



Vocational Rehabilitation Program's Performance Has Been Mixed Since the Abolishment of Occupational Access and Opportunity Commission

at a glance

The Vocational Rehabilitation Program's performance under the Department of Education has been mixed. While its performance initially improved after the Occupational Access and Opportunity Commission was abolished in 2002, performance declined during Fiscal Year 2003-04.

The program has taken several steps to improve its performance, including developing a five-year strategic plan, improving its contracting system, and developing innovative contracting methods to increase privatization and expand service capacity. However, the program's performance has been hampered by consistently high staff turnover.

The current initiative to move developmentally disabled individuals into employment will increase the demand for vocational rehabilitation services. While the initiative may produce Medicaid Waiver savings, it will require a high level of collaboration between the Agency for Persons with Disabilities and the Vocational Rehabilitation Program.

Scope

Chapter 2002-22, *Laws of Florida*, directed the Office of Program Policy Analysis and Government Accountability (OPPAGA) to review the status of the Vocational Rehabilitation Program since the abolishment of the Occupational Access

and Opportunity Commission. To conduct this review, we answered two questions.

- How has the program performed since the Occupational Access and Opportunity Commission was abolished in 2002?
- What actions has the program taken to improve its performance and what factors continue to hamper its operation?

Background

The Vocational Rehabilitation Program provides individually tailored rehabilitation and job training services to disabled people who are able and willing to work. The program's goal is to enable clients to become self-sufficient through long-term employment. Under federal regulations, the program must give priority to serving clients with the most significant disabilities.¹

¹ Section 413.20(17), *F.S.*, defines a person with a significant disability as an individual who has a severe physical or mental impairment that seriously limits one or more functional capacities in terms of an employment outcome; whose vocational rehabilitation may be expected to require multiple vocational rehabilitation services over an extended period of time; and who has one or more physical or mental disabilities or a combination of disabilities that is determined, after an assessment for determining eligibility and vocational rehabilitation needs, to cause comparable substantial functional limitation. The law allows the program to further define those clients with the most significant disabilities.

Vocational rehabilitation services traditionally have been delivered by a mix of state employees and private providers. Federal law requires that state employees must deliver certain client services, including determining client eligibility for program services, approving service plans, and closing cases. In addition, state employees traditionally have provided other basic program services, including client recruitment, intake, and case management. These services are provided through six area offices that supervise 24 service regions. Private providers generally supply the program's rehabilitation services, such as medical treatment, counseling, and job training.

Resources

The program is funded through a state and federal matching agreement. A federal government grant provides 78.7% of program funds while the state contributes a 21.3% match; under this formula the federal government contributes \$3.69 for each \$1 in state funding. For Fiscal Year 2004-05, the program was appropriated \$29,462,956 in general revenue to match \$117,332,830 in federal funds. See Appendix A for more information about program appropriations over the past five years.

The Legislature appropriated 931.5 full-time equivalent positions to administer the program and provide client services during Fiscal Year 2004-05.

Organizational structure

The Vocational Rehabilitation Program has undergone several organizational changes in recent years. The program has been under the authority of the Department of Education since April 2002 when the prior oversight entity, the Occupational Access and Opportunity Commission, was abolished. The commission had responsibility for the program between 1999 and 2002.²

The commission was created by Ch. 99-240, *Laws of Florida*, with the directive to increase service capacity using private rehabilitation providers. However, a 2002 OPPAGA report concluded that program outcomes had declined

and costs had increased under the commission.³ In addition, we found that contracts entered into by the commission for pilot privatization projects had major flaws.⁴ The 2002 Legislature subsequently enacted Ch. 2002-22, *Laws of Florida*, which eliminated the commission and transferred program oversight to the Department of Education.⁵ This law also required the program to identify weaknesses in service capacity and program performance and consult with stakeholders to develop a five-year plan to identify additional initiatives to provide vocational rehabilitation services.

Questions and Answers —

How has the Vocational Rehabilitation Program performed since the Occupational Access and Opportunity Commission was abolished?

Program performance has been mixed. The program's overall performance substantially improved during its first year under the Department of Education. However, performance on several key measures subsequently fell during Fiscal Year 2003-04.

Fiscal Year 2002-03. The Vocational Rehabilitation program's performance in serving clients improved during Fiscal Year 2002-03 after the Department of Education assumed control of the program. As shown in Exhibit 1, the number of significantly disabled clients who were gainfully employed for at least 90 days increased by almost 16%, while the number of all clients gainfully employed rose by over 18%. The number of clients placed in competitive employment also increased by 17% during the year. These changes reversed the negative performance trends that previously had existed under the commission.

³ *Special Examination: Responsibilities Not Fulfilled by Occupational Access and Opportunity Commission; Program Performance Declines*, [Report No. 02-06](#), January 2002.

⁴ On October 27, 2000, the federal government designated Florida as a high risk grantee in part because of concerns over the commission's privatization efforts. This status resulted in special conditions being imposed on Florida's federal grant award beginning with the 2001 grant award. Conditions of the corrective action plan were met and the program was removed from high risk status on October 2, 2003.

⁵ The program director position has been vacant since October 1, 2004.

² Prior to the creation of the commission, the program was delivered under the authority of the Department of Labor and Employment Security.

Exhibit 1**In General, Program Performance Initially Increased Under the Department of Education,
But Declined in the Last Fiscal Year**

	Occupational Access and Opportunity Commission	Department of Education		
	2001-02	2002-03	2003-04	First Six Months 2004-05
Client Outcomes				
Number of significantly and most significantly disabled clients gainfully employed at least 90 days	6,593	7,641	7,210	3,366
Change from prior year		+15.9%	-5.6%	-6.2%¹
Number of all other clients gainfully employed	1,986	2,346	2,203	1,028
Change from prior year		+18.1%	-6.1%	-8.1%¹
Number of clients placed in competitive employment	8,459	9,912	9,381	4,391
Change from prior year		+17.2%	-5.4%	-6.2%¹
Number of clients gainfully employed	8,579	9,987	9,413	4,394
Change from prior year		+16.4%	-5.7%	-6.6%¹
Rate gainfully employed	53.5%	53.1%	54.2%	56.6%
Change from prior year		-0.4%	+1.1%	+3.1%¹
New Clients Served				
Clients reviewed for eligibility	26,262	26,003	24,333	10,860
Change from prior year		-0.1%	-6.4%	-10.0%¹
Number of plans written	19,517	19,644	17,356	7,914
Change from prior year		+1.0%	-11.6%	-10.8%¹

¹ As compared to the first six-month period of Fiscal Year 2003-04.

Source: Division of Vocational Rehabilitation documents and OPPAGA analysis.

Fiscal Year 2003-04. However, some of these performance improvements were lost in Fiscal Year 2003-04. During the year, the number of significantly and most significantly disabled clients placed in competitive employment fell 5.6% from the previous year, although these placements remained more than 10% higher than the level achieved under the Occupational Access and Opportunity Commission. The numbers of other clients gainfully employed, and those placed in competitive employment also fell during 2003-04. The numbers of new clients entering the program and case plans written for clients also showed declines, which appear to be related to high numbers of counselor vacancies. Program staff reported that the increase in the percentage of client cases closed with a successful employment outcome is because, with fewer counselors on staff, a greater emphasis has been placed on achieving success for existing clients rather than increasing the number of new clients.

Fiscal Year 2004-05. Additional declines in performance occurred during the first six months of Fiscal Year 2004-05; however, the percentage of client cases closed from the program with a successful employment outcome again increased. These declines can be attributed to the four hurricanes that affect the state in the fall of 2004. The hurricanes destroyed six vocational rehabilitation offices, disrupted services, required relocations and long-term office closures, and disrupted the plans and progress of many disabled clients.⁶ Statewide, the number of eligibility determinations fell 10%, and the number of plans written fell 11% when compared to the same period in the previous fiscal year. The number of clients placed in competitive employment also fell by more than 6% during this period. At the same time, the percentage of clients placed in employment increased by

⁶ Offices permanently closed because of hurricane damage included two Pensacola offices, Vero, Port St. Lucie, Kissimmee, and Lakeland.

almost 6%. The significant reduction in new clients entering the program during Fiscal Year 2003-04 may have affected the number of clients placed in employment during this period. Further, continued reductions in the number of new clients entering the program may reduce the number of clients placed in employment in subsequent periods.

What has the Vocational Rehabilitation Program done to improve its performance?

The program has taken several steps to improve its services. Management sought stakeholder input and developed a five-year plan to improve performance and increase service capacity. The program also has established a comprehensive contracting system and standardized its contracting practices; expanded its service capacity through innovative privatization efforts; and broadened required contractor qualifications. However, the program can take several additional steps to address high staff turnover and the recent performance declines.

Strategic planning process completed

As required by law, the program developed a five-year strategic plan to address specific program priorities, including increasing service capacity and program performance. The plan, disseminated in April 2003, was based on a needs assessment that utilized existing data about program performance and broad stakeholder input to identify the most important issues.⁷ The plan identifies program strategies and activities for achieving four broad objectives: (1) improving services and employment opportunities; (2) improving efficiency of service delivery; (3) maximizing funding for service delivery; and (4) maintaining an internal system of quality assurance.

The program reports considerable progress in implementing its strategic plan. In November 2004, the program reported completing more than half of the plan's individual improvement strategies, including developing a comprehensive counselor training orientation package, creating a

database of employers that have hired persons with disabilities, and expanding outsourcing as a method to increase efficiency and improve services when it is cost beneficial.

The program is measuring the success of its strategic plan by monitoring its implementation and tracking critical performance. This will allow the program to determine the extent to which its plan is addressing identified weaknesses in service capacity and program performance. However, the effect of consistently high staff turnover on performance may hamper the program's ability to evaluate the plan's effectiveness.

Contracting practices have been strengthened

In the process of implementing our 2002 recommendation to improve contracts for privatization pilot projects, the program took additional steps to strengthen its overall contracting system. Specifically, the program developed and implemented internal contracting guidelines that focus on legal compliance, accountability, and client outcomes and provide extensive written procedures for the contracting process.⁸ The program also has clarified program policy, deliverables, and provider qualifications in its contracting requirements, and the contracts include standardized payment rates and require uniformity in provider reporting.

Information provided by the new contracting system will allow the program to evaluate the overall performance of individual providers and compare performance between providers. In the past, the system tracked individual client outcomes but did not measure the overall performance of individual providers. This provider-level data will be collected as providers are referred clients under contracts the program expects to execute in April 2005. The program intends to use the data in its planned Vendor Profile and Report Card System, which will enable clients to compare the performance of available vocational development and supported employment providers when selecting among vendors for services. In addition, the program

⁷ Stakeholder groups included clients, providers, employers, workforce boards, the Florida Rehabilitation Council, the Center for Independent Living, the Client Assistance Program, and vocational rehabilitation counselors and area directors.

⁸ For more information on these processes, see our September 2003 report *Agency Implements Recommendations to Improve Vocational Rehabilitation Services*, [Report No. 03-51](#).

will be able to use the data to identify and assist providers who are not meeting performance expectations and make future contracting decisions.

Service capacity is being increased through innovations in privatization

The program also has developed new privatization practices to address evolving program needs and to expand service capacity. Specifically, the program entered into an employee leasing agreement, and has broadened contractor qualifications. While these steps should improve program capacity, further steps can be taken to help ensure that program performance improves.

Employee leasing. The program addressed critical staffing needs by initiating a contract to lease employees from a private provider. This contract was an innovative solution to staffing needs that resulted when a vendor for one of several pilots that privatized the delivery of core services terminated its contract with the program, making it necessary to move clients from privately employed counselors back to state-employed staff.⁹ After the contract was terminated, the state was able to hire several counselors who had been employed by the private provider. However, most of these employees quickly resigned from state employment and were difficult to replace. Recognizing that a private provider could hire staff more quickly and offer higher salaries than the state, the program requested bids for employee leasing services. The contract was awarded to the remaining pilot provider and soon was expanded to another service region that faced a similar problem. Employee leasing agreements were entered into in April and July 2004 for a one-year term.¹⁰

Department managers report that the leasing agreements have worked well to meet immediate staffing needs. However, because it takes approximately 18 months for a client to be placed successfully in employment, this model

has not existed long enough to determine how well the leased employees are performing and whether the contract will be able to meet long-term needs. The program should monitor the cost-effectiveness of these agreements by comparing rehabilitation outcomes of clients served by the leased employees to those served by traditional employees. If employee leasing is determined to be cost-effective, the program should consider whether such contracts would be appropriate to meet staffing needs in other service regions.

Broadened vendor qualifications. The program also is increasing service capacity and client choice by broadening the qualifications needed by private providers to contract with the program. As a part of its current contracting for employment services, the program changed the qualifications for vendor certification to allow an increased variety of providers to be awarded contracts. Previously, contract awards were restricted to agencies holding Commission on Accreditation of Rehabilitation Facilities accreditations and individual providers with specific education and experience. Requirements now have been expanded to include agencies with other designations and accreditations or meeting specific education and experience requirements. The program's expanded qualifications have resulted in an increased number of potential employment services providers.

Counselor turnover hinders program operations

Despite these improvements, program operations have been hindered by continuing turnover of vocational rehabilitation counselors. Turnover in the entry-level counselor position was 35.3% in 2002-03 and 27.3% in 2003-04. In total, 94 of 147 entry level counselors left the program during this two-year period. In addition, while turnover for entry-level counseling staff actually decreased in 2003-04, delays in filling open positions resulted in having more positions open at any one time than in the previous year.¹¹ Studies have shown that positive client-counselor relationships contribute to good rehabilitation outcomes, and

⁹ These pilots were initiated in three service regions by the Occupational Access and Opportunity Commission and privatized the delivery of basic client services that had historically been provided by state employees.

¹⁰ The leasing agreement includes three one-year renewal options.

¹¹ High counselor turnover is a national problem that is expected to increase as counselors who joined the program during its rapid expansion in the 1960s and 1970s begin to retire.

counselor turnover can disrupt this relationship and negatively affect outcomes such as job placements and earnings. Moreover, high employee turnover requires the program to focus time and money on recruiting and training new employees and diminishes the morale of remaining staff.¹²

Two factors have been cited as contributing to counselor turnover. First, program management reports that many newly hired counselors leave for higher salaries elsewhere. The low salaries offered by the program also result in many qualified applicants refusing positions.¹³ Second, national studies have shown that counselors leaving the rehabilitation field frequently cite dissatisfaction with the work environment as the reason for their departure.

The program completed an employee satisfaction survey as part of the Department of Education Operation Excellence Initiative and is currently implementing program improvements such as updating equipment, developing recognition programs, and providing clearer performance expectations to address employee concerns. The program should monitor the effectiveness of these efforts in addressing employee satisfaction and retention problems, and identify and address other internal factors that may contribute to employee departures.

¹² The federal government requires a comprehensive system of personnel development which establishes high educational standards for the counselor position. New counselors must have a master's degree, national certification in rehabilitation, or a training plan that will allow them to meet these standards.

¹³ OPPAGA's *Program Evaluation and Justification Review, Rehabilitation Program Administered by the Department of Labor and Employment Security*, July 1998, [Report No. 98-04](#) noted that program managers were attributing turnover to higher salary rates offered by private providers. A need for increased salaries was recognized by the Department of Management Services in Fiscal Year 1998-99 when it recommended that Vocational Rehabilitation salaries be brought to parity to address turnover. Salary rates have not been increased and in fact, program policy established under the Occupational Access and Opportunity Commission continues to restrict hiring to the minimum of the pay range. In state Fiscal Year 2004-05, the entry pay in the Vocational Rehabilitation program is \$27,002 for counselors and \$29,785 for senior counselors.

Initiative to employ the developmentally disabled could affect program performance

Program outcomes also may be affected by a recent initiative to serve developmentally disabled clients through the Vocational Rehabilitation Program. In November 2003, the Department of Children and Families Developmental Disabilities Program (now the Agency for Persons with Disabilities) announced an initiative to move 25% of developmentally disabled individuals being served in its Adult Day Training program into integrated employment; currently, there are approximately 11,000 clients receiving adult day training services.¹⁴ While this initiative may produce Medicaid Waiver savings, it could significantly increase the demand for the program's supported employment services.

Supported employment services are provided through a system that involves both the Vocational Rehabilitation Program and the Agency for Persons with Disabilities. Vocational Rehabilitation provides the initial services, referred to as Phase I Supported Employment Services. These services include job placement, job stabilization, and job transition services. Clients such as the developmentally disabled typically need indefinite long-term ongoing supports for successful job retention. These supports are referred to as Phase II Supported Employment and are most often provided by the Agency for Persons with Disabilities.¹⁵ See Exhibit 2 for a breakdown of the supported employment services provided by the Vocational Rehabilitation Program and under Medicaid Waivers in the Agency for Persons with Disabilities.

¹⁴ Chapter 2004-267, Section 70, *Laws of Florida*, created the Agency for Persons with Disabilities, effective October 1, 2004, to provide services previously provided by the Developmental Disabilities Program in the Department of Children and Families.

¹⁵ These supports include monitoring job stability, retraining, consulting with employers and coworkers, counseling with consumers and families, and arranging transportation.

Exhibit 2**The Vocational Rehabilitation Program and Agency for Persons with Disabilities
Provide Supported Employment Services**

Program and Clients	Supported Employment Services Provided
Vocational Rehabilitation Clients with All Disabilities	Phase I: Job Placement Job Stabilization Job Transition Service ends 90 days after successful transition to employment. No limit on costs. Current contract rate is \$7,000 for a successful supported employment outcome. ¹
Developmental Disabilities Medicaid Waiver¹ Developmentally Disabled Clients Only	Phase II: Ongoing support services and other services needed to support and maintain a client in Supported Employment. Provided indefinitely. Not time-limited. Limited to approximately \$16,000 per year.
Family and Supported Living Medicaid Waiver² Developmentally Disabled Clients Only	Phase II: Ongoing support services and other services needed to support and maintain a client in Supported Employment. Provided indefinitely. Not time-limited. \$2,500 per year limit. Limit may be exceeded.

¹ The Vocational Rehabilitation Program also provides case management and may purchase other services identified as necessary to an employment outcome, such as rehabilitation technology or personal care assistance.

² Medicaid is the payer of last resort. However, Phase I services may be provided under the Medicaid Waiver if client is determined ineligible for Vocational Rehabilitation Services.

Source: OPPAGA analysis.

The developmental services initiative likely will increase the demand for vocational rehabilitation services and the average cost of those services, which may subsequently limit the number of clients the program is able to serve. Using incomplete information provided by the Agency for Persons with Disabilities, the Vocational Rehabilitation Program projected 1,000 referrals from the agency during federal Fiscal Year 2005-06, which would represent a 20% increase in projected supported employment clients. The average cost to rehabilitate supported employment clients in Fiscal Year 2003-04 was \$7,312 compared to \$5,386 for other types of clients. Many clients referred from the Agency for Persons with Disabilities will be more severely disabled than current supported employment clients are and may require additional services such as rehabilitation technology and personal assistance; during Fiscal Year 2003-04, the average per client cost for rehabilitation technology services was \$6,676 and was \$8,497 for personal assistance.

The initiative will require a high level of collaboration between the Agency for Persons with Disabilities and the Vocational Rehabilitation Program to adequately plan for the impact of the increased demand for supported employment services. Increasing employment services for the developmentally disabled is consistent with federal regulations that mandate prioritizing services to the most severely disabled. However, if all eligible consumers cannot be served, the program must declare an "order of selection" and serve consumers in the order of their disability, with the most significantly disabled being served first.

Planning for this initiative has been complicated because the agency has not been able to provide the Vocational Rehabilitation Program with reasonable estimates of the number of clients to be referred or their associated service needs. To date, the agency has provided the program with data on the number of clients who indicated an interest in employment; however, subsequent review indicates that fewer than half of these

clients were in the initiative's target population, and 16% were already receiving supported employment services. In addition, no projections of the service needs of these clients was provided. This limited information has not been adequate for the program to plan for the provision of services. To help ensure that the Vocational Rehabilitation Program does not have to go to an order of selection, the Agency for Persons with Disabilities should work with the program to develop realistic estimates of the number of clients that will be referred under the agency's employment initiative and the associated service needs and costs.

Furthermore, while Agency for Persons with Disabilities district offices have been charged with planning for and implementing the initiative, the offices have received limited agency oversight. Each district was responsible for developing a separate implementation plan. However, these plans vary in the degree of intended coordination with the Vocational Rehabilitation Program as well as knowledge of the program's role in providing supported employment services. We recognize the agency's position that each district faces different challenges and opportunities in implementation and should therefore plan independently. However, without agency guidance, implementation efforts may be inconsistent and ineffective. We recommend that the agency review district implementation plans to determine whether they are consistent with the intent of the developmental disabilities employment initiative and correctly reflect the involvement of the Vocational Rehabilitation Program. In addition, the agency should periodically evaluate district progress in implementing these plans.

Moreover, although the initiative is intended to help identify barriers to successful employment and may produce Medicaid Waiver cost savings because working developmental disability clients will need fewer services, no system has been established to capture this information or to track the success of clients involved in the initiative. The Agency for Persons with Disabilities should work with the Vocational Rehabilitation Program to design a system of data collection that identifies barriers to successful employment and measures initiative costs and savings.

Recommendations

To address the recent decline in program outcomes, the Vocational Rehabilitation Program should

- fully implement the strategies related to employee empowerment detailed in its strategic plan, including improving staff knowledge and skills and addressing workload equity issues;
- develop measurements related to employee turnover and establish goals to reduce turnover rates, such as increasing the rate of retention of current counseling and supervisory staffs; and
- establish goals to improve in areas of low employee satisfaction identified in the employee satisfaction survey, such as relationships with supervisory staff.

We also recommend that the program monitor the cost-effectiveness of employee leasing agreements by comparing rehabilitation outcomes of clients served by the leased employees to those served by traditional employees to determine if the model could be expanded to meet staffing needs in other service regions.

To implement the employment initiative for persons with developmental disabilities, the Agency for Persons with Disabilities should

- review district implementation plans to determine whether they are consistent with the intent of the developmental disabilities employment initiative and correctly reflect the involvement of the Vocational Rehabilitation Program; and
- periodically evaluate district progress in implementing these plans.

We also recommend that the Agency for Persons with Disabilities collaborate with the Vocational Rehabilitation Program to

- develop realistic estimates of the number of clients that will be referred under the agency's employment initiative and the associated service needs and costs; and
- design a system of data collection that identifies barriers to successful employment and measures initiative costs and savings.

Agency Response

In accordance with the provisions of s. 11.51(6), *Florida Statutes*, a draft of our report was submitted to the Commissioner of Education and to the Director of the Agency for Persons With Disabilities for each to review and respond.

The Commissioner and the Director each provided a written response. Both responses are reproduced in Appendix B.

OPPAGA supports the Florida Legislature by providing evaluative research and objective analyses to promote government accountability and the efficient and effective use of public resources. This project was conducted in accordance with applicable evaluation standards. Copies of this report in print or alternate accessible format may be obtained by telephone (850/488-0021 or 800/531-2477), by FAX (850/487-3804), in person, or by mail (OPPAGA Report Production, Claude Pepper Building, Room 312, 111 W. Madison St., Tallahassee, FL 32399-1475). Cover photo by Mark Foley.

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Gary R. VanLandingham, OPPAGA Interim Director

Appendix A

Differences Between Federal and State Fiscal Years Allowed Increasing Federal Funds to Be Matched

Historically, the Vocational Rehabilitation Program took advantage of the difference between the federal and state fiscal years to meet federal grant matching requirements and draw down all available federal funds.¹⁶ The federal grant year ends September 30, which marks the end of the first quarter of the state fiscal year. At this time, there are three state fiscal quarters remaining, and the program will have adequate general revenue appropriations to meet the match. However, because increases in general revenue continue to be less than the increase in required match, continuing the match would require that the program expend increasingly more general revenue in the first quarter. This continuing practice could affect client services in the remainder of the year, and the long-term cumulative effect would be to reduce the amount of matching monies available for the subsequent grant. In addition, if the program were unable to continue contributing the same amount of match, the federal government would reduce grant funding.

In 2002, to realign the federal grant period to corresponding state appropriations, program management began to limit this practice and to decline federal funds. Since that time, the program has sought alternative ways to match the federal grant. For example, in state Fiscal Year 2004-05, the program entered into third-party agreements with several school districts and the Department of Juvenile Justice to share equally in the costs of dedicated vocational rehabilitation counselor positions. Amounts contributed under these agreements can be reported as match for the federal grant.

Table A-1 below shows federal grant amounts available and the federal grant dollars the program declined over the past several years.

Table A-1

	Federal Grant Year October 1 through September 30				
	2000-01	2001-02	2002-03	2003-04	2004-05 ¹
Federal Grant Available	\$97,022,340	\$102,514,596	\$106,010,524	\$112,280,220	\$119,017,033
Required Match	26,258,905	27,745,374	28,691,540	30,388,420	32,211,726
Match Made	26,258,905	25,000,000	27,258,905	28,258,905	Not available
Match Deficiency	No deficiency	2,745,374	1,432,635	2,129,515	Not available
Total Federal Grant Dollars Declined		\$10.1 Million	\$5.3 Million	\$7.86 Million	Not Known

¹ 2004-05 federal grant is estimated

Source: Vocational Rehabilitation Program.

¹⁶ The state fiscal year goes from July 1 through June 30. The federal fiscal year goes from October 1 through September 30.

Appendix B

FLORIDA DEPARTMENT OF EDUCATION

STATE BOARD OF EDUCATION

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John L. Winn
Commissioner of Education



March 1, 2005

Mr. Gary R. VanLandingham
Interim Director
Office of Program Policy Analysis
And Government Accountability
111 West Madison Street, Suite 312
Tallahassee, Florida 32399-1475

Dear Mr. VanLandingham:

The Department of Education is pleased to have the opportunity to submit the attached responses regarding the preliminary and tentative findings and recommendations for the audit report *Vocational Rehabilitation Performance Mixed Since Abolishment of Occupational Access and Opportunity Commission*.

If you have any further questions, please contact Inspector General John Franco at 850-245-0403.

Sincerely,

/s/

John L. Winn
Commissioner

JLW/jm/br

Attachment

c: Daniel Woodring
Sheree Keeler
Ed Jordan

Florida Department of Education
Division of Vocational Rehabilitation
Responses to Preliminary and Tentative Findings for Audit Report Vocational
Rehabilitation Performance Mixed Since Abolishment of Occupational Access and
Opportunity Commission.
March 1, 2005

Recommendation

- *Fully implement the strategies related to employee empowerment detailed in its strategic plan, including improving staff knowledge and skills and addressing workload equity issues.*

Response:

The agency agrees that it is important to pursue full implementation of its strategies related to employee empowerment. The agency will continue working towards achieving strategies as resources permit and make changes to strategies as appropriate and necessary.

Recommendation

- *Develop measurements related to employee turnover and establish goals to reduce turnover rates, such as increasing the rate of retention of current counseling and supervisory staffs.*

Response

The agency agrees that retention of good employees is important to the success of both the program and clients served. Methods to implement this recommendation will be researched and evaluated.

Recommendation

- *Establish goals to improve in areas of low employee satisfaction identified in the employee satisfaction survey, such as relationships with supervisory staff.*

Response:

The agency agrees that employee satisfaction is important. The agency will follow-up on initiatives taken to improve in this area as well as steps needed for closing any remaining gaps.

Recommendation

- *Monitor the cost-effectiveness of employee leasing agreements by comparing rehabilitation outcomes of clients served by the leased employees to those served by traditional employees to determine if the model could be expanded to meet staffing needs in other service regions.*

Response

The agency agrees that it is important to compare client outcomes served by leased and state staff. Performance measures are established in the contract for leased staff based on the same methodology as for state staff; therefore, a comparison of staff performance and client outcomes can be made and evaluated.

Recommendation

- *To implement the employment initiative for persons with developmental disabilities, the Agency for Persons with Disabilities should:*
 - a. Review district implementation plans to determine whether they are consistent with the intent of the developmental disabilities employment initiative and correctly reflect the involvement of the Vocational Rehabilitation Program; and*
 - b. Periodically evaluate district progress in implementing these plans.*
- *The Agency for Persons with Disabilities (APD) collaborate with the Vocational Rehabilitation program to:*
 - a. Develop realistic estimates of the number of clients that will be referred under the agency's employment initiative and the associated service needs and costs; and*
 - b. Design a system of data collection that identifies barriers to successful employment and measures initiative costs and savings.*

Response

The agency concurs that it is important to have realistic estimates of the number of clients that may be referred from APD and a sound system for data collection. The agency will work cooperatively and collaboratively with the APD towards implementing these recommendations as appropriate.



March 9, 2005

Jeb Bush,
Governor

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Dear Mr. VanLandingham:

Thank you for giving the Agency for Persons with Disabilities (APD) the opportunity to review and respond to the draft report **"Vocational Rehabilitation Program (VR) Performance Mixed Under Department of Education."** The report has been reviewed by staff of the Agency and the following comments and corrections are offered.

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"In November, 2003 the Department of Children and Families Developmental Disabilities Program (now the Agency for Persons with Disabilities) announced an initiative to move 25% of developmental disabled individuals being served in its Adult Day Training Program into integrated employment; currently, there are approximately 11,000 clients receiving adult day training services."

Response: The 5-Year Employment Initiative was announced in November 2003. The official implementation date began on July 1, 2004 and all goals are based upon that date with the Five-Year's goals based upon a completion target date of June 30, 2009. The approximately 11,000 individuals receiving services in an adult day training program is the number of individuals over the age of 18 receiving services in an Adult Day Training (ADT). There are a total of 9,034 individuals receiving services in ADTs who are in the typical employment age range of 18-55. The 5-Year Initiative goal of 25% was established for each district based upon the number of individuals who receive ADT services in their district and this resulted in a 5-year statewide goal of 2,258 individuals obtaining employment.

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"The initiative will require a high level of collaboration between the Agency for Persons with Disabilities and the Vocational Rehabilitation Program to adequately plan for the impact of the increased demand for supported employment services."

Mr. VanLandingham

March 9, 2005

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Response: Collaboration between the Agency for Persons with Disabilities and the Vocational Rehabilitation Program must be an essential component of planning for the 5-year initiative. The Agency for Persons with Disabilities and the Vocational Rehabilitation Program have already begun several activities to improve collaboration and plan for the anticipated increase in demand for supported employment services. These collaborative efforts include but are not limited to weekly central office meetings; Regional/District meetings of APD and VR; joint training with VR counselors and APD support coordinators; development of a statewide APD and VR interagency cooperative agreement; and formation of a statewide employment workgroup with participation of various stakeholders including VR.

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"To date, the agency has provided the program with data on the number of clients who indicated an interest in employment; however, subsequent review indicates that fewer than half of these clients were in the initiative's target population, and 16% were already receiving supported employment services."

Response: The target population for the 5-Year Employment Initiative is anyone receiving any day service through APD who indicated on the individual Cost Guidelines that was completed in the Fall of 2003 that they would like a job and any other individual who subsequently indicates a desire to work. While 16% of the individuals may be receiving supported employment services, we do not count anyone as employed until he/she begin work. The fluidity of this data represents the changing nature and circumstances of individuals and confirms the interest or circumstances for that time period.

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"Furthermore, while Agency for Persons with Disabilities district offices have been charged with planning for and implementing the initiative, the offices have received limited agency oversight."

Response: APD is providing extensive oversight of the districts in the endeavor. The central office has charged the districts with the responsibility to implement this at the local levels. A model plan for implementing the 5-Year Employment Initiative was provided to the districts for their reference and assistance in developing their district's plan. When the district plans were submitted they were assigned to one of three APD central office staff who has considerable supported employment experience. These staff reviewed each assigned district plan and provided written comments to the district staff. For each district, an individual conference call was arranged to review their plans and central office comments. Plans were then resubmitted, reviewed and if necessary changes were again made. The primary emphasis was that these plans could and should be modified on a regular basis. To encourage changes and improvements, the plans were posted on the APD web site so that staff could determine innovative ideas from other districts and the status of these plans.

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One of the first steps for many of the plans was to meet with their area's VR staff to learn more about how each agency works and how services could be coordinated. These steps were begun and are continuing now as the collaborative efforts between VR and APD develop.

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"In addition, the agency should periodically evaluate district progress in implementing these plan."

Response: Plans are required to be updated quarterly and central office staff will review these. APD central office will review the progress toward achieving plan goals, through monthly reports and weekly conference calls with district staff.

The Agency for Persons with Disabilities has a tracking system for the quality of employment outcomes i.e. amount of pay, possibility for career advancement, fringe benefits, and integration with non-disabled workers. Districts are also gathering local information on barriers to employment and barriers to improving quality indicators of employment. These are reflected in the 5-Year Initiative Plans. The APD and the Vocational Rehabilitation Program will work together to improve the quality of service data and determine potential cost savings and overall benefits that result from this initiative.

Sincerely,

/s/

Shelly Brantley

Director