

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



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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 Commonwealth of Pennsylvania (PA):

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

In PA, the Office of Vocational Rehabilitation (OVR) together with the statewide rehabilitation council and the statewide independent living council are responsible for the four programs.

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

- gathered and reviewed information regarding each program's performance;
- identified a wide range of VR and IL stakeholders and invited them to provide input into the review process;
- conducted one on-site visit, and held multiple discussions with state agency staff, PA state rehabilitation council (PaRC) members, PA Statewide Independent Living Council (PA SILC) members, PA Client Assistance Program (PA CAP), and stakeholders to share information, identify promising practices and areas for improvement;
- provided technical assistance;
- worked with OVR and stakeholders to develop goals, strategies, and evaluation methods to address performance and compliance issues; and
- identified the technical assistance that RSA would provide to help improve program performance.

As a result of the review, RSA:

- identified promising practices;
- identified performance and compliance issues;
- and OVR developed performance and compliance goals and strategies related to selected issues;
- identified the technical assistance that it would provide assist the agency to achieve the goals identified as a result of the review; and
- identified potential issues for further review.

Strengths and Challenges:

OVR staff are dedicated to providing quality services to individuals in the Commonwealth of PA. OVR has established effective collaborative relationships with other PA agencies. There is a consumer and advocacy community committed to improving the lives of individuals with disabilities and working with OVR to ensure that quality services are provided and successful employment outcomes are achieved. OVR has established collaborative relationships with the PA state education agency and local school districts to address the successful transition of youths to post secondary education and training, community participation, and employment.

OVR faces the challenges of operating a state-funded VR program separate and distinct from the Title 1 VR program, improving the rehabilitation rate of transition age youths, and employment outcomes for blind and visually impaired consumers. OVR must also successfully implement and complete the remaining corrective actions from RSA's FY 2005 monitoring of the agency.

OVR, the PA SILC, and IL partners face challenges related to varying definitions for services used by CILs, access to services, outreach, and public awareness.

Introduction

Section 107 of the Rehabilitation Act of 1973, as amended, 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 vocational rehabilitation (VR) agency is complying substantially with the provisions of its state plan under section 101 of the Act and with the evaluation standards and performance indicators established under section 106. In addition, the Commissioner must assess the degree to which VR agencies are complying with the assurances made in the Supplement for Supported Employment under Title VI of the Act and programs offered under Title VII of the Act are substantially complying with their respective state plan assurances and program requirements.

In order to fulfill its monitoring responsibilities, RSA:

- reviews the state agency's performance in assisting eligible individuals with disabilities to achieve high-quality employment and independent living outcomes;
- develops, jointly with the state agency, performance and compliance goals as well as strategies to achieve those goals; and
- provides technical assistance 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 supported employment (SE) program, established under Title VI, part B;
- the independent living (IL) programs, authorized under Title VII, part B; and
- the Independent Living Services Program for Older Individuals Who Are Blind (OIB), established under Title VII, Chapter 2.

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

- the agency's Corrective Action Plan (CAP) that was established as a result of findings from RSA's FY 2005 Section 107 monitoring review; and
- the assurances that OVR made to RSA in conjunction with its FY 2007 state plan.

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

In PA, OVR is the designated State unit for the general VR services program and services for individuals who are blind or visually impaired. The PA State Board of Vocational Rehabilitation is the designated state agency. OVR and the PA SILC jointly administer the IL program under Chapter 1 and the OIB program under Chapter 2.

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

Appreciation

RSA wishes to express appreciation to the representatives of the Pennsylvania State Board of Vocational Rehabilitation and OVR, PaRC, PA SILC, PA CAP, Disability Rights Network of PA, and other stakeholders who assisted the RSA monitoring team in the review of OVR.

Chapter I: RSA's Review Process

Data Used During the Review

RSA's review of OVR 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 PA state team:

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

RSA PA State Team Review Participants

Members of RSA's PA state team included representatives from each of RSA's State Monitoring and Program Improvement's (SMPID's) five functional units. The RSA PA state team was led by RSA's state liaison to PA, Terrence Martin (VR Unit) and the following RSA PA team members: Sue Rankin-White (Technical Assistance Unit); Regina Luster (Fiscal Unit); Jean Yan (Data Unit); and Elizabeth Akinola (IL Unit).

Information Gathering

During FY 2007, RSA began its review of OVR by analyzing information including, but not limited to, RSA's various data collections, OVR's VR and IL state plans, and OVR's State Rehabilitation Council's (SRC,s) Annual Report. After completing its internal review, the RSA team carried out the following information gathering activities with OVR and stakeholders in order to gain a greater understanding of OVR's strengths and challenges:

- the RSA PA state liaison conducted a series of individual teleconferences with the OVR management team as well as stakeholders;
- the RSA PA state team conducted three teleconferences and one meeting with the OVR management;
- the RSA PA state team held five teleconferences and one meeting with stakeholders;

- RSA conducted an on-site monitoring visit on April 2 - 6, 2007;
- the RSA PA state team also held several teleconferences and on-site meetings focused on the PaRC and IL services, including the development of the SILC;
- the RSA state team attended public meetings soliciting input on the FY 2008 state plan; and
- the RSA PA state team conducted teleconferences and held on-site meetings with the SILC chairperson and representatives from the IL community.

Chapter 2: Vocational Rehabilitation and Supported Employment Programs

Program Organization

OVR provides VR and SE services through 15 district offices. Additionally, six district offices provide services to individuals who are blind or visually impaired. At the time of the review, OVR staffing included 381 VR counselors in the general VR services program, and 31 VR counselors serving individuals who are blind or visually impaired. The average caseload of a VR counselor in the general VR services program was 118. The average caseload of a VR counselor serving individuals who are blind or visually impaired was 66. At the time of the review, there were approximately 40 VR counselor vacancies.

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
PA OVR Trend Data**

PENNSYLVANIA	2002	2003	2004	2005	2006
Total funds used	\$146,257,595	\$151,981,006	\$163,927,060	\$153,386,934	\$160,240,862
Individuals served during year	57,087	59,512	61,531	60,950	60,213
Applicants	28,999	30,344	31,640	29,770	28,951
Closed after receiving services	16,983	17,705	18,620	18,914	18,960
Closed with employment outcomes	11,035	11,052	11,067	10,897	10,995
Employment outcomes without supports in an integrated setting	9,796	9,951	10,092	9,967	10,214
Average cost per individual served	\$2,562.01	\$2,553.79	\$2,664.14	\$2,516.60	\$2,661.23
Average cost per employment outcome	\$13,253.97	\$13,751.45	\$14,812.24	\$14,076.07	\$14,573.98
Employment outcomes per \$million spent	75.45	72.72	67.51	71.04	68.62
Competitive employment outcomes per \$million spent	70.77	68.86	64.19	68.19	66.31
Average hourly earnings for paid employment outcomes	\$9.34	\$9.60	\$9.80	\$9.98	\$10.25

PENNSYLVANIA	2002	2003	2004	2005	2006
Average state hourly earnings	\$17.22	\$17.78	\$18.24	\$19.03	\$19.65
Average hours worked per week for paid employment outcomes	33.16	33.23	33.20	32.88	33.01
Percent of transition age served to total served	25.89	25.01	25.30	26.04	26.55
Employment rate for transition age served	67.86	66.82	62.53	57.23	59.45
Average time between application and closure (in months) for individuals with successful paid employment outcomes	28.00	27.20	26.40	27.00	28.20
Average number of individuals served per total staff	57.03	59.45	62.34	62.45	59.62

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

RSA provided technical assistance to OVR 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 present case management system;
- provided training on how to use RSA's Management Information System;
- advised agency on expanding partnerships with other entities such as community development department, assistive technology grantee, transportation alliance, and volunteers in order to leverage resources;
- provided results of a survey of vehicle purchase policies and guidelines;
- reviewed mechanisms for consumer involvement;
- reviewed a state statute that facilitates the maintenance of the membership of the statewide rehabilitation council, and the reimbursement of expenses related to participation;
- reviewed the status of existing CAP, and provided additional guidance;
- reviewed status of assurances provided for FY 2007 state plan approval;
- assessed data collection methodology related to programs and activities conducted with the PA Community on Transition;
- reviewed the Comprehensive Workforce Development System (CWDS) being developed for case management;
- provided guidance on allowable use of electronic signatures in the CWDS; and
- assessed QA practices and provided information on QA.

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

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

1. Participation in the Pennsylvania Community on Transition.

OVR is an active participant in the PA Community on Transition - State Leadership Team. The PA Community on Transition initiative is a result of a Memorandum of Understanding (MOU) established by the 1998 Governor's Executive Order, "Interagency Committee to Coordinate Services Provided to Individuals with Disabilities." The State Leadership Team is comprised of representatives from the significant Commonwealth agencies providing services to individuals with disabilities and is dedicated to fulfilling the intent of the MOU to improve coordination of services to children across the Commonwealth. In 2006, a new MOU was signed to advance and reconfirm the original 1998 MOU. Through this MOU, representatives from four PA agencies (Department of Education; Department of Labor and Industry; Department of Public Welfare; and the Department of Health) committed to "work together in supporting youth and young adults with disabilities transitioning into adult life in the achievement of their desired post-school outcomes, with a focus on post-secondary education, training and lifelong learning; community participation; and healthy lifestyles... to work in equal partnership with youth and young adults with disabilities and their families and care givers in advancing this shared agenda."

The 2006 MOU strengthened the commitment of the original 1998 MOU that provided the springboard for the work of the PA Community on Transition. OVR, as a participant in the 2006 MOU, and member of the State Leadership Team, committed to the PA Community on Transition vision. In addition to serving on the State Leadership Team, OVR representatives have been instrumental in the creation of one of the four Outcome Practice Groups. The Employment Outcome Practice Group was established to increase the number of youth in Pennsylvania that obtains competitive employment, as a result of a systematic approach to career development activities.

As an active participant in the Pennsylvania Community on Transition, OVR has been a significant contributor to the development and implementation of over 40 transition programs in career exploration, job shadowing, and mentoring, as well as developing and conducting capacity building training programs such as "Building Partnerships to Improve Employment Outcomes of Youth with Disabilities." OVR is an active participant in the 70 Local Transition Coordinating Councils (LTCCs) across the state. The LTCCs are comprised of OVR staff, educators, parents, advocates, and community rehabilitation providers. The LTCCs provide training on transition services and employment. In addition, OVR is an active participant in the IDEA partnership, and disseminates materials, experiences, models, and resources through the Sharedwork.org web site funded by the U.S. Department of Education's Office of Special Education Programs.

In FY 2006, 5,033 youths with disabilities were served by OVR, an increase from 4,926 served in FY 2005. In FY 2006, the cases of 2,992 youths with disabilities were successfully closed, an increase from 2,819 in FY 2005 (RSA).

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

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

- providing vocational rehabilitation services to returning veterans;
- number of cases PA CAP receives in relation to number of applications and people served;
- order of selection category determination;
- access to One-stop facilities and programs;
- counselor vacancies and large caseloads;
- communication with referral sources;
- need for training VR program participants in the use of assistive technology prior to entering college;
- information on policy waivers provided to consumers;
- communication and timely access to materials during policy development;
- fair hearing officer selection and training;
- fair hearing process satisfaction survey;
- outreach to individuals who are deaf, hard of hearing, and individuals with intellectual disabilities;
- customer satisfaction survey for all closures;
- merit scholarship in computing costs for college programs;
- number of blind or visually impaired individuals in leadership and professional positions;
- counselor contact with consumer while awaiting services; and
- long term employment support and outcome based contracting.

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

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

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

1. Transition Age Youths

Issue: During FY 2005, OVR served 4,926 transition age youths representing 26.04 percent of the total of the number of individuals served by OVR. In FY 2006, PA OVR served 5,033 transition age youths representing 26.55 percent of the total number of individuals served. The rehabilitation rate for transition youths also increased from 57.23 percent in FY 2005, to 59.45

percent in FY 2006, as a result of an increase from 2,819 successful outcomes in FY 2005, to 2,992 successful outcomes in FY 2006. The national employment rate for 16 to 24 year old youths reported by the US Department of Labor in the summer of 2006 was 88.8 percent.

Providing services that result in the successful transition of youths to employment outcomes is a significant issue for OVR. Transition age youths represent a substantial percentage of the total number of individuals OVR serves. During the on-site visit, OVR staff expressed concern about tracking youths who participate in programs conducted through the PA Community on Transition. In FY 2006, 1,288 youths were closed after determination of eligibility for services without an Individualized Plan for Employment (IPE) being developed, or after development of the IPE without receiving services. Data regarding participation and outcomes could be used to maximize resources, and improve programs.

In addition, issues such as those related to the provision of services and policy development, which were expressed by stakeholders during the monitoring process, have implications for providing services to transition age youths that result in quality employment outcomes.

Goal: Close the gap between the rehabilitation rate of transition age youths with disabilities and the employment rate of all youths.

Strategies:

1. hire new transition coordinator by October 1, 2007 to continue and enhance effective collaborative relationships with state and federal entities serving youths, and family and student organizations;
2. develop and implement common data elements with collaborating partners to enhance tracking and reporting capabilities; and
3. analyze data to assess impact of collaborative activities on outcomes.

Method of Evaluation: OVR will be successful as the gap between the rehabilitation rate of transition age youths with disabilities and the employment rate of all youths is closed.

Technical Assistance: RSA will provide technical assistance on measurement of progress and outcomes.

2. Individuals who are Blind or Visually Impaired

Issue: In 1999, OVR was restructured with the establishment of the Bureau of Blindness and Visual Services within OVR. The bureau mission is to assist individuals who are blind or visually impaired gain the skills necessary to live and work independently in their communities. The bureau provides services with staff located in six district offices. In FY 2006, OVR served 761 individuals who are blind or visually impaired, an increase from the 699 individuals served in FY 2005. The number of individuals who are blind or visually impaired receiving services represents 4 percent of OVR's total population served in FY 2006. In FY 2006, 527 individuals

who are blind or visually impaired achieved an employment outcome, which is a 69.3 percent rehabilitation rate.

The BEP is an employment outcome option available to individuals who are blind or visually impaired. In FY 2006, 11 individuals chose BEP as an employment outcome, which was an increase from three in FY 2005. During FY 2006, there were 54 vendors in PA. At the end of FY 2006, there were 57 BEP cafes, snack bars, and vending locations. Two new locations were opened in FY 2006. OVR also operates a BEP training program as part of the state operated comprehensive rehabilitation center, the Hiram G. Andrews Center, in Johnstown, PA. The BEP training program provides initial, advanced, and upward mobility training for vendors. The three training programs had nine participants in FY 2006.

Goals:

1. Close the gap between employment outcomes of individuals who are blind/visually impaired and the employment rate of the general population in Pennsylvania.
2. Increase BEP outcomes for those individuals choosing the BEP as an outcome.

Strategies:

1. focus counselors on providing services to achieve employment outcomes;
2. establish one new BEP location in FY 2008, and two new BEP locations in FY 2009;
3. provide initial, advanced, and upward mobility training to 10 BEP managers in FY 2008, and 15 BEP managers in FY 2009; and
4. enhance BEP training at HGAC to develop BEP facility managers for new locations and upward mobility.

Methods of Evaluation:

1. OVR will be successful as the gap between employment outcomes of individuals who are blind/visually impaired and the employment rate of the general population in Pennsylvania is closed; and
2. OVR will be successful as the number of BEP outcomes for those individuals choosing BEP as an outcome increases in FY 2008, and FY 2009.

Technical Assistance: RSA will provide technical assistance by assisting OVR in learning more about BEP training programs at other state agencies.

3. Quality Improvement

Issue: OVR will implement a new case management system beginning in November of 2007, followed by three more system component releases over the next four years. The new system, CWDS, has been under development since 2005. OVR staff have been active participants in the design of the CWDS, and in end-user testing. System implementation and staff training during FY 2008 will present demanding challenges for OVR. The CWDS project is a partnership among the Department of Labor and Industry's Bureau of Workforce Development Partnership and OVR, and the Department of Public Welfare's Bureau of Employment and Training Programs. The CWDS is an extensive systems upgrade that will affect case management procedures and processes, as well as provide new tools to all staff. A review of the functionality of the CWDS demonstrated to RSA staff that the system would provide OVR with a significant tool for enhancing its existing QA practices, and for developing new process analysis measures to ensure continuous improvement in the quality of service provision.

During the on-site review, the RSA state team had the opportunity to review the QA process for case review, and the results of customer satisfaction surveys. OVR's case review process is based on effective QA practices and provides significant performance data to counselors and supervisors, as well as to district office and central office management. The data are also used to determine training needs.

OVR also uses data derived from customer satisfaction surveys as a source of information on agency performance. It was noted during discussions that OVR only surveys those individuals who have been closed with an employment outcome. PaRC and PA CAP representatives raised concerns about surveying only individuals with employment outcomes. They noted that it may be beneficial to solicit input from individuals exiting without employment outcomes in order to provide a more complete view of consumer satisfaction, and to enable OVR to make program improvements to respond to consumer concerns derived from the surveys.

Goal: Increase agency capacity for continuous improvement of service delivery and achievement of employment outcomes through enhancement of existing QA processes and procedures, and development of new QA processes and procedures.

Strategies:

1. identify data and capacities available within the new CWDS that can be used to assess agency performance and support continuous improvement of service delivery;
2. hire two program analysts in FY 2008;
3. develop key indicators, performance measures, and reports by September 30, 2008; and
4. implement improvement recommendations resulting from analysis of performance data by September 30, 2008.

Method of Evaluation: OVR will be successful as quality and performance measures are developed in the CWDS and implemented to support QA and continuous improvement of services and outcomes.

Technical Assistance: RSA will provide technical assistance on development of QA and continuous improvement processes and procedures.

4. Consumer Involvement:

Issue: RSA observed active and dedicated stakeholders in Pennsylvania. OVR, in collaboration with consumers and stakeholders, has established Citizen Advisory Councils in each of the 21 OVR district office areas. The CACs enable consumers and stakeholders at the district level to provide OVR with input on service delivery and policy development. OVR management expressed appreciation for the involvement of the PaRC, the PA CAP, the CACs and other advisory groups and stakeholders in assisting OVR with its mission “to assist Pennsylvanians with disabilities to secure and maintain employment and independence.”

OVR management expressed their intention to seek input on policy related matters from consumers early in the process. However, feedback from the PaRC and the PA CAP indicated their concern that, from their perspective, they were not involved with OVR in policy development at the formative stages of development, but only after the fact, and then, only in a perfunctory manner. OVR has established CACs across the state for the purpose of securing consumer input into the VR program. However, based on discussions with stakeholders, the network is currently underutilized.

RSA staff had an opportunity to attend a session for public comment on the FY 2008 state plan on April 4, 2007, held at the Harrisburg district office. At the public comment session, RSA observed that attendance appeared to be lower than expected with only a few individuals attending. OVR staff indicated that attendance has been low over the last few years in spite of extensive efforts to publicize the sessions. Dialogue ensued with district office staff on strategies to potentially improve attendance, such as conducting focus group discussions and conducting meetings in neutral locations. District staff indicated they have tried many ways to increase participation.

Goal: OVR and its stakeholders will work together to enhance consumer involvement in VR program activities.

Strategies:

1. access capacity building training for CACs and/or alternative community advocates to improve their effectiveness in providing input into the VR program; and
2. develop and implement strategies to increase participation on public meetings.

Method of Evaluation: OVR and its stakeholders will be successful as consumer involvement in policy development is enhanced.

Technical Assistance: RSA will provide technical assistance to OVR and stakeholders on approaches used by other agencies and constituent groups to enhance involvement.

VR and SE Compliance Issues, Goals, Strategies, Methods of Evaluation, and Technical Assistance

The following was identified as a compliance issue during FY 2007 monitoring.

1. State-Funded VR Program

Issue: OVR's state-funded VR program was established on July 1, 1998, when funds were made available from the Commonwealth of Pennsylvania to OVR to serve individuals with disabilities "who are eligible under the federal Act and meet the definition of Severely Disabled (SD) or Non-Severely Disabled (NSD)" (Department of Labor and Industry, Office of Vocational Rehabilitation, Program Policies & Guidelines, 98-300.30, 1998, p.1). Authorization to operate the program was derived from the State Vocational Rehabilitation Act of 1987 enacted by the General Assembly (Senate Bill 1190, Session of 1987). The program was to be, "funded entirely by a State appropriation," and "most of the provisions of the Federal Rehabilitation Act of 1973 and its amendments are not applicable" (98-300.30, p.1). The intent of the appropriation was "to provide only immediate and short-term services to effect an employment outcome" (p.1). The program was initially established within OVR as a "demonstration project to allow for a period of review and revision" (p.1), but was extended by 98-300.30 (Supplement 2) through June 30, 2000. "Although it is anticipated the Program will become permanent, it will continue as a demonstration project until final policy development" (98-300.30 (Supplement 2), p.1).

Program Policies & Guidelines 98-300.30, provides operational instructions for the state-funded VR program to OVR staff on appropriate customers; allowable services; service providers; plan development; fiscal procedures; case documentation; case closure; appeals; and information system code changes. Operational instructions provided to VR counselors state that "in order to receive services, an individual and their OVR counselor must develop a mutually agreed upon employment plan...The plan shall include decisions made as to selection of vocational goal, services to be provided, and parties responsible for the cost of such services...Decisions will be made after the individual and counselor discuss appropriate options" (p.3). Furthermore, "throughout the life of the case it is the counselor's responsibility to document activities as regards all aspects of the case. Documentation should include, but is not limited to, progress notes as regards personal or phone contacts, discussions with the individual or vendors and employment activities germane to case services" (p.3).

OVR's State VR Program Report, July 1, 2005 - June 30, 2006, provides statistics for the period July 1, 2005 through June 30, 2006. The report indicates that, as of June 30, 2006, OVR had 1,550 open cases in the State-funded VR program; 1,699 receiving services under the state-funded program; and 1,560 closed State-funded VR program cases, of which 1,284 were closed working.

34 CFR 361.13(b)(iii) states that the designated State unit have a staff “at least 90 percent of whom are employed full time on the rehabilitation work of the organizational unit.” The state-funded VR program is administered by OVR through the Commonwealth of Pennsylvania law that provides the authority of the State Board of Vocational Rehabilitation. The State Board of Vocational Rehabilitation is the Designated State Agency. The VR counselor staff of OVR provide the services of the state-funded VR program to individuals. VR counselors are paid 100 percent from Basic Support Program funds, and work with these individuals until they obtain employment and are closed under the rules of the state-funded VR program.

On July 10, 2007, RSA advised OVR that in order for a state VR agency to operate a separate VR program with state funds or other sources, the program must be totally separate and distinct from the VR program established under Title I of the Act. In particular, funds allotted under Title I must be kept completely separate from that other program. If OVR were to operate this state-funded program such that the funds were kept completely separate and the counselors' salaries/benefits and other administrative costs were allocated properly between the programs, then it may be possible for OVR to run a separate program. If the program is completely separate and distinct from the Title I VR program, then OVR is not obligated to follow federal requirements for the separate state-funded program.

To resolve this compliance issue, OVR must submit a CAP for RSA approval within 30 days of receiving this report. The submitted CAP will describe:

- the steps OVR will take to ensure that Title I funds are not used in the administration of the state-funded VR program; and
- the timelines for completing the steps necessary to ensure that Title I funds are not used in the administration of the state-funded VR program.

VR and SE Recommendations

RSA recommends that OVR establish goals and strategies to address the following VR and SE issue:

- As noted earlier in this report, OVR only sends consumer satisfaction surveys to individuals who have exited the VR program with an employment outcome. The PaRC and PA CAP representatives raised concerns about surveying only individuals with employment outcomes. The PaRC and PA CAP have recommended that OVR survey individuals exiting the VR program without employment outcomes in order to provide a more complete view of consumer satisfaction.

VR and SE Issues for Further Review

RSA plans on conducting further review of the following VR and SE issue.

Issue: Fair hearing process.

During monitoring activities, stakeholders noted issues related to the fair hearing process. Specifically, stakeholders noted concerns about fair hearing officer selection, qualifications, and training. Additionally, stakeholders noted dissatisfaction about the discontinuance of fair hearing process satisfaction surveys. As a result of stakeholders' expressing these concerns, RSA will conduct further review of the fair hearing process during FY 2008.

Chapter 3: Fiscal Review of the VR Program

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

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

Table 2
Fiscal Data for OVR for FY 2002 through FY 2006

Pennsylvania (C)					
Fiscal Year	2002	2003	2004	2005	2006
Grant Amount	111,070,319	113,062,577	115,424,463	115,157,515	118,963,780
Required Match	30,060,963	30,600,164	31,239,404	31,167,155	32,197,313
Federal Expenditures	101,873,054	96,605,820	110,833,827	112,485,743	108,080,795
Actual Match	30,060,963	30,993,091	31,310,953	31,187,719	32,199,928
Over (Under) Match	0	392,927	71,549	20,564	2,615
Carryover	9,197,265	16,456,757	4,590,636	2,671,772	10,882,985
Program Income	8,329,536	6,124,669	3,948,580	3,475,212	5,533,438
Maintenance of Effort (MOE)	28,310,456	28,834,759	30,060,963	30,600,164	31,239,404
Administrative Costs	12,355,774	13,286,023	12,558,640	13,495,609	13,855,384
Total Expenditures	146,257,595	151,981,006	163,927,060	153,386,934	160,240,862
Percent Admin Costs to Total Expenditures	8.45%	8.74%	7.66%	8.80%	8.65%

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 Basic Support Program, other than for the construction of a facility related to a community rehabilitation program, was established in the 1992 Amendments to the Rehabilitation Act at 21.3 percent. As

such, a *minimum* of 21.3 percent of the total allowable program costs charged to each year's grant must come from non-federal expenditures from allowable sources as defined in program and administrative regulations governing the VR Program. (34 CFR 361.60(a) and (b); 34 CFR 80.24)

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

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

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

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

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

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

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

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

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

RSA provided technical assistance to OVR in a number of fiscal areas during the review. RSA:

- obtained and input all Financial Status Reports (SF-269s) not previously entered into RSA's Management Information System (MIS) for all formula grant programs;
- reviewed financial reports with agency staff, made corrections, and approved all reports for FYs 2002 – 2007;
- clarified issues related to the carryover of federal funds from FYs 2003, 2004 and 2005;
- made adjustments to properly report the obligation and expenditure of FYs 2003, 2004 and 2005 carryover funds (\$5,754,786);
- provided extensive technical assistance to ensure future compliance with the statutory carryover requirement;
- identified significant issue with the sufficiency of matching funds;
- discussed strategies to address the growing shortfall of matching funds for the VR Program;
- discussed RSA's analysis of Pennsylvania's allotment from FYs 2002 – 2007, and the agency's entitlement to priority consideration for additional federal funds through the reallocation process in each of these years;
- analyzed the impact of requesting and receiving \$5,855,891 through the reallocation process during the 4-year period from FYs 2003 – 2006 (The expenditure of these funds reduced the amount of state funds projected as available for match in the subsequent federal FY and essentially increased the growing match shortfall by \$1,584,885);
- reviewed variances in program income earned each fiscal year and the impact of the shortfall in projected FY 2007 program income;
- provided comparisons of OVR's program income earned with national averages for all VR agencies and combined agencies;
- discussed strategies for increasing program income, and the agency's use of this income to increase counselor case services budgets in the districts in which the income was earned;
- indicated that administrative costs charged to the VR program are well-below national averages and, from initial discussions with the agency, concluded that these costs may not be accurately reported and distributed to all benefiting programs; and
- reviewed time distribution documentation requirements and the OMB Circular A-87 semi-annual certification requirement for all staff charged 100 percent to any federal grant program.

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

1. Match

Issue: There is a significant and increasing shortfall in non-federal funds available for match in the VR Program. At the time of RSA's onsite review, an analysis of agency workpapers substantiated a projected match shortfall of \$14,000,000 for FY 2007. One part of this deficit can be attributed to the increase in the VR Program allotment each year since FY 2002, without a corresponding increase in state matching funds (FY 2003 - \$539,201; FY 2004 - \$639,240; FY 2005 - \$72,249; FY 2006 - 1,030,158; FY 2007 - \$750,134). A second factor to take into consideration is the additional \$5,855,891 received through the reallocation process from FYs 2003 - 2006, which also had to be matched during this period. With no increase in state funding, OVR began to borrow more and more of the state funds appropriated for future grant periods to closeout the current federal FY. Financial staff are aware of this large deficit and continuously update resource information (federal and state) to provide management with accurate financial information related to this growing deficit.

Goal: To obtain full match for each federal fiscal year.

Strategies:

1. explore options to reduce match shortfall and eliminate reliance on the use of state funds appropriated for future periods to close out each federal fiscal year (increase in state appropriations, outside sources of match); and
2. if unable to reduce shortfall, develop a strategy for releasing federal funds through the reallocation process (timing and amount).

Technical Assistance: RSA will provide on-going technical assistance throughout this exploration process as OVR devises strategies to increase VR Program matching funds, resolves the issue of a significant shortfall in current year state appropriations, and, if necessary, through the development of a strategy to begin the release of federal funds through the reallocation process.

VR and SE Issues for Further Review

RSA plans on conducting further review of the following VR and SE issue.

Issue: Continuance of financial monitoring review activities to complete all planned review activities.

Upon completion of the onsite review activities there were three financial areas where planned review activities were incomplete. Throughout FY 2008, RSA will continue monitoring activities as described below.

- Complete the review of the classification and reporting of administrative costs charged to the VR Program. (RSA-2 Report, Schedule I, Line 1). Although reported costs are lower than the national averages for all VR agencies and combined agencies, concerns surfaced during an initial review of workpapers that some administrative costs may not be properly reported and such costs may not be allocated to all benefitting programs.
- Verify adherence (since documentation was not available during the onsite review) to time distribution and A-87 certification requirements outlined in OMB Circular A-87, Attachment B, Paragraph H – support for salaries and wages. (These requirements are separate from time and attendance requirements for all employees charged to federal grant programs.).
- Conduct a complete review of the procurement process used by OVR to purchase goods and services for the VR Program. This review will include the sufficiency of staff to carry out this function, the agency’s use of the innovation and expansion authority to “grant” VR Program funds and other procurement arrangements classified by OVR as grants, contracts and interagency agreements. Procurement impediments, contractor evaluation and contract oversight will also be reviewed.
- Review charges allocated to the VR Program and other RSA-funded programs for the Department of Labor & Industry’s new CWDS. At the time of RSA’s onsite review, OVR had been designated as a mandatory partner and it was projected that a minimum of \$10.08 million had been, or would be, charged to the VR Program for the initial costs of this new system.

Chapter 4: IL Program

Program Organization

OVR and the PA SILC jointly administer the state's Part B IL program. The Pennsylvania Council on Independent Living, (PCIL), works closely with the PA SILC to administer the other IL programs in the state. The PA SILC and the PCIL are each primarily responsible for fulfilling the day-to-day administrative responsibilities for their respective organizations. The state has nine federally funded, and nine state-funded CILs. Through a contractual agreement, Resources for Human Development was responsible for providing training to both the PA SILC and the CILs at the time of RSA's on-site visit.

Table 3
Sources and Amounts of Funding (FY 2006)

	SILC
Part B Funds	702,551
Older Blind	1,489,998
Other Federal Funds	566,640
State Funds	231,421
Local Government	0
Private/Other Funds	0
Total	2,990,610

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

RSA provided technical assistance to OVR in a number of IL program areas during the review process. RSA:

- provided technical assistance on ways to develop a statewide uniform reporting system for the CILs programs in the state. RSA shared information about the I-Online, a statewide reporting system that is being used successfully in Virginia. All the IL key players were interested in learning more about the I-Online, and suggested that RSA facilitate discussions with Access to Independence, the CIL in Virginia that provides training on using the I-Online on their behalf. RSA has since spoken with Access to Independence, and they have agreed to work with the PA SILC. Contact information has been shared with representatives of both parties;
- provided technical assistance on how to improve working relationships for better collaboration, coordination, and cooperation among the different IL programs in the state, including the IL services for older blind individuals; and
- provided technical assistance on how PA SILC can participate in the achievement of State Plan for Independent Living goals without engaging in activities beyond those SILC statutory duties that are laid out in Section 705(c) of the Act.

Promising IL Practices Identified by OVR and Stakeholders During the Review Process

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

1. Effective Utilization of PA SILC Staff in SPIL Monitoring and Evaluation.

The PA SILC has adopted a staff model in which employees are trained to specialize in issue areas based on the goals and objectives identified in the SPIL. These staff monitor implementation and progress as activities are conducted to accomplish each SPIL goal or objective. This approach is effective because the PA SILC staff work as a team, exchanging ideas and suggestions on SPIL-related projects and activities based on each person's area of expertise. This staff model allows the PA SILC to effectively evaluate implementation of SPIL goals and objectives, and determine whether or not to explore alternative methods and/or approaches. The use of specialized staff and teamwork gives the PASILC the appropriate feedback with which the organization provides direction to the IL community in meeting consumer service needs.

IL Issues Identified by OVR and Stakeholders During the Review Process

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

- lack of a uniform statewide reporting system for CILs;
- need for a stronger working relationship between the different IL programs in the state; and
- need for increased outreach efforts by the different IL programs in the state.

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

IL Performance Issues, Goals, Strategies, and Technical Assistance

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

1. Uniform Statewide Reporting System

Issue: According to information obtained from stakeholders, it has been difficult to develop a set of uniform definitions for the different IL services provided by all the CILs, federally funded and state-funded. This has led to a statewide inconsistency in the types of IL services provided by the different CILs, and in the method of reporting service outcomes. Having a uniform statewide accountability system in place will ensure that there is consistency in the types of services provided, that consumers are able to receive similar IL services from any CIL, and that the CILs

will be able to report similar outcomes for each type of service provided regardless of where the CIL is located within the state.

Goal: Develop a statewide uniform accountability system for improved IL service provision and reporting.

Strategies:

1. the PA SILC and the PCIL will continue to work together to come up with uniform definitions for all the types and categories of IL services that are provided in the state;
2. the PA SILC will continue to search for suggestions and ideas from other states on how to ensure that all IL service types and categories have the same definition statewide, and that all consumers seeking these services have equal access to them regardless of where a CIL is located within the state;
3. OVR, the PA SILC, and the PCIL will jointly create a statewide reporting system by developing a database that contains all the definitions for all IL service types and categories; and
4. OVR and the PA SILC will organize training and technical assistance to enable all CIL staff and IL service providers learn how to operate the database, and thus improve the method of reporting statewide.

Method of Evaluation: OVR and the PA SILC will be successful when a statewide uniform accountability system is developed.

Technical Assistance: RSA will facilitate the exchange of ideas with other states where such systems have been developed and utilized successfully.

2. Stronger working relationship between the different IL programs in the state.

Issue: Currently, IL issues affecting the blind have generally been separated from those affecting other disability groups. The PA SILC, the OIB program officers, the CILs, individual consumers, and consumer advocacy groups agree that when it comes to IL services, the disability category is secondary. All the parties strongly believe that strengthening the working relationship between the PA SILC and the OIB program will ensure that issues affecting the older blind are identified and addressed along with those of other disability groups.

Goal: Improve the collaboration, cooperation, and coordination among the PA SILC, the CILs, and the OIB program.

Strategies:

1. the PA SILC and the CILs will continue to strengthen the existing working relationship with the OIB program;

2. OVR will work more closely with the PA SILC to ensure that the PA SILC receives more feedback from older blind consumers on IL service provision, and service areas needing improvement;
3. OVR will work more closely with the PA SILC to increase public awareness about the OIB program, and issues affecting older blind consumers; and
4. OVR will work more closely with the CILs to improve access to IL services for older blind consumers through the CILs in their communities.

Method of Evaluation: OVR and the PA SILC will be successful when collaboration, cooperation, and coordination among OVR, PA SILC, the CILs, and the OIB program have improved.

Technical Assistance: RSA will provide technical assistance when requested by the PA SILC, the CILs, and OVR regarding ways to improve collaboration, coordination, and cooperation among all the parties.

3. Outreach to increase public awareness of IL services in the state.

Issue: Currently, many of the centers for independent living conduct outreach activities in their communities. However, the rural nature of some geographic areas in the state hinders progress on this issue for some centers. There is a need for increased outreach efforts by the different IL programs to increase public awareness of IL services available within PA, especially the awareness of those individuals residing in rural areas.

Goal: Improve outreach efforts to increase public awareness, especially among individuals in rural areas, about the availability of IL services.

Strategies:

1. the PA SILC and PCIL will identify increased outreach efforts, especially rural outreach, as part of the goals and objectives in the new SPIL;
2. all IL service providers and partners in the state will periodically organize and increasingly participate in rural community events as a way of reaching out to individuals with disabilities residing in those communities; and
3. the PA SILC, all IL service providers, and partners will work closely with individual IL consumers and consumer advocacy groups to develop new methods and approaches for increasing public awareness about disability issues in all geographic areas of the state.

Method of Evaluation: OVR and the PA SILC will be successful when there is increased public awareness, especially among individuals in rural areas, of IL services in the state.

Technical Assistance: RSA will share techniques utilized by states with similar demographics to address issues of IL service provision to rural populations. RSA will also facilitate training and technical assistance from the Association of Programs for Rural Independent Living.

Chapter 5: OIB Program

Program Organization

The OIB program in Pennsylvania is operated by OVR. The program receives \$1,489,998 of Title VII, chapter 2 funds; and \$165,555 state funds (excluding in-kind contributions).

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

RSA provided technical assistance on how to improve the working relationship between the OIB and other IL programs in the state.

OIB Issues Identified by OVR and Stakeholders During the Review Process

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

- consumers with visual impairments, especially the older blind, have very limited access to IL services;
- consumers are unaware of the vast array of services that CILs provide; and
- general belief in the blindness community that CIL services are only available to individuals with physical disabilities.

Following compilation of this list, RSA worked with OVR to address as many of these issues as possible.

OIB Performance Issues, Goals, Strategies, and Technical Assistance

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

1. Access to IL services for older blind consumers.

Issue: Individuals with visual impairments, especially the older blind, have very limited access to IL services. This is because a high number of these individuals are unaware of the vast array of services that CILs provide, or that these services are available to them because of the general belief in the blindness community that CIL services are only available to individuals with physical disabilities. There is a need for increased access to IL services for the blind and visually impaired, especially the older blind, through the CILs.

Goal: Increase access to IL services for older blind individuals.

Strategies:

1. the PA SILC and the OIB program director will continue to improve on their existing working relationship;
2. OVR will strengthen its working relationship with the CILs as a way of improving access to IL services for older blind consumers in a timely manner; and
3. OVR and OIB program officers will provide some basic blindness and IL skills training to CIL staff to enable them meet the basic IL service needs of the older blind and other consumers with vision impairments.

Method of Evaluation: OVR and the OIB program will be successful when older blind individuals' access of IL services increases.

Chapter 6: Progress on Issues Raised in Previous Reviews

As a result of the RSA review conducted with OVR in FY 2005, the agency developed a CAP. A summary of the progress that OVR has made on the CAP is described below.

Corrective Action Plan

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

- establishing a policy with a time standard for contacting an individual referred to the agency for services;
- establishing a policy with a time standard for development of the IPE following a determination of Eligibility;
- establishing time standards for: contact with Referrals; determining Eligibility and priority for services; and development of the customer's IPE;
- taking corrective action to assure all services considered necessary for an employment outcome are provided and contribute substantially to the employment outcome of the individual;
- taking action to assure the individual achieves the employment outcome described in the IPE;
- taking corrective action to assure service records include verification that the individual's wage and level of benefits are not less than that usually paid non-disabled individuals for the same or similar work;
- revising its training policy to state that a customer is not required to take out a loan to pay for this service;
- revising its training policy to assure that the rehabilitation needs of each individual's IPE are the basis for determining the cost of training;
- revising its SF-269's for the fourth quarter of FY 2004 and FY 2005 to properly reflect how it's using program income; and
- revising its RSA-2 for FY 2004 to reflect BEP expenditures.

OVR has not successfully resolved compliance findings related to the following topics and continues to work toward their resolution.

1. Developing formal written agreements or other mechanisms with PA state universities and community colleges, setting forth (1) the financial responsibility of each party; (2) the conditions, terms and procedures for reimbursement; (3) procedures for resolving disagreements between the parties; and (4) procedures for coordinating services among the parties in accordance with 34 CFR 361.53(d).

Status: On August 15, 2007, RSA received an update on the status of this CAP item from OVR stating that the final document has been sent to the State System of Higher Educations (SSHE) for three required signatures. Following return from SSHE OVR will secure four additional required signatures from within the PA Department of Labor and Industry and the Attorney

General's Office. OVR provided RSA an assurance that the agreements will be signed by September 30, 2007, for approval of the FY 2007 state plan.

2. Taking corrective action to ensure counselors appropriately follow agency policies on determining the significance of disability of a customer.

Status: Training has been provided to the VR staff in four OVR District Offices. Also, training was provided to the newly hired VR counselors from all the 21 field offices. Three levels of QA Reviews are done on an ongoing basis. This will also be covered in the training component for implementation of the new computer system, which will occur in October 2007.

3. Revising its order of selection policy and procedures to be consistent with 34 CFR 361.36 (d) (1).
4. Taking corrective action to assure its policies for determining significance of disability are consistent with the tools used by counselors to implement the policy. It must also use the appropriate functional capacities and recommends use of the ones found in Section 7 (21) (A) of the Act.
5. Take corrective action to assure that the functional capacities used in its definition of "significant disability" and "most significant disability" and the related process for determining limitations in these capacities, be the same as outlined in Section 7 (21) (A) of the Act.

Status: On August 15, 2007, RSA received an update on the status of this CAP item from OVR stating that the three items above will be corrected by revising its order of selection policy and procedures by adopting guidance related to determining significance of disability provided in RSA Technical Assistance Circular (TAC) 05-01. RSA will review the revised policy memo to ensure compliance with 34 CFR 361.36(d)(1). OVR will also provide training to staff to ensure that the revised policies and procedures for determining significance of disability are implemented correctly.

Chapter 7: Summary Conclusion

OVR staff are dedicated to providing quality services to individuals in the Commonwealth of PA. OVR has established effective collaborative relationships with other PA agencies. There is a consumer and advocacy community committed to improving the lives of individuals with disabilities and working with OVR to ensure that quality services are provided and successful employment outcomes are achieved. OVR has established collaborative relationships with the PA state education agency and local school districts to address the successful transition of youths to post secondary education and training, community participation, and employment.

OVR faces the challenges of operating a state-funded VR program separate and distinct from the Title 1 VR program, improving the rehabilitation rate of transition age youths, and employment outcomes for blind and visually impaired consumers. OVR must also successfully implement and complete the remaining corrective actions from RSA's FY 2005 monitoring of the agency.

OVR, the PA SILC, and IL partners face challenges related to varying definitions for services used by CILs, access to services, outreach, and public awareness.

Table 4 summarizes the results of RSA's review.

**Table 4
Summary of the Results of RSA's Review**

Agency: PA OVR		
Program: VR		
Goal	Strategies	Technical Assistance
1. Transition Age Youths Close the gap between the rehabilitation rate of transition age youths with disabilities and the employment rate of all youths.	1 Hire new transition coordinator by October 1, 2007 to continue and enhance effective collaborative relationships with state and federal entities serving youths, and family and student organizations. 2. Develop and implement common data elements with collaborating partners to enhance tracking and reporting capabilities. 3. Analyze data to assess impact of collaborative activities on outcomes.	RSA will provide technical assistance on measurement of progress and outcomes.
2. Individuals who are Blind	1. Focus on providing	RSA will provide technical

<p>or Visually Impaired</p> <ol style="list-style-type: none"> 1 Close the gap between employment outcomes of individuals who are blind/visually impaired and the employment rate of the general population in Pennsylvania. 2 Increase BEP outcomes for those individuals choosing the BEP as an outcome. 	<p>services to achieve employment outcomes.</p> <ol style="list-style-type: none"> 2. Establish one new BEP location in FY 2008, and two new BEP locations in FY 2009. 3. Provide initial, advanced, and upward mobility training to 10 BEP managers in FY 2008, and 15 BEP managers in FY 2009. 4. Enhance BEP training at HGAC to develop BEP facility managers for new locations and upward mobility. 	<p>assistance by assisting OVR in learning more about BEP training programs at other state agencies.</p>
<p>3. Quality Improvement Increase agency capacity for continuous improvement of service delivery and achievement of employment outcomes through enhancement of existing QA processes and procedures, and development of new QA processes and procedures.</p>	<ol style="list-style-type: none"> 1. Identify data and capacities available within the new CWDS that can be used to assess agency performance and support continuous improvement of service delivery. 2. Hire two program analysts in FY 2008. 3. Develop key indicators, performance measures, and reports by September 30, 2008. 4. Implement improvement recommendations resulting from analysis of performance data by September 30, 2008. 	<p>RSA will provide technical assistance on development of QA and continuous improvement processes and procedures.</p>
<p>4. Consumer Involvement OVR and its stakeholders will</p>	<ol style="list-style-type: none"> 1. Access capacity building training for CACs and/or 	<p>RSA will provide technical assistance to OVR and</p>

<p>work together to enhance consumer involvement in VR program activities.</p>	<p>alternative community advocates to improve their effectiveness in providing input into the VR program.</p> <p>2. Develop and implement strategies to increase participation on public meetings.</p>	<p>stakeholders on approaches used by other agencies and constituent groups to enhance involvement.</p>
<p>Program: IL</p>		
<p>Goal</p>	<p>Strategies</p>	<p>Technical Assistance</p>
<p>1. Uniform Statewide Reporting System Develop a statewide uniform accountability system for improved IL service provision and reporting.</p>	<p>1. The PA SILC and the PCIL will continue to work together to come up with uniform definitions for all the types and categories of IL services that are provided in the state.</p> <p>2. The PA SILC will continue to search for suggestions and ideas from other states on how to ensure that all IL service types and categories have the same definition statewide, and that all consumers seeking these services have equal access to them regardless of where a CIL is located within the state.</p> <p>3. OVR, the PA SILC, and the PCIL will jointly create a statewide reporting system by developing a database that contains all the definitions for all IL service types and categories.</p> <p>4. OVR and the PA SILC will organize training and technical assistance to enable all CIL staff and IL</p>	<p>RSA will facilitate the exchange of ideas with other states where such systems have been developed and utilized successfully.</p>

	<p>service providers learn how to operate the database, and thus improve the method of reporting statewide.</p>	
<p>2. Stronger working relationship between the different IL programs in the state Improve the collaboration, cooperation, and coordination among the PA SILC, the CILs, and the OIB program.</p>	<ol style="list-style-type: none"> 1. The PA SILC and the CILs will continue to strengthen the existing working relationship with the OIB program. 2. OVR will work more closely with the PA SILC to ensure that the PA SILC receives more feedback from older blind consumers on IL service provision, and service areas needing improvement. 3. OVR will work more closely with the PA SILC to increase public awareness about the OIB program, and issues affecting older blind consumers. 4. OVR will work more closely with the CILs to improve access to IL services for older blind consumers through the CILs in their communities. 	<p>RSA will provide technical assistance when requested by the PA SILC, the CILs, and OVR regarding ways to improve collaboration, coordination, and cooperation among all the parties.</p>
<p>3. Outreach to increase public awareness of IL services in the state Improve outreach efforts to increase public awareness, especially among individuals in rural areas, about the availability of IL services.</p>	<ol style="list-style-type: none"> 1. The PA SILC and PCIL will identify increased outreach efforts, especially rural outreach, as part of the goals and objectives in the new SPIL. 2. All IL service providers and partners in the state will periodically organize and increasingly participate in rural community events as a way of reaching out to 	<p>RSA will share techniques utilized by states with similar demographics to address issues of IL service provision to rural populations. RSA will also facilitate training and technical assistance from the Association of Programs for Rural Independent Living.</p>

	<p>individuals with disabilities residing in those communities.</p> <p>3. The PA SILC, all IL service providers, and partners will work closely with individual IL consumers and consumer advocacy groups to develop new methods and approaches for increasing public awareness about disability issues in all geographic areas of the state.</p>	
Program: OIB		
Goal	Strategies	Technical Assistance
<p>1. Access to IL services for older blind consumers Increase access to IL services for older blind individuals.</p>	<p>1. The PA SILC and the OIB program director will continue to improve on their existing working relationship.</p> <p>2. OVR will strengthen its working relationship with the CILs as a way of improving access to IL services for older blind consumers in a timely manner.</p> <p>3. OVR and OIB program officers will provide some basic blindness and IL skills training to CIL staff to enable them meet the basic IL service needs of the older blind and other consumers with vision impairments.</p>	<p>RSA will provide technical assistance when requested.</p>

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>