

**Fiscal Year 2007 Monitoring Report
on the Vocational Rehabilitation and
Independent Living Programs in the
Territory of the U.S. Virgin Islands**



**U.S. Department of Education
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Executive Summary

The Rehabilitation Services Administration (RSA) reviewed the performance of the following programs of the Rehabilitation Act of 1973, as amended (the Act) in the territory of the U.S. Virgin Islands:

- the Vocational Rehabilitation (VR) program, established under Title I;
- the State Supported Employment (SE) Services Program, established under Title VI, Part B;
- the Independent Living (IL) 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 the U.S. Virgin Islands, the Division of Disabilities and Rehabilitation Services (VIDDRS) is the agency that is responsible for the administration of the four programs cited above.

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

- gathered and reviewed information regarding each program's performance;
- identified a wide range of VR and IL stakeholders and invited them to provide input into the review process;
- conducted two on-site visits and held multiple discussions with state agency staff, SRC members, SILC members, and stakeholders to share information, identify promising practices and areas for improvement;
- provided technical assistance;
- worked with VIDDRS 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 performance and compliance issues;
- developed performance and compliance goals and strategies related to selected issues;
- identified the technical assistance that it would provide to assist the agency to achieve the goals identified as a result of the review;
- made recommendations in those instances when VIDDRS and RSA did not agree on issues; and
- identified potential issues for further review.

VIDDRS' Challenges

The VIDDRS has significant challenges ahead in order to address the identified developmental issues to increase the quantity and quality of its employment outcomes; improve data usage and reporting; improve its fiscal accountability; establish a more focused direction with CRPs to increase productivity; identify an appropriate quality assurance and evaluation system to ensure VIDDRS developmental milestones; and consolidate the management team to unify efforts toward achieving the goals outlined below.

Introduction

Section 107 of the Rehabilitation Act of 1973, as amended, requires the Commissioner of the Rehabilitation Services Administration (RSA) to conduct annual reviews and periodic on-site monitoring of programs authorized under Title I of the Act to determine whether a state vocational rehabilitation (VR) agency is complying substantially with the provisions of its state plan under section 101 of the Act and with the evaluation standards and performance indicators established under section 106. In addition, the Commissioner must assess the degree to which VR agencies are complying with the assurances made in the Supplement for Supported Employment under Title VI of the Act and programs offered under Title VII of the Act are substantially complying with their respective state plan assurances and program requirements.

In order to fulfill its monitoring responsibilities, RSA:

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

Scope of the Review

RSA reviewed the performance of the following programs of the Act:

- the VR program, established under Title I;
- the State Supported Employment (SE) Services program, established under Title VI, Part B;
- the Independent Living (IL) 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 addition, RSA also reviewed VIDDRS' progress on:

- the agency's Corrective Action Plan that was established as a result of findings from RSA's FY 2003-4 Section 107 monitoring review;
- the agency's Program Improvement Plan that was established as a result of the fact that VIDDRS did not meet performance standards for indicators 1.1, 1.4 and 1.5 for FY 2004; and

- the assurances that VIDDRS made to RSA in conjunction with its FY 2007 state plan.

The Territory of the U.S. Virgin Islands Administration of the VR, SE, IL, and OIB Programs

VIDDRS falls under the umbrella of the Department of Human Services (DHS) in the U.S. Virgin Islands. VIDDRS administers a combined program that serves individuals who are blind as well as individuals with other disabling conditions.

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

Appreciation

RSA wishes to express appreciation to the representatives of the Virgin Islands Department of Human Services (DHS), VIDDRS, the State Rehabilitation Council, the Statewide Independent Living Council, and the stakeholders who assisted the RSA monitoring team in the review of VIDDRS.

Chapter I: RSA's Review Process

Data Used During the Review

RSA's review of VIDDRS 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 were available from the FY 2005 and FY 2006 data collections. Unlike other reviews that RSA conducted in FY 2007, this report cites more data from FY 2005 and than from FY 2006 because VIDDRS did not submit a significant portion of its FY 2006 data to RSA in a timely manner.

Review Process Activities

During the review process, RSA's VIDDRS state team:

- gathered and reviewed information regarding VIDDRS' 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, SRC members, SILC members, and stakeholders to share information, identify promising practices and areas for improvement;
- provided technical assistance to VIDDRS;
- worked with VIDDRS to develop goals, strategies, and evaluation methods to address performance and compliance issues;
- made recommendations to VIDDRS in those instances when VIDDRS and RSA did not agree on issues;
- identified potential issues for further review; and
- identified the technical assistance that RSA would provide to help VIDDRS improve its performance.

RSA's VIDDRS State Team Review Participants

Members of RSA's VIDDRS state team included representatives from each of RSA's State Monitoring and Program Improvement Division's (SMPID's) five functional units. The RSA VIDDRS state team was led by RSA's state liaison to VIDDRS, Fred Isbister (technical assistance unit), and the following RSA VIDDRS team members: Carol Dobak (vocational rehabilitation unit), Sean Barrett (independent living unit), Regina Luster (fiscal unit), and Steve Zwillinger (data unit).

Information Gathering

During FY 2007, RSA began its review of VIDDRS by analyzing information including, but not limited to, RSA's various data collections, VIDDRS' VR and IL state plans, and VIDDRS' State Rehabilitation Council's (SRC's) annual

report. After completing its internal review, RSA carried out the following information gathering activities with VIDDRS and stakeholders in order to gain a greater understanding of VIDDRS' strengths and challenges:

- conducted a series of individual teleconferences with the VIDDRS management team as well as stakeholders;
- conducted four teleconferences with VIDDRS senior management;
- held two teleconferences with stakeholders;
- conducted two on-site monitoring visits: the first monitoring visit was conducted from January 12, 2007 through January 19, 2007 and the second monitoring visit was conducted from March 19, 2007 through March 23, 2007;
- held several teleconferences and on-site meetings focused on the SRC and IL services, including the development of the SRC and the Statewide Independent Living Council (SILC); and
- conducted teleconferences and held on-site meetings with the SILC chairperson as well as potential members of the SILC.

Chapter 2: Vocational Rehabilitation and Supported Employment Programs

Program Organization

At the time of the review, VIDDRS employed a total of 15 staff to administer the VR and SE programs through two area offices, one on St. Thomas and another on St. Croix. One counselor is assigned to the Island of St. John. There were three staff vacancies in the St. Croix office. At the time of this review, VIDDRS was implementing an Order of Selection with no eligible individuals waiting to receive services. Finally, the federal government has placed the government of the Virgin Islands in receivership due to financial mismanagement. A third party fiduciary must approve the expenditure of all federal funds, including those made by VIDDRS.

During FY 2005, VIDDRS expended a total of \$2,661,501 under Title I of the Act on the administration and operation of the VR program. During this period, VIDDRS provided services to a total of 431 individuals. Of this total, 49 individuals exited the VR program after receiving services, and VIDDRS assisted 26 individuals to achieve employment outcomes. Individuals achieving employment outcomes received an average hourly wage of \$10.17 and worked an average of 34.9 hours per week. This and other data are set forth in Table 1 which describes the agency's performance trends from FY 2001 through FY 2005, the most recent year for which RSA has complete data from VIDDRS.

**Table 1
FY 2001 - FY 2005 VIDDRS VR Program Highlights**

Table 1 - Performance Measures by Year

VIRGIN ISLANDS	2001	2002	2003	2004	2005
Total funds used	\$2,572,452	\$2,646,208	\$2,359,526	\$2,366,714	\$2,661,501
Individuals served during year	526	521	455	432	431
Applicants	345	263	192	243	239
Closed after receiving services	71	97	67	37	49
Closed with employment outcomes	53	57	40	25	26
Employment outcomes without supports in an integrated setting	Data not available	39	30	24	26

Virgin Islands	2001	2002	2003	2004	2005
Average cost per individual served	\$4,890.59	\$5,079.09	\$5,185.77	\$5,478.50	\$6,175.18
Average cost per employment outcome	\$48,536.83	\$46,424.70	\$58,988.15	\$94,668.56	\$102,365.42
Employment outcomes per \$million spent	20.60	21.54	16.95	10.56	9.77
Competitive employment outcomes per \$million spent	Data not available	15.87	13.56	10.14	9.77
Average hourly earnings for paid employment outcomes		\$8.73	\$7.30	\$7.42	\$10.17
Average state hourly earnings		\$14.67	\$14.89	\$15.11	\$16.06
Average hours worked per week for paid employment outcomes		0.00	0.00	0.00	34.92
Percent of transition age served to total served		9.28	28.36	35.14	38.78
Employment rate for transition age served		44.44	52.63	69.23	42.11
Average time between application and closure (in months) for individuals with successful paid employment outcomes		34.00	24.50	30.00	30.30
Average number of individuals served per total staff		30.94	40.08	37.92	36.00

VIDDRS receives an annual allotment of approximately \$37,125 under Title VI, part B of the Act, which represents 35 percent of the agency's total expenditures for SE services, with the remaining 65 percent provided by VR program funds. VIDDRS enters into contractual arrangements with two community rehabilitation programs in the territory, Work Able, Inc. and the Harvest, to provide a full range of SE services to the agency's consumers. Once individuals have achieved stable employment, extended services are provided by the Harvest or by the employers through "natural supports."

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

RSA provided technical assistance to VIDDRS in a number of VR program areas during the review process. RSA provided information on:

- the agency's case management system;
- use of RSA's Management Information System;
- the content of the VR state plan and supplement for SE services, as required by Sections 101(a) and 625(a) of the Act;
- the appointment and composition requirements for the SRC, resulting in the governor filling all vacant membership positions prior to the issuance of this report; and
- the provisions of the Act and regulations governing the implementation of an order of selection, based on which VIDDRS determined to no longer implement an order.

VR and SE Issues Identified by VIDDRS and Stakeholders during the Review Process

During the review process, RSA solicited input from VIDDRS and stakeholders about VR and SE performance and compliance issues. The following issues were identified:

- VIDDRS did not have a legally constituted SRC that had received gubernatorial appointment;
- the Virgin Islands has a limited number of community rehabilitation programs;
- the Virgin Islands has a general lack of medical, training and educational resources;
- the cost of evaluations and general services are significantly higher than mainland programs because participants who require services or training not available on the Islands are transported to the mainland for services;
- staff turnover has been ongoing and staff vacancies persist due to the Virgin Islands State Personnel Department's delay in filling positions;
- Order of Selection (OOS) had not been implemented consistent with federal regulations;
- VIDDRS has had a significant decrease in the number of individuals served by the agency over the past several years;
- VIDDRS lacked clear performance expectations for Community Rehabilitation Programs (CRPs); and
- VIDDRS' cost per rehabilitation has escalated as the FY 2005 data indicated. It cost VIDDRS \$102,000 per individual rehabilitated and the current data for FY 2007 indicate the agency's cost per rehabilitated individual will greatly increase unless VIDDRS makes significant progress in the current fiscal year.

Following compilation and discussion with VIDDRS about the issues, RSA worked with VIDDRS 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 VIDDRS agreed on the following performance goals and strategies to achieve those goals, and technical assistance that RSA will provide to assist VIDDRS to achieve each goal. VIDDRS will consider including these goals and strategies in its FY 2009 state plan and if they are included, the agency will report progress on achieving these goals in its FY 2011 annual state plan submission.

1. Number and Quality of Successful Outcomes

Issue: As reflected in Table 1 above, VIDDRS experienced a significant decline in its performance from FY 2001 through FY 2005. For example, the number of individuals served by the agency decreased from 526 in FY 2001 to 431 in FY 2005. The agency assisted 53 individuals to achieve employment outcomes in FY 2001, but only 26 individuals achieved employment outcomes in FY 2005, a decrease of approximately 50 percent. At the same time, the agency's costs per employment outcome were increasing, rising to a high in FY 2005 of \$102,365. In addition, the VIDDRS management team expressed its concern regarding the agency's lack of higher level employment opportunities for program participants.

Based on a review of this and other performance data, VIDDRS and RSA agreed to the following goal to address the need for improved performance on behalf of individuals with disabilities.

Goal: VIDDRS will increase the number and quality of employment outcomes over the next two years: goal of 39 successful outcomes in FY 2008 and goal of 52 successful outcomes in FY 2009.

Strategies: To achieve this goal, VIDDRS will implement the strategies listed below:

- conduct caseload analyses to determine the number of new applications VIDDRS should receive to maintain active, viable case movement;
- conduct outreach efforts to increase client population and establish office targets for new applications;
- manage caseload growth and anticipated expenditures through use of projection tools and the ongoing monitoring of performance and expenditures;
- train field staff on how to build and manage full caseloads;
- establish appropriate linkages with the employer community, as well as placement goals for each counselor;
- train staff on methods of job placements;
- implement a quality assurance and evaluation program focused on the quantity and quality of outcomes;

- develop a contract-based CRP system focused on increases in the quality and quantity of outcomes; and
- appoint a project manager to work with RSA on this goal.

Method of Evaluation: Through quarterly teleconferences and written reports, VIDDRS and RSA will use the following measures to assess the agency's progress toward achieving the goal: VIDDRS will be successful if it doubles the number of employment outcomes over the next three years using the FY 2006 baseline of 26 (targets: FY 2007 - 33; FY 2008 - 39; FY 2009 - 52.)

Technical Assistance: RSA will identify and/or provide the technical assistance listed below to assist VIDDRS to achieve the goal:

- provide quarterly TA through teleconferences on issues identified by VIDDRS as the strategies are implemented;
- provide consultation on the development of a quality assurance and evaluation system and provide TA from other VR agencies, as appropriate;
- arrange for TA from other VR agencies that have been successful with contract-based CRP systems; and
- work with the RCEP to secure training for counselors on job development and placement, including the conduct of outreach with employers.

2. Participation of Consumers in the VR Program

Issue: The SRC was established under Section 105 of the Act to provide a vehicle through which individuals with disabilities can work in partnership with the state agencies to improve the VR program. To this end, the Act specifies a number of functions that SRC members are required to perform, including jointly developing and agreeing to agency goals and priorities, providing input on the agency's state plan, providing recommendations on the development and amendment of agency policies on the provision of VR services and evaluating the performance of the program. The VIDDRS management team stated that consumer involvement was minimal. The agency has had no focus group meetings with its consumers in the recent past and the SRC essentially was not meeting.

As stated above, the Governor of the Virgin Islands recently filled long-standing vacancies on the SRC for the territory. To assist the newly formed Council to perform its responsibilities in an effective and independent manner, VIDDRS and RSA have agreed to the following goal.

Goal: To improve the participation of consumers in the VR program, VIDDRS will support the efforts of SRC members to carry out their mandated functions in an effective and independent manner.

Strategies: VIDDRS will employ the following strategies to achieve the goal:

- assign a staff person to work with the newly-formed SRC;

- assist the SRC to hold quarterly meetings and ensure that it has necessary supports to function; and
- sponsor annual joint consumer information workshops.

Method of Evaluation: To determine the extent to which the SRC is functioning in an effective and independent manner, VIDDRS and RSA will review the SRC's annual report for FY 2008 and for each year thereafter. The SRC is required to submit this report to RSA within 90 days from the end of the fiscal year covered by the report.

Technical Assistance: To assist VIDDRS and the SRC to achieve the goal, RSA will provide the technical assistance described below:

- train the newly formed SRC in its role and functions;
- conduct teleconferences with the SRC to address topics of specific interest to the members;
- provide quarterly teleconference hook-ups with the RSA national meeting of SRC participants;
- provide web-based training for SRC members;
- arrange for TA from the RCEP to train on strategies for the development of effective SRCs; and
- provide TA from other resources as appropriate.

3. Improve the VIDDRS management practices through improved MIS data usage.

Issue: RSA observed that the supervisors within VIDDRS seldom meet as a management team and the director works individually with each supervisor. Through discussions with the director, RSA advised that VIDDRS would benefit if she developed a management team approach with her supervisors and shared the overall responsibility for the administration of the program with them. Specifically, RSA recommended that the management team use the MIS systems as a management tool to strengthen the agency's operation.

Goal: To improve the VIDDRS management team's use of the MIS (collection and use of data).

Strategies: VIDDRS will employ the following strategies to achieve the goal:

- implement a monthly management meeting to review and discuss data verification of the agency's RSA 911 case record data for FY 2004, FY 2005, and FY 2006;
- implement a monthly management meeting to review and discuss data verification of the agency's RSA 911 case record data for FY 2004, FY 2005, and FY 2006;
- train staff on data analysis;

- analyze trends in data to establish appropriate targets for program improvement;
- establish appropriate targets for caseloads through data analysis;
- resubmit the last three years of RSA-113 data for review to RSA as this data was misreported; and
- appoint a project manager to work with RSA on this goal.

Method of Evaluation: RSA will evaluate VIDDRS' submission of reports to RSA to assess the agency's abilities in the development and use of this data.

Technical Assistance:

- RSA will hold quarterly teleconferences with VIDDRS management team to review their collection and use of data.
- RSA will secure TA from high-performing VR agencies or other sources to assist VIDDRS in its use of data.

4. Performance of Service Providers

Issue: The RSA representatives met with a number of individuals within VIDDRS regarding the identified issue of community rehabilitation program (CRP) usage in the state. The senior leadership of VIDDRS advised RSA that VIDDRS primarily works with two community rehabilitation programs and has minimal involvement with the Projects with Industry (PWI) program that serves the Islands. The RSA representatives met with all three CRP program providers to discuss their programs. The Harvest program serves only the St. Croix office. The Work Able, Inc. serves both islands, but has had significant losses in staff and was not fully operational at the time of this review. Work Able, Inc. and Harvest are provided a fee that totals \$1,384 per month per client. VIDDRS had not implemented outcome standards with the CRPs and many individuals spend significant time in the CRPs with no successful outcomes. RSA asked the CRP directors and the VIDDRS management team how many VIDDRS clients were enrolled in the CRPs, what was the average length of stay at each CRP, and how many successful outcomes had been achieved. VIDDRS and the CRP directors were unable to provide this information. In reviewing the high CRP costs and low productivity in terms of successful CRP outcomes, VIDDRS should establish standards of performance with the currently funded CRPs. The RSA representatives held focus group meetings with representatives of the CRPs to discuss a performance-based contract system. The participants were receptive to this change.

After these CRP meetings, the RSA representatives suggested to the VIDDRS management team that an investment in establishing a more accountable, timely and outcome-based CRP contract system would be an appropriate developmental goal for VIDDRS over the next few years. The VIDDRS management team supported this goal. RSA suggested that VIDDRS:

- institute an annual report card to evaluate CRP performances and establish future performance goals based on each CRP's performance;
- consider that financial rewards be more heavily weighted toward successful outcomes rather than job preparation and placement efforts;
- consider establishing a performance expectation that VIDDRS counselors collaborate more closely with CRP staff regarding ongoing client services in order to provide more seamless services to individuals and that VIDDRS require VR counselors to meet with CRP staff on an established basis in order to process each client's progress, problems and future challenges;
- establish a quality assurance and evaluation system and conduct annual site visits to all CRPs throughout the territory to evaluate each CRP's reports as well as the quality of services; and
- establish a working relationship with the PWI program serving the islands in order to provide services to less significantly disabled individuals.

Goal: VIDDRS will develop a CRP business model that meets the needs of VIDDRS and enhances CRP effectiveness.

Strategies: VIDDRS will employ the following strategies to achieve the goal:

- analyze CRP past performance and identify CRP data needed and make available to VIDDRS senior managers and to CRPs;
- negotiate contract-based services with CRPs and issue yearly "report cards" to CRPs to establish appropriate targets for improvements in quality and quantity of outcomes;
- identify content elements to be included in CRP report cards and the associated grading system (criteria for excellent A, good B, fair C, etc.);
- conduct analysis regarding the length of time individuals receive services from CRPs prior to successful outcome; and
- appoint a project manager to work with RSA on this goal.

Method of Evaluation: Review data outcomes on a quarterly basis to track progress toward improved performance by CRPs.

Technical Assistance:

- RSA will provide quarterly reviews of the agency's progress in this area and provide TA to the VIDDRS management team.
- RSA will provide TA to VIDDRS in the areas of identifying relevant CRP data and in defining the components to be included in the CRP report cards.
- RSA will provide TA to CRPs to assist the CRPs to improve the quantity and quality of outcomes.
- as appropriate, RSA will identify VR agencies that use this business contract model to assist VIDDRS improve CRP performance.
- RSA will solicit training from the RCEP on contract-based models if appropriate.

- RSA will arrange for TA from VR agencies and/or other resources as appropriate.

5. Quality Assurance System

Issue: During the extensive work that was conducted by RSA with the VIDDRS senior managers, it was evident that VIDDRS did not have a viable quality assurance or evaluation system in place. RSA noted during one of the on site visits that the VIDDRS management team was unaware of how many individuals the agency had successfully rehabilitated at that point in the year and had not established over agency goals for the numbers of individuals to be served, successfully placed, etc. RSA asked to review the agency's methods for establishing its goals and evaluating its accomplishments. However, it was clear that such a system had not been established. RSA discussed this with the VIDDRS leadership and it was agreed that this would be a worthwhile goal for the future development of the VIDDRS management team.

Goal: VIDDRS will develop a quality assurance and evaluation system to improve the overall operation of VIDDRS.

Strategies: VIDDRS will employ the following strategies to achieve the goal:

- develop a quality assurance and evaluation system that is focused on the unique needs of VIDDRS;
- train field staff on the intent of this system;
- identify appropriate targets for field offices;
- DHS designate an evaluator to work with VIDDRS regarding the quality assurance and evaluation system; and
- appoint a project manager to work with RSA on this goal.

Method of Evaluation:

- VIDDRS will work with RSA to evaluate progress on a quarterly basis.
- VIDDRS will incorporate the use of the RSA case monitoring tool and conduct a thorough analysis annually of each counselor's case documentation, timeliness of services and appropriateness of services.

Technical Assistance:

- RSA will hold quarterly teleconferences with VIDDRS and DHS to provide TA on its implementation of this system.
- As appropriate, RSA will identify high-performing VR agencies that will be enlisted to consult with VIDDRS on the development and implementation of the system.
- If appropriate, RSA will work with the RCEP to assist VIDDRS refine and improve its system.

VR and SE Program Recommendations

RSA recommends that VIDDRS establish goals and strategies to manage the case flow within the agency and to establish a standard for quality of outcomes in order to improve these basic components to the basic operation of the VR program:

- RSA should arrange for TA from VR agencies and/or other resources as appropriate to assist the VIDDRS management team to establish a system to track the monthly flow of cases and establish a system to monitor progress toward yearly goals.
- VIDDRS should evaluate the quality of outcomes on a quarterly basis to assure the agency is improving its performance in terms of increased salaries and benefits.

Chapter 3: Fiscal Review of the VR Program

RSA reviewed VIDDRS' 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 are taken from the fourth quarter of the respective fiscal year's SF-269 report. The maintenance of effort (MOE) requirement data is 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 is taken from the RSA-2.

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

Fiscal Year	Virgin Islands (C)				
	2002	2003	2004	2005	2006
Grant Amount	1,976,916	1,849,919	1,889,392	1,861,075	1,935,920
Required Match	535,048	500,677	511,360	503,696	523,953
Federal Expenditures	1,942,573	1,780,421	1,670,564	1,812,858	1,817,007
Actual Match	604,943	530,665	607,690	584,074	650,867
Over (Under) Match	69,895	29,988	96,330	80,378	126,914
Carryover	34,343	69,498	218,828	48,217	118,913
Program Income	0	0	0	0	0
Maintenance of Effort (MOE)	307,553	415,409	604,943	530,665	607,690
Administrative Costs	298,515	287,191	286,078	241,018	Not Available
Total Expenditures	2,646,208	2,359,526	2,366,714	2,661,501	Not Available
Percent Admin Costs to Total Expenditures	11.28%	12.17%	12.09%	9.06%	Not Available

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 for each grant year. 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:

- conducted 1½ days of intensive financial management training with financial staff (including staff of the 3rd party fiduciary agent). Topics covered include: the VR program formula, the allotment process and program cost of living increases, match/overmatch, maintenance of effort, carryover, grant period, liquidation of obligations, grant closeout, prior approval requirements, program income, allowable costs, guidance and reference materials, financial reports, reallotment and establishment authority;
- conducted ½ day of financial training for program managers and supervisors (including a representative from the Designated State Agency). Topics covered included: the VR Program formula and allotment trends for each VR and Independent Living program, match, maintenance of effort, carryover, reallotment, and financial reporting requirements;
- met with staff of the 3rd party fiduciary agency (Alvarez and Marsal) to discuss the implications of the high-risk designation and issues related specifically with VIDDRS' financial performance since the onset of this arrangement;
- worked with the 3rd party fiduciary agency to determine the allowability of questionable program costs that had not been approved by them for payment. (after review, authorized payment of these invoices);
- discussed strategies related to managing the maintenance of effort requirement (leveling MOE);
- reviewed with staff RSA's assessment of the agency's compliance with specific financial requirements – match, maintenance of effort (MOE), carryover, reallotment, program income, liquidation of outstanding obligations and grant closeout;

- reviewed administrative costs with national and comparable agency data provided to analyze these costs;
- 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;
- discussed the fact that Financial Status Reports (SF-269s) not entered into RSA's Management Information System (MIS) for the VR Programs FYs 2002 – 2007; and
- discussed with program managers all current and pending contractual arrangements.

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

1. VR Program Financial Accountability

Issue: VIDDRS' Financial Status Reports (SF-269s) and Annual Vocational Rehabilitation Program/Cost Reports (RSA-2s) have longstanding issues related to the accuracy and timely submission of both reports. Tables 3 and 4 below provide information on the due dates, submission dates and missing reports. As a result of VIDDRS' untimely submission of required reports, the current knowledge level of staff recently assigned the responsibility for report preparation, and RSA's inability to verify reported information while onsite, the accuracy of reported information is also questioned.

**Table 3
SF-269 Due Date and Submission Date Information**

VIDDRS – Financial Status Reports (SF-269)				
FY 2003				
Quarter	Quarter Ending Date	Report Due Date	Report Submission Date	Untimely (X)
1	12/31/02	01/30/03	02/16/03	X
2	03/31/03	04/30/03	05/13/03	X
3	06/30/03	07/30/03	08/20/03	X
4	09/30/03	12/29/03	11/18/03	
5	12/31/03	01/30/04	02/24/04	X
6	03/31/04	04/30/04	05/17/04	X
7	06/30/04	07/30/04	08/11/04	X
8	09/30/04	12/29/04	11/07/04	
Comments: Six of eight quarterly reports were not timely submitted, but within an acceptable tolerance level (less than 30 days). The final report for FY 2003 was timely submitted.				
FY 2004				
1	12/31/03	01/30/04	05/17/04	X
2	03/31/04	04/30/04	05/17/04	X

3	06/30/04	07/30/04	08/11/04	X
4	09/30/04	12/29/04	11/30/04	
5	12/31/04	01/30/05	02/16/05	X
6	03/31/05	04/30/05	06/14/05	X
7	06/30/05	07/30/05	08/17/05	X
8	09/30/05	12/29/05	11/30/05	
9	12/31/05	01/30/06	03/14/06	X
Comments: Seven of nine required reports were not timely submitted. Of the seven late reports, three exceeded 30 days. The final report was 42 days late.				
FY 2005				
1	12/31/04	01/30/05	02/16/05	X
2	03/31/05	04/30/05	06/14/05	X
3	06/30/05	07/30/05	08/16/05	X
4	09/30/05	12/29/05	11/30/05	
5	12/31/05	01/30/06	03/30/06	X
Comments: Four of the five required reports were not timely submitted, with the 5 th quarter report being 60 days late. <i>None</i> of the other quarterly reports (6 th , 7 th or 8 th), including the final report required to closeout this FY, have been submitted.				
FY 2006				
1	12/31/05	01/30/06	10/06/06	X
2	03/31/06	04/30/06	10/06/06	X
3	06/30/06	07/30/06	10/06/06	X
4	09/30/06	12/29/06	12/11/06	
Comments: Three of the four quarterly reports submitted for FY 2006 were not timely submitted. The 1 st quarter report was over eight months late. The 2 nd quarter report was over five months late. The 3 rd quarter report was over two months late. No other quarterly reports (5 th , 6 th , 7 th , or 8 th) have been submitted for FY 2006.				
FY 2007				
No quarterly Financial Status Reports have been submitted for FY 2007. As of August 10, 2007, VIDDRS was required to submit reports for the 1 st , 2 nd and 3 rd quarters for this FY.				

**Table 4
RSA-2 Report Due Date and Submission Date Information**

VIDDRS Annual Vocational Rehabilitation Program/Cost Report (RSA-2)			
FY	Due Date	Date Submitted	Untimely (X)
2002	01/31/03	01/08/04	X
2003	01/31/04	09/01/04	X
2004	01/31/05	05/02/05	X
2005	01/31/06	04/18/06	X
2006	12/31/06		X
<p>Comments: The RSA-2 reports for FYs 2002 – 2005 range from over 2 months to one year late. At the time of RSA’s onsite monitoring review in March 2007, a draft report for FY 2007 had been prepared and was available for review (almost three months after the due date). VIDDRS staff preparing the report had recently been given this assignment and could not fully explain or provide supporting documentation for expenditures on the draft report. As a result, RSA instructed VIDDRS not to submit the RSA-2 report for FY 2006 until training was provided to agency staff related to the preparation of this report.</p>			

Goal: Ensure the accuracy and timely submission of SF-269 and RSA-2 reports.

Strategies: VIDDRS will employ the following strategies to achieve the goal:

- assign responsibilities for the preparation, review and approval of all required SF-269s and the RSA-2 report;
- complete a listing of all outstanding reports;
- identify and remove impediments to the timely and accurate submission of required reports;
- submit missing reports, along with any supporting documentation requested by RSA necessary to review the accuracy of reported information; and
- establish internal policies and procedures to ensure the accurate and timely submission of required reports.

Technical Assistance: RSA will provide the technical assistance required throughout this process to ensure that the goal is met.

2. Contractual Arrangements

Issue: VIDDRS has exhibited limited program and financial accountability in existing and pending contractual arrangements. RSA determined that contracts do not have measurable deliverables, and, in one instance, the contractor was

authorized to begin work had almost completed the project, and still the contractual document had not been signed by the appropriate VI DHS officials. Loose procurement controls put contractors at risk of not being paid with federal grant funds. Further, there was no system in place to monitor and evaluate the work done under contractual arrangements.

Goal: Strengthen financial and program accountability under contractual arrangements.

Strategies: VIDDRS will employ the following strategies to achieve the goal:

- submit copies of policies and procedures to RSA for review and discussion;
- RSA will review with staff the current policies/procedures applicable to entering into contractual arrangements in the Virgin Islands;
- submit a copy of all FYs 2006 and 2007 contractual arrangements to RSA for evaluation (upon completion, RSA will discuss with VIDDRS the weaknesses of the existing contractual arrangements and any immediate steps that need to be taken to strengthen accountability under existing contracts);
- develop policies and procedures to ensure that future contracts have measurable deliverables and meet the requirements of OMB Circular A-87, “Cost Principles for State, Local and Indian Tribal Governments”; and
- develop policies and procedures (including assigning responsibilities) to ensure that contractor performance is monitored and evaluated throughout the contractual arrangement.

Technical Assistance: RSA will provide the technical assistance required throughout this process to ensure that the goal is met.

3. Financial Management

Issue: Most of the VIDDRS management team is relatively new in their positions and are unfamiliar with the financial management requirements of the VR Program. As part of their responsibilities, VR program managers must ensure that the financial requirements of this program are met, specifically as they relate to match, MOE, carryover, cooperative arrangements, use of the establishment authority, submission of accurate and timely required federal reports, and administering the program in an efficient and effective manner. VIDDRS’ limited knowledge of these requirements and the lack of controls in place to ensure compliance pose serious financial risks to the agency.

Goal: Improve the overall financial management of the VR program.

Strategies: VIDDRS will employ the following strategies to achieve the goal:

- continue training related to specific financial requirements of the VR program, i.e., match, maintenance of effort, carryover, and recording and liquidation of obligations;

- discuss strategies for compliance with fiscal requirements;
- determine additional training required for financial staff and appropriate providers;
- analyze the cost efficiency of program and administrative costs; and
- determine the type and frequency of financial/program information that need to be disseminated to program managers and provide training on how this information should be utilized to improve overall VR program efficiency and effectiveness.

Technical Assistance: RSA will provide the technical assistance required throughout this process (including aiding with the identification of external training resources) to ensure that the goal is met.

Chapter 4: IL Program

VIDDRS receives \$27,953 in part B funding that supports SILC activities, one part-time SILC support staff, and one part-time staff liaison from VIDDRS.

The table below identifies funding sources and amounts for the VI IL programs:

Table 5
Sources and Amounts of IL Funding (FY 2006)

	Amounts of Funding
Part B Funds	27,953
Older Blind	40,000
Other Federal Funds	0
State Funds	0
Local Government	27,500
Private/Other Funds	2,625
Total	98,078

At the time of the review, the SILC chairperson reported that he was the only SILC member who had been officially appointed in the last six years. An on-site meeting with potential SILC members indicated local interest in increasing the number of SILC members, as well as VIDDRS' interest in facilitating applications to the Governor's office.

VIDDRS staff reported interest in expanding the means of providing IL services by purchasing IL services from the local center for independent living (CIL). Evidence of this contracting or specific future plans to do so were not apparent. However, during the review VIDDRS had not yet entered into a contract with the CIL for these services, nor was there a plan in place to do so.

At the time of on-site visit in March, 2007, the SILC and VIDDRS had not begun to develop the SPIL. However, subsequent to the on-site visit, the VIDDRS director indicated that the SILC had joined with the VIDDRS/SRC to conduct a comprehensive needs assessment in preparation for developing the SPIL. Activities to complete the new SPIL had not, as of the on-site visit, begun. Subsequent conversations did, however, indicate a plan to join efforts with the VIDDRS/SRC to conduct a joint comprehensive needs assessment.

Results of the IL program review are discussed below.

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

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

- met with community members interested in SILC participation and educated them on the SILC roles and responsibilities; and
- provided two hour teleconference training on SILC roles and responsibilities, SPIL requirements, and roles of different members of the IL community.

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

- an inactive SILC;
- inconsistent utilization of IL vendors by VR; and
- late and inaccurate reporting.

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

1. Lack of consumer involvement in the state IL program

Issue: To retain eligibility to receive funds under Title VII of the Act, each state or territory must establish and maintain a Statewide Independent Living Council (SILC) as defined by section 705.

Section 705 (c) (1) requires that the SILC work in partnership with the DSU (VIDDRS) to jointly develop and sign the state plan.

During the review, RSA became aware that the VI SILC had not been officially appointed, had not held an official meeting for numerous years, and had made no progress in developing the SPIL.

As the time of issuance of this report, the VI SILC had been officially appointed by the Governor and is therefore no longer a compliance issue. However, issues related to SILC performance are still relevant.

Goal: To develop a fully and appropriately constituted SILC that effectively implements an approved SPIL.

Strategies: VIDDRS will employ the following strategies to achieve the goal:

- assign a staff person to work with the newly-formed SILC;
- ensure the SILC has appropriate supports to function; and
- appoint a project manager to work with RSA on this goal.

Method of Evaluation: RSA will determine that the matter has been successfully resolved upon completion of the following:

- RSA approval of the VI SPIL; and
- provide documentation through periodic reports that the SILC is carrying out the activities in the approved SPIL (or conducting IL activities consistent with its approved SPIL) six months after SPIL approval that IL activities mandated in the SPIL are in process.

Technical Assistance: RSA will provide the following technical assistance:

assist in training the newly-formed SILC in its role and functions;
hold teleconferences with the SILC, as needed; and
arrange for TA from VR agencies and/or other resources as appropriate.

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

RSA and VIDDRS agreed on the following IL compliance goals, strategies to achieve those goals, method of evaluation to determine that the compliance issue has been resolved and technical assistance that RSA would provide to assist VIDDRS achieve each goal.

1. Timely and accurate completion of annual report

Issue: Section 704(m) of the Act requires state IL programs to submit annual reports. However the VI reports for FY 2005 and 2006 were late and contained multiple inaccuracies. The primary deficiency is that a very high proportion of reported outcomes for the state IL program are in fact outcomes generated by the VI CIL.

Goal: VIDDRS and SILC will submit accurate and timely Part 1 704 reports.

Strategies: VIDDRS and the SILC will employ the following strategies to achieve the goal:

- work with RSA staff to assure full understanding of reporting requirements; and
- VIDDRS and SILC staff will develop and implement steps to assure timely and accurate completion of the Part 1, 704.

Method of Evaluation: RSA will determine the matter has been successfully resolved upon timely receipt of an accurate Part 1 704.

Technical Assistance: RSA will provide education on report requirements and timelines as well as address any questions that may arise during the process.

IL Recommendations

The director of VIDDRS and the director of the VI CIL indicated there was no plan on how to best address the VR and IL needs of those individuals served jointly by both agencies. Therefore, RSA recommends that VIDDRS and the SILC establish goals and strategies to address the following:

- develop and implement strategies to strengthen collaboration and communication among VIDDRS, state IL, and CIL programs; and
- develop a plan to address the VR and IL needs of individuals served by both VIDDRS and the VI CIL (the plan would address referrals, services of each agency, and funding arrangements).

Chapter 5: OIB Program

Program Organization

VIDDRS receives \$40,000 in Chapter 2 funding for the OIB program that supports one staff person. In FY 2007, the program served 117 individuals.

OIB staff identifies consumers through collaboration between VIDDRS, senior centers and the local Technology Act program. OIB staff then work with consumers to identify assistive technology (AT) needs. Staff works with consumers to identify solutions, occasionally collaborating with the local AT program. Appropriate technology is then purchased through the OIB program. OIB staff plans to expand these efforts to community centers and other more residential facilities.

Results of the IL program review are discussed below.

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

RSA provided TA to VIDDRS on 7-OB reporting requirements.

Promising OIB Practices Identified by VIDDRS and Stakeholders during the Review Process

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

1. Community collaboration to expand AT usage

The practice of collaborating with senior centers and the local AT project is an excellent method of leveraging resources in a low resource area. The resources of both provide access to consumers and expertise in specific areas (seniors and assistive technology) that will maximize positive outcomes. This collaboration expands resources that support VIDDRS' plan that enable consumers of the OIB program to be more independent.

OIB Issues identified by VIDDRS and Stakeholders during the Review Process

RSA's review process solicited input from VIDDRS and stakeholders about OIB performance and compliance issues, and an incomplete 7-OB report issue was identified.

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

RSA and VIDDRS agreed on the following OIB compliance goals, strategies to achieve those goals, method of evaluation to determine that the compliance issue has been resolved and technical assistance that RSA would provide to assist VIDDRS achieve each goal.

1. Completion of the 7-OB annual report

Issue: Section 752(i) (2) (A) of the Act requires submission of an annual report. Most sections of the Virgin Islands OIB report submission are left incomplete or reported under “data not reported.” This has been a consistent issue over multiple years.

Goal: To submit a completed 7-OB annual report.

Strategies: The strategies to accomplish this goal are listed below:

- OIB staff will review all current data tracking mechanisms and institute mechanisms to assure compliance with standards. These new mechanisms will be implemented, to the greatest possible degree, for submission of the FY 2007 7-OB report.
- OIB staff will institute new data measures and assure that 7-OB reports, beginning FY 2008, are fully compliant with applicable standards.

Method of Evaluation: VIDDRS will be successful if it submits a timely and complete 7-OB report to RSA in FY 2008 and subsequent years.

Technical Assistance: RSA will provide education on report requirements and timelines as well as address any questions that may arise during the process.

Chapter 6: Status of Issues Raised in Previous Reviews

As a result of the RSA review conducted with VIDDRS in FY 2003-2004, the agency developed a Corrective Action Plan (CAP). In addition to the Corrective Action Plan, VIDDRS was subject to a Program Improvement Plan (PIP) because VIDDRS did not comply with 34 CFR 361.82 (b) by failing to meet the performance indicators 1.1, 1.4, and 1.5 for FY 2004. A summary of the progress that VIDDRS made on the CAP and PIP is described below.

Corrective Action Plan

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

- presumption of eligibility;
- order of selection;
- eligibility determination;
- transitioning students - IPEs;
- interagency agreement governing transition services; and
- fee schedules.

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

1. Written policies for the provision of services to individuals with disabilities: VIDDRS must develop and submit to RSA for review a service policy manual that complies with the requirements of 34 CFR 361.50, describing the nature and scope of all VR services available to its eligible program participants.

Status: VIDDRS entered into a contractual arrangement to have its policy manual revised and the manual is expected to be completed by August, 2007.

2. Exception or Waiver: VIDDRS must ensure that it is in compliance with the requirements of 34 CFR 361.50 by developing formal procedures that are available in written form to individuals who wish to receive VR services that exceed any thresholds or limitations described in the written VR service policy manual.

Status: VIDDRS reported that a contractor will complete its new policy manual by August 2007 and the manual will contain a universal waiver policy that applies to the provision of services.

3. IPE Development: VIDDRS should take corrective action to ensure that VR counselors meet the established 30-day time standard for IPE development in at least 90 percent of all cases of individuals determined eligible for VR services.

Status: As stated above, VIDDRS will have a new policy manual and revise this time standard to 60 days for IPE development. This revised policy will be submitted to the SRC for review.

4. Interagency Agreements with Institutes of Higher Education.

Status: VIDDRS made several attempts to develop an interagency agreement between the University of the Virgin Islands and VIDDRS. VIDDRS completed a draft of this agreement that has yet to be signed by the university.

Program Improvement Plan

Through the implementation of its PIP, VIDDRS successfully met the performance standards for indicator 1.1– Change in the Number of Employment Outcomes; 1.5--Significant Disability; and 1.5--Earnings Ratio.

VIDDRS met all the performance standards in FY 2006 and the PIP is resolved.

Chapter 7: Summary Conclusion

VIDDRS' Challenges

The VIDDRS has challenges ahead in order to address the identified developmental issues to increase the quantity and quality of its employment outcomes; improve data usage and reporting; improve its fiscal accountability; establish a more focused direction with CRPs to increase productivity; identify an appropriate quality assurance and evaluation system to ensure VIDDRS developmental milestones; and consolidate the management team to unify efforts toward achieving the goals outlined below.

Table 6
summarizes the results of RSA's review

Agency: VIDDRS		
Program: VR		
Goal	Strategies	Technical Assistance
<p>1. VIDDRS will increase the number and quality of employment outcomes over the next two years: goal of 39 successful outcomes for FY 2008 and goal of 52 successful outcomes by FY 2009</p>	<ul style="list-style-type: none"> • conduct caseload analyses to determine the number of new applications VIDDRS should receive to maintain active, viable case movement; • conduct outreach efforts to increase client population and establish office targets for new applications; • manage caseload growth and anticipated expenditures through use of projection tools and the ongoing monitoring of performance and expenditures; • train field staff on how to build and manage full caseloads; • establish appropriate linkages with the employer community, as well as placement goals for each counselor; 	<ul style="list-style-type: none"> • provide quarterly TA through teleconferences on issues identified by VIDDRS as the strategies are implemented; • provide consultation on the development of a quality assurance and evaluation system and provide TA from other VR agencies, as appropriate; • arrange for TA from other VR agencies that have been successful with contract-based CRP systems; and • work with the RCEP to secure training for counselors on job development and

	<ul style="list-style-type: none"> • train staff on methods of job placements; • implement a quality assurance and evaluation program focused on the quantity and quality of outcomes; • develop a contract-based CRP system focused on increases in the quality and quantity of outcomes; and • appoint a project manager to work with RSA on this goal 	<p>placement, including the conduct of outreach with employers</p>
<p>2. To improve the participation of consumers in the VR program, VIDDRS will support the efforts of SRC members to carry out their mandated functions in an effective and independent manner</p>	<ul style="list-style-type: none"> • assign a staff person to work with the newly-formed SRC; • assist the SRC to hold quarterly meetings and ensure that it has necessary supports to function; and • sponsor annual joint consumer information workshops 	<ul style="list-style-type: none"> • train the newly formed SRC in its role and functions; • conduct teleconferences with the SRC to address topics of specific interest to the members; • provide quarterly teleconference hook-ups with the RSA national meeting of SRC participants; • provide web-based training for SRC members; • arrange for TA from the RCEP to train on strategies for the development of effective SRCs; and • provide TA from other resources as appropriate
<p>3. To improve the VIDDRS Management Team's use of the MIS (collection and use of</p>	<ul style="list-style-type: none"> • implement a monthly management meeting to review and discuss data verification of the 	<ul style="list-style-type: none"> • RSA will hold quarterly teleconferences with VIDDRS

<p>data)</p>	<p>agency's RSA 911 case record data for FY 2004, FY 2005, and FY 2006;</p> <ul style="list-style-type: none"> • implement a monthly management meeting to review and discuss data verification of the agency's RSA 911 case record data for FY 2004, FY 2005, and FY 2006; • train staff on data analysis; • analyze trends in data to establish appropriate targets for program improvement; • establish appropriate targets for caseloads through data analysis; • resubmit the last three years of RSA-113 data for review to RSA as this data was misreported; and • appoint a project manager to work with RSA on this goal 	<p>management team to review their collection and use of data; and</p> <ul style="list-style-type: none"> • RSA will secure TA from high-performing VR agencies or other sources to assist VIDDRS in its use of data
<p>4. VIDDRS will develop a CRP business model that meets the needs of VIDDRS and enhances CRP effectiveness</p>	<ul style="list-style-type: none"> • analyze CRP past performance and identify CRP data needed and make available to VIDDRS senior managers and to CRPs; • negotiate contract-based services with CRPs and issue yearly "report cards" to CRPs to establish appropriate targets for improvements in quality and quantity of outcomes; 	<ul style="list-style-type: none"> • RSA will provide quarterly reviews of the agency's progress in this area and provide TA to the VIDDRS management team; • RSA will provide TA to VIDDRS in the areas of identifying relevant CRP data and in defining the components to

	<ul style="list-style-type: none"> • identify content elements to be included in CRP report cards and the associated grading system (criteria for excellent A, good B, fair C, etc.); • conduct analysis regarding the length of time individuals receive services from CRPs prior to successful outcome; and • appoint a project manager to work with RSA on this goal 	<p>be included in the CRP report cards;</p> <ul style="list-style-type: none"> • RSA will provide TA to CRPs to assist the CRPs to improve the quantity and quality of outcomes; • as appropriate, RSA will identify VR agencies that use this business contract model to assist VIDDRS improve CRP performance; • RSA will solicit training from the RCEP on contract-based models if appropriate; and • RSA will arrange for TA from VR agencies and/or other resources as appropriate
<p>5. VIDDRS will develop a quality assurance and evaluation system to improve the overall operation of VIDDRS</p>	<ul style="list-style-type: none"> • develop a quality assurance and evaluation system that is focused on the unique needs of VIDDRS; • train field staff on the intent of this system; • identify appropriate targets for field offices; • DHS designate an evaluator to work with VIDDRS regarding the quality assurance and evaluation system; 	<ul style="list-style-type: none"> • RSA will hold quarterly teleconferences with VIDDRS and DHS to provide TA on its implementation of this system; • as appropriate, RSA will identify high-performing VR agencies that will be enlisted to consult with VIDDRS on the development and implementation of the system; and

	<ul style="list-style-type: none"> and • appoint a project manager to work with RSA on this goal 	<ul style="list-style-type: none"> • if appropriate, RSA will work with the RCEP to assist VIDDRS refine and improve its system
<p>Recommendations:</p> <p>6. RSA should arrange for TA from VR agencies and/or other resources as appropriate to assist the VIDDRS management team to establish a system to track the monthly flow of cases and establish a system to monitor progress toward yearly goals.</p> <p>7. VIDDRS should evaluate the quality of outcomes on a quarterly basis to assure the agency is improving its performance in terms of increased salaries and benefits.</p>		
<p>8. Ensure the accuracy and timely submission of SF-269 and RSA-2 reports</p>	<ul style="list-style-type: none"> • Assign responsibilities for the preparation, review and approval of all required SF-269's and the RSA-2 report; • complete a listing of all outstanding reports; • identify and remove impediments to the timely and accurate submission of required reports; • submit missing reports, along with any supporting documentation requested by RSA necessary to review the accuracy of reported information; and • establish internal policies and procedures to ensure the accurate and timely submission of required reports 	<ul style="list-style-type: none"> • RSA will provide TA required throughout this process to ensure the goal is met

<p>9. Strengthen financial and program accountability under contractual arrangements</p>	<ul style="list-style-type: none"> • submit copies of policies and procedures to RSA for review and discussion; • RSA will review with staff the current policies/procedures applicable to entering into contractual arrangements in the Virgin Islands; • submit a copy of all FYs 2006 and 2007 contractual arrangements to RSA for evaluation. (Upon completion, RSA will discuss with VIDDRS the weaknesses of the existing contractual arrangements and any immediate steps that need to be taken to strengthen accountability under existing contracts); • develop policies and procedures to ensure that future contracts have measurable deliverables and meet the requirements of OMB Circular A-87, “Cost Principles for State, Local and Indian Tribal Governments”; and • develop policies and procedures (including assigning responsibilities) to ensure that contractor performance is monitored and evaluated throughout the contractual arrangement 	<ul style="list-style-type: none"> • RSA will provide TA required throughout this process to ensure the goal is met
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<p>10. Improve the overall financial management of the VR program</p>	<ul style="list-style-type: none"> • continue training related to specific financial requirements of the VR program, i.e., match, maintenance of effort, carryover, and recording and liquidation of obligations; • discuss strategies for compliance with fiscal requirements; • determine additional training required for financial staff and appropriate providers; • analyze the cost efficiency of program and administrative costs; and • determine the type and frequency of financial/program information that need to be disseminated to program managers and provide training on how this information should be utilized to improve overall VR program efficiency and effectiveness 	<ul style="list-style-type: none"> • RSA will provide the technical assistance required throughout this process (including aiding with the identification of external training resources) to ensure that the goal is met
<p>Program: IL</p>		
<p>Goal</p>	<p>Strategies</p>	<p>Technical Assistance</p>
<p>11. To develop a fully and appropriately constituted SILC that effectively implements an approved SPIL</p>	<ul style="list-style-type: none"> • assign a staff person to work with the newly-formed SILC; • ensure the SILC has appropriate supports to function; and • appoint a project manager to work with RSA on this goal 	<ul style="list-style-type: none"> • assist in training the newly-formed SILC in its role and functions; • hold teleconferences with the SILC, as needed; and • arrange for TA from VR agencies and/or other resources as appropriate

<p>12. VIDDRS and SILC will submit accurate and timely Part 1 704 reports</p>	<ul style="list-style-type: none"> • work with RSA staff to assure full understanding of reporting requirements; and • VIDDRS and SILC staff will develop and implement steps to assure timely and accurate completion of the Part 1, 704 	<ul style="list-style-type: none"> • RSA will provide education on report requirements and timelines as well as address any questions that may arise during the process
<p>Recommendations:</p> <p>13. Develop and implement strategies to strengthen collaboration and communication among VIDDRS, state IL and CIL programs.</p> <p>14. Develop a plan to address the VR and IL needs of individuals served by both VIDDRS and the VI CIL (the plan would address referrals, services of each agency, and funding arrangements).</p>		
<p style="text-align: center;">Program: OIB</p>		
<p>Goal</p>	<p>Strategies</p>	<p>Technical Assistance</p>
<p>15. To submit a completed 7-OB annual report</p>	<ul style="list-style-type: none"> • OIB staff will review all current data tracking mechanisms and institute mechanisms to assure compliance with standards. These new mechanisms will be implemented, to the greatest possible degree, for submission of the FY 2007 7-OB report; and • OIB staff will institute new data measures and assure that 7-OB reports, beginning FY 2008, are fully compliant with applicable standards 	<ul style="list-style-type: none"> • RSA will provide education on report requirements and timelines as well as address any questions that may arise during the process

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>