Results									
		Met (M)					Did Not Meet (DNM)				
		FY 2002		FY 2003		FY 2004		FY 2005		FY 2006	
Indicator 1.1 Difference in the number of individuals with employment outcomes from prior year for general and combined agencies or prior two years for blind agencies											
Current year employment outcomes		1,490		1,436		1,266		1,418		1,498	
Prior year employment outcomes		1,216		1,490		1,436		1,266		1,418	
	Equal or exceed	274	M	-54	DNM	-170	DNM	152	M	80	M
Indicator 1.2 Percent with employment outcomes after services											
Employment outcomes		1,490		1,436		1,266		1,418		1,498	
Individuals served		2,351		2,498		2,288		2,616		2,387	
	55.8%	63.38%	M	57.49%	M	55.33%	DNM	54.20%	DNM	62.76%	M
Primary Indicators (1.3, 1.4, & 1.5)											
Indicator 1.3 Percent of all employment outcomes that were competitively employed											
Employed competitively		1,427		1,386		1,223		1,380		1,495	
Employment outcomes		1,490		1,436		1,266		1,418		1,498	
	72.6%	95.77%	M	96.52%	M	96.60%	M	97.32%	M	99.80%	M
Indicator 1.4 Percent of individuals with competitive employment outcomes who had a significant disability											
Significantly disabled employed competitively		1,427		1,386		1,223		1,380		1,495	
Employed competitively		1,427		1,386		1,223		1,380		1,495	
	62.4%	100.00%	M	100.00%	M	100.00%	M	100.00%	M	100.00%	M

Table 2 Continued

Five-Year Summary of Results of Standards 1 and 2											
NVR											
	RSA Minimum Performance Level	Computational Data & Results									
		Met (M)					Did Not Meet (DNM)				
		FY 2002		FY 2003		FY 2004		FY 2005		FY 2006	
Indicator 1.5											
Ratio of average hourly VR wage to average state hourly wage											
Average hourly wage of competitively employed		\$8.39		\$8.52		\$8.62		\$8.74		\$9.06	
State average hourly wage		\$14.16		\$14.61		\$14.93		\$15.49		\$16.11	
	0.52	0.593	M	0.583	M	0.577	M	0.564	M	0.562	M
Indicator 1.6											
Difference Between Percent Self-Supporting at Closure and Application											
Competitive Employment Outcomes		1,427		1,386		1,223		1,380		1,495	
Primary Support is Own Income at Application		591		216		326		270		266	
% self-support at application		41.42%		15.58%		26.66%		19.57%		17.79%	
Primary Support is Own Income at Closure		1076		1037		948		1047		1131	
% self-support at closure		75.40%		74.82%		77.51%		75.87%		75.65%	
	53.0	33.99	DNM	59.24	M	50.86	DNM	56.30	M	57.86	M
Indicator 2.1											
Ratio of minority to non-minority service rate											
Non-Minorities Exiting VR		3,437		3,607		3,575		3,759		3,346	
Non-Minorities Who Received Services		2,120		2,202		2,012		2,247		2,009	
Non-Minority service rate		61.7%		61.0%		56.3%		59.8%		60.0%	
Minorities Exiting VR		494		602		617		744		736	
Minorities Who Received Services		231		296		276		369		378	
Minority service rate		46.8%		49.2%		44.7%		49.6%		51.4%	
	0.80	0.758	DNM	0.805	M	0.795	DNM	0.830	M	0.855	M

Provision of TA to the VR and SE Programs During the Review Process

RSA provided TA to NVR in a number of VR and SE program areas during the review process. RSA:

- verified the agency's RSA 911 case record data for FY 2004, FY 2005, and FY 2006;
- provided feedback to the agency on its case management system;
- provided training on how to use RSA's Management Information System (MIS);
- shared data tables generated from the RSA-911 and assisted NVR staff in interpreting the results and in generating ideas as to how results might be improved;
- provided TA on NVR's draft of Rule 72, "Cost Sharing and Cost Containment Rules for VR services," the agency's comprehensive service policy manual;
- led a discussion of possible approaches to mapping agency processes systematically with the goal of improving service provision and consumer outcomes; and
- provided guidance on ways to create more measurable goals so that NVR's progress can be readily evaluated.

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

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

1. Employment Warranty

NVR agency staff provide follow-up contacts to consumers who have become employed. These contacts are made 90 days, 180 days, and one year after the individual has become employed. NVR's philosophy is that it is important to maintain contact with consumers so that intervention can occur quickly should the individual require services to maintain employment. If short-term services are needed, the consumer receives post-employment services. If long-term or more complex services are needed, then the consumer's case is reopened.

2. Transition Scholarships

NVR awards "scholarships" to transition-age youths who are eligible for VR services. These youths are given internships with an employer that can last up to 12 weeks. NVR pays up to half of the costs while the consumer is working as an intern. The employer teaches the young person the skills necessary to do the job and often provides the youth with a mentor. At the end of the internship, the youth is hired.

VR and SE Issues Identified by NVR and Stakeholders During the Review Process

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

- NVR collaborates well with its stakeholders and its SRC;

- NVR's retooled up-front process works well: consumers are engaged in a rigorous employment discussion of their goals and service needs and are given materials to help them work through this process;
- NVR would like to develop more meaningful ways to measure consumer satisfaction;
- NVR would like to develop more sophisticated analyses allowing the agency to compare its performance to the national average and to similar VR agencies;
- stakeholders want NVR's communication with consumers to be timely and accurate in order to promote clear expectations of both counselors and consumers;
- stakeholders want consumers to be provided with individualized job placement assistance rather than expecting them to locate their own employment after being given job readiness services;
- there is a lack of SE opportunities, particularly for individuals with developmental disabilities, because there are insufficient sources of extended services, particularly for developmentally disabled youths between the ages of 18 and 21;
- youths with learning disabilities have complex needs that are challenging for NVR counselors to understand and address properly;
- NVR provides exemplary transition services, but does not have sufficient resources to make these services available in every school to all youths with disabilities who could benefit from them; and
- services to individuals with mental illnesses have improved as a result of a cooperative agreement between NVR and the Division of Behavioral Health Services.

Following compilation and discussion with NVR about the issues, RSA worked with NVR 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, Methods of Evaluation, and TA

RSA and NVR agreed on the following performance goals, strategies to achieve those goals, methods of evaluation, and TA that RSA would provide to assist NVR to achieve each goal. These goals and strategies are included in NVR's FY 2008 state plan, and progress on achieving these goals will be reported in NVR's FY 2009 annual state plan submission.

1. Outcomes for Transition-Age Youths

Issue: Over 30 percent of the consumers NVR serves are transition-age youths. Services for transition-age youths are characterized by a high degree of collaboration at the state and local levels. The Transition Program Director in NE holds a position that is jointly funded by NVR and the NE Department of Education. Each of NVR's teams has at least one counselor who is dedicated to working with youths and who works actively and collaboratively with school personnel to provide services to youths as early as possible. NVR counselors often provide services to groups of youths with disabilities prior to determining their eligibility. Once a youth is determined eligible for VR services, he/she is transferred to another counselor on the team who has an adult caseload. Because the transition counselor and the adult counselor interact regularly as members of the same team, the consumer does not experience interruption in services or plans made.

RSA staff discussed the importance of being able to measure the effectiveness of NVR's work with transition-age youths. NVR wants to measure outcomes for youths, both before they are determined eligible for VR services when transition counselors provide services to groups of students with disabilities as well as after youths become eligible for services when counselors provide them services under an individualized plan for employment (IPE). Currently, NVR can analyze data on transition-age youths who enter the VR program to the same extent as data on anyone served by the program can be analyzed. For example, NVR tracks the employment outcomes of those youths who enter the VR program; the employment rate for this population is slightly higher than for the population of VR consumers taken as a whole, varying from 60 to 66 percent from FY 2002 through FY 2006, with a brief dip in FY 2005 to 58 percent. The agency's data collection would be enhanced if NVR had access to data currently collected by the educational system. Having such data would be helpful in measuring NVR's effectiveness both with those youths who may choose not to enter the VR program as well as those who eventually choose to participate in the VR program. NVR agreed to work toward gaining access to data collected by the schools and then to develop methodologies that would allow the agency to track and examine additional outcomes for this population (e.g., graduation rate, postsecondary education rate).

Goal: Expand and enhance the transition program for youths beginning at age 14 using shared resources and a coordinated planning process to help students be engaged in their education and establish their post high school vision for education and employment.

Objective: 1.1 Develop a system for measuring the success of youths in the NVR program through the following measures:

- (a) graduation rate;
- (b) employment rate;
- (c) postsecondary education rate; and
- (d) transfer into employment program rate.

Strategies:

1.1A Explore how NVR can access data collected by the NE Department of Education.

1.1B Ensure that measurement data can be collected and retrieved from QUEST, NVR's system for collecting and tracking consumer data.

Method of Evaluation: Success will be achieved if NVR develops a system for collecting and reporting the measurement data by September 30, 2008.

TA: RSA will assist NVR to clearly define its outcome measures for transition-age youths and to define the sources for such data. RSA will identify other states that have developed agreements with their state education agencies whereby they have access to school data.

2. Quality Employment Opportunities

Issue: NVR devotes considerable staff resources to employer development. The agency has a full-time employment program director who provides TA to the individuals on the 14 teams who are placement specialists. These placement specialists meet consumers soon after they apply for services in order to begin to identify employment options that are consistent with the consumer's abilities, interests, and informed choice while at the same time are based on local labor market conditions. Placement specialists provide job readiness and job seeking skills training to consumers. These specialists also work to develop relationships with local employers that will yield quality job placements for consumers. The average earnings of those NVR consumers who achieved a paid employment outcome increased from \$8.23 in FY 2002 to \$9.05 in FY 2006.

Despite the trend of increased consumer earnings, and despite NVR's passing Indicator 1.5, the ratio of VR consumers' average earnings to the state average hourly wage dropped from 0.59 in FY 2002 to 0.56 in FY 2006. A 0.56 ratio means that their consumers who became employed earned just over half as much as the average earnings of all individuals in the state. Therefore, the agency is concerned about increasing consumer earnings, and strategies such as those described below are designed to address this issue.

One strategy that NVR has found particularly effective for transition-age youths is to work with employers who offer a "scholarship" to a youth who then becomes employed with the company. NVR covers some of the costs of this internship which lasts up to 12 weeks; the employer works with the student to teach job skills; and at the end of the process, the youth becomes employed. See Objective 2.1 below. Because this initiative has been successful, NVR intends to redouble its efforts to increase the number of scholarships for consumers and the number of employers who offer such scholarships.

Another strategy NVR uses is to focus on "targeted" employers, i.e., employers who are able to provide consumers with high wages and benefits; see Objective 2.2 below. An example of this latter initiative is the employer development NVR did with Chief Industries, a welding company based in Grand Island, NE, that offers jobs with wages starting at \$10.30 an hour as well as good benefits. NVR is committed to developing more employment opportunities for consumers that will help them achieve parity with their nondisabled peers.

Goal: Increase quality job opportunities for persons with disabilities through partnerships with businesses offering a wide range of positions, a living wage, benefits, and career advancement.

Objectives:

2.1 Create a minimum of 30 employer scholarships statewide for transition students with a minimum of 14 employers offering scholarships to transition students.

2.2 Establish long-term relationships with a minimum of 14 targeted employers providing employment with quality wages and benefits.

Strategies:

- 2.1A Develop relationships with employers who have the capacity to establish scholarships for transition students.
- 2.1B Develop a system for tracking the total number of employers offering employment scholarships, the total number of scholarships offered, and the total number of students with a scholarship who achieve an employment outcome.
- 2.2A Determine criteria to be used for targeting employers who offer quality wages and benefits.
- 2.2B Develop relationships with targeted employers meeting the established criteria.
- 2.2C Develop a system for tracking outcomes for consumers employed by targeted employers.

Methods of Evaluation:

- 2.1 Success is achieved if NVR develops 30 or more employer scholarships with at least 14 employers by September 30, 2008.
- 2.2 Success is achieved if NVR develops 14 or more accounts with targeted employers and if the outcomes for consumers with targeted employers are better than the outcomes of consumers with non-targeted employers in terms of wages and benefits.

TA: RSA will provide information to NVR regarding effective employer development and marketing practices developed and implemented by other state VR agencies.

3. Consumer Satisfaction

Issue: NVR is committed to working toward obtaining an accurate picture of consumer satisfaction while consumers are in the VR process. Typically, VR agencies assess a consumer's satisfaction with services only after the consumer leaves the program.

Goal: Create an effective system for assessing consumer satisfaction during and following a consumer's program of rehabilitation with the objective of using the consumer feedback to make enhancements to the VR program.

Objective: 3.1 Develop (in consultation with the SRC) methods for assessing consumer satisfaction while consumers are in the VR process.

Strategies:

- 3.1A Develop and pilot a consumer satisfaction survey to be completed by the consumer immediately following the employment discussion, and implement the survey statewide.
- 3.1B Expand the consumer satisfaction survey to one or more other aspects of the VR process.

Methods of Evaluation:

- Success is achieved if NVR implements a statewide consumer satisfaction survey following the employment discussion by September 30, 2008.
- Success is achieved if NVR expands the survey approach to one or more other aspects of the VR process by September 30, 2008.

TA: RSA will research consumer satisfaction strategies utilized by other state VR agencies and will then share this information with NVR.

4. Employment Outcomes

Issue: In FY 2006, of the individuals whose cases were closed after receiving services from NVR, 62.8 percent became employed (Indicator 1.2). Achievement of this rate occurred after a number of years in which the employment rate fell, from 63.4 percent in FY 2002 to 54.2 percent in FY 2005. Although an employment rate of 62.8 percent is well above the 55.8 percent required to pass this indicator, NVR acknowledges that 37.2 percent of consumers who received services and whose cases were closed in FY 2006 did not become employed, an indication of inefficiency they want to reduce. In addition to working more successfully with these consumers, NVR also wants to reach those consumers who leave the program prior to developing a plan of services. In FY 2006, 1,250 consumers exited the VR program before any services were provided, and NVR wants to become more successful with such individuals.

Goal: Improve the effectiveness of the VR program in assisting individuals with disabilities to achieve quality employment.

Objective: 4.1 Identify and implement strategies and processes to achieve an employment rate at or above 65 percent.

Strategies:

4.1A Conduct team case reviews during FY 2008 on unsuccessful cases in order to identify consumer planning and readiness factors and agency processes that contribute to unsuccessful outcomes.

4.1B Explore the feasibility of surveying unsuccessful consumers to identify consumer planning and readiness factors and agency processes that contribute to unsuccessful outcomes.

Methods of Evaluation:

- Success is achieved if NVR identifies and addresses common consumer planning and readiness factors and agency processes.
- Success is achieved if NVR makes progress toward or achieves an employment rate of 65 percent or higher in FY 2008.

TA: RSA will participate in some of NVR's service record reviews to help agency staff examine factors that may have led to the unsuccessful outcome. RSA will help design a brief survey instrument that could be given to consumers who do not achieve employment or to consumers who leave prior to developing a plan.

5. Employment Retention

Issue: NVR believes that employment retention for individuals with disabilities is an indicator of the success of the VR program, although currently NVR does not have reliable data on the employment retention of its consumers. In order to address this issue, NVR offers consumers an "employment warranty" and follows up with consumers who achieve employment outcomes to be certain that they have the services they require to maintain employment. This program is voluntary, but most consumers are interested in participating. Follow-up occurs 90 days, 180 days, and one year after the individual achieves an employment outcome. If assistance is requested during one of these follow-up contacts, the consumer may receive postemployment services, or if more extensive assistance is necessary, his/her case may be reopened. In FY 2008, NVR wants to offer the Employment Warranty program statewide with dedicated staff to provide follow-up contacts with consumers. Therefore, NVR plans to pilot a program whereby an individual(s) with disabilities will be hired and trained to provide these follow-up contacts.

Goal: Improve the system for gathering and evaluating data on consumer employment at 90 days, 180 days, and 1-year following the employment outcome.

Objective: 5.1 Establish a process to monitor the Employment Warranty program statewide.

Strategies:

5.1A Develop in QUEST a system to identify employment data elements for collection and measurement to evaluate the long-term employment outcomes of consumers.

5.1B Recruit and train individuals with disabilities to monitor consumers in the Employment Warranty program.

Method of Evaluation: Success is achieved if NVR implements a statewide Employment Warranty monitoring program by September 30, 2008.

TA: RSA will work with agency staff to develop the data elements the agency collects in its follow-up contacts with consumers as well as the measures the agency will utilize to determine long-term effectiveness of its program.

VR and SE Recommendations

RSA recommends that NVR establish goals and strategies to address the following VR and SE issues:

1. Mapping Agency Processes

NVR should consider exploring the advantages of mapping agency processes systematically using a consultant with expertise in this quality assurance methodology. NVR has in place many effective processes that lead to successful consumer outcomes. Having a method to catalog these processes would prove beneficial in helping the agency maintain the progress it makes, even when current staff retire and new staff become employed with the agency.

2. Earnings Goals

NVR should consider setting goals regarding increasing earnings for its consumers. Through such initiatives as increasing the number of accounts agency staff have with targeted employers who provide jobs with high wages and benefits, it is clear that NVR is interested in raising the earnings of its consumers. However, without an earnings goal, it is difficult to determine whether NVR is making substantial progress on this issue.

Chapter 3: Nebraska Vocational Rehabilitation: Fiscal Review

RSA reviewed NVR's 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 NVR for FY 2002 through FY 2006

Fiscal Year	NVR				
	2002	2003	2004	2005	2006
Grant Amount	13,545,566	13,645,186	13,952,091	13,943,911	14,459,977
Required Match	3,666,081	3,693,043	3,776,106	3,773,892	3,913,564
Federal Expenditures	11,423,169	9,615,681	10,246,054	10,354,971	11,357,158
Actual Match	3,666,081	5,572,725	3,776,106	3,813,842	3,913,565
Over (Under) Match	0	1,879,682	0	39,950	1
Carryover	2,122,397	4,029,505	3,706,037	3,588,940	3,102,819
Program Income	40,911	202,365	129,465	4,188	76,866
Maintenance of Effort (MOE)	3,434,462	3,382,463	3,666,081	3,796,671	3,782,182
Administrative Costs	3,017,730	2,361,485	3,211,361	3,535,550	3,302,560
Total Expenditures	15,359,250	17,497,671	17,576,239	18,442,954	19,103,760
Percent Admin Costs to Total Expenditures	19.65%	13.50%	18.27%	19.17%	17.29%

Explanations Applicable to the Fiscal Profile Table

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

Match (Non-Federal Expenditures): The non-federal share of expenditures in the Title I VR 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 MOE 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 MOE 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 TA to the VR and SE Programs During the Review Process

RSA provided fiscal TA to NVR during the review process. RSA:

- discussed changes in federal allotment, reallocation process, and strategies for determining reallocation needs, results of reallocation for FYs 2003 – 2006, program income data and transfers to other formula grant programs, carryover, year-end obligations, MOE and MOE waivers, and drawdowns of federal funds and clearance patterns;
- discussed one-time financial “windfalls” – how they should be reported and the effect on the MOE requirement;
- reviewed requirements for liquidation of year-end obligations and strategies for expediting this process;
- reviewed allowable sources of matching funds and actions taken by NVR to eliminate reliance on outside sources of match;
- reviewed the accuracy of NVR’s financial reporting and helped the agency revise its SF-269s to correct SE program administrative expenditures and its RSA-2 establishment project reporting;
- discussed requirements for third-party cooperative arrangements and the use of the establishment authority; and
- discussed documentation requirements for program income transferred to other formula grant programs.

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

1. iChat

NVR utilizes the iChat instant messaging technology built into Mac OS X as a cost-saving tool for communication among the 19 field office locations across NE. The iChat program can use the widely used AOL instant messaging protocol, AIM, or the universally compatible Jabber instant messaging protocol for correspondence across the Internet. Additionally, the Bonjour protocol provides secure instant messaging between client machines within the same local area network.

NVR has been using instant messaging technology on the Mac OS X platform for over three years. It is estimated that the agency is saving several thousand dollars each month on phone bills as a result. iChat for Mac OS X provides for one-to-one audio conferencing or up to 10-way audio conferencing, as well as one-to-one

video conferencing or up to four-way video conferencing, all using the H.264 compression standard, also known as MPEG-4 Part 10. Furthermore, electronic files can be transferred between employees, and the next release of iChat will include a white board space.

2. Match

Several years ago, NVR reached the point where 85 percent of state funding, of which approximately 60 percent was appropriated for the subsequent federal fiscal year, had to be utilized for match to close out the current federal fiscal year. This situation resulted from not receiving sufficient matching funds from the state legislature (or other allowable sources) for a period of several years, and continuing to drawdown and utilize the entire VR program allotment each year. To address this crisis, the NE legislature appropriated sufficient funds to eliminate this shortfall and fully match the VR program each year. The entire required match is made by June 30 of each year, thereby ensuring that sufficient match is available and that the agency has met the match, MOE, and carryover requirements.

3. MOE Compliance

To ensure the timely and accurate submission of required Financial Status Reports (SF-269s), NVR has developed an automated spreadsheet, which is updated monthly to track all federal and non-federal program expenditures. At the beginning of this report is a spreadsheet that contains information related to the agency's compliance with the MOE requirement, detailing the additional expenditures necessary to meet this requirement or a statement that MOE has been met for this grant year. This information is provided to all program managers and financial staff.

4. Procurement – Client Purchases / Property Management

To provide maximum flexibility, client choice, and expedite purchases for clients, NVR has obtained a waiver from state purchasing requirements for all consumer purchases. The agency is authorized to expend an unlimited dollar amount to make direct purchases for individual clients of items that do not become part of the state inventory for NVR.

5. Contract (Grant) Monitoring

Program staff are required to conduct quarterly monitoring of each service provider to discuss contract goals and progress made toward meeting each goal, any required contractual revisions, plans for future periods, and the responsibilities of NVR and contractor. This information is documented in Quest, which is the agency's case management and financial tracking system and is available to all program and financial staff. Further, NVR has assigned an Administrative Specialist (internal auditor) to conduct on-site financial reviews of all service contracts at least once every two years, with problem arrangements being reviewed each year. During this review, all contract expenditures are reconciled with detailed final allowable expenditure information subsequently provided to the contractor and VR program and financial staff.

Chapter 4: Nebraska Commission for the Blind and Visually Impaired: Vocational Rehabilitation and Supported Employment Programs

Program Organization

NCBVI is an independent consumer-controlled commission led by an executive director and a Commission Board of five individuals who are blind appointed by the Governor. The agency's stated mission is: "empowering blind individuals, promoting opportunities, and building belief in the blind." NCBVI is currently embarking on a rigorous self-evaluation of its programs and services with the goal of improving consumer outcomes.

Table 4 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 4
NCBVI Trend Data

NEBRASKA	2002	2003	2004	2005	2006
Total funds used	\$3,020,302	\$3,128,156	\$3,087,174	\$3,325,635	\$3,363,290
Individuals served during year	428	458	503	507	466
Applicants	304	371	358	311	194
Closed after receiving services	99	110	129	163	129
Closed with employment outcomes	67	66	82	82	71
Employment outcomes without supports in an integrated setting	39	32	50	42	46
Average cost per individual served	\$7,056.78	\$6,830.03	\$6,137.52	\$6,559.44	\$7,217.36
Average cost per employment outcome	\$45,079.13	\$47,396.30	\$37,648.46	\$40,556.52	\$47,370.28
Employment outcomes per \$million spent	22.18	21.10	26.56	24.66	21.11

Table 4 Continued
NCBVI Trend Data

NEBRASKA	2002	2003	2004	2005	2006
Competitive employment outcomes per \$million spent	15.56	11.51	17.82	16.24	16.35
Average hourly earnings for paid employment outcomes	\$9.98	\$10.36	\$9.71	\$10.29	\$11.31
Average state hourly earnings	\$14.16	\$14.61	\$14.93	\$15.49	\$16.11
Average hours worked per week for paid employment outcomes	31.57	30.60	31.35	27.43	33.26
Percent of transition age served to total served	18.18	14.55	10.08	14.72	11.63
Employment rate for transition age served	61.11	37.50	38.46	29.17	40.00
Average time between application and closure (in months) for individuals with successful paid employment outcomes	33.90	28.70	33.10	32.70	34.50
Average number of individuals served per total staff	8.92	9.54	10.48	10.56	10.36

Table 5

Five-Year Summary of Results of Standards 1 and 2											
NCBVI											
	RSA Minimum Performance Level	Computational Data & Results									
		Met (M)					Did Not Meet (DNM)				
		FY 2002		FY 2003		FY 2004		FY 2005		FY 2006	
Indicator 1.1 Difference in the number of individuals with employment outcomes from prior year for general and combined agencies or prior two years for blind agencies											
Current year employment outcomes		149		133		148		164		153	
Prior year employment outcomes		189		149		133		148		164	
	Equal or exceed	-40	DNM	-16	DNM	15	M	16	M	-11	DNM
Indicator 1.2 Percent with employment outcomes after services											
Employment outcomes		149		133		148		164		153	
Individuals served		213		209		239		292		292	
	68.9%	69.95%	M	63.64%	DNM	61.92%	DNM	56.16%	DNM	52.40%	DNM
Primary Indicators (1.3, 1.4, & 1.5)											
Indicator 1.3 Percent of all employment outcomes that were competitively employed											
Employed competitively		99		83		91		109		109	
Employment outcomes		149		133		148		164		153	
	35.4%	66.44%	M	62.41%	M	61.49%	M	66.46%	M	71.24%	M
Indicator 1.4 Percent of individuals with competitive employment outcomes who had a significant disability											
Significantly disabled employed competitively		99		83		91		109		109	
Employed competitively		99		83		91		109		109	
	89%	100.00%	M	100.00%	M	100.00%	M	100.00%	M	100.00%	M

Table 5 Continued

Five-Year Summary of Results of Standards 1 and 2											
NCBVI											
	RSA Minimum Performance Level	Computational Data & Results									
		Met (M)					Did Not Meet (DNM)				
		FY 2002		FY 2003		FY 2004		FY 2005		FY 2006	
Indicator 1.5											
Ratio of average hourly VR wage to average state hourly wage											
Average hourly wage of competitively employed		\$10.38		\$10.70		\$10.33		\$10.25		\$11.21	
State average hourly wage		\$13.89		\$14.35		\$14.76		\$15.21		\$15.80	
	0.59	0.748	M	0.746	M	0.700	M	0.674	M	0.709	M
Indicator 1.6											
Difference Between Percent Self-Supporting at Closure and Application											
Competitive Employment Outcomes		99		83		91		109		109	
Primary Support is Own Income at Application		34		30		36		37		33	
% self-support at application		34.34%		36.14%		39.56%		33.94%		30.28%	
Primary Support is Own Income at Closure		70		59		63		71		76	
% self-support at closure		70.71%		71.08%		69.23%		65.14%		69.72%	
	30.4	36.36	M	34.94	M	29.67	DNM	31.19	M	39.45	M
Indicator 2.1											
Ratio of minority to non-minority service rate											
Non-Minorities Exiting VR		178		286		274		265		157	
Non-Minorities Who Received Services		80		103		109		135		110	
Non-Minority service rate		44.9%		36.0%		39.8%		50.9%		70.1%	
Minorities Exiting VR		35		33		36		43		33	
Minorities Who Received Services		19		7		20		28		19	
Minority service rate		54.3%		21.2%		55.6%		65.1%		57.6%	
	0.80	1.208	?	0.589	?	1.397	?	1.278	M	0.822	M

Provision of TA to the VR and SE Programs During the Review Process

RSA provided TA to NCBVI in a number of VR and SE program areas during the review process. RSA:

- verified the agency's RSA 911 case record data for FY 2004, FY 2005, and FY 2006;
- provided feedback to the agency on its case management system;
- provided training on how to use RSA's MIS;
- shared data tables generated from the RSA-911 and assisted NVR staff in interpreting the results and in generating ideas as to how results might be improved;
- provided guidance on ways to create more measurable goals so that NCBVI's progress can be readily evaluated; and
- provided NCBVI with a model for a service record review instrument and demonstrated its use with the three district supervisors.

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

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

1. Consumer Involvement

NCBVI works very well with its consumers, keeping them involved in many ways and soliciting input on many aspects of the agency's processes. Consumer involvement is made easier by the fact that this is a relatively small agency. Even so, NCBVI staff actively seek the input of consumers, including those who receive services at the orientation and training center and those whose cases are closed from the VR program. The NCBVI director and staff attend the state and local meetings of both major consumer organizations for the blind. In addition, they conduct focus groups in different areas of the state. The agency is committed to providing information to consumers in alternate formats and regularly emails policy documents and other materials to interested consumers.

VR and SE Issues Identified by NCBVI and Stakeholders During the Review Process

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

- NCBVI collaborates well with its consumers and consumer advisory groups;
- consumers belonging to both of the major consumer organizations of the blind, the American Council of the Blind (ACB) and the National Federation of the Blind (NFB), believe NCBVI is doing well in meeting the needs of blind Nebraskans;
- NCBVI wants to place more emphasis on full-time employment with higher wages and benefits;
- NCBVI wants assistance with analyzing the trends in its performance on the standards and indicators in order to improve performance;

- NCBVI staff asked for assistance in developing service delivery strategies that are effective in addressing the needs of consumers who face multiple challenges;
- NCBVI is proud of its orientation and training center and the skills of blindness that are taught there;
- NCBVI and stakeholders stated that the agency's transition services are effective but the agency would like to study which of its many transition programs are most effective;
- both NCBVI and consumers were supportive of legislation to establish a state standard for VR counselors for the blind at the bachelor's level; and
- some consumers who belong to ACB believe that the orientation and training center, a center providing services using a model largely reflecting the NFB philosophy of service delivery, should offer choice to consumers who would prefer to receive services using alternative approaches.

Following compilation and discussion with NCBVI about these issues, RSA worked with NCBVI 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, Methods of Evaluation, and TA

RSA and NCBVI agreed on the following performance goals, strategies to achieve those goals, methods of evaluation, and TA that RSA would provide to assist NCBVI achieve each goal. These goals and strategies are included in NCBVI's FY 2008 state plan, and progress on achieving these goals will be reported in NCBVI's FY 2009 annual state plan submission.

1. Quality Employment

Issue: Over the past few years, NCBVI has been making a shift from being an agency largely focused on services to one that is primarily focused on employment. Currently, they want to focus on increasing the percentage of consumers who achieve full-time competitive employment, which they have defined as at least 31 hours of work per week. In FY 2006, only 50.7 percent of the individuals who became employed achieved a competitive employment outcome working at least 31 hours per week, up from 32.9 percent in FY 2004 and 28.0 percent in FY 2005. NCBVI's percentage of homemaker closures of all their employment outcomes is high (19.7 percent). One of the reasons NCBVI cites for its high homemaker rate is that NCBVI does not have sufficient funding in the OIB program to serve all of the older blind individuals who need IL services and therefore provides some of these individuals services leading to a homemaker outcome under the VR program. Because NE is a rural state, NCBVI faces many challenges in developing meaningful employment opportunities for blind individuals living in these areas. When NCBVI consumers do achieve employment, however, their earnings compare favorably to those of nondisabled individuals in NE. Illustrative of this fact is their performance on Indicator 1.5 in FY 2006, when their consumers achieved earnings at a ratio of .71 compared to the average earnings of all individuals in the state.

In order to increase the focus on employment, the director and staff have committed themselves to systematically tracking the agency's performance on the standards and indicators and on other

measures of quality employment. The agency will analyze the data they collect, using a new and more comprehensive data management system which is scheduled to become operational during FY 2008. The agency will then work with staff to set performance goals for each of their three districts. In addition, the NCBVI Commission Board and other blind consumers have helped to secure \$75,000 in state funds for the OIB program, taking some pressure off the VR program to provide services to older blind individuals.

Goals:

1. To achieve a full-time (31 or more hours per week) competitive employment rate of at least 52 percent in FY 2008.
2. To achieve a ratio of average hourly earnings of clients who become employed compared to average hourly earnings in the state of at least 0.72 in FY 2008.

Strategies:

1. Identify ways to increase counselors' focus on achieving quality employment outcomes for their clients.
2. Leadership will work with district/office staff to develop procedures specific to each office, which will lead to increased numbers and percentage of clients achieving competitive employment outcomes, and support the implementation of the new practices.
3. Deputy directors will meet regularly with each district/office supervisor and counselors to review best practice procedures and performance data in order to improve performance in achieving full-time competitive employment outcomes and increase hourly earnings rate.
4. Analyze data per district for the past three years. Examine employment outcomes, wages earned, hours worked per week by clients, and client wages as compared to the state's average hourly wage. Take into consideration economic changes such as inflation.
5. In August of each year, each district/office will review progress to date and will establish objectives to achieve in the upcoming year.

Methods of Evaluation:

1. Success is achieved if NCBVI demonstrates that at least 52 percent of clients achieve full-time (31 or more hours per week) competitive employment outcomes in FY 2008.
2. Success is achieved if NCBVI achieves at least a 0.72 ratio of average hourly earnings of clients who become employed compared to average hourly earnings in the state in FY 2008.

TA: RSA will help the agency analyze its data in order to determine possible causes for the agency's performance on various measures. Once these analyses are complete, RSA will work with staff to set additional goals.

2. Employment for Transition-Age Youths

Issue: In recent years, NCBVI has developed a number of programs to serve blind youths. The agency begins working with these youths early in school. Some of their transition programs include:

- Project Independence: a five-day summer program for young transition-age students that provides counseling on attitudes toward blindness, self-esteem building, and recreation and social activities;
- Winnerfest retreats: twice a year overnight events that focus on personal achievement, goal setting, and communication skills focused on issues in their everyday lives and career aspirations;
- The College Workshop: a program focusing on job seeking and job development skills for college students; and
- Work and Gain Experience in the Summer (WAGES): a summer work experience program for students as they approach graduation.

Despite considerable staff time and resources devoted to working with youths, NCBVI's employment rate for transition-age youths is relatively low. In FY 2006, the employment rate for this population was 40.0 percent, which represented an increase from 38.5 percent in FY 2004 and 29.2 percent in FY 2005. The staff observe that some youths among the 60 percent who left the VR program without employment in FY 2006 will later return to the program for services. Notwithstanding this possible explanation, NCBVI is committed to improving its performance in assisting transition-age youths to achieve a higher rate of employment.

NCBVI is currently participating with other partners in the state to develop a protocol of promising practices for working with transition-age youths, and the staff intends to implement some of these practices. NCBVI is beginning a needs assessment process with Mississippi State University to look at the needs of transition-age youths and their families. Using the results of this assessment, NCBVI will be better able to plan effective services for youths. The agency also plans to develop capacity in its new data collection system to track a variety of outcomes for this population (e.g., continuation in education beyond high school, summer employment, etc.) in order to assess consumers' success at various stages of the rehabilitation process. With this increased emphasis on data and analysis, NCBVI hopes to target its resources toward programs that are truly effective.

Goal: To achieve an employment rate for transition age clients of at least 40 percent in FY 2008.

Strategies:

1. Implement the protocol of best practices for improving services to children and youths in concert with education officials, school districts, and the Nebraska Center for the Education of Children who are Blind and Visually Impaired (NCECBVI).
2. Upgrade the data collection system to track the employment rate for students participating in transition programs.

3. Establish a benchmarking system to track progress throughout the transition years including but not limited to involvement in transition programs, continuation of education beyond high school, scholarships awarded, summer employment, full-time employment, and community involvement.
4. Analyze the results of the statewide needs assessment survey with transition age clients to gain insights to enhancing agency strengths and minimizing weaknesses.

Method of evaluation: Success is achieved if NCBVI achieves at least a 40 percent employment rate for transition-age clients.

TA: The Study Group, an RSA contractor, has finished a report on effective transition practices among state VR agencies. When the report is released, RSA will work with NCBVI to implement some of these practices. In addition to looking at employment outcomes, RSA staff will also help the agency further define its interim outcome measures for the transition-age population which will help the agency determine whether it is successfully serving blind youths in NE.

3. Methods of Quality Assurance

Issue: NCBVI has a fairly informal system of quality assurance. In order to better track consumer outcomes, the NCBVI director and staff have come to believe that they must be more structured and rigorous in examining the agency's performance.

Goal: Improve NCBVI's quality assurance system.

Strategies:

1. Implement a new, electronic, fully accessible, more comprehensive client information tracking system that will allow the agency to collect and analyze data more proficiently.
2. Document the procedures currently used for measuring performance outputs and outcomes and for disseminating these measures. Once these procedures are documented, develop new reports to measure agency performance.
3. Pilot and evaluate a formal service record review system statewide.

Methods of evaluation:

1. Success is achieved if NCBVI implements an electronic, fully accessible client information tracking system by November 1, 2007.
2. Success is achieved if NCBVI documents the procedures used for measuring performance outputs and outcomes and for disseminating measures to improve performance by December 31, 2007.

3. Success is achieved if NCBVI pilots and evaluates a service record review system statewide by December 31, 2007.

TA: RSA will help the agency analyze data produced with its new client tracking system. RSA will continue to work with supervisors as they implement their service record review tool.

VR and SE Recommendations

RSA recommends that NCBVI establish goals and strategies to address the following VR and SE issues:

1. Following Up on Needs Assessment

NCBVI should follow up on the recommendations resulting from the needs assessment currently being conducted by Mississippi State University. The results of this assessment will be helpful to the agency in setting future goals, and implementation of findings from the study should assist the agency to further improve its performance.

2. Building on Promising Practices

NCBVI should consider further exploration of approaches that build on the promising practices demonstrated by NCBVI's orientation and training center in helping blind consumers achieve employment and independence. Successful approaches demonstrated at the center could then be provided in other areas of the state.

3. Options Regarding Adjustment to Blindness Services

NCBVI should explore the concerns raised by those consumers who believe that NCBVI is not currently providing sufficient choice to consumers with regard to services, specifically adjustment to blindness services. In particular, NCBVI should examine whether consumers who do not choose to attend the orientation and training center because they have philosophical differences with the rehabilitation methods utilized there are being offered alternatives that will meet their needs.

Chapter 5: Nebraska Commission for the Blind and Visually Impaired: Fiscal Review

RSA reviewed NCBVI's 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 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 6
Fiscal Data for NCBVI for FY 2002 through FY 2006

Fiscal Year	NCBVI				
	2002	2003	2004	2005	2006
Grant Amount	2,428,891	2,460,851	2,508,172	2,557,759	2,652,382
Required Match	657,375	666,024	678,832	692,252	717,862
Federal Expenditures	2,428,891	2,460,851	2,508,172	2,557,759	2,326,522
Actual Match	657,374	666,024	678,832	692,252	717,862
Over (Under) Match	(1)	0	0	0	0
Carryover	0	0	0	0	325,860
Program Income	319,322	116,439	80,717	1,450	188,112
Maintenance of Effort (MOE)	643,909	643,055	657,374	666,024	678,832
Administrative Costs	396,428	424,613	379,255	424,436	505,490
Total Expenditures	3,020,302	3,128,156	3,087,174	3,325,635	3,363,290
Percent Admin Costs to Total Expenditures	13.13%	13.57%	12.28%	12.76%	15.03%

Explanations Applicable to the Fiscal Profile Table

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

Match (Non-Federal Expenditures): The non-federal share of expenditures in the Title I VR 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 MOE 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 MOE 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 TA to the VR and SE Programs During the Review Process

RSA provided fiscal TA to NCBVI during the review process. RSA:

- after providing an overview of each requirement, reviewed with financial staff RSA's assessment of the agency's compliance with specific financial requirements – match, MOE, carryover, reallocation, program income, **time distribution, salary reporting and documentation requirements for all federal programs**, liquidation of outstanding obligations and grant closeout;
- reviewed administrative costs using national and comparable agency data to analyze these costs;
- reviewed internal control requirements and assessed agency policy and procedures;
- discussed requirements for MOE waivers and what it means to a financial manager at the state level to “manage MOE” (this discussion was necessary because NCBVI moved from an evenly matched state agency to a situation where the MOE requirement will exceed the match requirement due to an increase in the availability of state matching funds);
- discussed strategies for utilizing the projected increases in FY 2007 program income receipts, including strategies for financially supporting the expansion and improvement of NCBVI's orientation and training center programs and other one-time uses for expending program income;
- discussed actions required to revise the FY 2006 year-end Financial Status Report (SF-269) to accurately report the carryover balance and adjust year-end expenditures to report as of September 30 of each year instead of the October submittal date; and
- analyzed the sufficiency of matching resources for FYs 2007 and 2008 and determined the level of additional funds that can be matched if requested and received through the reallocation process.

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

- Procurement – Client Purchases / Property Management
To provide maximum flexibility, client choice, and expedite purchases for clients, NCBVI has obtained a waiver from state purchasing requirements for all consumer purchases. The agency is authorized to expend an unlimited dollar amount to make direct

purchases for individual clients of items that do not become part of the state inventory for NCBVI.

Chapter 6: Independent Living Program

Table 7

Sources and Amounts of Funding for NE (FY 2006)

Sources	Amounts
Part B Funds	\$301,477
Older Blind	\$225,000
Other Federal Funds	0
State Funds	\$249,310
Local Government	0
Private/Other Funds	\$1,750
Total	\$777,537

Program Organization

NVR, NCBVI, and the NE SILC jointly administer the IL program under Chapter 1, Part B of Title VII. Approximately \$7,500 of Part B funds from NCBVI, together with approximately \$68,000 from NVR under Title I Innovation and Expansion, support the operation of the NESILC, established as a not-for-profit in 2002 to carry out the day-to-day responsibilities on behalf of the SILC. The funds are used to provide salaries for two part-time staff, an executive director, and an administrative assistant; rent for the SILC office; and funds to reimburse members for expenditures associated with their participation in quarterly meetings. Staff responsibilities include: planning and convening public meetings; developing the SPIL at the direction of the SILC, NCBVI, and NVR; providing quarterly evaluations on progress of meeting SPIL objectives; coordinating the development of the 704 Part I annual performance report; planning and convening quarterly SILC meetings; and reimbursing SILC members for their participation in the quarterly meetings.

Provision of TA to the IL Program During the Review Process

RSA provided TA to the NE IL program in a number of IL program areas during the review process. RSA:

- conducted a training and TA session on the SPIL with staff and representatives of the NESILC, CILs, CAP, NCBVI, NVR, OIB program, and IL service providers;
- provided TA on the development of goals and objectives;
- provided TA to the ATP service provider under Part B related to the requirements for the SPIL, the financial needs test for services, and exceptions to the needs test;
- provided TA to the SILC on requirements related to resource development, i.e., that SILCs cannot use federal funds, including Part B funds, to conduct fundraising activities or pursue resource development; and
- provided TA to the SILC regarding standards for Part B service providers.

IL Issues Identified by NVR, NCBVI, and Stakeholders During the Review Process

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

- lack of resources to adequately meet the IL service needs of individuals with significant disabilities in NE, especially in rural areas of the state; and
- insufficient funds in the OIB program to serve the growing population.

IL Performance Issues, Goals, Strategies, Methods of Evaluation, and TA

As part of the 2007 monitoring, RSA and the NE IL partners agreed on the following performance goal, strategies to achieve this goal, methods of evaluation, and TA to be provided to assist NE to achieve this goal. The goal and strategies are aligned with the goals in the SPIL for FY 2008.

1. Communication and Collaboration

Issue: During the on-site review and during teleconferences held subsequent to the on-site visits, the NE IL constituents indicated that there was not a strong working relationship among the SILC, NVR, NCBVI, the CILs and other IL service providers. There were expressions of concern that the work of CILs could be better represented on the SILC and that their work plans should be reflected in the SPIL objectives. Other concerns were expressed about the need to increase accountability on the part of the entire IL constituency for the use of IL resources.

Goal: To improve communication and collaboration between the NE SILC, the CILs, NVR, NCBVI, and the IL service providers that will result in maximizing existing resources, identifying opportunities for expansion, and increasing access to IL services.

Strategies:

1. SILC, DSUs, CILs, and IL service providers will engage in a facilitated process designed to improve communication and collaboration.
2. SILC, DSUs, CILs, and IL service providers will gather information about the needs of individuals with significant disabilities in NE.
3. SILC, DSUs, CILs, and IL service providers will continue to advocate and promote IL for persons with disabilities in NE.

Methods of Evaluation: Success will be achieved if the SILC, DSUs, CILs, and IL service providers engage in a facilitated process designed to improve communication and collaboration, gather information about the needs of individuals with significant disabilities in NE, and continue to promote IL in NE.

TA: RSA will assist in the identification and provision of a consultant to facilitate the development of an IL strategic plan and the identification of IL service delivery models, particularly effective rural service delivery models.

Chapter 7: Independent Living Program for Older Individuals Who Are Blind

Program Organization

The OIB program in NE is operated by NCBVI. The program receives \$225,000 in Title VII, Chapter 2 funds, and \$25,801 in state funds, excluding in-kind contributions.

Provision of TA to the OIB Program During the Review Process

RSA provided TA to NCBVI in a number of OIB program areas during the review process. RSA:

- provided TA on how to improve OIB services by continuing to engage in discussions with other states whose demographics are similar to those of NE. The OIB program manager has since contacted South Dakota to learn more about that state's Lease-or-Loan CCTV program and other creative ideas on maximizing available resources to meet the ever-growing consumer service needs; and
- provided TA on how to better complete the portion of the 704 Part II report which relates to the NCBVI's IL service provision to consumers who are blind or visually impaired.

OIB Issues Identified by NCBVI and Stakeholders During the Review Process

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

- meeting the IL needs of older blind Nebraskans using available resources; and
- identifying, reaching, and providing IL services to older blind Nebraskans residing in rural communities where there is no public transportation.

OIB Performance Issues, Goals, Strategies, Methods of Evaluation, and TA

As a result of the review, RSA and NCBVI agreed on the following OIB performance goal, strategies to achieve this goal, methods of evaluation, and TA that RSA would provide to assist NCBVI to achieve this goal.

1. Resources

Issue: NE is a state with many rural communities and a growing number of citizens who are 55 years or older and who are blind. Most members of the older blind population reside in communities where there is no public transportation, and access to IL services is limited. Currently, all the resources available minimally meet the IL service needs of 349 consumers receiving services under the state's OIB program. The state is interested in leveraging resources with national, state, and local agencies in order to increase the number of consumers served.

Goal: Leverage resources to increase the number of older blind Nebraskans served by the OIB program.

Strategies:

1. In order to supplement OIB staff resources, work with staff at CILs so that they may also provide services to older Nebraskans who are blind, thereby increasing access to basic IL services, even in rural communities where there is no public transportation.
2. Conduct fund-raising and research activities at the national, state, and local levels so as to generate additional resources to meet the IL service needs of older Nebraskans who are blind.
3. Increase the number of referrals for older blind Nebraskans to existing programs provided by other state and local agencies.

Methods of Evaluation: Success is achieved if the relationship between the OIB program and CILs improves, fund-raising and research activities yield additional resources, and there are increased numbers of referral of older blind Nebraskans to existing programs provided by state and local agencies.

TA: RSA will facilitate the improvement of existing relationships among the OIB program, CILs, and other IL service providers. RSA will also continue to provide guidance on how to increase the number of consumers served through the exchange of program ideas and suggestions with other states whose demographics are similar to those of NE.

Chapter 8: Nebraska Vocational Rehabilitation: Status of Issues Raised in Previous Reviews

As a result of the RSA reviews conducted with NVR in FY 2003 and 2004, the agency developed a CAP. In addition to the CAP, NVR was subject to a PIP because NVR did not comply with 34 CFR 361.82 (b) in that it did not meet minimum performance levels for Indicators 1.1, 1.2, and 1.6 for FY 2004. A summary of the progress that NVR has made on the CAP and PIP is described below.

CAP

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

- completion of all interagency agreements with public institutions of higher education (IHEs) in NE;
- achievement of a 90 percent standard for timely development of individualized plans for employment (IPEs);
- achievement of a 90 percent standard for consistency between the employment goal on the IPE and the employment outcome achieved; and
- development of a description of agency policies and action steps designed to ensure that minorities have equal access to VR services.

PIP

Through the implementation of its PIP, NVR has successfully met the performance standards for the following indicators in FY 2006: Indicator 1.1 (change in the number of employment outcomes); Indicator 1.2 (percentage of individuals who achieved an employment outcome after receiving services); and Indicator 1.6 (difference in the percent of individuals who reported their own income as a primary source of support at application and at closure).

Chapter 9: Nebraska Commission for the Blind and Visually Impaired: Status of Issues Raised in Previous Reviews

As a result of the RSA reviews conducted with NCBVI in FY 2003 and 2004, the agency developed a CAP. A summary of the progress that NCBVI has made on the CAP is described below.

CAP

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

- completion of all interagency agreements with public IHEs in NE;
- achievement of a 90 percent standard for the presumption of eligibility for SSI/SSDI beneficiaries;
- achievement of a 90 percent standard for determining eligibility within 60 days of application; and
- development of a description of agency policies and action steps designed to ensure that minorities have equal access to VR services.

Chapter 10: Summary Conclusion

NE's two VR agencies—NVR and NCBVI—are very different in terms of their structure, but each has strengths in terms of assisting individuals with disabilities to achieve quality employment.

NVR's strengths include:

- a commitment to examining its processes to determine how they can be enhanced in order to better contribute to the agency's overall goal of assisting individuals with significant disabilities to achieve quality employment outcomes;
- a team structure that enables professionals of different backgrounds and skills to come together to work with a consumer, who is at the center of the VR process, to achieve his/her goals;
- passing all six indicators in Standard 1 and the one indicator in Standard 2 in FY 2006;
- a strong program of employer development, built on numerous placement specialists who are integral members of each of the teams;
- an effective program to serve transition-age youths, with at least one transition specialist on each of the agency's teams;
- an Employment Warranty program to provide follow-up contact to assure that individuals with disabilities will have ready access to services they may need to maintain an employment outcome;
- comprehensive written tools that enable consumers to understand more clearly the VR process and what they can expect from that process;
- written policies and training materials aimed at making certain that staff, despite being members of different teams, will have a basic set of skills and thus be able to provide consistent services across the state; and
- a strong relationship between the agency and its SRC.

NCBVI's strengths include:

- a strong belief in the abilities of individuals who are blind to achieve employment and independence;
- an active five-member Commission Board of blind individuals appointed by the Governor and a strong commitment to meaningful consumer involvement in all of the agency's processes;
- a dedication to serving transition-age youths with a variety of programs to meet their varying needs;
- a highly effective orientation and training center that teaches the skills of blindness that enable individuals who are blind to live independently and to pursue employment; and
- a new and comprehensive client tracking and data collection system that will allow the agency to become more analytical about the ways to improve consumer outcomes.

Both agencies face the challenges inherent in being located in a rural state where job opportunities in rural areas are scarce and where transportation in those areas of the state is spotty.

Additional challenges NVR faces include:

- integrating new employees into the team structure and ensuring that older members of a team who began their career in a more traditional VR model buy into the team concept; and
- obtaining data from the educational system so that outcomes for transition-age youths can be measured more accurately.

Additional challenges NCBVI faces include:

- continuing to work with staff to value employment as the ultimate goal for consumers ;
- training staff to use a new data tracking and data collection system;
- insufficient resources in the OIB program that forces some individuals who are blind to seek VR services under Title I rather than receiving more appropriate IL services under Title VII; and
- increasing emphasis on the implementation of practices that result in quality employment outcomes and decreasing the provision of those services that, although beneficial, do not contribute to such outcomes.

Table 8
Summary of the Results of RSA’s Review

State: Nebraska		
Program: NVR VR		
Goal	Strategies	Technical Assistance
1. Develop system for measuring success of transition-age youths, including graduation rate, employment rate, postsecondary education rate, transfer into employment program rate.	Explore how data can be collected from the NE Dept. of Education; ensure that measurement data can be collected and retrieved from QUEST.	Assist NVR to clearly define its outcome measures and sources for such data; identify other states with agreements where they have access to school data.
2. Create a minimum of 30 employer scholarships statewide for transition students with a minimum of 14 employers offering scholarships; establish long-term relationships with a minimum of 14 targeted	Develop relationships with employers who can offer scholarships. Develop system for tracking number of employers offering scholarships, number of scholarships offered, and number of students with	Provide information to NVR regarding effective employer development and marketing practices developed and implemented by other state VR agencies.

employers.	scholarship who achieve employment. Determine criteria to be used for targeting employers, develop relationships with employers, and develop system for tracking outcomes.	
3. Develop methods for assessing consumer satisfaction while consumers are in the VR process.	Develop and pilot consumer satisfaction survey to be completed immediately following employment discussion and implement survey statewide; expand consumer satisfaction survey into one or more other aspects of the VR process.	Research consumer satisfaction strategies utilized by other state VR agencies and share information with NVR.
4. Identify and implement strategies and processes to achieve employment rate at or above 65 percent.	Conduct team case reviews during FY 2008 on unsuccessful cases in order to identify consumer planning and readiness factors and agency processes that contribute to unsuccessful outcomes; explore feasibility of surveying unsuccessful consumers to identify consumer planning and readiness factors and agency processes that contribute to unsuccessful outcomes.	Participate in some service record reviews to help agency staff to examine factors that might have led to unsuccessful outcomes; help design a brief survey instrument that could be given to unsuccessful consumers.
5. Establish process to monitor the Employment Warranty program statewide.	Develop in QUEST system to identify employment data elements for collection and measurement to evaluate long-term employment outcomes of consumers; recruit and train individuals with disabilities to monitor consumers in Employment Warranty program.	Work with agency staff to develop data elements agency collects in its follow-up contacts with consumers and measures agency will utilize to determine long-term effectiveness of its program.

Recommendations		
1. NVR should consider exploring advantages of mapping agency processes systematically using consultant with expertise in quality assurance.		
2. NVR should consider setting goals regarding increasing earnings for its consumers.		
Program: NCBVI VR		
Goal	Strategies	Technical Assistance
1. To achieve full-time (31 or more hours per week) competitive employment rate of at least 52 percent in FY 2008.	Identify ways to increase counselors' focus on achieving quality employment outcomes; Leadership will work with district staff to develop procedures which will lead to increased competitive employment outcomes; Deputy Directors will review best practice procedures and performance data in order to improve performance; analyze data per district; in August of each year each district will establish objectives for next year.	Help analyze data in order to determine possible causes for agency's performance; work with staff to set additional goals.
2. To achieve a ratio of average hourly earnings of clients who become employed compared to average hourly earnings in the state of at least 0.72 in FY 2008.	Same strategies as Goal 1.	Same TA as Goal 1.
3. To achieve an employment rate for transition-age clients of at least 40 percent in FY 2008.	Implement protocol of best practices for improving services to youths in concert with education officials, school districts, and NCECBVI; upgrade data collection system to track employment rate for students in transition program; establish benchmarking system to track progress throughout transition years	Upon release of The Study Group's report on effective transition practices among state VR agencies, RSA will work with NCBVI to implement new practices; also help agency further define its interim outcome measures for transition-age population in order to determine level of success in serving blind youths in NE.

	(e.g., involvement in transition programs, scholarships awarded, etc.); analyze results of statewide needs assessment survey with transition-age clients for insights for improvement of agency.	
4. Improve NCBVI's quality assurance system.	Implement a new, electronic, fully accessible, comprehensive client information tracking system; document procedures used for measuring performance outputs and outcomes and for disseminating these measures, and then develop new reports to measure agency performance; pilot and evaluate formal service record review system statewide.	Help agency analyze data produced with its new client tracking system; continue to work with supervisors as they implement their service record review tool.

Recommendations

1. NCBVI should follow up on recommendations resulting from needs assessment conducted by Mississippi State University. The results will be helpful to the agency in setting future goals, and implementation of findings should assist the agency to further improve performance.
2. NCBVI should consider further exploration of approaches that build on the promising practices demonstrated by NCBVI's orientation and training center; successful approaches could then be provided in other areas of the state.
3. NCBVI should explore concerns raised by those consumers who believe that NCBVI is not currently providing sufficient choice to consumers with regard to services, specifically adjustment to blindness services.

Program: NE IL

Goal	Strategies	Technical Assistance
1. To improve communication and collaboration between NE SILC, CILs, NVR, NCBVI, and IL service providers that will result in maximizing existing resources, identifying opportunities for expansion, and increasing access to IL services.	SILC, DSUs, CILs, and IL service providers will: engage in facilitated process designed to improve communication and collaboration; gather information about needs of individuals with significant disabilities in NE; and continue to advocate and promote IL services.	Assist in identification and provision of consultant to facilitate the development of an IL strategic plan and IL service delivery models (particularly for rural areas).

Program: NE OIB		
Goal	Strategies	Technical Assistance
1. Leverage resources to increase the number of older blind Nebraskans served by the OIB program.	In order to supplement OIB staff resources, work with staff at CILs so that they may also provide services to older Nebraskans who are blind, thereby increasing access to basic IL services, even in rural areas without public transportation; conduct fund-raising and research activities at the national, state, and local levels so as to generate additional resources to meet the IL service needs of older Nebraskans who are blind; increase number of referrals of older blind Nebraskans to existing programs provided by other state and local agencies.	Facilitate improvement of existing relationships among OIB program, CILs, and other IL service providers to help ensure that older Nebraskans who are blind have access to IL services in timely manner; continue to provide guidance on how to increase number of consumers served through exchange of program ideas and suggestions with other states.

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>