

DOCUMENT RESUME

ED 230 758

CE 036 211

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 TITLE Vocational Rehabilitation Program Standards Evaluation System. Final Report. Volume III: Guidance Materials. Revised.
 INSTITUTION Berkeley Planning Associates, Calif.
 SPONS AGENCY Rehabilitation Services Administration (ED), Washington, DC.
 PUB DATE 21 Jun 82
 CONTRACT HEW-105-76-4116; HEW-105-79-4000
 NOTE 244p.; For related documents, see CE 036 208-212.
 PUB TYPE Guides - Non-Classroom Use (055)

EDRS PRICE MF01/PC10 Plus Postage.
 DESCRIPTORS Adults; Evaluation Methods; Guidelines; Program Effectiveness; *Program Evaluation; Program Implementation; *Program Improvement; *Standards; *Vocational Rehabilitation
 IDENTIFIERS *Rehabilitation Act 1973

ABSTRACT

The Program Standards Evaluation System was developed in response to evaluation requirements in the 1973 Rehabilitation Act. The system includes procedures for using standards data to monitor and evaluate vocational rehabilitation (VR) service outcomes and outputs as well as standards on key procedural issues. These, guidance materials, volume 3 of the final report on the Program Standards System, contain an overview of the Program Standards System and descriptions of the standards, data elements, and data collection forms. Instructions for collecting the data are included, as is a description of the standards reports that will be generated by the Rehabilitation Services Administration's Management Information System. An appendix to this volume contains the program data requirements for the current version of the benefit-cost model for rehabilitation services. (KC)

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ED230758

VOCATIONAL REHABILITATION PROGRAM
STANDARDS EVALUATION SYSTEM

FINAL REPORT

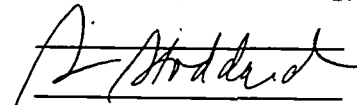
VOLUME III: GUIDANCE MATERIALS

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This project has been funded at least in part with federal funds from the U.S. Department of Education under Contract Number HEW-105-79-4000. The program standards which were tested and refined in this contract were developed in a previous BPA contract, HEW-105-76-4116. The contents of this publication do not necessarily reflect the views or policies of the U.S. Department of Education, nor does mention of trade names, commercial products, or organizations imply endorsement by the U.S. Government.

Revised June 21, 1982.

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PREFACE

The VR Program Standards Evaluation System was developed in response to evaluation requirements in the 1973 Rehabilitation Act. It has been designed with a focus on VR service outcomes, and on key procedural issues. The system includes procedures for using standards data to monitor and evaluate program performance, and to assist program managers in directing their programs toward improved performance. During the last two years, the system of standards has been pretested in six Model Evaluation Unit states. As a result of the pretest, final revisions have been made to the Program Standards System. The refined system contains eight Performance Standards and associated data elements, and five Procedural Standards. Our recommendations for data collection procedures reduce the requirements for client surveys, and integrate new data collection needs into the routine data requirements to reduce reporting burden.

These Guidance Materials are Volume III of our final report on the Program Standards System. They contain an overview of the Program Standards System, and descriptions of the standards, data elements, and data collection forms. Instructions for collecting the data are included, as is a description of the Standards Reports which will be generated by the RSA Management Information System (MIS). Volume I of our final report presents the results of the Program Standards Pretest, from which final recommendations for the Standards System were developed. Volume II covers the Analytic Paradigm, which describes the management uses of the system. Volume IV is Training Materials for users of the system.

Berkeley Planning Associates would like to thank the Model Evaluation Units for their participation in the pretest. We would also like to thank the San Diego State University RCEP IX for serving in its role in training and data analysis for the Procedural Standards pretest. Finally, we would like to thank the University of Michigan RRI, Abt Associates, and all RSA reviewers for their input into our project efforts.

I. INTRODUCTION

The 1973 Rehabilitation Act contained, among its many other provisions, a requirement that evaluation standards be devised and implemented to measure the performance of the VR program in achieving its mandate. Since 1974, state VR agencies have provided RSA with data on their clients, on the services provided to clients, and on various aspects of agency organization and operation. RSA, in turn, has used this data to generate "Standards Reports," which detail each state agency's level of performance on the various measures included in the standards, and which provide comparative information on state agencies' performance in relation to national norms.

Beginning in 1976, RSA undertook a new developmental effort to revise the VR Program Standards. The steps in that process included:

- a two-year contract, awarded to Berkeley Planning Associates (BPA), to develop a revised set of Program Standards and data collection instruments; and
- a three-year pretest of the revised Program Standards, conducted in six state agency Model Evaluation Units (MEUs),¹ and designed to test the validity, feasibility, and informational utility of the revised standards.

The pretest culminated in a final set of recommendations for the revised Program Standards. This report is intended to provide guidance to state agency and RSA federal and regional personnel in understanding and implementing the Program Standards system. To provide the necessary guidance, this report discusses a wide variety of topics. First, we present a brief, overall description of the purposes and structure of the Program Standards system. Following this, we present detailed discussions of the various components of the system. Chapter II deals with the

¹The six MEUs were: the Michigan General Agency; the Pennsylvania, Oregon, Delaware, and Virginia Combined Agencies; and the Mississippi Blind Agency.

"Performance Standards." These consist of eight goal-statements (i.e., "standards"), and the data elements used to measure achievement of those goals. The Performance Standards provide information to answer questions concerning a state agency's achievements, in terms of:

- Coverage: For example, is the agency adequately addressing the scope and type of needs of its eligible target populations?
- Efficiency: Is the agency sufficiently productive, given the resources available to it?
- Impact: Does the agency help to improve the quality of life of the individual clients it serves? Does the agency return more benefits to society (in terms of wages, taxes, and other benefits) than the societal costs it incurs (e.g., tax revenues expended)?

Chapter II discusses each of the eight Performance Standards and data elements with respect to the rationale for including the standard or data element in the Performance Standards; and with respect to the form, data sources, and method of computing each of the data elements. As well, Chapter II discusses the data collection requirements for implementing the Performance Standards. Here, we present examples of the data collection forms, and instructions for their implementation.

In Chapter III we turn to the "Procedural Standards." These are a set of five goal-statements pertaining to issues of compliance, data validity, and case handling. The Procedural Standards are addressed via a case review procedure. As with the Performance Standards, in Chapter III we discuss the rationale for each of the Procedural Standards, and present the data collection forms and instructions for their implementation.

Finally, in Chapter IV we discuss the reporting system which will be implemented as part of the overall Program Standards system. This chapter illustrates the specific data items which will be produced by the reporting system, and illustrates how the data items will be juxtaposed by the reporting system to facilitate analysis and interpretation of the standards data.

When fully implemented, the revised Program Standards system will deviate in several important ways from the current standards system. Our

first order of business, then, is to provide the reader with a broad understanding of the revised VR Program Standards system. Below, we provide a brief discussion of the purposes and structure of the overall system.

PURPOSES OF THE PROGRAM STANDARDS SYSTEM

The purposes of the program standards system, simply put, are:

- to make available information on the achievement of the state VR agencies with respect to the goals and functions of the VR system, as measured by the standards data elements; and, more importantly,
- to identify possible problems and corrective actions, whenever state VR agencies are unable to reach their objectives for achievement; and thus
- to guide the behavior of state VR agencies towards greater achievement.

Providing Information

The revised standards system thus shares with the current standards system the purpose of providing information to RSA, to the state VR agencies, and to other interested parties such as OMB and Congress on the achievement of state VR agencies. Information will be provided on the VR program as a whole, and on each state VR agency. Information will be provided on current achievement, as well on past achievement. Moreover, other information relevant to the VR program will be provided as part of the revised standards system.

Identification of Problems and of Corrective Actions

One of the unique features of the revised standards system is that it does not stop when a state VR agency does not meet its objective on a particular standard data element. Instead, a newly-developed data-based decision support system identifies possible problems and corrective actions. This system is designed to enable program managers to quickly identify whether

possible problems can be identified or whether further investigative research is required.

Guiding the Behavior of the State VR Agencies

Another unique feature of the revised standards system is that it is oriented to guiding and changing the behavior of the state VR agencies in new directions, not just reporting on past behavior. It is prospective, not retrospective. Whereas the current standards system calculates performance norms based on central tendency measures for the nation as a whole, the revised standards system is designed to allow setting of future performance goals, based on the individual state. In the revised system, each state (1) sets its own objectives under the standards for evaluative comparison; and (2) has the option of deciding which other state programs, if any, should provide appropriate comparisons for assessing the state's performance. State agencies can consider such things as past state program performance, state need and available resources, and state-set policies when setting their performance goals.

In short, the revised standards system replaces a federally-directive set of "after the fact" norms with future-oriented goals set by the individual state program. By setting goals in advance, the VR system can be guided in the directions that the states and RS want the system to go. The overall direction of the VR program thus can be changed, as can the achievement of particular state VR agencies.

However, it should be noted that no sanctions are built into the Program Standards system. That is, no punitive actions are tied to the failure of a state VR agency to meet its objectives. Funding decisions are also not based on achievement of the objectives. Instead, the revised standards system is concerned with flagging problematic attainment, investigating possible problems, and identifying and taking corrective actions.

In sum, the focus of the new standards system is state agency management improvement and evaluation capacity. The federal role is proposed

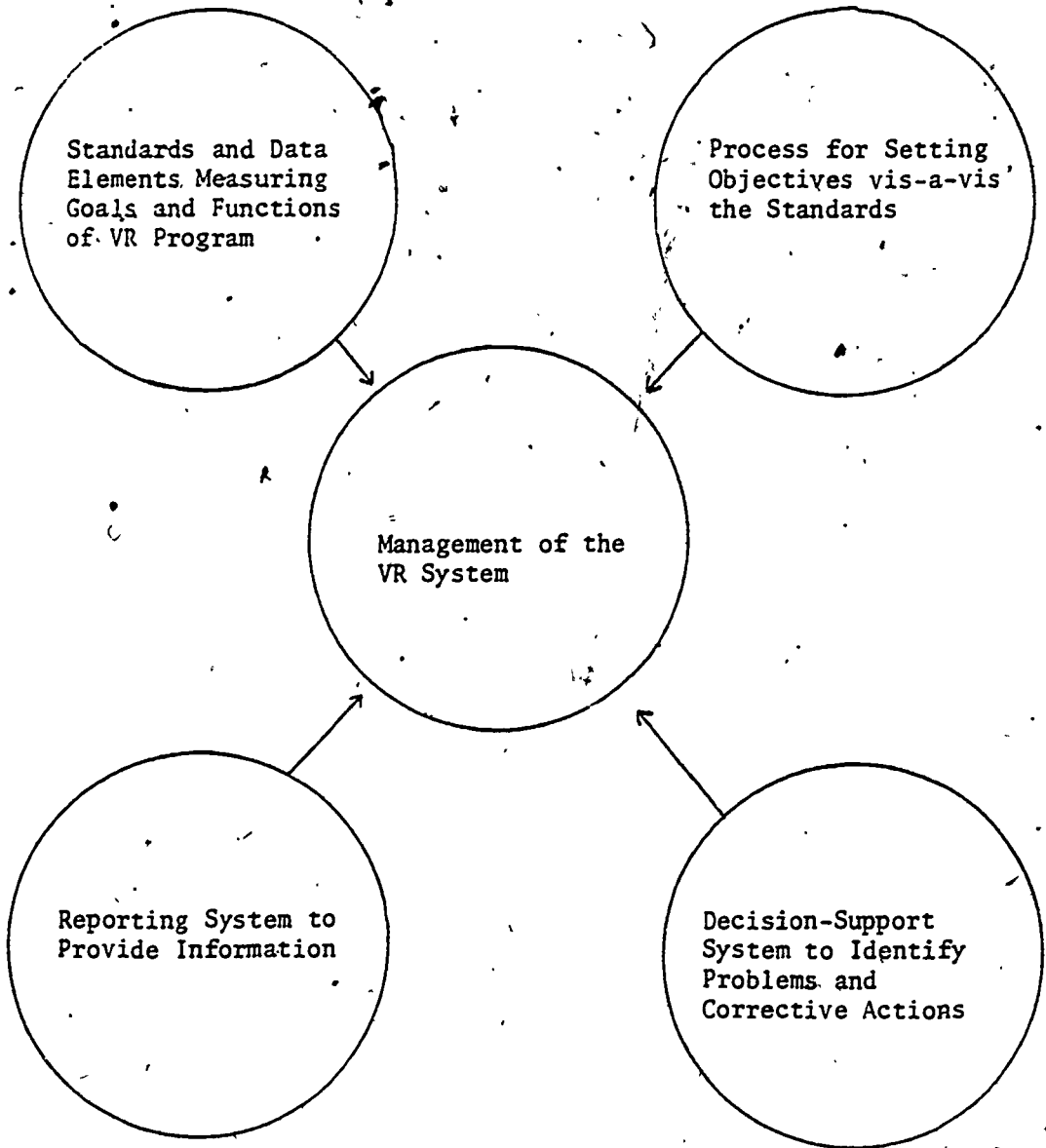
as one of necessary data provision, the generation and making available of comparison data as appropriate, and the provision of technical assistance to the state agency for interpreting standards data and identifying how to improve program performance. The leadership role in improving state performance is assigned to the individual state agency under the revised standards system.

STRUCTURE OF THE PROGRAM STANDARDS SYSTEM

The Program Standards system has several components, as shown in Figure 1:

- Standards and Data Elements. A set of eight Performance Standards and five Procedural Standards, with associated data elements, measures the goals and functions of the VR program with respect to coverage, cost-effectiveness, impact of client services, compliance, data quality, and the process of service delivery.
- Process for Setting Performance Objectives. A process for setting objectives for each state VR agency on each of the standards data elements provides clear expectations for achievement, expectations that are set in conjunction with each agency.
- Reporting System. A reporting system presents the levels of achievement of state VR agencies on the measures of the goals and functions of the VR system which are captured in the standards data elements. The system also identifies those state VR agencies with difficulties in achieving their performance expectations. Background information on past achievement, the achievement of other state VR agencies, the components of the data elements, and on informational data elements are also presented.
- Data-Based Decision-Support System. Possible reasons for problematic attainment of a particular state VR agency on a particular data element are identified, either through investigation by program managers or through further

Figure 1
The Program Standards System



evaluation research. In addition, corrective actions are identified for each possible problem.

As can be seen from Figure 1, all four of these components are oriented to the management of the VR program.

The Revised Standards and Data Elements

The new standards, and the decision-support system underlying them, emphasize objective-setting by state agencies and analysis of data which is sensitive to the state's particular circumstances. The standards are, however, firmly grounded in RSA's statement of national goals, specifically those of coverage, cost-effectiveness and efficiency, the quality and impact of services, and compliance with federal regulations. The state agency sets the level of performance to be achieved in terms of these broad goals. The new recommended standards and data elements for measuring and monitoring their achievement are shown in Table 1. Reviewed individually, the standards are as follows:

- The first standard addresses coverage, or the extent to which the vocational rehabilitation program is serving the eligible target population. The need to ensure accessibility of services to all the eligible disabled is of paramount important to RSA and the states. The first data element -- clients served per 100,000 population -- provides a proxy measure of coverage of eligible population. The second measure -- percent of clients served who are severely disabled -- measures achievement of the priority legislated for the severely disabled by Congress.

- The second standard addresses directly the cost-effectiveness of the state program's overall use of resources, and the benefit-cost returns from investment in vocational rehabilitation services. The first two data elements measure the cost of achieving desirable outcomes -- first, expenditures per competitively employed closures, and second the expenditure per 26 closure. The focus on competitively employed closures recognizes the policy decision in RSA that such a closure is the highest priority in the program for clients. The second two data elements focus on the two accepted measures of benefit-cost returns -- the benefit-cost ratio and discounted present value. The standards use the benefit-cost model developed at



Table 1

VR Program Standards and Data Elements: Final Recommendations, 1981

PERFORMANCE STANDARDS AND DATA ELEMENTS

1. Coverage

VR shall serve the maximum proportion of the potentially eligible target population, subject to the level of federal program funding and priorities among clients.

- (i) Clients served per 100,000 population
- (ii) Percent severely disabled served

2. Cost-Effectiveness and Benefit-Cost Return

The VR program shall use resources in a cost-effective manner and show a positive return to society of investment in vocational rehabilitation of disabled clients.

- (i) Expenditures per competitively employed closure
- (ii) Expenditure per 26 closure
- (iii) Ratio of total VR benefits to total VR costs (Benefit-cost ratio)
- (iv) Total net benefit from VR services (Discounted net present value)

3. Rehabilitation Rate

VR shall maximize the number and proportion of clients accepted for services who are successfully rehabilitated, subject to the meeting of other standards.

- (i) Percent 26 closures
- (ii) Annual change in number of 26 closures

4. Economic Independence

Rehabilitated clients shall evidence economic independence.

- (i) Percent 26 closures with weekly earnings at/above federal minimum wage
- (ii) Comparison of earnings of competitively employed 26 closures to earnings of employees in state

5. Gainful Activity

There shall be maximum placement of rehabilitated clients into competitive employment. Noncompetitive closures shall represent an improvement in gainful activity for the client.

- (i) Percent 26 closures competitively employed
- (ii) Percent competitively employed 26 closures with hourly earnings at/above federal minimum wage
- (iii) Percent noncompetitively employed 26 closures showing improvement in function and life status (implement after FAI/LSI pretest)

6. Client Change

Rehabilitated clients shall evidence vocational gains.

- (i) Comparison of earnings before and after VR services
- (ii) (In addition, changes in other statuses, and functioning ability, when such measures become available)

7. Retention

Rehabilitated clients shall retain the benefits of VR services.

- (i) Percent 26 closures retaining earnings at follow-up
- (ii) Comparison of 26 closures with public assistance as primary source of support at closure and at follow-up
- (iii) Percent noncompetitively employed 26 closures retaining closure skills at follow-up (implement after FAI/LSI pretest)

8. Satisfaction

Clients shall be satisfied with the VR program, and rehabilitated clients shall appraise VR services as useful in achieving and maintaining their vocational objectives.

- (i) Percent closed clients satisfied with overall VR experience
- (ii) Percent closed clients satisfied with: counselor, physical restoration, job training services, placement services
- (iii) Percent 26 closures judging services received as useful in obtaining their job/homemaker situation or in current performance

Table 1 (cont.)

<u>PROCEDURAL STANDARDS</u>	
9.	<p><u>R-300 Validity</u></p> <p>Information collected on clients by the R-300 and all data reporting systems used by RSA shall be valid, reliable, accurate, and complete.</p>
10.	<p><u>Eligibility</u></p> <p>Eligibility decisions shall be based on accurate and sufficient diagnostic information. and VR shall continually review and evaluate eligibility decisions to ensure that decisions are being made in accordance with laws and regulations.</p>
11.	<p><u>Timeliness</u></p> <p>VR shall ensure that eligibility decisions and client movement through the VR process occur in a timely manner appropriate to the needs and capabilities of the clients.</p>
12.	<p><u>IWRP</u></p> <p>VR shall provide an Individualized Written Rehabilitation Program for each applicable client and VR and the client shall be accountable to each other for complying with this agreement.</p>
13.	<p><u>Goal Planning</u></p> <p>Counselors shall make an effort to set realistic goals for clients. Comprehensive consideration must be given to all factors in developing appropriate vocational goals such that there is a maximum of correspondence between goals and outcomes: competitive goals should have competitive outcomes and noncompetitive goals should have noncompetitive outcomes.</p>

Berkeley and used over the years by RSA and many state agencies for reports to Congress and state legislatures.¹

- The third standard monitors the quality of service in terms of rehabilitation rate, using the traditional data elements of percent of closures which are successful (the 26 closure) and annual change in the number of 26 closures. These data elements have a long history of use and acceptance in state programs as measures of how many clients VR is successfully serving.

- The fourth standard focuses on whether rehabilitated clients evidence economic independence, recognizing that VR's most basic purpose is to assist disabled persons in finding gainful employment that will permit their economic self-sufficiency. Two data elements compare the wages achieved by rehabilitants to national standards* (the minimum wage) and to state norms (earnings of employees in the state). These again are measures of the quality of service outcomes.

- The fifth standard focuses on gainful activity for both competitive and non-competitive employment closures, in order to assess the quality of closures obtained by VR agencies. The first two data elements measure the percent of 26 closures who achieve competitive employment, and among these the percent employed at or above the national standards of the minimum wage. The last data element recognizes that competitive employment may not be the appropriate placement for all clients, but that it still is important that rehabilitation services achieve improvements in gainful activity for those clients for whom employment is not the goal. For non-competitive closures, then, a data element measures the percent showing improvements in function and life status. The instrumentation for determining such improvements is being developed by others for inclusion in the MIS, and will be pretested in subsequent years by RSA.

¹The model is to be expanded by incorporation of subsystems being developed by the Texas Institute for Rehabilitation Research (TIIR) for taking into account the non-monetary benefits of increased functional capacity and other aspects of independent living.

- The sixth standard is directed at measuring client change before and after services. The first data element focuses on vocational improvement, as measured by changes in client earnings after receipt of VR services. The second data element focuses on non-vocational gains, and will be implemented after completion of the above-noted MIS developments.

- The seventh standard again monitors quality of service outcome and overall program effectiveness, and focuses on the retention of client benefits from VR services over time. The data elements draw on follow-up data after case closure to monitor retention of earnings by individual 26 closures, the percent of 26 closures who remain non-dependent on public assistance as their primary source of support, and the percent of non-competitively employed 26 closures who retain their enhanced independent living and functional skills. (The last data element again requires further MIS developments.)

- The eighth and last performance standard monitors the consumer's appraisal of services; that is, client satisfaction with VR services. Two data elements include measures of client satisfaction with overall services and various aspects of services (e.g., counselor promptness, the quality of placement services). The third data element moves beyond satisfaction to monitor the client's judgement that services received were useful in obtaining and functioning in their job or homemaking situation.

Thus far, we have only discussed the Performance Standards. In addition, the revised Program Standards include five Procedural Standards that focus attention of critical process areas and on data validity. The data elements for these standards consist of a number of individual items gathered through case review, using modifications of the Case Review Schedule developed by the San Diego State RCEP IX. The Procedural Standards focus on the validity and completeness of R-300 data, the need for eligibility decisions to be based on adequate diagnostic data, and to conform to federal laws and regulation, the desirability for eligibility decisions and movement through the VR process to be completed in a timely manner appropriate to the needs of clients, the need for compliance with the requirement for the Individualized Written Rehabilitation Program, and the need for realistic goal-setting for clients and adherence to the policy of seeking competitive employment outcomes when feasible.

Abandoned in the Program Standards revision are those elements in the existing standards which focused on post-employment services, manageable caseloads, the reasons for unsuccessful rehabilitation, and the length in time of the service process. The proposed new performance standards monitor outcomes, cost-effectiveness, and key procedural issues.

The Process for Setting Performance Objectives

A major shift in the proposed standards system is for state agencies to set their own objectives, in terms of levels of expected performance by which the state program is to be monitored and "held accountable." The existing standards draw on central tendency statistics to judge whether a state program performed adequately in the past year. The central tendency statistical approach, while descriptive, does not examine the level of typical performance with what is reasonable, or desirable, but instead automatically generates "failures" and "successes" among state programs. The more that state agencies are fairly similar in performance in terms of some data element, the more arbitrary the central tendency approach becomes. Finally, because the central tendency approach requires the data for all state programs to be available so that the distribution could be calculated, performance "norms" for state programs are dependent on the timeliness of state submissions of data.

The new system for setting performance objectives places responsibility within each state to set its own objectives for the level of performance to be achieved in an upcoming fiscal year, rather than continuing with the post-hoc system based on national norms. When setting performance objectives, state agencies might be anticipated to look at their past performance, at the levels of performance being achieved by other state programs that agency staff view as comparable, at the performance nationwide, and at pending changes in state economic conditions, policies on client and service mix, and other unique state factors which might affect performance. RSA will provide technical assistance to the state agency in identifying appropriate levels, and participate in the state's setting of its goals, but the lead and principal responsibility in setting objectives for performance for the coming fiscal year would be with the

state agency. The new system recognizes that state agencies best understand the needs of their programs, that there are appropriate differences among state agencies in policy priorities, and that it is the state agency which must accept that there are performance problems or shortfalls if needed improvements are to be identified and implemented.

A particular advantage of this reliance on state agencies to set performance level objectives is that it permits the standards system to be used for monitoring and assessing the ongoing program. State agencies can use their in-house data systems to monitor individual data items on a monthly or quarterly basis, and to see if the program is on target in terms of moving toward annual goals or sustaining acceptable rates of quality closures. Thus, the standards evaluation system can provide much more immediate feedback to program management to lead to improvements in performance.

The Reporting System

The role of the reporting system in the standards system is to provide the vehicle for bringing together the various sources of data so that a particular agency's attainment for a specific time period can be compared to its objectives for the period. In addition, the reporting system will provide program managers with the capability to flag and investigate problematic attainment, as we shall describe subsequently. To do these two things, a reporting system has been designed to:

- keep track of past performance as well as current expectations;
- present the findings in an easy to use, easy to understand way, without unwieldy reports, emphasizing graphical presentations as well as plain numbers; and
- make sure that the reporting of results occurs in a timely fashion, so that future performance can be affected.

The new data collection requirements for the standards system are described later in these Guidance Materials. The procedures and sources have been integrated with the Management Information System (MIS) being

developed separately by RSA and Abt Associates. Indeed, the refined standards have been made the centerpiece of the MIS since they focus on the program outcomes and achievement of overall program goals. The MIS, while obviously serving many additional objectives as well, will readily provide information to state agencies that would show performance in terms of the standards and also be usable in identifying how to improve performance. However, even if the MIS unexpectedly were to be delayed in implementation, the standards system is compatible with the kinds of program data compilations routinely generated even now in many state agencies' internal information systems. Thus, the evaluation standards system could be adapted by individual state agencies for their use, quite independently of RSA's development of the national MIS.

Data-Based Decision-Support System: Investigating Problematic Attainment through Supportive Evaluation

Out of the standards reporting system will come the clear indication that some agencies will not have met their objectives for level of attainment on some data elements. The standards system does not stop there, however, but instead provides a system for investigating the causes for problematic attainment and for developing corrective actions as part of the decision-support system. This system is described in detail in the Analytic Paradigm for the VR Program Standards,¹ but can be illustrated briefly here. Basically, the decision-support system is designed to provide VR program managers with information which is:

- relevant to the issues (i.e., problems) under consideration;
- quickly and easily interpretable;
- timely; and
- suggestive either of an immediate policy response to the problem, or of further investigation needed before an appropriate response can be formulated.

¹Berkeley Planning Associates, Program Standards Evaluation System, Final Report Volume II, Analytic Paradigm for the VR Program Standards. This report is available from RSA.

The basic flow of the decision-support system is shown in Figure 2. Problematic attainment, where an agency is unable to meet its agreed-upon objective for a particular standard data element, is the signal for the process to start. First, program managers within RSA and within the state VR agencies investigate the problematic attainment. If they are able to identify problems and possible corrective actions, then implementation is the next step. If not, then more formal evaluation research is called for. Implementation of the corrective actions will affect state VR agency operations in the next cycle of the standards system. As a result of the corrective actions, the agency may be able to meet its objectives. Otherwise, the cycle starts anew.

As noted, the investigation of problematic attainment has been broken into two parts:

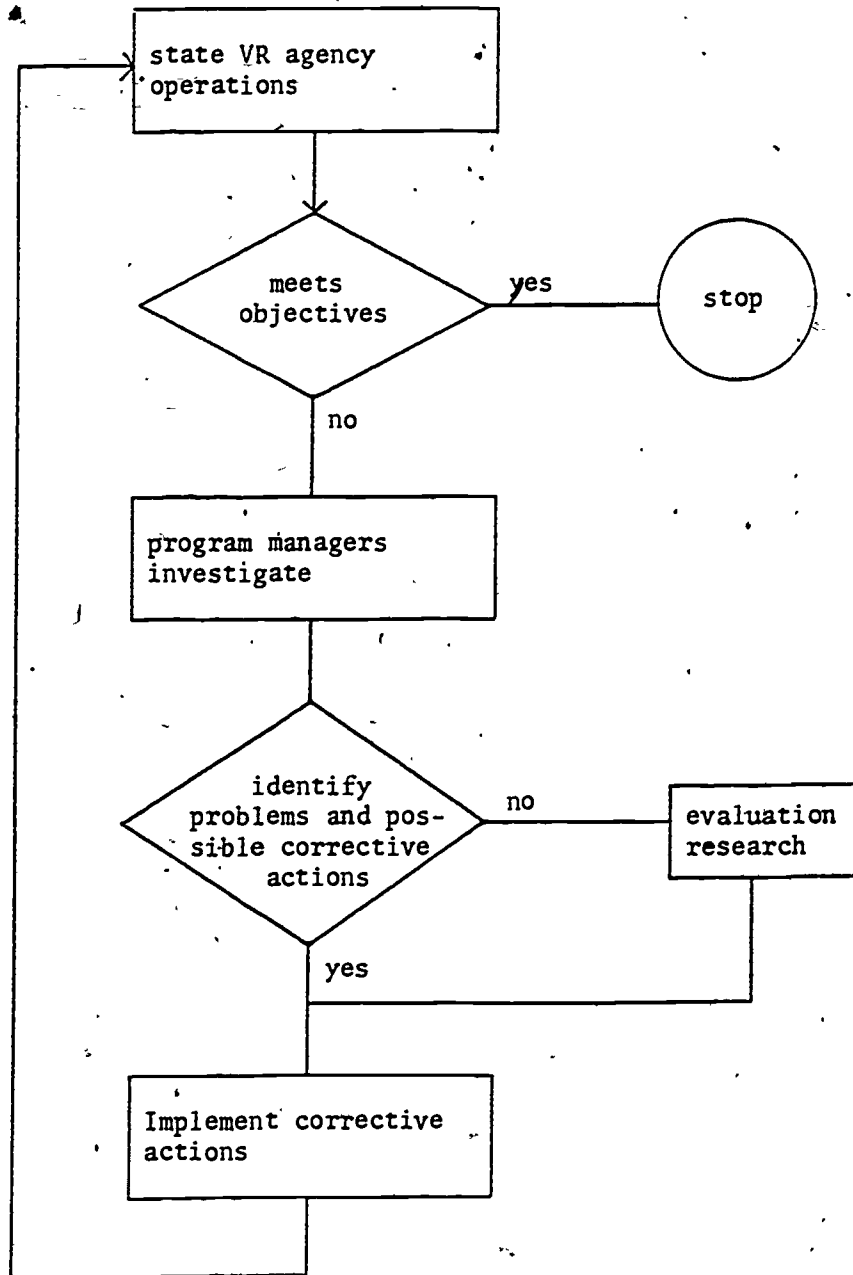
- basic problem identification, carried out by program managers within RSA and within the state VR agencies, using the standards reporting system plus the managers' knowledge of program operations; and
- evaluation research, carried out by evaluation researchers within RSA or within the state VR agencies, or by outside consultants, using the proposed MIS and other data bases, as well as requiring primary data collection.

These two parts differ in who carries them out, but especially to the extent that the basic problem identification occurs in a timely fashion, using the reporting system and the MIS. If evaluation research is required, then most likely corrective actions will not be possible in time for the next cycle of the process. In fact, the results of the evaluation research may not be available for a year or more, given the nature of evaluation research. This lag is the reason that the investigation of problematic attainment is broken into two parts, so that timely corrective actions can be taken, if possible.

The Process of Problem Identification

The process of problem identification outlined below is to be carried out by program managers, within RSA and within state VR agencies. The

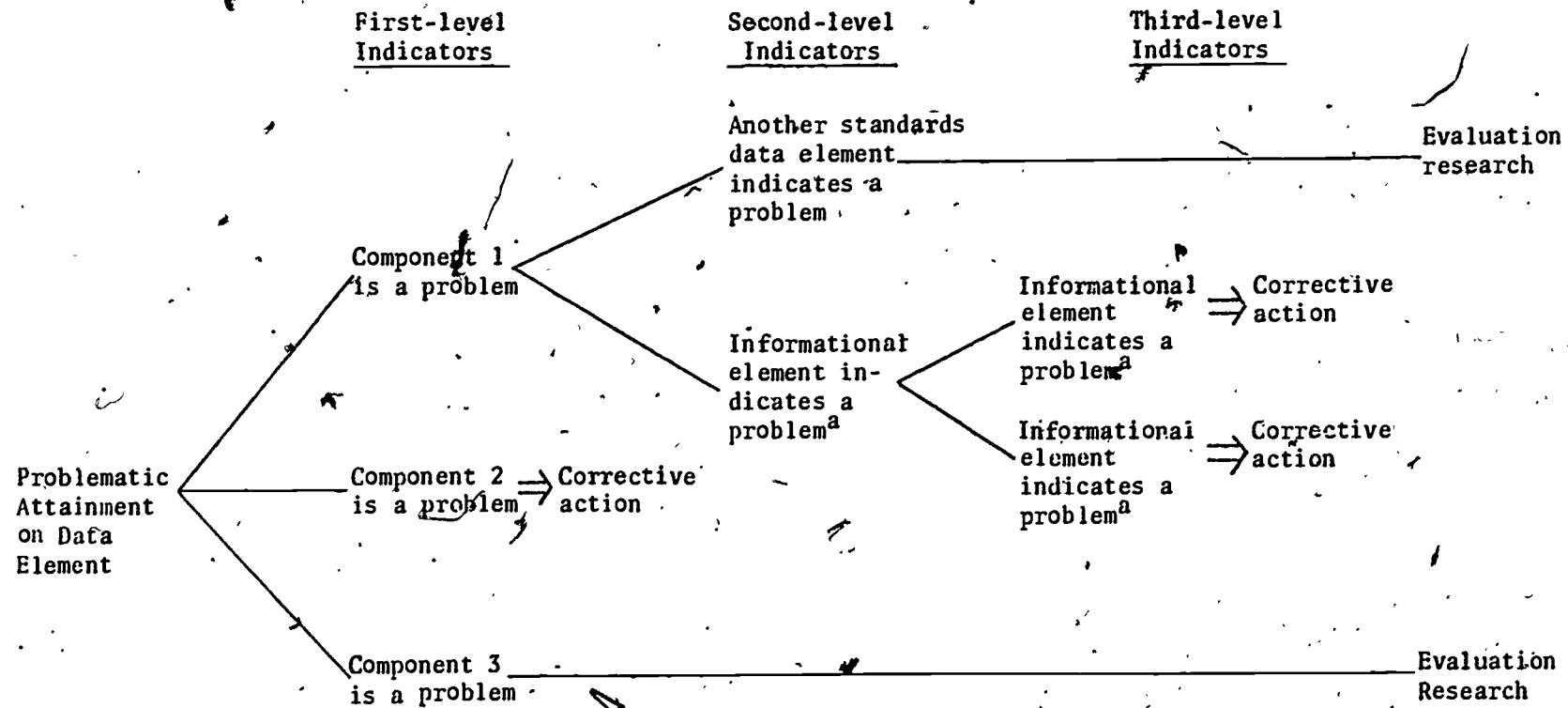
Figure 2
The Flow of the Decision-Support System



information for the problem identification will come from the standards reporting system incorporated within the MIS, as well as from the managers' knowledge of program operations. The process consists of tracing the possible problems by first organizing the components of the standard, then examining as "second-level" indicators other data elements and other informational elements of the reporting system. Examination of these will then lead to further examination of third-level indicators, and so on. At any point in tracing out these indicators the problem may be identified to the manager's satisfaction. At that point, corrective action is formulated. Or, at any point in tracing out these problems, further analysis in the form of evaluation research may be required. This process is like that normally illustrated by a decision tree. Of course, the process of problem identification may lead down several paths at once. Also, more than two paths may need investigation from a particular node, or more than three levels of indicators may have to be examined. The point is to do the analytical thinking and utilize existing information to identify possible problems and corrective actions. This process is illustrated in Figure 3.

If a data element shows problematic attainment, the first level of analysis is to examine the components of the element, dissecting the ratio or measure into its separate parts, to pinpoint the areas needing attention. For example, if the numerical value of a ratio is too large, the problem may be in the numerator (too large), the denominator (too small), or both. Comparison of attainment on the data elements or their components with that of other agencies with similar programs, or historically, or on other data items, can help determine the extent to which the indicator shows a real problem or if there is a good explanation for the attainment. The goal in this analysis is to seek explanation, or the identification of which components or related measures pinpoint the areas to be explored further. This analytical process may take several iterations before a cause is pinpointed. The first levels of the process are not to be seen as complex statistical analysis problems, but rather straightforward, simple program comparisons that allow VR managers to progress through a decision tree, diagnosing problems and using program information to reach conclusions

Figure 3
Process of Problem Identification



^aAn "informational element" is a piece of data that comes from the MIS or other reporting system, but is not a standards data element.

about probable causes. Some branches of a decision tree process may lead to problems or investigations that require complex statistical analyses, but only after several levels of the process have occurred.

Table 2 shows the decision steps in an example exploration; this is a model for investigating the possible causes or problems if "expenditures per 26 closure" (data element 2(ii)) is problematic.¹

The column showing "first level indicators" shows four possible combinations of two other indicators, cost/closure and cost/case, which are used to investigate an unacceptable (high) value of data element 2(ii). Depending on acceptable or unacceptable levels of these indicators, a different "scenario," or type of problem, is identified. For instance, if both of these indicators are "acceptable," then this indicates that the agency is achieving a proportion of 26 closures which is too low. This can be confirmed by referring to data element 3(i). If cost/closure is unacceptable, but the cost/case is acceptable, then the agency is achieving too few closures. As can be seen here, this first-level diagnosis leads to in-depth investigation of different parts of the system. The table shows the types of second- and third-level questions that could be pursued, depending on the initial comparisons and explanation.

At each level of the investigation, the goal should be to quickly and more finely hone in on the precise nature (i.e., cause) of the problem. Depending on the findings generated by a given level of the analysis, the program manager may decide either: that further investigation is warranted before formulating a policy response; that the findings are adequate to suggest an appropriate response; or that, despite the adequacy of the findings, no useful policy response can be offered (e.g., due to prior institutional, legislative, or funding constraints).

The indicators used in the investigation of problematic attainment are grouped and sequenced in such a way as to answer increasingly detailed questions. This allows managers to go a fair distance in determining the nature of the problem before needing recourse to more sophisticated and

¹The Analytic Paradigm provides similar decision trees for other Performance Standards data elements.

Table 2
Investigating Inadequate Performance on Data Element 2(ii);
Expenditures Per 26 Closure

Scenario	First Level Indicators		Implications of First Level Indicators	Second Level Indicators	"Leading Questions" (and answer)	Third Level Indicators (if applicable)	Research Questions
	Cost/Closure	Cost/Case					
1	Acceptable	Acceptable	Agency is achieving too low a proportion of 26 closures	Standards Data Element 3(i) $\frac{\#26}{\#26+\#28+\#30}$	Is the % too low? If yes, why? If no, which clients or components cost too much?	None (go to next column) • Administration costs • Service costs to: -- 26s -- 28s and 30s -- 08s (from the MIS) • Service costs by service type	Conduct Outcomes Analysis 1. What proportion of total costs go to administration? 2. What is the average life-of-case cost for each closure group? 3. What proportion of total life-of-case costs are spent on each closure group? 1. What proportion of current service costs went to each service type? 2. What is the average cost of each service type, for clients receiving that service?
2	Un-acceptable	Acceptable	Agency is serving clients too slowly: achieving too few closures	MIS element: Post-Acceptance Closure Rate $\frac{\#26+\#28+\#30}{\# \text{ open cases}}$	1. Is the service process too slow? 2. Have we had a recent influx of acceptances?	1. Timeliness 10-12/12-24 R-300 item 3,M,2: Average time from acceptance to closure (10-24) MIS element: rate of acceptance	Which aspect of services for accepted clients takes relatively too long? None (end of investigation)
3	Acceptable	Un-acceptable	Agency has recently developed a bottleneck in intake process: too few clients being accepted into the system	1. Standards Data Element 1(ii) $\frac{\# \text{ served } (10-30)}{100,000 \text{ population}}$ 2. MIS element: Rate of Acceptance $\frac{\# \text{ of new status } 10s}{\# \text{ new applicants} + \# \text{ on-hand applicants} + \# \text{ on-hand } 06s}$	1. Do we have too few applicants? 2. Does use of Extended Evaluation account for the low acceptance rate? 3. Do we have too many ineligible applicants?	# of applicants (From RSA-101) 1. R-300 item 3M TIP06 (06 takes too long) 2. MIS element: % 02 => 06 (too many enter 06) MIS elements: 02 => 08 and 06 => 08	Could outreach be made more effective? 1. What kinds of clients are going into 06? 2. What kinds of services are provided during 06? 1. What reasons are given for closing clients ineligible? 2. From where are these clients being referred?
4	Un-acceptable	Un-acceptable	Agency has both an intake and a timeliness	Same as 2 and 3	Same as 2 and 3		

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time-consuming "causal" analyses. This is not to say that other sophisticated analyses are undesirable or unnecessary. On the contrary, they as often as not may prove useful to managers in pinpointing precise causes of problem performance. However, the advantage of this model is that it allows managers to quickly investigate and discard certain hypotheses regarding the problem's cause, and therefore to more quickly direct the investigation toward what seems to be the likely cause. Once the likely cause is identified through use of the indicators, the manager can direct the evaluation/research staff to conduct the needed causal analyses.

Evaluation Research

As noted above, corrective actions may not always result from the problem identification procedure. Instead, the program manager may need to conduct "causal" evaluation research and program analyses to determine the source of program performance problems. These (often multivariate) analyses control for various state factors which simultaneously influence performance. Such research often examines the VR program as an inter-related system of activities and may require special data collection.

Summary

This concludes the description of the revised Program Standards system. The system includes a set of Performance and Procedural Standards and associated data elements, a new procedure for setting performance goals by states, a reporting system to provide information on performance, and a data-based decision-support system to assist program managers in analyzing and interpreting performance data as a tool for program improvement.

The new standards evaluation system promises to solve a number of long-standing rehabilitation program needs: it provides an evaluation framework for monitoring performance based on program outcomes; it places the leadership role for deciding how to improve performance with the state agency; it provides a workable evaluation system linked with an agency MIS; it provides a clear role for RSA as the source of technical assistance to the states, the developer of basic systems technology for helping states in evaluation, and the periodic conduct of special evaluation studies

that would be infeasible or inefficiently mounted by a single state. However, before this can occur, the system must be implemented in RSA and state VR agencies. The purpose of these Guidance Materials is to ease implementation by describing the various "input components" of the system -- that is, standards, data elements, data collection forms, and reporting systems -- which must be made operational in order for the system to serve its function as a tool for improved program performance. To this end, we turn next to a discussion of the Performance Standards.

II. GUIDE TO THE PERFORMANCE STANDARDS SYSTEM

The Performance Standards consist of eight goal-statements for the VR program, and "data elements" to be used in measuring achievement of those goals. The Performance Standards focus on "outputs" of the VR program: that is, on client outcomes and agency productivity. They provide measures of an agency's level of coverage of the eligible population, efficiency in service provision, and impact on clients' lives.

The Performance Standards will be reported each fiscal year. State agencies will submit the required data to RSA, and RSA will compute the data elements and produce a Standards Report for each state agency. RSA will use the management information system (MIS) to store and analyze the data.

States already routinely collect much of the data required by the Performance Standards. Of the seven separate data sources used for the Performance Standards, three are routine RSA reports:

- the RSA-300 Case Service Report (providing data on individual client outcomes);
- the RSA-2 Annual Report for Vocational Rehabilitation (providing data on aggregate agency expenditures); and
- the RSA-113 Quarterly Cumulative Caseload/Expenditure Report (providing data on the agency's caseload flow).

The RSA-300 report has been expanded to provide certain additional data needs required by the Performance Standards. It has four parts which are completed at different points in the rehabilitation process: at first referral, at completion of the referral process, at completion of the IWRP, and at closure. The information gathered pertains to the clients' work status, disability, primary source of support, the results of their movement through the VR system, and other demographic and personal information.

The RSA-2 has been discontinued by RSA, and the report's information is part of the proposed RSA-113. However, we retain a reference to the RSA-2 because the RSA-113 financial information is insufficiently detailed for the benefit-cost data elements. Our concern is to show data collectors the type

of information required; thus we include the RSA-2 to illustrate the specific information needed. The precise location of the data (i.e., the report containing the needed information) is irrelevant, as long as the data is accessible from somewhere within the state agency accounting system.

The RSA-113 is a new report created by RSA to gather quarterly information about client flow within each VR agency. It shows how many clients the agency accepted in the previous quarter, how many closures were made during the previous quarter, and the types of closures. As well, the report provides information on the number of applicants and entrants in extended evaluation; gives projections on new acceptances and rehabilitations; and provides information on expenditures. However, as noted above, the expenditure information is insufficiently detailed for some data elements.

RSA is currently involved in efforts to revise the RSA-300 and RSA-113 reports, in response to OMB requirements. Because of this, the reader should be aware that the references to specific data items, made in this report, may not correspond exactly to the actual location of the data items once the reports' forms are finalized. Nonetheless, although the location of the required data may change, the content of the data will not. That is, RSA has ensured the availability of all program-related data required to implement the Performance Standards.¹

In addition to the three program reports used for the Performance Standards, the standards will also require implementation of two different client surveys:

- the Client Closure Survey (providing information on client satisfaction with VR services); and
- the Client Follow-up Survey (providing information on client retention of benefits).

These two surveys are administered as mail-back surveys, completed by a sample subset of the agency's total group of closed clients for the given

¹As of late October 1980, Berkeley Planning Associates received indications that the revisions to the RSA-113 would include the detailed financial information needed for the benefit-cost data elements. If true, this would remove the need to maintain the RSA-2 or other additional reports beyond the RSA-113.

fiscal year. The Closure Survey functions as the data source for measuring a client's satisfaction with various aspects of his/her VR services. In order to tap the person's opinions while the VR experience is still "fresh in mind," the survey must be administered as soon as possible after closure from VR. In contrast, the Follow-up Survey is used to measure clients' success in maintaining, over time, the "benefits" resulting from VR service: thus it is concerned with whether or not rehabilitated clients have retained their jobs, earnings levels, freedom from public assistance, and functional abilities. The Follow-up Survey is sent to the client one-year after closure from VR.

Finally, implementation of the Performance Standards will require accessing two "exogenous" data sources:

- the annual U.S. Census publication Statistical Abstract of the U.S. (to provide data on the current federal minimum wage and on state wage norms); and
- the U.S. Bureau of the Census Current Population Reports, Series P-25 (to provide state population estimates).

Each of these data sources will be accessed by RSA, and RSA will input the required data into the MIS for computing of the relevant data elements.

To summarize, the Performance Standards address eight output goals of the VR program, and require data from three program documents, two client surveys, and two "exogenous" sources. With this overview, we next turn to a detailed discussion of the Performance Standards, their data elements, and the various data collection instruments. The discussion of the standards and data elements include: a brief description of the rationale for including the standard or data element in the Performance Standards; the formula of each data element; and the data sources for each data element. After these discussions, we present a summary table with instructions for computing the data elements (definition of terms and data specifications). Following this, each of the data sources are presented, with instructions for their implementation.

THE EIGHT PERFORMANCE STANDARDS

STANDARD 1: VOCATIONAL REHABILITATION SHALL SERVE THE MAXIMUM PROPORTION OF THE POTENTIALLY ELIGIBLE TARGET POPULATION, SUBJECT TO THE LEVEL OF FEDERAL PROGRAM FUNDING AND PRIORITIES AMONG CLIENTS.

Data Elements: (i) Clients served per 100,000 population
(ii) Percent severely disabled served

This standard addresses coverage, or the extent to which the vocational rehabilitation program is serving the eligible target population. The need to ensure accessibility of services to all the eligible disabled is of paramount importance to RSA and the states. Alone, this standard ignores considerations of the quality of the coverage (i.e., the appropriateness and utility of the program's activities in the clients' behalf, and the clients' service outcomes). However, these considerations are addressed by other standards.

Data Element 1(i): Clients served per 100,000 population

Rationale:

Although this data element does not provide a true estimate of the level of coverage of the eligible target population, it serves a useful purpose (a) by providing a proxy measure of the size of the target population in terms of the total state population; and (b) because it is used now by state agencies, it already has management utility and validity as a performance measure.

Formula:

$$\frac{\# \text{ served in a given year}}{\text{State population (in 100,000's)}}$$

Data Sources:

- RSA-113
- U.S. Bureau of the Census, Series P-25

Data Element 1(ii): Percent severely disabled servedRationale:

The proportion of severely disabled within a caseload can reasonably be expected to impact negatively on a state agency's total volume (i.e., caseload size) and on its costs. With a high proportion of severely disabled clients, time in process would be expected to increase and counselor capacity decrease, thus decreasing a program's caseload volume potential; that is, a decrease in coverage. To effectively assess coverage, the proportion of the caseload that is severely disabled must be taken into account. Further, given the legislative importance attached to service to severely disabled, it is most appropriate to include this data element under the standard on coverage of the eligible client population.

Formula:

$$\frac{\text{\# severely disabled served in a given year}}{\text{Total \# served in a given year}}$$

Data Sources:

- RSA-113

STANDARD 2: THE VOCATIONAL REHABILITATION PROGRAM SHALL USE RESOURCES IN A COST-EFFECTIVE MANNER AND SHOW A POSITIVE RETURN TO SOCIETY OF INVESTMENT IN VOCATIONAL REHABILITATION OF DISABLED CLIENTS.

- Data Elements:
- (i) Expenditure per competitively employed 26 closure
 - (ii) Expenditure per 26 closure
 - (iii) Ratio of total VR benefits to total VR costs (benefit-cost ratio)
 - (iv) Total net benefit from VR services (discounted net present value)

Two issues are addressed by this standard. The first is the issue of cost-effectiveness: with the financial resources available to the state, how successfully did it achieve desired objectives? The second issue revolves around cost-benefit concerns (i.e., "return on investment"). Specifically, the standard asks the question: Are we getting more out of the program than we put in?

Data Element 2(i): Expenditure per competitively employed 26 closure

Rationale:

This data element compares total agency expenditures to the number of competitively employed 26 closures. It applies the most stringent criteria to the measurement of cost-effectiveness by focusing on only those 26 closures who are competitively employed. The data element is very similar to data element 2(ii) (expenditure per 26 closure). However, it is included because, historically and even today, a consensus exists that competitive employment is the highest quality and most desirable type of closure obtainable. Thus data element 2(i) allows agencies to measure the cost-effectiveness of their services in terms of VR's highest goal: achievement of competitive employment.

Formula:

$$\frac{\text{Total agency expenditures}}{\# \text{ competitively employed 26 closures}}$$

Data Sources:

- RSA-2
- RSA-300

Data Element 2(ii): Expenditure per 26 closureRationale:

This cost-effectiveness measure relaxes the measurement criteria somewhat to allow "credit" for all types of rehabilitations. It recognizes that some clients are not capable of achieving competitive employment and that other employment outcomes can represent achievement commensurate with a client's abilities. This data element compares total agency expenditures to all 26 closures, thus capturing the effect of gainful activity, whether it lies in the realm of competitive or non-competitive employment.

Formula:

$$\frac{\text{Total agency expenditures}}{\# 26 \text{ closures}}$$

Data Sources:

- RSA-2
- RSA-300

Data Elements 2(iii) and (iv):(iii) Ratio of total VR benefits to total VR costs (Benefit-Cost ratio)(iv) Net total benefit from VR services (Discounted net present value)Rationale and Discussion

These two data elements are very similar in concept, and they will be discussed together. Benefit-cost modeling of social service delivery systems enjoys current wide acceptance as a measurement tool. Its use extends considerably beyond the VR field. The figures provided by benefit-cost analysis yield a single number which is an immediate indicator of program success. Unlike cost-effectiveness measures, which determine the unit costs for achieving a given objective (such as costs per competitive closure), benefit-cost models estimate total benefits and total costs in terms of dollars. These models are neutral with regard to type of delivery strategy. As such, they do not penalize agencies which choose to spend more per client in order to produce better results. Because of their surface simplicity, and because they are a popular sophisticated analytic tool for evaluating program worth, benefit-cost measures of the VR system are included in the Performance Standards.

As a review for the National Science Foundation has noted, benefit-cost applications in the VR field are more extensive and have generally been more sophisticated (or at least at a higher level of technical quality) than in most other social service and manpower program areas.¹ There are a number of models available for use. In one case, RSA commissioned the development of a model for routine use by the program, which was designed to be adaptable to the needs of many users (i.e., state agencies, RSA contracted evaluation studies, RSA itself) and to be capable of periodic updating and refinement as new data became available. That model, developed at the University of California, Berkeley, and subsequently refined by BPA staff, has been used by RSA, several state agencies, the Urban Institute, Abt Associates, National Analysts, and Greenleigh Associates, among others.

¹ Berkowitz and Anderson, PADEC -- An Evaluation of an Experimental Rehabilitation Project, Rutgers University, 1974.

Data Elements 2(iii) and iv) (continued)

usually under RSA recommendation.¹ This model is the basis for the two data elements proposed for use in measuring benefits in relation to costs in terms of:

- a ratio $\left(\frac{\text{Benefits}}{\text{Costs}} \right)$

- a net difference (Benefits-Costs)

Currently, the BPA model does not account for gains in functional ability and life status (although it does include monetary valuations for the unpaid output of non-wage-earning rehabilitants). However, the model is currently undergoing revision by a project at the Texas Institute for Rehabilitation (TIRR), which will develop subsystems within the model to account for such functional and life status gains. Because of these impending revisions, we cannot include the precise mathematical formulation for the model in these Guidance Materials. However, upon final revision, the benefit-cost model will be incorporated within the MIS, and the interested reader can obtain documentation on the mathematical formulation from RSA. Further, we can specify the components of program benefits and program costs which are in the current version of the model, and which will remain after final revision.

Both of the benefit-cost data elements use the discounted present value of social² benefits and costs, and both use the same components to arrive at benefits and costs. These components, in brief, are as follows:

¹Frederick C. Collignon and Richard Dodson, Benefit-Cost Analysis of Vocational Rehabilitation Services Provided to Individuals Most Severely Handicapped (ISMH), April 1975.

²A comparison of the full costs and benefits of a VR program can be undertaken from several perspectives. Perhaps the most common benefit-cost perspectives are the "taxpayer" perspective and the "social" perspective. In taxpayer BC, we compare direct administrative and service costs of the VR program as well as the costs of other government agencies providing benefits and services to the client population (SSI, SSDI, Food Stamps, Medicare, other employment and supportive services) with benefits such as taxes that successful rehabilitants pay from their earnings and savings in public assistance. Social BC takes the broadest perspective, incorporating the widest range of costs and benefits and including on the cost side, for example, costs borne by clients and, on the benefit side, client earnings as an addition to the GNP.

Data Elements 2(iii) and (iv) (continued)Benefits

- discounted value of paid earnings;
- change in output of homemaker closures;
- change in output of unpaid family workers;
- change in "after hours work" (e.g., homemaking tasks performed by wage-earning rehabilitants);
- fringe benefits;
- change in output of families of rehabilitants (as a result of rehabilitants assuming homemaker tasks);
- reductions in public assistance benefits;
- repeater costs (a "negative benefit").

Costs

- total program costs during the fiscal year, minus carry-over costs and maintenance costs;
- costs borne by parties other than VR;
- research, training, and demonstration costs;
- benefits foregone by clients during participation in VR services (i.e., any wages and fringe benefits foregone by clients with earnings at referral); and
- client-borne costs for VR services.

The model uses two basic types of input: (1) "variables" which are input or computed from program documents (e.g., the RSA-300 and RSA-113) for the year in question; and (2) "parameters" which take the form of constants which are derived by estimation or inference based on previous related research, current macroeconomic conditions, and so forth. Again, we cannot include an exhaustive list of all the input variables and parameters which will be required by the final revised model. However, in Appendix 1 the reader will find a listing of the program data which is used to compute the variables (as opposed to the parameters) used in the current version of the model. Upon final model revision, the interested reader may obtain documentation on all input variables and parameters from RSA.

A few final notes are in order with regard to the components of the current version of the model, as listed above. The costs associated with homemakers and unpaid family workers are the same as those for any other

Data Elements 2(iii) and (iv) (continued)

26 closure. The benefits of a homemaker are determined by estimating the "worth" of homemakers in the general population; that is, by estimating the dollar value of the various functions performed by a homemaker. The worth of disabled homemakers is assumed to be some proportion (less than 1) of the worth of homemakers in general. This proportion is then estimated to be the same as the proportionate worth of disabled workers to normal workers. Unpaid family workers are treated similarly. The value of a sheltered workshop employee is his/her market value, i.e., his/her wages, regardless of whether they are above or below the minimum wage.

There is a term in the model for workers who have been displaced by handicapped workers. The term estimates the negative impact on these displaced workers. The term currently has a value of zero because there is no evidence of substantial impact in today's economy. This is, of course, not relevant to BEP or sheltered workshop employees.

The net benefit measure (B-C) is included among the standards data elements primarily because it is the preferred approach of economists. The problem with the measure is that it is very sensitive to the scale of program operation: in the case of VR, for example, larger agencies would produce greater total net benefits than small agencies, simply because of their larger caseloads. Thus, the measure is inappropriate for comparing across state agencies, although it is useful for observing change over time within an agency. The ratio measure (B/C) overcomes the problem of agency size, thus allowing comparison across agencies. As well, B/C can be used to observe change over time within a single agency.

Formula:

$$2(iii) \left(\frac{\text{Benefits}}{\text{Costs}} \right)$$

$$2(iv) (\text{Benefits} - \text{Costs})$$

Data Sources:

- RSA-300
- RSA-2

Data Elements 2(iii) and (iv) (continued)

- RSA-113
- Follow-up Survey

(A listing of program data requirements for the current version of the model appears in Appendix 1.)

STANDARD 3: VR SHALL MAXIMIZE THE NUMBER AND PROPORTION OF CLIENTS ACCEPTED FOR SERVICES WHO ARE SUCCESSFULLY REHABILITATED, SUBJECT TO THE MEETING OF OTHER STANDARDS.

Data Elements: (i) Percent 26 closures
(ii) Annual change in number of 26 closures

Traditionally, success in VR has been measured by the number of "26 closures," or successful rehabilitations obtained. The VR goal is to rehabilitate clients, and to ignore that goal in the standards system would be a serious omission. VR does need to know how many individuals it successfully serves and must have encouragement to rehabilitate as many persons in need as possible.

Data Element 3(i): Percent 26 closures

Rationale:

This data element provides a straightforward measure of an agency's success in rehabilitating the clients it accepts for services. The data element focuses on the proportion of clients, accepted for service (i.e., excluding 08's), who are successfully rehabilitated.

Formula:

$$\frac{\# \text{ 26 closures}}{\# \text{ 26} + \text{28} + \text{30 closures}}$$

Data Sources:

- RSA-113

Data Element 3(ii): Annual change in number of 26 closuresRationale:

This data element attempts to assess an agency's success in maximizing the number of clients, accepted for services, who are successfully rehabilitated. The measure uses the state agency's prior performance as a baseline for determining success in "maximization:" that is, an agency is judged to have maximized the number of rehabilitants if it has increased the number of 26 closures by some previously specified amount. That amount will have been set by the state agency, in conjunction with RSA.

Formula:

(# of 26 closures in current year) - (# of 26 closures in previous year)

Data Sources:

- RSA-113

STANDARD 4: REHABILITATED CLIENTS SHALL EVIDENCE ECONOMIC INDEPENDENCE

- Data Elements: (i) Percent 26 closures with weekly earnings at/above federal minimum wage
- (ii) Comparison of earnings of competitively employed 26 closures to earnings of employees in state

VR's most basic purpose is to assist disabled persons in finding gainful employment. One fundamental aspect of gainful employment is the ability to be economically self-sufficient (i.e., "independent").

Data Element 4(i): Percent 26 closures with weekly earnings at/above federal minimum wage

Rationale:

In addressing economic independence, the logical place to look is to wages. This first data element assesses wages as they compare to the national standard (the federal minimum wage). The normative implications of this data element are that a disabled person should be expected, under equivalent circumstances, to make at least the minimum required by law for citizens of the U.S. This data element uses the weekly minimum wage figure as the standard rather than the hourly wage, because the former more accurately captures the concept of this Standard. Whereas hourly wage indicates a measure of the employee's worth to the employer, total (i.e., weekly, monthly, cumulative yearly) earnings is a better indicator of the employee's financial well-being (i.e., how much money he/she makes, and whether that amount can support him/her). If an employee is able to work only five hours a week, his/her economic condition will be affected by this as well as by the hourly rate. Thus, total earnings is the more appropriate indicator of economic independence.

Formula:

$$\frac{\# \text{ 26 closures with weekly earnings level at/above federal minimum wage}}{\# \text{ 26 closures}}$$

Data Sources:

- RSA-300
- U.S. Census Bureau, Statistical Abstract of the U.S.

Data Element 4(ii): Comparison of earnings of competitively employed 26 closures to earnings of employees in state

Rationale:

This data element controls for state-to-state variation in earnings levels, whereas data element 4(i) does not. In some respects, this is a more comprehensive indicator than data element 4(i) because it provides an estimate of clients' "standard of living" relative to other persons in the state.

Formula:

$$\frac{\text{Mean weekly earnings of competitively employed 26's}}{\text{Mean weekly earnings of employees in state}}$$

Data Sources:

- RSA-300
- U.S. Census Bureau, Statistical Abstract of the U.S.

STANDARD 5: THERE SHALL BE MAXIMUM PLACEMENT OF REHABILITATED CLIENTS INTO COMPETITIVE EMPLOYMENT. NON-COMPETITIVE CLOSURES SHALL REPRESENT AN IMPROVEMENT IN GAINFUL ACTIVITY FOR THE CLIENT.

- Data Elements:
- (i) Percent-26 closures competitively employed
 - (ii) Percent competitively employed 26 closures with hourly earnings at/above the federal minimum wage
 - (iii) Percent non-competitively employed 26 closures showing improvement in function and life status

Like Standard 4, this standard concerns the impact on clients obtained by VR agencies. Historically, competitive employment has been seen as the best kind of closure. However, competitive employment may not be the appropriate placement for all clients. Still, VR regulations require that any placement of a successfully closed client be into "gainful and suitable employment," "consistent with his/her capacities" whether in competitive, sheltered, or non-competitive employment. For this reason, improvement in gainful activity for non-competitive closures is also included.

Data Element 5(i): Percent 26 closures competitively employed

Rationale:

This standard's bias toward competitive employment reflects the belief that vocational rehabilitation should focus on employment, preferably competitive employment. For a standard emphasizing maximum placement into competitive employment, perhaps the most obvious data element is to determine the proportion of 26 closures placed into competitive employment.

Formula:

$$\frac{\text{\# competitively employed 26's}}{\text{\# 26 closures}}$$

Data Sources:

- RSA-300

Data Element 5(ii): Percent competitively employed 26 closures with hourly earnings at/above the federal minimum wage

Rationale:

This data element applies more stringent criteria to the measurement of "maximum placement of rehabilitated clients into competitive employment." It compares the number of competitively employed 26 closures with hourly earnings at or above the federal minimum wage to the total number of competitively employed 26 closures. As in data element 4(i), this data element implies that a disabled person in the competitive labor market should be expected to earn at least the federal minimum wage. Unlike 4(i), however, this measure represents an employee's worth to the employer. Total weekly earnings are an indication of an employee's financial well-being, while his/her "worth" may be determined by examining his/her hourly wage. Thus, this data element provides a measure of the "value" of rehabilitated VR clients who are in the competitive labor market relative to the federal minimum wage.

Formula:

$$\frac{\# \text{ competitively employed 26 closures with hourly earnings at/above federal minimum wage}}{\# \text{ competitively employed 26's}}$$

Data Sources:

- RSA-300
- U.S. Census Bureau, Statistical Abstract of the U.S.

Data Element 5(iii): Percent non-competitively employed 26 closures showing improvement in function and life status

Rationale:

Closures into non-competitive employment may be legitimate for certain clients, but in order to attribute any credit to VR for "rehabilitating" clients into non-competitive employment, there must be some indication that VR helped improve those clients' capacity for gainful activity. This data element will use information gathered on clients at acceptance and at closure, using elements of the Functional Assessment Inventory (FAI) and Life Status Indicators (LSI) instruments. The information will be input on the client's RSA-300. However, RSA is currently undertaking a pretest of the FAI and LSI items, to determine which specific items will be included on the RSA-300. Until completion of the pretest, no data specifications can be made; thus, data collection will be deferred until after the pretest. When implemented, the data element will have the following formula and data sources.

Formula:

$$\frac{\# \text{ non-competitive 26's with improvement on LSI-FAI measures from plan to closure}}{\# \text{ non-competitive 26's}}$$

Data Sources:

- RSA-300

STANDARD 6: REHABILITATED CLIENTS SHALL EVIDENCE VOCATIONAL GAINS.

- Data Elements: (i) Average earnings change of 26 closures, before versus after VR services
- (ii) Other changes in functional ability and life status

It is axiomatic that, after VR services, rehabilitated clients should evidence some sort of vocational gains; either in monetary or non-monetary terms. This standard assures that attention will be paid by the VR field to the level of client changes. It supplements the concern for measuring post-service outcomes (as in Standards 3-5) by using the client's pre-service circumstances as a baseline for comparison.

Data Element 6(i): Average earnings change of 26 closures, before versus after VR services

Rationale:

This data element is included because wages are the most straight-forward indicator of vocational change. Weekly earnings are used to measure change.

Formula:

$$\frac{(\text{Sum of closure earnings for 26 closures}) \text{ minus } (\text{sum of referral earnings for 26 closures})}{\# \text{ 26 closures}}$$

Data Sources:

- RSA-300

Data Element 6(ii): Changes in functional ability and life statusRationale:

In addition to vocational change (as measured by data element 6(i)), the VR program also acts as a change-agent in terms of non-vocational aspects of a client's life. As with the data elements associated with non-competitive employment closures (as in data element 5(iii)), the methodology for assessing non-vocational change needs development. This development should occur as an outgrowth of the FAI/LSI pretest for the MIS. Until such time as the measures can be developed, no data collection or reporting will be conducted for this data element.

STANDARD 7: REHABILITATED CLIENTS SHALL RETAIN THE BENEFITS OF VR SERVICES.

- Data Elements:
- (i) Percent 26 closures retaining earnings at follow-up
 - (ii) Comparison of 26 closures with public assistance as primary source of support at closure and at follow-up
 - (iii) Percent non-competitively employed 26 closures retaining closure skills at follow-up

Retention of benefits gained through vocational rehabilitation services is important to the rehabilitated client and as a measure of overall program effectiveness. Job losses following successful closure imply program failure and point to incongruence of program goals vis-a-vis individual client goals: are we "rehabilitating" clients temporarily to meet program objectives, then finding clients back where they started a few months later? This question has a great degree of importance to the overall VR mission and thus a standard in this area is highly appropriate. Aside from employment measures of benefit retention, additional attention is given to expanding the data elements for this standard to include non-employment measures.

Data Element 7(i): Percent 26 closures retaining earnings at follow-up

Rationale:

As noted, retention of benefits gained through VR services is very important both to the individual client and to the overall effectiveness of the program. This data element looks at retention of wages earned, as one of the most important benefits obtained from VR.

Formula:

$$\frac{\# \text{ 26's with earnings at closure who retained or increased earnings at follow-up}}{\# \text{ 26 closures with earnings at closure, surveyed at follow-up}}$$

Data Sources:

- RSA-300
- Follow-up Survey (merge with RSA-300)

Data Element 7(ii): Comparison of 26 closures with public assistance as primary source of support at closure and at follow-up

Rationale:

This data element provides a needed dimension in assessing benefit-retention for non-competitively as well as competitively placed successful closures. Here benefits are proxied by measuring the extent of the clients' use of public resources. By focusing on the degree to which there is a reduced need for public assistance, an emphasis is given to the economic self-sufficiency of the client in terms of stability or improvement.

This data element requires a new definition of "primary source of support" (discussed later in the section of the RSA-300), where "source of support" is broken into only two categories ("public" versus "private") and where "primary" is taken to mean "that source supplying 51% or more of person's total monthly support."

Formula:

$$\frac{\% \text{ of 26's with public assistance as primary source of support at follow-up}}{\% \text{ of 26's with public assistance as primary source of support at closure}}$$

Data Sources:

- RSA-300
- Follow-up Survey (merge with RSA-300)

Data Element 7(iif): Percent non-competitively employed 26 closures retaining closure skills at follow-up

Rationale:

Retention of functional and life status benefits is equally important as retention of vocational (i.e., monetary) benefits, particularly in the case of non-competitively employed 26 closures for whom non-vocational improvement is the primary "benefit" derived from participation in VR. This data element "updates" the information provided by data element 5(iii), and will use the same FAI and LSI data items used for data element 5(iii). However, for the purposes of this data element, the FAI and LSI items will need to be modified into a form suitable for self-administration by the clients, via the Follow-up Survey. The specific items and their forms will be determined after completion of the FAI/LSI pretest. Until that time, data collection for data element 7(iii) would be deferred. Once implemented, the data element will have the following formula and data sources.

Formula:

$$\frac{\# \text{ non-competitive 26 closures retaining LSI/FAI closure skills}}{\# \text{ non-competitive 26 closures surveyed at follow-up}}$$

Data Sources:

- RSA-300
- Follow-up Survey (merge with RSA-300)

STANDARD 8: CLIENTS SHALL BE SATISFIED WITH THE VOCATIONAL REHABILITATION PROGRAM, AND REHABILITATED CLIENTS SHALL APPRAISE VOCATIONAL REHABILITATION SERVICES AS USEFUL IN ACHIEVING AND MAINTAINING THEIR VOCATIONAL OBJECTIVES.

- Data Elements:
- (i) Percent closed clients satisfied with overall VR experience
 - (ii) Percent closed clients satisfied with specific aspects of VR
 - (iii) Percent 26 closures judging services received to have been useful in obtaining their job/homemaker situation or in current performance

As an indicator of consumer appraisal of services, the standard on client satisfaction with vocational rehabilitation services has considerable merit. Since client satisfaction polls usually offer high degrees of support for the program, this standard is viewed as having distinct political value in lobbying for expanded financial support at both the state and federal level. Complementing the political utility of a satisfaction measure is the inclusion of a client utility assessment in the standard. The intent of this clause is to ensure that successfully closed clients assess the utility of VR services positively in terms of actually having contributed to their getting a job and functioning in it. As a substantive rationale for the satisfaction standard, utility assessment offers a valuable entree for probing areas needing program improvement and for ensuring consumer involvement in improving the responsiveness of VR services to client needs.

Data Element 8(i): Percent closed clients satisfied with overall VR experience

Rationale:

As one of the data elements of the original nine standards, retaining overall satisfaction as a measure of program performance has several advantages: (1) the procedure is in place; (2) developmental costs have already been absorbed; (3) it constitutes a composite measure of client satisfaction which responds to legislative and consumer advocacy concerns; and (4) the data show some discrimination among closure statuses.

Data Element 8(i) (continued)Formula:

$$\frac{\# \text{ closed clients surveyed satisfied with overall VR experience}}{\# \text{ closed clients surveyed}}$$

Data Sources:

- Closure Survey (merge with RSA-300)

Data Element 8(ii): Percent closed clients satisfied with specific aspects of VR

Rationale:

This data element attempts to gain a more detailed picture of client satisfaction with specific key aspects of the overall VR process. In particular, the aspects isolated for inquiry include questions about the client's counselor, the physical restoration services received, the job training services received, and the job placement process. Consistent negative assessment in any one of these areas would be highly useful in guiding state evaluations and providing substantive input to programmatic improvements.

Formula:

- a. $\frac{\# \text{ closed clients satisfied with their counselors}}{\# \text{ closed clients surveyed}}$
- b. $\frac{\# \text{ closed clients satisfied with physical restoration services}}{\# \text{ closed clients surveyed}}$
- c. $\frac{\# \text{ closed clients satisfied with job training services}}{\# \text{ closed clients surveyed}}$
- d. $\frac{\# \text{ closed clients satisfied with job placement services}}{\# \text{ closed clients surveyed}}$

Data Sources:

- Closure Survey (merge with RSA-300)

Data Element 8(iii): Percent 26 closures judging services received to have been useful in obtaining their job/homemaker situation or in current performance

Rationale:

Rehabilitated clients can make fairly objective assessments of whether the services they received were instrumental in securing their outcome situations. Equally as important as VR services' contribution to the attainment of the client's closure situation is the usefulness of the skills obtained in assisting clients to function in these new positions. While not unequivocally objective, the client's assessment of whether he/she uses these skills and/or knowledge gained from VR services is the closest approximation of the case.

Formula:

26 closures judging services received to have been useful in
obtaining their job/homemaker situation or in current performance
26 closures surveyed

Data Sources:

- Closure Survey (merge with RSA-300)

COMPUTING THE PERFORMANCE STANDARDS DATA ELEMENTS

Having provided the reader with an overview of the Performance Standards and data elements, the next task is to provide the detailed information needed to access the required data and compute the data elements. Table 3 serves this function. Reading from left to right, the table provides the following information for each data element:

- the data element wording and the equation for computing the data element;
- definitions of terms used in the data element's equation;
- the sources (i.e., documents, reports, or surveys) which provide the information needed to compute the data element;
- the data specifications, which identify the location of the specific information items used to compute the data element;¹ and
- a notation of the page numbers, in these Guidance Materials, where the data source appears. The reader may refer to these pages for an illustration of the data sources and data items used.

Table 3 should suffice as the general instructions on how to compute the data elements. However, there are two additional points which must be made regarding the process of accessing data and computing the data elements:

1. Merging of client surveys with client RSA-300 records: The client Closure and Follow-up Surveys will need to be "merged" with the individual clients' RSA-300's. In the case of the Follow-up Survey, this is required so that comparisons may be made between the client's situation at closure (e.g., earnings level) and his or her situation at the point of follow-up. The data items using the Closure Survey do not require any over-time comparisons. However, the Closure Survey should be merged with the RSA-300 data record so that RSA and state agencies may have access to data on the client's personal characteristics and services provided. In this way, RSA and state agencies may conduct policy-related analysis when problems in performance appear in the satisfaction/service utility data elements. For both the

¹The reader must bear in mind that these locations may change as a result of the revisions to RSA reports currently being undertaken in response to OMB requirements. All the data items will be retained after revision.

Closure and the Follow-up Survey, merging requires that a consistent identifier appear both on the RSA-300 and on the Survey. The client's case number or Social Security number are the most logical client identifiers to use.

2. Using only "valid" cases to compute data elements: Most of the data elements for Standards 4-8 require input of client-level data. All calculations must be made using only those cases for which "legitimate" data exist (i.e., using only "valid" cases). This excludes cases on which data are "missing," because:

- the counselor could not obtain the information for entry on the RSA-300;
- the client gave no response to a question on the survey;
- the client could not remember or did not know the answer to a question on the survey; or
- the question was not appropriate to the client's circumstances (e.g., clients receiving no physical restoration services should not be used to assess satisfaction with physical restoration services).

For most of the data elements using client-level data, the valid cases will determine the denominator for the data element. For example, data element 4(i) computes the percent of 26 closures earning the weekly minimum wage at closure. Assume that there are 1,000 26 closures, total; but that 200 of those cases are missing data on earnings at closure (leaving 800 with "valid" data). Assume further that, of the 800 with valid data, 400 earned the weekly minimum wage at closure. Depending on the denominator used, the state agency's performance on data element 4(i) will vary:

- using all 26 closures:

$$\begin{array}{r} 400 \text{ (# earning weekly minimum wage)} \\ \div 1000 \text{ (all 26 closures)} \\ = 40\% \end{array}$$
- using only valid cases:

$$\begin{array}{r} 400 \text{ (# earning weekly minimum wage)} \\ \div 800 \text{ (26 closures with valid data)} \\ = 50\% \end{array}$$

Clearly, in this case (and in fact, in all cases where a percentage score is computed) a state agency's performance will appear "better" when only valid cases are used for the computation. Further, since we do not know the true situation of clients for whom data are missing, we may mistakenly bias the score downward when including invalid cases. (For example, in the numerical example above, the 200 cases with missing data may in fact have been earning the weekly minimum wage. Had the data been available, the agency's score would have been 60%. We must, however, assume that they were not earning the weekly minimum wage, if we wish to include them in the calculation.) In short, because we wish to provide as accurate a picture of performance as possible, based on the available data, we must compute the data elements using only those cases for which all data exist; that is, the valid cases.

Table 3
Summary of Data Elements, Definitions, and Data Specifications
for the VR Program Performance Standards

STANDARD 1: VOCATIONAL REHABILITATION SHALL SERVE THE MAXIMUM PROPORTION OF THE POTENTIALLY ELIGIBLE TARGET POPULATION, SUBJECT TO THE LEVEL OF FEDERAL PROGRAM FUNDING AND PRIORITIES AMONG CLIENTS.

Data Element and Equation	Definitions	Data Sources	Data Specifications	Page Reference for Data Source
(i) Clients served per 100,DDO population: $\frac{\# \text{ served in a given year}}{\text{state population (in 100,000s)}}$	# served = all active and closed cases (statuses 10-30) in the year.	RSA - 113 (Oct - Sept)	II.A.3.a	71 - 76
	State population = current best proxy for "eligible population." Divide state population by 100,000 and truncate at two decimal points.	U.S. Bureau of the Census, Current Population Reports, Series - P-25	State population estimate as of July	96
(ii) Percent severely disabled served: $\frac{\# \text{ severely disabled served in a given year}}{\# \text{ served in a given year}}$	# severely disabled served = all active and closed severely disabled cases (statuses 10-30) in the year.	RSA - 113 (Oct - Sept)	II.A.3.b	71 - 76
	# served = same as 1(i).	RSA - 113 (Oct - Sept)	II.A.3.a	71 - 76

Table 3 (continued)

STANDARD 3: VR SHALL MAXIMIZE THE NUMBER AND PROPORTION OF CLIENTS ACCEPTED FOR SERVICES WHO ARE SUCCESSFULLY REHABILITATED, SUBJECT TO THE MEETING OF OTHER STANDARDS.

Data Element and Equation	Definitions	Data Sources	Data Specifications	Page Reference for Data Sources
(i) Percent 26 closures: $\frac{\# \text{ 26 closures}}{\# \text{ 26} + \text{28} + \text{30 closures}}$	# 26 closures = 26 closures during fiscal year.	RSA - 113	II.A.4.a	71 - 76
	# 26 + 28 + 30 closures = total accepted clients closed (26 + 28 + 30) during fiscal year.	RSA - 113	II.A.4.a + II.A.5.a + II.A.6.a	77 - 81
(ii) Annual change in number of 26 closures: (# 26 closures in current year) - (# 26 closures in previous year)	# 26 closures, current fiscal year.	RSA - 113 (current year)	II.A.4.a	71 - 76
	# 26 closures, previous fiscal year.	RSA - 113 (previous year)	II.A.4.a	71 - 76

Table 3 (continued)

STANDARD 4: REHABILITATED CLIENTS SHALL EVIDENCE ECONOMIC INDEPENDENCE.

Data Element and Equation	Definitions	Data Sources	Data Specifications	Page Reference for Data Sources
(i) Percent 26 closures with weekly earnings at/above the federal minimum wage: # 26 closures with weekly earnings at/above the federal minimum wage <u># 26 closures</u>	Weekly earnings = earnings at closure.	RSA - 300	Item 4.J	63 - 70
	Weekly minimum wage = 35 hours x hourly minimum wage (BLS definition of full-time employment).	U.S. Bureau of the Census, <u>Statistical Abstract of the U.S.</u>	Federal hourly minimum wage	94
	# 26 closures = closures during fiscal year.	RSA - 300	Item 4:P.2	63 - 70
(ii) Comparison of earnings of competitively employed 26 closures to earnings of employees in the state: <u>Mean weekly earnings of competitively employed 26's</u> Mean weekly earnings of employees in the state	Competitively employed 26s = wage and salaried workers (competitive labor market), and self-employed (non-BEP).	RSA - 300	Item 4.P.2 (26 closures); codes 1 and 3 on Item 4.I (competitively employed)	63 - 70
	Mean weekly earnings = average earnings, week of closure, for competitive 26 closures.	RSA - 300	Item 4.J (average)	63 - 70
	Employees in state = production workers in manufacturing industries.	U.S. Bureau of the Census, <u>Statistical Abstract of the U.S.</u>	Labor Force, Employment, and Earnings: Production-Workers, Manufacturing Industries -- Hours and Gross Earnings, by state, average Weekly earnings	95

Table 3 (continued)

STANDARD 5. THERE SHALL BE MAXIMUM PLACEMENT OF REHABILITATED CLIENTS INTO COMPETITIVE EMPLOYMENT. NON-COMPETITIVE CLOSURES SHALL REPRESENT AN IMPROVEMENT IN GAINFUL ACTIVITY FOR THE CLIENT.

Data Element and Equation	Definitions	Data Sources	Data Specifications	Page Reference for Data Source
(i) Percent 26 closures competitively employed: <u># competitively employed 26s</u> # 26 closures	# competitively employed = wage and salaried workers (competitive labor market) plus self-employed (non-BEP).	RSA-300	Codes 1 and 3 on Item 4.I	63 - 70
	# 26 closures	RSA-300	Item 4.P.2	63 - 70
(ii) Percent competitively employed 26 closures with hourly earnings at/above the federal minimum wage: <u># competitively employed 26 closures with hourly earnings at/above federal minimum wage</u> # competitively employed 26s	Hourly earnings = (weekly earnings at closure) ÷ (# hours worked).	RSA-300	Item 4.J (weekly earnings at closure); Item 4.M (# hours worked at closure)	63 - 70
	Hourly minimum wage	Statistical Abstract of the U.S.	Federal hourly minimum wage	94
	# competitively employed 26s = same as 5(i).	RSA-300	Codes 1 and 3 on Item 4.I; Item 4.P.2	63 - 70
(iii) Percent non-competitively employed 26 closures showing improvement in function and life status (implement after LSI/FAI pretest): <u># non-competitive 26s with improvement on LSI/FAI measures from plan to closure</u> # non-competitive 26s	Non-competitive 26s = sheltered workshop worker, self-employed (BEP), homemakers, and unpaid family workers.	RSA-300	Item 4.P.2 (26 closures); Codes 2, 3, 5, and 6 on Item 4.I (non-competitively employed)	63 - 70
	Improvement on LSI/FAI = positive change on functional and status indicators; measures to be determined by pretest.	R-300: • acceptance • closure	Item 2.V Item 4.N	63 - 70

Table 3 (continued)

STANDARD 6: REHABILITATED CLIENTS SHALL EVIDENCE VOCATIONAL GAINS.

Data Element and Equation	Definitions	Data Sources	Data Specifications	Page Reference for Data Source
(i) Average earnings change of 26 closures, before versus after VR services: (Sum of closure earnings, for 26 closures) minus (Sum of referral earnings for 26 closures) <u>÷ 26 closures</u>	Sum of earnings for 26 closures = total earnings for the group of 26 closures: • at closure • at referral.	RSA-300	Item 4.J (sum for all 26s)	63 - 70
		RSA-300	Item 2.P (sum for all 26s)	63 - 70
	÷26 closures = closures during current fiscal year.	RSA-300	Item 4.P.2	63 - 70
(ii) Other changes in functional ability and life status (implement after LSI/FAI pretest)	Change in functional ability and life status = same as 5(iii); measures to be determined by pretest.	RSA-300: • acceptance • closure	Item 2.V Item 4.N	63 - 70

STANDARD 7: REHABILITATED CLIENTS SHALL RETAIN THE BENEFITS OF VR SERVICES.

Data Element and Equation	Definitions	Data Sources	Data Specifications	Page Reference for Data Source
(i) Percent 26 closures retaining earnings at follow-up: # of 26 closures with earnings at closure who retained or increased earnings at follow-up # 26 closures with earnings at closure, surveyed at follow-up	Retained or increased earnings = cases where follow-up earnings are greater than or equal to closure earnings.	RSA-300 Follow-up Survey (Merge with R-300)	Item 4.J (Weekly closure earnings) Question 3 (Weekly earnings at follow-up)	63 - 70 88 - 91
	# 26 closures with earnings at closure = cases where weekly closure earnings are greater than zero.	RSA-300	Item 4.P.2 (26 closures) Item 4.J (Weekly closure earnings)	63 - 70
	Only 26 closures are surveyed at follow-up.			
(ii) Comparison of 26 closures with public assistance as primary source of support at closure and at follow-up: % 26 closures with public assistance as primary source of support at follow-up % 26 closures with public assistance as primary source of support at closure	Public assistance as primary source of support = cases where SSI, SSDI, AFDC, GA, Workmen's Compensation, and public institutions account (singly or in combination) for more than 50% of a person's total monthly support: • at follow-up • at closure.	Follow-up Survey (Merge with R-300) RSA-300	Questions 2, 3, 4: $Q.2 \div (Q.2 + (Q.3 \times 4) + Q.4)$ Item 4.N.1	88 - 91 63 - 70
	26 closures (Only 26 closures are surveyed at follow-up).	RSA-300	Item 4.P.2	63 - 70
(iii) Percent non-competitively employed 26 closures retaining closure skills at follow-up (implement after LSI/FAI pretest): # non-competitive 26 closures retaining LSI/FAI closure skills # non-competitive 26s surveyed at follow-up	Non-competitive closures = sheltered workshop worker, self-employed (BEP), homemakers, and unpaid family workers.	RSA-300	Item 4.P.2 (26 closures); Codes 2, 4, 5, and 6 on Item 4.I (non-competitively employed)	63 - 70
	Retaining closure skills = equal or greater score on functional and status indicators at follow-up, compared to closure: • closure (measures to be determined by pretest) • follow-up (measures to be determined by pretest).	RSA-300 (closure section) Follow-up Survey (Merge with R-300)	Item 4.N Question 5	63 - 70 88 - 91

STANDARD 8: CLIENTS SHALL BE SATISFIED WITH THE VR PROGRAM, AND REHABILITATED CLIENTS SHALL APPRAISE VR SERVICES AS USEFUL IN ACHIEVING AND MAINTAINING THEIR VOCATIONAL OBJECTIVES.

Data Element and Equation	Definitions	Data Sources	Data Specifications	Page Reference for Data Source
(i) Percent closed clients satisfied with overall VR experience. <u># closed clients surveyed satisfied with overall VR experience</u> # closed clients surveyed	Closed clients = 26, 28, and 30 closures (Closure survey given only to 26, 28, and 30 closures).	Closure Survey (Merge with R-300)	Question 1 (all respondents)	82 - 87
(ii) Percent closed clients satisfied with specific aspects of VR: <u># closed clients satisfied with specific aspects of VR</u> # closed clients surveyed (four equations)	Closed clients = 26, 28, and 30 closures. Specific aspects = satisfied/not satisfied with counselor, physical restoration services, job training services, job placement services.	Closure Survey (Merge with R-300)	Questions 2 - 8 (All respondents)	82 - 87
(iii) Percent 26 closures judging services received to have been useful in obtaining their job/homemaker situation or in current performance: <u># 26 closures judging services received to have been useful in obtaining their job/homemaker situation or in current performance</u> # 26 closures surveyed	Closure Status = 26.	RSA-300-	Item 4.P.2	63 - 70
	Useful = "useful in helping get or perform in" the person's closure occupation.	Closure Survey (Merge with R-300)	Question 9 (26 closures only)	82 - 87

DATA SOURCES FOR THE PERFORMANCE STANDARDS

In the following sections, each of the data sources for the Performance Standards are discussed. For each source, we present an example of the source (i.e., the report, survey, or document); the standards data elements for which it is used; and, when necessary, instructions for implementing the data collection.

THE REVISED RSA-300

The evaluation of the VR program is based, to a large extent, on the data submitted by state agencies to RSA on form OHD-RSA 300. The R-300 data, as it is called, contains information recorded by the vocational rehabilitation counselor on each client's characteristics, history with the program and several other programs, work situation and income prior to and after receiving rehabilitation services. The purposes of collecting this information are to:

- (1) measure the effectiveness of the VR program at the national and state levels;
- (2) describe the operations of the program to the President, Congress, and state legislators;
- (3) disseminate data on the characteristics of clients in the VR program;
- (4) provide data on the operations and effectiveness of the program to various public and private organizations interested in the vocational rehabilitation of the handicapped; and
- (5) provide specific answers to questions raised on operation of the program.

The original R-300 form consisted of three different parts, each of which was designed to collect information about the client at a different phase of the rehabilitation process:

- Part 1 -- to be recorded at the time of the first referral;
- Part 2 -- to be recorded at completion of the referral process; and
- Part 3 -- to be recorded at the time of closure.

The data requirements of the Standards necessitated the creation of an additional section (containing three new items), which in the revised R-300 is labeled "Part 3 -- to be recorded at the completion of the IWRP." What was originally Part 3 is now labeled Part 4 and contains three additional items. Two new items have also been added to Part 2. No changes were made in Part 1. The new items have been added to the R-300 to facilitate the collection of data that more accurately portray client job status and benefits incurred as a result of the VR process. Below we introduce each new item that has been added to the R-300.

Additions to Part 2: Completion of Referral Process

Two new data items are added to Part 2. However, one of these -- the Functional Assessment and Life Status Indicators -- will not be added until after completion of the FAI/LSI pretest. In addition to the two new items, states are urged to include an item on their R-300 equivalent for entering the name and address of a friend or relative of the client.

Item U: Federal Special Program Identification

None	TF	VET		MAW	PO	WIN	SEC4	SF	SD	Sum
000	001	002	004	010	020	040	100	200	400	

Directions: Insert an "X" within each box for each federal special program group with which the individual was identified, and enter in the "Sum" box the sum of the codes for the boxes marked with an "X". (For code definitions, see RS Manual.)

Item V: FAI/LSI Indicators

When the pretest of the Functional Assessment Inventory and Life Status Indicator items is complete, the items chosen for use in assessing function and status will be input on the R-300. Function and life status will be assessed at acceptance and at closure. The "scores" at acceptance will appear in Item V.

For State R-300 Equivalent Only: Address of Friend or Relative

This item is not used specifically to compute any data elements. However, it potentially could be very helpful in boosting response rates to the Follow-up Survey, as well as in keeping contact with clients in service statuses. However, it is not necessary or desirable for this information to be included on the R-300 input data sent to RSA. Instead, individual state agencies are encouraged to include this information on the R-300 equivalent only.

New Section 3: Information to be Recorded at Completion of the IWRP

This section actually will be used to address one of the Procedural Standards, discussed later in these Guidance Materials. The new Part 3 of the R-300 pertains to the original IWRP. Three items are included: date IWRP completed, work status of original IWRP goal, and original occupational goal. The "work status" item is used in the Procedural Standards. The date of IWRP completion is useful to have on the R-300, both to verify the Case Record and to calculate the months a client is in Status 10. The occupational goal is useful to have as a cross-check on work status of the goal and to inform managers of the range of occupational goals made by clients and counselors. These items must be filled out at the point of completing the original IWRP.

Item A: Date IWRP Completed

Directions: Record the date that the client's original IWRP was given final approval. The date should be the same as the date the client moved from Status 10 (Plan Development) to Status 12 (Plan Completed).

Item B: Work Status of Original IWRP Goal

Directions: Record the one-digit number indicating the work status of the original IWRP goal, using the same codes as for Item 2.0 (Work Status at Referral). Do not use codes 7-9 or Y for Item 3.B.

Item C: Original Occupational Goal

Directions: Record four digit code from the Dictionary of Occupational Titles for the vocational job goal listed in the original IWRP.

Additions to Part 4: Closure from VR

Three new items are added to Part 4 of the R-300: number of hours worked the week of closure; primary source of support at closure; and functional and life status at closure. All are used to compute Performance Standards data elements.

Item M: Number of Hours Worked During Week of Closure

Directions: The counselor will need to determine the number of hours the client worked at his or her job during the week of closure. Because this information will be used to compute the client's hourly wage, the "week" referenced here must be the same as the week used for Item 4.J (Weekly Earnings at Closure). Simply enter the number of hours worked in Item 4.M.

Item N: Primary Source of Support

Directions: The counselor will need to determine whether the client derives more than half of his or her total support from public or from private sources. To do this, the counselor must:

- (1) determine all sources of support, and the amount each source contributes;
- (2) add together the amount contributed by each public source to determine total public support;
- (3) repeat Step 2 for the sum of private sources of support;
- (4) check the box in Item 4.N which corresponds to the larger amount between Steps 2 and 3. The larger amount is, by definition, greater than 50% of the total support (represented by the sum of Steps 2 and 3). If the sources split 50% public and 50% private; code Item 4.N "private."

"Public sources" consist of the following:

- SSI,
- SSDI,
- AFDC,
- General Assistance (GA),
- Workmen's Compensation, and
- tax-supported public institutions.

Item 4.S: FAI/LSI Indicators

This item, when implemented after the FAI/LSI pretest, will give information at point of case closure corresponding to the acceptance information recorded in Item 2.V.

Uses of the RSA-300 Data for Performance Standards

Exhibit 1 presents an example of the revised RSA-300 form, and the instructions for completing the form. The reader can refer to Exhibit 1 when scanning Table 4, which shows the uses of R-300 data in computing the Performance Standards data elements and Procedural Standard 13 (goal-occupation match).

Table 4
Uses of R-300 Data for Performance Standards

R-300 Item	Used in Data Elements: ^a
1.C: Referral date	2(iii), 2(iv)
1.E: Age at referral	2(iii), 2(iv)
1.F: Sex	2(iii), 2(iv)
2.J: Previous closure from VR	2(iii); 2(iv)
2.O: Work status at referral	2(iii), 2(iv)
2.P: Weekly earnings at referral	2(iii), 2(iv), 5(i)
2.V: FAI/LSI at acceptance	5(iii), 6(ii)
3.B: Work status of IWRP goal	Procedural Standard 13
4.A: Closure date	2(iii), 2(iv)
4.E.1: Total case service costs	2(iii), 2(iv)
4.I: Work status at closure	2(i), 2(iii), 2(iv), 4(ii), 5(i)-(iii), 7(iii), Procedural Standard 13
4.J: Earnings at closure	2(iii), 2(iv), 4(i), 4(ii), 5(ii), 6(i), 7(i)
4.M: Number of hours worked during week of closure	5(ii)
4.N: Primary source of support at closure	7(ii)
4.O.2: Months in status 10-24	2(iii), 2(iv)
4.P: Closure status	2(i)-(iv), 4(i), 4(ii), 5(i)-(iii), 6(i), 6(ii), 7(i)-(iii), 8(i)-(iii), Procedural Standard 13
4.S: FAI/LSI at closure	5(iii), 6(ii), 7(iii)

^aColumn entries show standard number and data element number. The standards using RSA-300 data, and their broad foci, are:

- | | |
|--|---------------------------|
| 2: Cost-effectiveness and benefit-cost | 6: Client change |
| 4: Economic independence | 7: Retention |
| 5: Gainful activity | 8: Satisfaction |
| | 13: Goal-occupation match |

Exhibit 1.

Revised R-300 Form

(Standards input data is shaded)

Agency Code _____
Case Number _____

CASE SERVICE REPORT: STATE-FEDERAL PROGRAM OF VOCATIONAL REHABILITATION
PART 1 (TO BE RECORDED AT TIME OF FIRST REFERRAL)

A. Last Name _____ First Name _____ Initial _____ C. Referral Date _____ O. Referral Source _____
 E. Age _____ Job _____ F. Sex: 1 Male, 2 Female

B. Address: Street and Number _____ G. Disability as Reported (describe) _____
 City _____ County _____ (Code*) _____ Zip Code _____ Code _____

PART 2 (TO BE RECORDED AT COMPLETION OF REFERRAL PROCESS)

A. Soc. Sec. No. _____
 B. SSDI Status _____
 C. SST Status _____
 D. Race _____
 E. Date Referral _____
 Process Completed: _____
 F. Months in Statuses 00-02 _____
 G. Spanish Surname: 1 Yes; 2 No
 H. Outcome of Referral Process:
 NOT ACCEPTED: Reason _____
 1 from (00); 2 from (02)
 ACCEPTED FOR:
 04 Extended Evaluation (06)
 05 VR Services (10)
 I. Disabling Conditions (describe)
 1. Major _____ Code _____
 2. Secondary _____ Code _____

J. Previous Closure Within 36 Months:
 No: Yes-Outcome Rehab:
 Not Rehab: Yes-Months Since Last Closure: _____

K. Marital Status _____
 L. Number of Dependents _____
 M. Total Number in Family _____
 N. Highest Grade Completed _____
 O. Work Status _____
 P. Weekly Earnings _____
 Q. Total monthly Family Income (including earnings) _____

R. Public Assistance (including SSI) _____
 S. Primary Source of Support _____
 T. Type of Institution _____
 U. Federal Special Program Identification* _____

None	TF	VEY	PAW	PO	WIN	SECA	SF	SD	Sum
000	001	002	003	010	020	040	100	200	400

V. FRI/CSI Indicators (to be determined)

PART 3 (TO BE RECORDED AT COMPLETION OF THE IWRP)

A. Date IWRP completed _____
 B. New Status of Original IWRP Goal _____
 C. Original Occupational Goal (TITLE) _____

PART 4 (TO BE RECORDED AT TIME OF CLOSURE)

A. Date of Closure _____
 B. Referred by Sec. Sec. Admin.: 1 No; 2 Yes
 C. Social Security Claim Type _____
 D. Federal Special Program Identification* _____

None	TF	VEY	PAW	PO	WIN	SECA	SF	SD	Sum
000	001	002	003	010	020	040	100	200	400

E. Outcome of Extended Evaluation of VR Services:
 1. Closed From Extended Evaluation (Status 04) Reason: _____
 2. Closed Rehabilitation (Status 20) Reason: _____
 3. Closed Not Rehabilitated (Status 28) Reason: _____
 4. Closed Not Rehabilitated (Status 30) Reason: _____

Q. Services Provided:

Type of Service Provided or Arranged for by Agency	Cost Status
10 Diagnostic and Evaluation	
11 Restoration (Physical or Mental)	
12 College or University	
13 Other Academic (Elem. or HS)	
14 Business School or College	
15 Vocational School	
16 On-the-Job	
17 Personal & Voc. Adjustment	
18 Miscellaneous	
19 Maintenance	
20 Other Services	
21 Services to Other Family Members	

0 = No service
 1 = With agency cost only
 2 = Without agency cost only
 3 = With and without agency cost

E. Cost of Case Services: (Dollars)
 1. All Services - Total _____
 2. Rehabilitation Facilities - Total _____
 3. Social Security Trust Funds - Total _____
 4. Supplemental Security Income Funds - Total _____

F. Date Ext. Eval. Completed (if applicable) _____
 G. SSDI Status _____
 H. SSI Status _____
 I. Work Status _____
 J. Weekly Earnings _____
 K. Public Assistance (Type _____) (Monthly Amount _____)
 L. Occupation (title) _____ Code _____

M. Number of Hours Worked during Week of Closure _____
 N. Primary Source of Support: 1 public; 2 private
 O. Number of Months on Agency Roll:
 1. In Extended Evaluation (Status 06) _____
 2. From Acceptance to Closure (Statuses 10-24) _____
 3. In Training (Status 18) _____
 4. Ready for or in Employment (Statuses 20-22) _____

R. State Agency Special Program Identification* _____

None	TF	VEY	PAW	PO	WIN	SECA	SF	SD	Sum
000	001	002	003	010	020	040	100	200	400

S. FRI/CSI Indicators (to be determined)

Date of Report _____ Counselor Signature _____ Code _____

* These items are to be coded.



Exhibit 1 (continued)
(Asterisk indicates standards input data)

CODE LIST FOR FORM SRS-RSA-300

Agency Code - (See RS Manual)

Part 1 Item 8 - County Code

Enter the three digit code from the code list provided by your agency

Part 1 Item 0 - Referral Source Codes

(1.) Educational Institutions

- 10 College or university (institution offering higher than secondary education)
12 Vocational school, (including business, trade, and other technical)
14 Elementary or high school
16 School for the physically or mentally handicapped
19 Other educational institution

(2.) Hospitals and Sanitariums

- 20 Mental hospital
22 Other chronic condition or specialized hospital or sanitariums
24 General hospital
29 Other hospital or clinic (except public health clinic)

(3.) Health Organizations and Agencies

- 30 Rehab. Facility (except Community Mental Health Center)
32 Community Mental Health Center
34 State Crippled Children's Agency
36 Other public health department, organization, or agency (including public health nurse or clinic)
39 Other private health organization or agency

(4.) Welfare Agencies

- 40 Public welfare agency (state and local government)
44 Private welfare agency

(5.) Public Organizations and Agencies

- 50 Social Security Disability Determination Unit
51 Social Security District Office
52 Workmen's Compensation Agency (federal and state)
53 State Employment Service
54 Selective Service System
55 State Vocational Rehabilitation Agency
56 Correctional institution, court, or officer
59 Other public organization or agency (not specifically education, health or welfare)

(6.) Private Organizations and Agencies

- 60 Artificial appliance company
62 Employer (private)
69 Other private organization or agency (not specifically education, health or welfare)

(7.) Individuals

- 70 Self-referred person
72 Physician, n.e.c.
79 Other individual, n.e.c.

Part 1 Item G - Disability as Reported (See RS Manual)

Part 2 Items 8 and C and Part 4 Items G and H - SSDI and SSI Status

- 0 Not an applicant
1 Applicant - Allowed benefits
2 Applicant - Denied benefits
3 Applicant - Status of application pending
4 Not known if an applicant (Do not use in Part 2 Items 8 and C if accepted for EE or VR services. Do not use in Part 3 Items G and H if closed in status 26.)
5 Benefits discontinued or terminated

Part 2 Item 0 - Race

- 1 White 3 Indian Y Not available
2 Negro 4 Other

*Part 2 Item H and Part 4 Item P - Reason for Closure

- 1 Unable to locate or contact; or moved
2 Handicap too severe or unfavorable medical prognosis
3 Refused services or further services
4 Death
5 Client institutionalized
6 Transfer to another agency
7 Failure to cooperate
8 No disabling condition (closures from 00 or 02 only)
9 No vocational handicap (closures from 00 and 02 only)
Y Other

Part 2 Item I - Disabling Conditions (See RS Manual)

Part 2 Item K - Marital Status

- 1 Married 4 Separated
2 Widowed 5 Never married
3 Divorced Y Not available

*Part 2 Item O, Part 3 Item 8, and Part 4 Item I - Work Status

- 1 Wage or salaried worker - competitive labor market
2 Wage or salaried worker - sheltered workshop
3 Self-employed (except BEP)
4 State-agency-managed business-enterprise (BEP)
5 Homemaker
6 Unpaid family worker

* Part 2 Item Q, Part 3 Item 8, and Part 4 Item I (continued)

DO NOT USE THE FOLLOWING CODES AT PLAN COMPLETION, OR AT CLOSURE FOR STATUS 26 CLOSURES

- 7 Not working - student
8 Not working - other
9 Trainee or worker (non-competitive labor market)
Y Not available

Part 2 Item Q - Monthly Family Income (including earnings)

- 0 \$ 0.00 - 149.99 6 \$400.00 - 449.99
1 150.00 - 199.99 7 450.00 - 499.99
2 200.00 - 249.99 8 500.00 - 599.99
3 250.00 - 299.99 9 600.00 and over
4 300.00 - 349.99 Y Not available
5 350.00 - 399.99

Part 2 Item R and Part 4 Item K - Type of Public Assistance

0 None (Do not use at closure if client received PA between referral and closure. See code 9.)

- 1 SSI - aged
2 SSI - blind
3 SSI - disabled

4 Aid to families with dependent children (AFDC)

5 General assistance (GA) only

6 AFDC and SSI in combination

7 (Do not use)

8 Type(s) not known

9 PA received between referral and closure only. (Do not use in Part 2 Item R. Record dollar amount of first check.)

Y Not available (Do not use in Part 2 Item R if accepted for EE or VR services. Do not use in Part 3 Item K if closed in status 26.)

Part 2 Item R - Time on Public Assistance

- 0 Not receiving public assistance 5 Three years but less than six months
1 Less than six months 6 Four years but less than five years
2 Six months but less than one Year 7 Five years or more
3 One year but less than two 8 Two years but less than three
4 Two years but less than three Y Not available

Part 2 Item S - Primary Source of Support

- 00 Current earnings, interest, dividends, rent
01 Family and friends
02 Private relief agency
03 Public assistance, at least partly with federal funds
04 Public assistance, without federal funds (GA only)
05 Public institution - tax supported
06 Workmen's compensation
07 Social Security Disability Insurance benefits
08 All other public sources
09 Annuity or other nondisability insurance benefits (private)
10 All other sources of support
YY Not available

Part 2 Item T - Type of Institution

- 00 Not in institution at referral
01 Public mental hospital
02 Private mental hospital
03 Psychiatric inpatient unit of general hospital
04 Community mental health center - inpatient
05 Public institution for the mentally retarded
06 Private institution for the mentally retarded
07 Alcoholism treatment center
08 Drug abuse treatment center
09 School and other institution for the blind
10 School and other institution for the deaf
11 General hospital
12 Hospital or specialized facility for chronic illness
13 Institution for the aged
14 Halfway house
15 Correctional institution - adult
16 Correctional institution - juvenile
17 Other institutions and living arrangements

Part 2 Item U and Part 4 Item O - Federal Special Program Identification (See RS Manual)

Part 3 Item C - Original Occupational Goal (See Dictionary of Occupational Titles - DOT)

Part 4 Item C - Social Security Claim Type (See RS Manual)

- 1 DIS 3 CDB-01
2 CDB-0A 4 CDB
9 No trust funds expenditures

Part 4 Item L - Occupation (See RS Manual)

* Part 4 Item N - Primary Source of Support (enter code for source supplying 50% or more of total support)

THE RSA-113 QUARTERLY CUMULATIVE CASELOAD/EXPENDITURE REPORT

The RSA-113 report is a new form developed by RSA to replace the RSA-101 and RSA-2. At the present time, the RSA-113 contributes only caseload data for computing the Standards. After final revision, the RSA-113 will also contain the financial data needed for the Standards. Table 5 shows the standards data elements using RSA-113 data. An example RSA-113 form appears in Exhibit 2, with the standards input data shaded. (This version of the form was current as of July 28, 1981.)

Table 5
Uses of RSA-113 Data for Performance Standards^a

RSA-113 Item	Used in Data Element:
I.A.6.a (# 08 from 00/02)	2(iii), 2(iv) (benefit-cost) ^b
I.B.5.a (# 08 from 06)	2(iii), 2(iv) (benefit-cost) ^b
II.A.3.a (# available)	1(i), 1(ii) (coverage) ^b
II.A.3.b (# S.D. available)	1(ii) (coverage) ^b
II.A.4.a (# 26 closures)	2(ii) (cost-effectiveness) ^b 2(iii), 2(iv) (benefit-cost) ^b 3(i), 3(ii) (rehabilitation rate) ^b
II.A.5.a (# 28 closures)	2(iii), 2(iv) (benefit-cost) ^b 3(i) (rehabilitation rate) ^b
II.A.6.a (# 30 closures)	2(iii), 2(iv) (benefit-cost) ^b 3(i) (rehabilitation rate) ^b

^aAs of 7/28/81

^bFocus of relevant standard

QUARTERLY CUMULATIVE CASELOAD/EXPENDITURE REPORT

State & Agency _____ () Blind
 () General

Fiscal Year 19____, _____ Quarter

PART	SECTION	LINE	TOTAL - ALL CASES +	TOTAL - SEVERE CASES	SSDI	SSI	BASIC SUPPORT		
			a	b	c	d		e	
I. PREACTIVE CASELOAD (STATUSES 02-06)	A. APPLICANTS	1. On Hand Oct 1							
		2. New Since Oct 1							
		3. Available During Period (A1 + A2)							
		4. Accepted for VR Since Oct 1							
		5. Accepted for EE Since Oct 1							
		6. Not Accepted - Status 08							
		7. Remaining End of Qtr (A3 - A4 - A5 - A6)							
	B. EXTENDED EVALUATION	1. On Hand Oct 1							
		2. New Since Oct 1							
		3. Available During Period (B1 + B2)							
		4. Accepted for VR - Status 08							
		5. Not Accepted For VR - Status 08							
		6. Remaining End of Qtr (B3 - B4 - B5)							
		II. ACTIVE CASELOAD (STATUSES 10-23)	A. ACTIVE CASELOAD	1. On Hand Oct 1					
2. New Since Oct 1									
3. Available During Period (A1 + A2)									
4. Rehabilitated Since Oct 1 - Status 26									
5. Not Rehabilitated - Status 28									
6. Not Rehabilitated - Status 30									
7. Remaining End of Qtr (A3 - A4 - A5 - A6)									
B. SGA REHABILITATIONS	1. SGA - Blind								
	2. SGA - Non-Blind								
								SEVERE	NON-SEVERE

Exhibit 2
 Example RSA - 113 Report
 (Standards input data is shaded)

ERIC CASES. This column is for unduplicated totals and will be equal to or less than respective sums of SSDI, SSI and Basic Support columns

QUARTERLY CUMULATIVE CASeload/EXPENDITURE REPORT

State & Agency _____ } Blind
 _____ } General

Fiscal Year 19____, _____ Quarter

PART	SECTION	LINE	TOTAL -	TOTAL -	SSDI	SSI	BASIC		
			ALL CASES *	SEVERE CASES			SUPPORT	NON-	
			a	b	c	d	SEVERE	SEVERE	
III. PROJECTIONS	A. ESTIMATED NUMBER OF REHABILITATIONS	1. Next Quarter							
		2. Remainder of Fiscal Year							
	B. SUBSEQUENT FISCAL YEAR PROJECTIONS **	1. Number to be Served							
		2. Number to be Rehabilitated							
						FEDERAL PROPERTY	NON-FEDERAL PROPERTY		
	C. RANDOLPH SHEPPARD VENDING FACILITIES SUBSEQUENT FISCAL YEAR PROJECTIONS **	1. New Facilities to be Established							
2. Facilities to be Refurbished									
3. Facilities to be Closed									

* TOTAL-ALL CASES - This column is for unduplicated totals and will be equal to or less than respective sums of SSDI, SSI, and Basic Support columns.

** Report subsequent Fiscal Year projections only on first quarter-submission

CERTIFICATION

This report is complete and correct.

Date _____ Signed _____

Exhibit 2 (continued)



FINANCIAL STATUS REPORT (Follow instructions on the back)		1. FEDERAL AGENCY AND ORGANIZATIONAL ELEMENT TO WHICH REPORT IS SUBMITTED X			2. FEDERAL GRANT OR OTHER IDENTIFYING NUMBER		OMB Approved file 50-FOI80	PAGE OF				
3. RECIPIENT ORGANIZATION (Name and complete address, including ZIP code) X		4. EMPLOYER IDENTIFICATION NUMBER X		5. RECIPIENT ACCOUNT NUMBER OR IDENTIFYING NUMBER X		6. FINAL REPORT <input type="checkbox"/> YES <input type="checkbox"/> NO X		7. BASIS <input type="checkbox"/> CASH <input type="checkbox"/>				
		8. PROJECT/GRANT PERIOD (See instructions) FROM (Month, day, year) TO (Month, day, year) X			9. PERIOD COVERED BY THIS REPORT FROM (Month, day, year) TO (Month, day, year) X							
10. STATUS OF FUNDS												
PROGRAMS/FUNCTIONS/ACTIVITIES ▶		(a) Basic Support	(b) Trust Funds	(c) SSI	(d)	(e)	(f)	TOTAL (\$)				
a. Not outlays previously reported		\$ X	\$ X	\$ X	\$	\$	\$	\$ X				
b. Total outlays this report period		X	X	X				X				
c. Less: Program income credits		X	X	X								
d. Net outlays this report period (Line b minus line c)		X	X	X				X				
e. Not outlays to date (Line a plus line d)		X	X	X				X				
f. Less: Non Federal share of outlays		X						X				
g. Total Federal share of outlays (Line e minus line f)		X	X	X				X				
h. Total unliquidated obligations		X	X	X				X				
i. Less: Non Federal share of unliquidated obligations shown on line h		X						X				
j. Federal share of unliquidated obligations		X	X	X				X				
k. Total Federal share of outlays and unliquidated obligations		X	X	X				X				
l. Total cumulative amount of Federal funds authorized		X	X	X				X				
m. Unobligated balance of Federal funds		X	X	X				X				
11. DIRECT EXPENSE		a. TYPE OF RATE (Place "X" in appropriate box) <input type="checkbox"/> PROVISIONAL <input type="checkbox"/> PREDETERMINED <input type="checkbox"/> FINAL <input type="checkbox"/> FIXED			b. RATE		c. DATE		d. TOTAL AMOUNT		e. FEDERAL SHARE	
		SEE ADDENDUM										
12. CERTIFICATION I certify to the best of my knowledge and belief that this report is correct and complete and that all outlays and unliquidated obligations are for the purposes set forth in the award documents.				SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL X				DATE REPORT SUBMITTED		TELEPHONE (Area number and ext.)		
				TYPED OR PRINTED NAME AND TITLE X								

STANDARD FORM 250 (7-75)
Prescribed by Office of Management
and Enterprise Services

Exhibit 2
(continued)

00

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X. ENTRIES MADE BY STATE AGENCY

12. REMARKS: Addendum

a. Estimated Federal Fund Requirements to end of fiscal year for:

(1) Basic Support Program \$ _____

(2) Trust Fund Program \$ _____

(3) S.F.I. Program \$ _____

b. Estimate of State Matching Funds available
in the subsequent Fiscal Year for Basic
Support Program \$ _____

Exhibit 2 (continued)

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THE RSA-2 ANNUAL REPORT FOR VOCATIONAL REHABILITATION

The RSA-2 report has been discontinued by RSA as a reporting requirement for state agencies. However, we include the RSA-2 in these Guidance Materials because, as of this writing, the RSA-2 is the only currently or formerly used report containing certain financial data items needed for the Performance Standards. The new RSA-113 will, after final revision, contain the necessary information. Thus, the RSA-2 is included solely to show the specific data items needed; ultimately, these data items will come from the RSA-113.

Table 6 shows the uses of RSA-2 data for the Performance Standards. The data is used only in the cost-effectiveness and benefit-cost data elements. Exhibit 3 presents an example RSA-2, with the standards input data shaded.

Table 6
Uses of RSA-2 Data for Performance Standards

RSA-2 Item	Use in Data Element: ^a
II.B.1.D (Sect. 110 maintenance service costs)	2(iii), 2(iv)
II.D.1.D (Trust Fund maintenance service costs)	2(iii), 2(iv)
II.F.1.D (SSI maintenance service costs)	2(iii), 2(iv)
II.B.1.H (Sect. 110 total service costs)	2(iii), 2(iv)
II.D.1.H (Trust Fund total service costs)	2(iii), 2(iv)
II.F.1.H (SSI total service costs)	2(iii), 2(iv)
III.C.8 (Total Sect. 110 program costs)	2(i), 2(ii)
IV.4 (Trust Fund, SSI) ^b	2(i), 2(ii)
V.C.7 (I & E total costs) ^b	2(i), 2(ii)

^aRSA-2 data is used solely for the cost-effectiveness data elements [2(i) and (ii)] or the benefit-cost data elements [2(iii) and (iv)].

^bIf relevant to current program operations.

Exhibit 3

Example RSA - 2

(Standards input data is shaded)

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
REHABILITATION SERVICES ADMINISTRATION
WASHINGTON, D.C.

Form Approved
Budget Bureau
No: 83-R0017

ANNUAL REPORT FOR VOCATIONAL REHABILITATION

STATE OF _____

GENERAL BLIND

FOR FISCAL YEAR BEGINNING 19__ AND ENDING 19__

PART I Number of Persons Rehabilitated:

Severely Disabled
Non-Severely Disabled
Total

A BASIC SUPP.	B TRUST FUNDS	C SSI FUNDS	Total

PART II Obligations for Services for Individuals

(Include cash and certified disbursements and unliquidated obligations)	A		B		C		D		E		F	
	OBLIGATIONS FROM SECTION 110 (BASIC SUPPORT)		OBLIGATIONS FROM SOCIAL SECURITY TRUST FUNDS		OBLIGATIONS FROM SUPPLEMENTAL SECURITY INCOME PROGRAM							
	NO. OF CLIENTS	AMOUNT	NO. OF CLIENTS	AMOUNT	NO. OF CLIENTS	AMOUNT	NO. OF CLIENTS	AMOUNT	NO. OF CLIENTS	AMOUNT	NO. OF CLIENTS	AMOUNT
1. Services for Individuals												
A. Diagnostic and Evaluation												
B. Restoration (Physical - Mental)												
(1) Surgery and Treatment												
(2) Prosthetic and Orthotic Appliances												
(3) Hospital and Convalescent Care												
(4) Other Restoration												
(5) Total Restoration												
C. Training												
(1) College or University												
(2) Other Academic (Elementary or High School)												
(3) Business School or College												
(4) Vocational School												
(5) On the Job												
(6) Personal and Vocational Adjustment												
(7) Miscellaneous												
(8) Total Training												
D. Maintenance												
E. Services to Family Members												
F. Post Employment Services												
G. Other Services												
H. Total Services for Individuals												
2. Classification of Obligations by Type of Vendor												
A. State Agency Operated Rehab. Facilities												
H. Other Rehabilitation Facilities												
C. Other Vendors												
D. Total												
3. Obligations for Extended Eval. (Status 06)												

CERTIFICATE

This Report is Complete and Correct

Date

Signed

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Authorized Signature

Exhibit 3 (continued)

STATE OF _____ GENERAL BLIND

PART III Obligations From Section 110 of Rehabilitation Act	OBLIGATIONS		TOTAL CERTIFIED AND AGENCY
	CERTIFIED THIRD PARTY	STATE VR AGENCY	
1. Administration			
2. Counseling and Placement			
3. Services for Individuals			
4. Small Business Enterprises			
5. Establishment of Rehab. Facilities			
6. Fac. and Services to Groups of Individuals			
7. Agency Operated Rehab. Fac. (Cap. Expend.)			
8. Total			
9. Federal Share			
10. State Share			
11. Construction Costs*			
12. Federal Share			
13. State Share			
14. Total Federal Share			
15. Total State Share			

THE AGENCY'S SHARE OF THE AMOUNT REQUIRED UNDER THE MAINTENANCE OF EFFORT PROVISION. \$

PART IV Summary of Obligations and Allowances in Lieu of Direct Charges from Social Security Trust Funds and SSI Program	TRUST FUND		SSI
	T/R	F	
1. Administration			
2. Counseling and Placement			
3. Services for Individuals			
4. Total Obligations and Allowances			

* Indicate with a check mark if the amount entered was by the Time Records method (T/R) or Formula method (F).

PART V Obligations From Section 120 of the Rehabilitation Act	OBLIGATIONS		TOTAL CERTIFIED AND AGENCY
	CERTIFIED THIRD PARTY	STATE VR AGENCY	
1. Administration			
2. Counseling and Placement			
3. Services for Individuals			
4. Small Business Enterprises			
5. Establishment of Rehab. Facilities			
6. Fac. and Services to Groups of Individuals			
7. Total			
8. Federal Share			
9. State Share			

Exhibit 3 (continued)

STATE OF _____ GENERAL BLIND

PART VI Vocational Rehabilitation Personnel Equivalent Man Years	SECTION 110		SS DIS. BENEF.	SSI	ALL OTHERS	TOTAL
	THIRD PARTY	STATE DVR				
	MAN YEARS	MAN YEARS	MAN YEARS	MAN YEARS	MAN YEARS	MAN YEARS
1. Administration						
2. Counseling and Placement (a) Counselors						
(b) Other						
3. Services for Individuals						
4. Staff at St. Oper. Rehab. Fac (a) Counselors						
(b) Other						
5. Total						

PART VII Establishment of Vocational Rehabilitation Facilities	ESTABLISHMENT OF VOCATIONAL REHABILITATION FACILITIES			
	A Name and Location	B CAPACITY		C TOTAL OBLIGATIONS
		PRESENT	INCREASED TO	
Total				

PART VIII Construction of Vocational Rehabilitation Facilities	CONSTRUCTION OF VOCATIONAL REHABILITATION FACILITIES			
	A Name and Location	B CAPACITY		C TOTAL OBLIGATIONS
		PRESENT	INCREASED TO	
Total				

THE CLIENT CLOSURE SURVEY

The Vocational Rehabilitation Performance Standards require that VR clients be satisfied with the services and training received and that the services are useful in obtaining and performing jobs. In the past, VR agencies have gathered information addressing such issues through the use of follow-up questionnaire surveys. However, a review of the VR Program Evaluation Standards noted many criticisms of this effort, including non-comparable sampling designs, survey formats, definitions, and resulting data across states, high nonresponse rates, and reporting biases.¹ The Closure Survey (and the Follow-up Survey described later) is designed to replace the unsatisfactory ad hoc operations with a new approach, standardized across state agencies.

The Closure Survey is intended for distribution at case closure to a sample of clients whose services are terminating.² As a self-completion mailback questionnaire, it is designed to be self-explanatory and to be completed by the clients themselves. The Closure Survey will serve as the sole source of client satisfaction data (for all closure types) and of data on service utility (for successfully rehabilitated clients).

Exhibit 4 presents an example of the Closure Survey, complete with column numbers (for computer keypunching) and response categories. Table 7 shows how the Closure Survey data will be used in computing Performance Standards data elements.

Two points must be noted regarding the Closure Survey. First, as stated earlier, the Closure Survey was designed solely to address the standard on client satisfaction. However, at the state agency's option, it may include questions on income, etc., if the agency desires to use the survey as a validation procedure for its R-300 data. As well, the state, for its own purposes, may include other questions (for example, questions asking whether the client or someone else completed the survey,

¹Berkeley Planning Associates; VR Program Evaluation Standards: A Critique of the State of the Art; January 7, 1977; RSA Contract #105-76-4116.

²A sample of 500 clients (300 - 26 closures, 100 - 28 closures, and 100 - 30 closures) is adequate for the purposes of the standards. The clients should be sampled throughout the fiscal year, rather than sampling all respondents from a particular fiscal quarter or month.

Table 7

Uses of Closure Survey Data for Performance Standards

Closure Survey Question:.	Used in Data Element:
1	8(i) (Percent of closed clients satisfied with overall VR experience)
2	8(ii) (Percent of closed clients satisfied with their counselors)
3, 4	8(ii) (Percent of closed clients receiving physical restoration services, who are satisfied with those services)
5, 6	8(ii) (Percent of closed clients receiving job training services, who are satisfied with those services)
7, 8	8(ii) (Percent of closed clients receiving job placement services, who are satisfied with those services)
9	8(iii) (Percent of 26 closures judging services received to have been useful in obtaining their job/homemaker situation or in current performance)

Exhibit 4
Client Closure Survey

(Column #)	
(1-3)	Questionnaire No. / / / /
(4)	/ / (Card Number)
(5-14)	/ / / / / / / / / / (Client I.D.)
<u>VR CLIENT CLOSURE SURVEY</u>	
(15)	<p>1. Are you satisfied with your overall experience with the rehabilitation program? [PLEASE CHECK ONE]</p> <p><input type="checkbox"/> 1. Yes</p> <p><input type="checkbox"/> 2. No</p> <p><input type="checkbox"/> 9. Not sure or no opinion</p>
(16)	<p>2. Are you satisfied with your counselor's performance (that is, did he/she do a good job for you)? [PLEASE CHECK ONE]</p> <p><input type="checkbox"/> 1. Yes</p> <p><input type="checkbox"/> 2. No</p> <p><input type="checkbox"/> 9. Not sure or no opinion</p>
(17)	<p>3. Did your counselor arrange for you to have <u>physical restoration services</u>, such as medical treatment, physical therapy, artificial limbs, eyeglasses, dentures, hearing aids, etc.? [PLEASE CHECK ONE]</p> <p><input type="checkbox"/> 1. Yes</p> <p><input type="checkbox"/> 2. No</p> <p><input type="checkbox"/> 9. I don't remember</p>

Exhibit 4 (continued)

(Column #)	
(18)	<p>4. If YES, are you satisfied with these services? [PLEASE CHECK ONE]</p> <p><input type="checkbox"/> 1. Yes</p> <p><input type="checkbox"/> 2. No</p> <p><input type="checkbox"/> 9. Not sure or no opinion</p>
(19)	<p>5. Did your counselor arrange for you to have <u>job training</u>? [PLEASE CHECK ONE]</p> <p><input type="checkbox"/> 1. Yes</p> <p><input type="checkbox"/> 2. No</p> <p><input type="checkbox"/> 9. I don't remember</p>
(20)	<p>6. If YES, are you satisfied with the kind of training you received? [PLEASE CHECK ONE]</p> <p><input type="checkbox"/> 1. Yes</p> <p><input type="checkbox"/> 2. No</p> <p><input type="checkbox"/> 9. Not sure or no opinion</p>
(21)	<p>7. Did your counselor help you <u>look for</u> a job? [PLEASE CHECK ONE]</p> <p><input type="checkbox"/> 1. Yes</p> <p><input type="checkbox"/> 2. No</p> <p><input type="checkbox"/> 9. I don't remember</p>
(22)	<p>8. If YES, are you satisfied with the help you received? [PLEASE CHECK ONE]</p> <p><input type="checkbox"/> 1. Yes</p> <p><input type="checkbox"/> 2. No</p> <p><input type="checkbox"/> 9. Not sure or no opinion</p>

Exhibit 4 (continued)

(Column #)	
(23)	<p data-bbox="478 373 1336 596">9. Were the services or training you received from the rehabilitation program useful in helping you to perform in your present situation or in helping you get it? [PLEASE CHECK ONE]</p> <p data-bbox="548 604 1279 827"><input type="checkbox"/> 1. Yes <input type="checkbox"/> 2. No <input type="checkbox"/> 3. I received no services or training from the rehabilitation program <input type="checkbox"/> 9. I have no opinion</p>

how long it took to complete the survey, and whether further services are desired). However, all state agencies must use the exact wording and order for those questions used to address Standard 8; any other questions must be appended to the core set of questions for that standard.

The second point concerns merging of the Closure Surveys with the clients' R-300 records. By merging Closure Survey data to the R-300 data (on client characteristics, services received, and service outcomes), the Closure Survey can be used to help identify strengths and weaknesses of specific counselors and service strategies.

THE CLIENT FOLLOW-UP SURVEY

The Performance Standards mandate that "rehabilitated clients shall retain the benefits of VR services." The Client Follow-up Survey provides all data on retention of benefits. This data is used both for the retention standard (#7) and in the benefit-cost data elements (Standard 2).

The Closure and Follow-up Surveys differ in focus: the Closure Survey measures client satisfaction, while the Follow-up Survey measures benefit retention. Beyond this, however, the two surveys have many parallels. First, the Follow-up Survey is also designed as a mailback questionnaire, sent to a sample of former clients (sent one year after closure from VR). However, the Survey is sent only to rehabilitated clients (i.e., 26 closures) on the theory that benefit retention is relevant only for rehabilitated clients. A sample of 200 - 26 closures is adequate for the purposes of the standards. As with the Closure Survey, clients should be sampled throughout the fiscal year. This requires that some Follow-up Surveys be sent out each month, as close as possible to the point one year after closure from VR. The 200 clients sampled for follow-up need not be part of the Closure Survey sample. However, overlapping the two samples will reduce sampling effort and afford a more complete data base for use in investigating performance problems.

A second parallel is that, like the Closure Survey, the Follow-up Survey is intended to provide standardized data across all state agencies. Thus, while state agencies may add other questions to the Follow-up Survey as they wish, all states must use the exact wording and order for the questions used to address Standards 2 and 7; additional questions must be appended to the core set used for the standards.

Finally, the Follow-up Survey must be merged with the sampled clients' R-300 records, to allow measurement of benefit retention between closure and follow-up. As well, merging allows for investigation of performance problems.

Table 8 shows the uses of Follow-up Survey data in computing Performance Standards data elements. An example Follow-up Survey is presented in Exhibit 5, including column numbers and response categories. The table and exhibit also note that additional questions (pertaining to functional abilities and life status) will be added to the Follow-up Survey after completion of the pretest of the Functional Assessment Inventory (FAI) and Life Status Indicators instrument (LSI).

Table 8
Uses of Follow-Up Survey Data for Performance Standards

Follow-Up Survey Question:	Used in Data Element:
1	(Update on work status. Not used explicitly for standards.)
2	7(ii) (Primary source of support)
3	2(iii), 2(iv) (Benefit-cost) 7(i) (Earnings retention) 7(ii) (Primary source of support)
4	7(ii) (Primary source of support)
5 ^a	7(iii) (Retention of functional abilities and life status)

^aQuestions to be added after pretest of Functional Assessment Inventory (FAI) and Life Status Indicators (LSI).

Exhibit 5

Client Follow-Up Survey

(Column #)	
(1-3)	Questionnaire No. <u> </u> <u> </u> <u> </u> <u> </u> <u> </u>
(4)	<u> </u> <u> </u> (Card Number)
(5-14)	<u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> (Client I.D.)
	<u>VR CLIENT FOLLOW-UP SURVEY</u>
(15)	<p>1. Which of the following statements best describes your present work situation? [PLEASE CHECK <u>ONLY ONE</u>]</p> <p><input type="checkbox"/> 1. I earn a wage or salary, either at a regular job or from self-employment</p> <p><input checked="" type="checkbox"/> 2. I earn a wage or salary in a sheltered workshop or Business Enterprise Program (BEP)</p> <p><input type="checkbox"/> 3. I am a homemaker</p> <p><input type="checkbox"/> 4. I work in a family farm or business without pay</p> <p><input type="checkbox"/> 5. I am not working at present</p> <p><input type="checkbox"/> 6. Other (explain): _____ _____ _____</p>
(16-19)	<p>2. How much total income, if any, did you and your dependents receive <u>last month</u> from all sources of public welfare? [PLEASE CHECK <u>ONLY ONE</u> AND FILL IN THE SPACE]</p> <p><input type="checkbox"/> We received \$ _____ last month</p> <p><input type="checkbox"/> None^a</p> <p><input type="checkbox"/> I don't remember^a</p>

Exhibit 5 (continued)

(Column #)	
(20-21)	<p>3. What were your total earnings <u>last week</u> (from a job, self-employment, sheltered workshop, or Business Enterprise Program (BEP))?</p> <p><input type="checkbox"/> I earned \$ _____ last week</p> <p><input type="checkbox"/> I am working but I don't receive a wage or salary^a</p> <p><input type="checkbox"/> I am not working^a</p> <p><input type="checkbox"/> I don't know^a</p>
(22-26)	<p>4. What was your income <u>last month</u> from private sources other than the earnings reported in Question 3 (for example, from rents, dividends, or private insurance)?</p> <p><input type="checkbox"/> I received \$ _____ last month</p> <p><input type="checkbox"/> None^a</p> <p><input type="checkbox"/> I don't remember^a</p>
<p>5. (Items assessing functional ability and life status; items to be determined through pre-test of Functional Assessment Inventory (FAI) and Life Status Indicators instrument (LSI).</p>	

^aThese responses will require multicolumn codes (e.g., 0000 for "None" on Question 2, 9999 for "I don't remember" on question 2).

"EXOGENOUS" DATA SOURCES: U.S. CENSUS PUBLICATIONS

In addition to the program reports and client surveys, the Performance Standards also require data from recurrent Census Bureau reports. This data will be obtained by RSA and input to the MIS for computing the data elements. Two Census documents are used: the annual Statistical Abstract of the United States, and the annual Current Population Report, Series P-25. Table 9 lists the documents, data items used, and standards data elements using the exogenous data. Exhibits 6, 7, and 8 give examples of the input documentation.

Table 9
Uses of Exogenous Data for Performance Standards
U.S. Census Bureau Recurring Reports

Document	Data Item	Used in Data Element:
Statistical Abstract of the United States	Federal hourly minimum wage	4(i) (Weekly minimum wage) 5(ii) (Hourly minimum wage)
	Average weekly earnings of manufacturing production workers	4(ii) (Comparison of client earnings to state wage norms)
Current Population Reports, Series P-25	Current esti- mate of state population	1(i) (Coverage of eligible population)

Exhibit 6
Statistical Abstract of the United States:
Source of Minimum Wage Data^a

(Used in data elements 4(i) and 5(ii). Shading denotes Standards input data.)

No. 689. EFFECTIVE AND SCHEDULED FEDERAL MINIMUM HOURLY WAGE RATES, 1950 TO 1981, AND COVERAGE IN 1977

[Employee estimates as of September 1977, except as indicated. The Fair Labor Standards Act of 1938 and subsequent amendments to 1977 provide for minimum wage coverage to be extended to specified nonsupervisory employment categories. Exempt from coverage are executives and administrators or professionals]

EFFECTIVE DATE	MINIMUM WAGE RATES				SEX, RACE, AND INDUSTRY	NONSUPERVISORY EMPLOYEES, 1977				
	Nonfarm workers			Farm workers ¹		Total (1,000)	Subject to minimum wage rates			
	Law's prior to 1966 ²	Percent avg. earnings ³	1966 and later ⁴				Total (1,000)	Percent of total	Prior to 1966 ⁵ (1,000)	1966 and later Amendments ⁶ (1,000)
In effect:					Total.....	78,801	54,348	78.9	38,634	15,812
Jan. 25, 1950	\$.75	54	(X)	(X)	Male.....	41,070	31,969	77.8	24,814	7,355
Mar. 1, 1956	1.00	52	(X)	(X)	Female.....	29,731	22,477	75.8	14,020	8,457
Sept. 3, 1961	1.15	50	(X)	(X)	White.....	62,242	47,785	76.8	34,580	13,225
Sept. 3, 1963	1.25	51	(X)	(X)	Black and other.....	8,358	6,061	77.8	4,074	2,587
Feb. 1, 1967	1.40	50	\$1.00	\$1.00	Black only.....	7,821	6,111	78.1	3,738	2,373
Feb. 1, 1968	1.60	54	1.15	1.15	Private industry.....	61,518	51,893	84.4	38,634	13,239
Feb. 1, 1969	(?)	(?)	1.30	1.30	Agriculture.....	1,431	565	39.5	-	565
Feb. 1, 1970	(?)	(?)	1.45	(?)	Mining.....	763	759	99.5	759	-
Feb. 1, 1971	(?)	(?)	1.60	(?)	Construction.....	3,740	3,720	99.5	3,039	681
May 1, 1974	2.00	46	1.90	1.60	Manufacturing.....	17,618	17,146	97.3	17,045	101
Jan. 1, 1975	2.10	45	2.00	1.80	Transp., public util.....	4,124	4,052	98.3	3,956	96
Jan. 1, 1976	2.30	46	2.20	2.00	Wholesale trade.....	3,799	3,039	80.0	2,925	113
Jan. 1, 1977	(?)	(?)	2.30	2.20	Retail trade.....	12,645	9,871	78.1	4,756	5,115
Jan. 1, 1978	2.65	45	2.65	2.65	Finance, ins., real estate.....	3,896	2,969	76.2	2,856	113
Future rates:					Services.....	11,800	8,557	73.8	3,297	5,260
Jan. 1, 1979	2.90	46	2.90	2.90	Private households.....	1,994	1,215	64.1	-	1,215
Jan. 1, 1980	3.10	46	3.10	3.10	Government ⁷	9,291	2,552	27.5	-	2,552
Jan. 1, 1981	3.35	46	3.35	3.35						

- Represents zero. X Not applicable. ¹ Applies to workers covered prior to 1961 Amendments and, after Sept. 1965, to workers covered by 1961 Amendments. Rates set by 1961 Amendments were: Sept. 1961, \$1.00; Sept. 1964, \$1.15; and Sept. 1965, \$1.25. ² Percent of gross average hourly earnings of production workers in manufacturing. ³ Applies to workers newly covered by Amendments of 1966, 1974, and Title IX of Education Amendments of 1972. ⁴ Included in coverage as of 1966, 1974, and 1977 Amendments. ⁵ Currently employed workers subject to criteria in effect prior to 1966 Amendments. ⁶ Currently employed workers subject to provisions. ⁷ No change in rate. ⁸ Preliminary. ⁹ Federal, State, and local employees.

Source: U.S. Department of Labor, Employment Standards Administration, *Minimum Wage and Maximum Hours Standards Under the Fair Labor Standards Act, 1978*.

255-500 O - 78 - 29

^a Reprinted from U.S. Bureau of the Census, Statistical Abstract of the United States, 1978, page 425.

Exhibit 7

Statistical Abstract of the United States:

Source of State Wage Norm Data²

(Used in data element 4(ii). Shading denotes Standards input data.)

424 Labor Force, Employment, and Earnings
 No. 687. PRODUCTION WORKERS, MANUFACTURING INDUSTRIES—HOURS AND GROSS EARNINGS, BY STATES: 1965 TO 1977

STATE	AVERAGE HOURLY EARNINGS (dollars)					AVERAGE WEEKLY EARNINGS (dollars)					AVERAGE WEEKLY HOURS				
	1965	1970	1975	1976	1977	1965	1970	1975	1976	1977	1965	1970	1975	1976	1977
U.S.....	2.61	3.76	7.81	5.19	5.63	108	154	198	208	227	41.2	39.8	39.4	40.0	40.3
N. Eng.:															
Maine.....	2.06	2.71	3.51	4.16	4.52	85	109	152	166	189	41.3	40.1	39.9	39.9	39.8
N.H.....	2.06	2.81	3.97	4.23	4.66	84	109	153	165	187	40.2	38.8	39.1	39.6	40.8
Vt.....	2.17	2.93	4.07	4.40	4.70	92	120	161	185	192	42.4	41.0	40.4	41.0	40.8
Mass.....	2.45	3.23	4.49	4.79	5.13	99	127	175	190	205	40.3	39.2	39.1	38.7	39.3
R.I.....	2.18	2.85	3.84	4.15	4.39	86	112	149	164	172	40.6	39.2	38.9	38.5	39.1
Conn.....	2.69	3.43	4.78	5.12	5.56	113	140	194	209	231	42.1	40.9	40.5	40.8	41.6
Mid. Atl.:															
N.Y.....	2.68	3.46	4.91	5.27	5.67	106	135	181	208	228	39.7	38.9	38.9	39.4	39.8
N.J.....	2.74	3.46	4.93	5.25	5.80	112	139	200	218	240	41.0	40.3	40.5	40.3	41.3
Pa.....	2.66	3.36	4.98	5.36	5.85	108	132	183	210	231	40.5	39.2	38.8	39.2	39.5
E.No. Cent.:															
Ohio.....	3.01	3.81	5.57	6.10	6.74	127	155	224	253	283	42.2	40.6	40.3	41.4	42.0
Ind.....	2.92	3.72	5.49	6.00	6.60	122	149	219	244	272	41.7	40.1	39.8	40.6	41.2
Ill.....	2.83	3.65	5.53	5.85	6.28	117	147	219	236	255	41.4	40.3	39.7	40.4	40.8
Mich.....	3.22	4.15	6.15	6.81	7.54	144	168	251	291	328	44.6	40.6	40.8	42.7	43.3
Wis.....	2.75	3.81	5.26	5.69	6.16	115	146	212	231	259	41.7	40.4	40.4	40.8	40.6
W.No. Cent.:															
Minn.....	2.72	3.54	5.10	5.52	5.97	112	141	200	220	239	41.2	40.0	39.2	39.8	40.0
Iowa.....	2.78	3.70	5.40	5.85	6.43	113	147	214	233	258	40.7	39.7	39.7	39.9	40.1
Mo.....	2.62	3.39	4.75	5.20	5.75	106	133	185	207	231	40.3	39.3	39.0	39.8	40.2
N. Dak.....	2.36	2.93	4.31	4.75	5.19	100	119	172	188	200	42.5	40.7	39.9	39.1	39.1
S. Dak.....	2.37	2.98	4.23	4.51	4.84	104	123	174	180	199	43.8	44.6	41.0	39.9	39.3
Nebr.....	2.40	3.21	4.51	4.93	(NA)	104	135	184	203	(NA)	43.1	42.0	40.7	41.1	(NA)
Kans.....	2.69	3.25	4.62	4.95	5.33	114	135	189	203	219	42.3	41.0	40.9	41.0	41.1
So. Atl.:															
Del.....	2.77	3.44	5.02	5.51	5.89	115	136	197	220	238	41.5	39.6	39.3	40.0	39.5
Md.....	2.62	3.40	5.04	5.52	6.05	108	136	197	219	241	41.2	40.1	39.1	39.6	39.9
D.C.....	2.82	3.81	5.52	5.44	5.50	114	148	213	210	211	40.2	38.8	38.5	38.6	38.4
Va.....	2.11	2.72	3.99	4.30	4.69	88	109	156	172	187	41.5	40.0	39.2	39.9	39.9
W. Va.....	2.74	3.42	4.93	5.42	6.06	111	136	192	212	239	40.4	39.8	39.0	38.2	39.5
N.C.....	1.82	2.46	3.51	3.79	4.10	75	97	123	149	182	41.3	39.5	38.5	39.4	39.6
S.C.....	1.88	2.51	3.59	3.91	4.28	79	101	141	158	173	41.9	40.2	39.4	40.4	40.6
Ge.....	2.01	2.67	3.88	4.10	4.46	83	106	142	164	181	41.1	39.8	39.2	40.1	40.5
Fla.....	2.16	2.88	4.11	4.36	4.63	91	119	164	176	188	42.3	41.1	40.0	40.4	40.7
E. So. Cent.:															
Ky.....	2.51	3.27	4.65	5.14	5.69	103	129	180	203	225	41.0	39.4	38.8	39.4	38.5
Tenn.....	2.09	2.73	3.93	4.24	4.68	85	109	158	171	188	40.8	39.9	39.8	40.3	40.2
Ala.....	2.24	2.90	4.10	4.46	4.99	94	117	162	181	196	41.8	40.3	39.5	40.8	40.5
Miss.....	1.82	2.42	3.58	3.82	4.15	75	98	141	153	168	41.2	40.2	39.3	40.0	40.1
W. So. Cent.:															
Ark.....	1.82	2.48	3.59	3.81	4.20	75	99	129	155	171	41.0	39.8	38.8	39.6	39.7
La.....	1.55	2.28	4.88	5.33	5.75	108	137	208	220	240	42.3	41.8	42.8	41.3	41.8
Oka.....	2.41	3.09	4.45	4.83	5.21	101	128	178	195	218	42.0	40.0	40.1	40.3	40.4
Tex.....	2.46	3.18	4.57	4.96	5.42	104	129	186	204	223	41.9	40.7	40.6	40.9	41.1
Mt.:															
Mont.....	2.80	3.70	5.32	5.93	6.53	115	148	196	236	273	41.0	40.0	38.8	39.8	41.8
Idaho.....	2.65	3.29	4.77	5.29	5.82	106	128	185	205	229	40.0	38.9	38.8	38.7	39.3
Wyo.....	2.86	3.36	5.11	5.43	5.72	108	130	206	218	228	37.9	38.7	40.2	40.2	39.8
Colo.....	2.82	3.50	(NA)	(NA)	(NA)	116	141	(NA)	(NA)	(NA)	41.2	40.4	(NA)	(NA)	(NA)
N. Mex.....	2.31	2.68	3.67	4.07	4.46	94	103	144	161	172	40.6	39.0	39.1	39.5	38.9
Ariz.....	2.77	3.31	4.85	5.19	5.55	114	132	189	208	222	41.1	40.0	39.0	39.5	40.1
Utah.....	2.84	3.26	4.05	4.89	5.18	114	127	156	192	207	40.3	39.1	38.4	39.2	40.0
Nev.....	3.18	4.09	5.26	5.61	6.10	127	161	201	218	237	39.9	39.3	38.2	38.9	38.8
Pac.:															
Wash.....	3.09	4.06	5.79	6.36	6.83	122	159	224	249	268	39.5	39.1	38.7	39.1	39.2
Oreg.....	2.94	3.82	5.54	6.07	6.67	117	148	213	236	257	39.8	38.8	38.4	38.9	38.6
Calif.....	3.05	3.80	5.22	5.59	6.00	124	150	206	222	241	40.6	39.8	39.4	39.7	40.1
Alaska.....	3.70	4.66	6.09	7.62	9.12	159	192	298	317	365	43.1	41.2	38.6	40.5	43.3
Hawaii.....	2.28	3.17	4.68	5.14	5.51	90	127	183	200	209	39.3	40.0	39.1	39.0	38.0

NA Not available. ¹ Data for 1977 not strictly comparable with prior years.
² Represents Washington, D.C., Standard Metropolitan Statistical Area; data not comparable prior to 1975 due to change in area definition.
³ Data for 1970 not strictly comparable with 1965.

Source: U.S. Bureau of Labor Statistics, *Employment and Earnings*, monthly. Compiled from data supplied by cooperating State agencies.

Exhibit 8

U.S. Census Current Population Reports, Series P-25:

Source of State Population Estimates^a

(Used in data element 1(i). Shading denotes Standards input data.)

STATE	1976 POPULATION, prel.						AVERAGE ANNUAL PERCENT CHANGE					
	1960 (1,000)	1965 (1,000)	1970 (1,000)	1975 (1,000)	1974 (1,000)	1976 (1,000)	Rank order	Total (1,000)	Per sq. ml. of land area ¹	1950-1960	1960-1970	1970-1976
U.S.	179,979	182,526	200,966	209,653	211,399	213,032	(X)	214,659	69.7	1.7	1.3	.9
N.E.	19,532	11,329	11,863	12,144	12,147	12,187	(X)	12,221	184.1	1.2	1.2	.5
Mass.	497	497	497	497	497	497	28	497	34.6	.6	.6	1.2
N.H.	809	876	742	723	723	723	42	822	91.1	1.4	2.0	1.7
Vt.	389	464	446	464	468	472	48	476	51.4	.3	1.4	1.1
N.J.	5,160	5,502	5,708	5,802	5,800	5,814	10	5,609	742.3	1.0	1.0	.3
R.I.	848	883	861	871	841	831	20	927	882.7	.8	1.1	-.4
Conn.	2,544	2,837	3,041	3,077	3,085	3,100	24	3,117	641.1	2.4	1.8	.4
M.A.	34,270	36,122	37,374	37,363	37,359	37,359	(X)	37,282	371.6	1.3	.8	(2)
N.Y.	16,828	17,734	18,226	18,208	18,094	18,076	2	18,064	378.1	1.3	.8	-.2
N.C.	6,102	6,787	7,183	7,331	7,329	7,333	9	7,336	975.4	2.3	1.7	.3
Pa.	11,329	11,620	11,812	11,843	11,827	11,840	4	11,862	282.8	.8	.4	.1
E.N.C.	38,291	38,496	38,312	38,818	38,878	38,945	(X)	38,934	167.7	1.7	1.1	.3
Ohio	8,734	10,201	10,654	10,739	10,735	10,735	6	10,650	280.9	2.0	.9	(2)
Ind.	4,674	4,822	4,932	4,936	4,912	4,913	12	4,902	146.9	1.8	1.0	.2
Ill.	10,046	10,653	11,123	11,198	11,178	11,197	5	11,229	201.4	1.1	1.1	.1
Mich.	7,834	8,357	8,890	8,963	8,994	9,111	7	9,104	160.2	2.0	1.3	.4
Wis.	3,982	4,232	4,429	4,533	4,559	4,589	16	4,609	84.6	1.4	1.1	.7
W.N.C.	15,424	15,819	16,249	16,615	16,659	16,690	(X)	16,805	37.1	.9	.6	.4
Minn.	3,252	3,562	3,911	3,987	3,991	3,921	19	3,963	50.0	1.3	1.1	.6
Iowa	2,726	2,842	2,952	2,958	2,853	2,841	25	2,870	51.3	.9	.3	-.2
Mo.	4,326	4,467	4,698	4,763	4,772	4,787	15	4,778	69.3	.9	.8	.3
S. Dak.	834	848	820	832	834	837	45	843	9.3	.2	-.1	-.6
N. Dak.	863	892	898	879	890	881	44	886	9.0	.4	-.2	-.4
Nebr.	1,417	1,471	1,494	1,530	1,540	1,544	35	1,533	20.3	.7	.5	.7
Kans.	2,183	2,206	2,249	2,256	2,270	2,280	31	2,310	28.2	1.3	.3	.4
S.A.	28,691	28,743	28,896	28,863	28,863	28,868	(X)	28,790	127.3	2.1	1.7	1.7
Del.	499	507	511	513	513	513	47	513	282.6	3.4	2.1	.9
MD	3,112	3,600	3,808	4,081	4,100	4,122	18	4,144	419.0	2.8	2.4	.9
DC	785	787	786	777	772	712	(X)	702	(9)	-.5	-.1	-.3
Va.	3,866	4,411	4,680	4,843	4,927	4,981	13	4,932	128.5	1.9	1.6	1.3
W. Va.	1,853	1,786	1,751	1,782	1,783	1,799	34	1,821	75.7	-.8	-.6	.7
N.C.	4,572	4,843	5,089	5,318	5,381	5,441	11	5,469	112.1	1.2	1.1	1.2
S.C.	2,322	2,494	2,597	2,722	2,774	2,816	28	2,848	94.2	1.2	.8	1.5
Tx.	3,856	4,232	4,607	4,831	4,897	4,931	14	4,970	839.6	1.4	1.5	1.3
Ft.	6,064	6,354	6,648	6,756	6,802	6,877	8	6,921	155.7	5.9	3.2	3.5
T.S.C.	12,672	12,627	12,629	12,644	12,646	12,648	(X)	12,648	78.3	.5	.6	1.0
Ky.	3,041	3,149	3,231	3,323	3,353	3,397	23	3,423	86.5	.4	.6	1.0
Tenn.	3,578	3,708	3,837	4,096	4,137	4,173	17	4,214	102.0	.7	1.0	1.1
Ala.	3,274	3,443	3,451	3,541	3,575	3,618	21	3,668	72.3	.5	.5	1.0
Miss.	2,182	2,246	2,220	2,242	2,330	2,341	29	2,354	49.6	(2)	1.2	1.0
W. C.	17,619	18,269	19,223	20,249	20,533	20,867	(X)	21,204	49.4	1.5	1.3	1.5
Ark.	1,790	1,894	1,922	2,031	2,082	2,110	33	2,109	40.8	-.8	.8	1.5
La.	3,320	3,498	3,652	3,747	3,781	3,806	20	3,841	85.5	1.9	1.1	.8
Okl.	2,236	2,440	2,567	2,641	2,643	2,715	27	2,760	40.2	.5	.9	1.3
Tex.	9,624	10,379	11,236	11,830	12,017	12,337	3	12,617	47.6	2.2	1.6	1.8
Mt.	6,916	7,740	8,346	9,197	9,422	9,625	(X)	9,833	11.5	3.1	1.9	2.8
Mont.	679	706	727	735	744	744	43	753	5.2	1.4	.3	1.2
Idaho	674	696	718	731	794	813	41	831	10.1	1.3	.7	2.5
Wyo.	331	332	334	331	341	378	49	399	4.0	1.3	(7)	2.6
Colo.	1,769	1,966	2,222	2,470	2,507	2,541	24	2,593	24.9	2.9	2.3	2.5
N. Mex.	954	1,012	1,023	1,097	1,119	1,144	37	1,168	9.6	3.3	.7	2.2
Ariz.	1,321	1,564	1,722	2,076	2,187	2,212	32	2,270	30.0	3.7	3.1	4.0
Nev.	980	981	1,064	1,124	1,175	1,203	38	1,253	15.0	2.6	1.7	2.4
Nev.	201	444	493	552	574	590	46	610	3.6	9.0	5.4	3.6
Ne.	21,328	24,484	28,690	27,507	27,862	28,274	(X)	28,729	32.2	3.4	2.2	1.3
W. Va.	2,855	2,967	3,413	3,444	3,505	3,559	22	3,615	54.3	1.8	1.8	.9
Okla.	1,772	1,937	2,101	2,177	2,264	2,364	30	2,439	24.2	1.5	1.7	1.7
Calif.	15,970	19,385	20,017	20,665	20,907	21,194	1	21,529	137.6	4.0	2.3	1.8
Alaska	229	271	314	333	314	365	50	382	.7	5.4	2.9	3.9
Hawaii	642	704	774	844	856	868	40	887	134.1	2.6	1.0	2.3

^a Reprinted from U.S. Bureau of the Census, Current Population Reports, Series P-25, 1977, page 11.

III. GUIDE TO THE PROCEDURAL STANDARDS SYSTEM

The Procedural Standards consist of five goal-statements for the VR program, pertaining to R-300 validity, compliance with key regulations, and certain aspects of case handling. The wording of the Standards is as follows:

Procedural Standards

9. Information collected on clients by the R-300 and all data reporting systems used by RSA shall be valid, reliable, accurate, and complete.
10. Eligibility decisions shall be based on accurate and sufficient diagnostic information, and VR shall continually review and evaluate eligibility decisions to ensure that decisions are being made in accordance with laws and regulations.
11. VR shall ensure that eligibility decisions and client movement through the VR process occur in a timely manner appropriate to the needs and capabilities of the clients.
12. VR shall provide an Individualized Written Rehabilitation Program for each applicable client, and VR and the client shall be accountable to each other for complying with this agreement.
13. Counselors shall make an effort to set realistic goals for clients. Comprehensive consideration must be given to all factors in developing appropriate vocational goals such that there is a maximum of correspondence between goals and outcomes: competitive goals should have competitive outcomes and noncompetitive goals should have noncompetitive outcomes.

The Procedural Standards will be reported for a given state agency every third fiscal year. RSA will conduct the data collection and will report the results to each state agency. The data elements for the Procedural Standards consist of a number of individual information items pertaining to various aspects of the particular issues addressed by a given Procedural Standard. (For example, the eligibility standard includes data elements on the process followed in declaring applicants ineligible, as well as data elements on the process followed for eligible applicants.) Thus, RSA and state agency program managers will be presented with information on "how things are done" in the agency, with respect to

the key processes embodied in the Procedural Standards. It is intended for states to use the Procedural Standards to benefit their program evaluation efforts and facilitate the improvement of services to clients. The information obtained via the Procedural Standards will form the basis for agency decisions to make appropriate changes in practices, where current processes are not in keeping with client interests and positive program performance.

The methodology for implementing the Procedural Standards reflects the desire to allow maximum flexibility to states in the VR process, yet still ensure attention to the areas addressed by the Procedural Standards and provide sufficient data in these areas to allow for program-wide analysis. Ideally, a uniform procedure would be followed by all states for monitoring these process areas, even though states retain differences in the ways they organize and conduct case service delivery. Indicators of compliance with legal requirements, such as eligibility and IWRP, should be the same for all states; that is, the same questions should be asked and the same summary data should be reported.

Most of the needs of the Procedural Standards are best met through case review. Thus, a single case review process will be implemented to address the case review needs of four of the Procedural Standards. This process will use the Case Review Schedule (CRS), developed by the San Diego State RCEP IX, as the basic document for Procedural Standards data collection. The CRS has already been mandated by RSA as the standardized instrument to be used by regional RSA offices whenever they conduct case reviews. For Procedural Standards 10 (eligibility) and 12 (IWRP), the CRS items essential to adequately assess compliance have been selected. These items make up the Modified CRS, which is considerably shorter than the full CRS. RSA could choose either the CRS or the MCRS as the instrument for collecting Procedural Standards data.

While the CRS is an appropriate vehicle for collecting compliance data, it lacks certain items needed to assess the validity of R-300 data (Standard 9) or to assess timeliness of case service (Standard 11). For these standards, two separate instruments have been developed to complement the CRS. These two instruments are incorporated directly into the CRS to provide a unified data collection instrument.

Finally, Standard 13 on the correspondence between IWRP occupational goals and final outcome uses data from the R-300. The R-300 items have been noted earlier (see pp. 63-70).

To summarize, the Procedural Standards consist of five process-oriented goal-statements for the VR program. For Standards 9-12, data collection will occur in a given state agency every third year. RSA will conduct the case reviews needed for data collection. Standard 13 uses R-300 data, and could be reported annually. Having described the general thrust of the Procedural Standards and the general process for collecting the needed data, we turn next to a discussion of the individual standards. Following this, we present a summary of the data sources and data items used to compute the Procedural Standards. Finally, we present the Case Review Schedule (including R-300 and timeliness assessment sections) and instructions for collecting the data.

THE FIVE PROCEDURAL STANDARDSSTANDARD 9: R-300 VALIDITY

Information collected on clients by the R-300 and all data reporting systems used by RSA shall be valid, reliable, accurate, and complete.

The VR service delivery systems needs an objective data base from which to measure performance. Yet inconsistencies and errors in reporting currently exist among and within VR program data systems. Confusion or misunderstanding over definitions exist and need to be minimized. This Procedural Standard would ensure that state agencies maintain acceptable levels of validity and reliability in reporting of R-300 and other data. This standard assumes states' attention to good data processing is pertinent to all the standards. Thus, given the importance of reliable, valid, and accurate data on which to base the program's evaluation capacity, this Procedural Standard relates to the broad RSA goals of compliance, quality, and cost-effectiveness.

Reliability, accuracy and completeness of data could be checked in several ways. While a state agency could conduct validity studies on a periodic basis, and edit checks as a part of routine data processing, this standard encompasses a specific recommended procedure for states to follow to ensure the accuracy of data recorded and submitted to RSA through the R-300. Primarily, the case review process includes an accuracy check between the case folder information, the R-300 form itself, and, if the state has a computer system, computer output listing of R-300 items selected for review. In particular, those R-300 data items which are used in computing the standard's data elements are subjected to checks of accuracy and validity through case folder documentation.

This standard uses the R-300 Verification Instrument (Section I.C of the Modified Case Review Schedule, presented below) as the data source. Table 10 shows the R-300 items which are checked using the R-300 Verification Instrument.

Table 10

R-300 Items Checked Using the R-300 Verification Instrument^a

Referral date	Monthly amount of public assistance received <u>at closure</u>
Closure date	Occupation at <u>closure</u>
Social Security number	DOT code for that occupation
SSDI status <u>at referral</u>	Outcome status (08, 26, 28, 30)
SSI status <u>at referral</u>	Reason for nonrehabilitated closure
Major (primary) disabling condition	Total cost of all case services
Secondary disability	Total cost of all case services, provided in rehabilitation facilities
Work status <u>at referral</u>	Total cost of case services charged to Social Security Trust Funds
Earnings the week prior to <u>referral</u>	Total cost of case services charged to Supplemental Security Income Funds
Receipt or nonreceipt of public assistance <u>at referral</u>	Receipt or nonreceipt <u>and</u> cost status of the following services:
Type(s) of public assistance received at <u>referral</u> (SSDI, SSI-Aged, SSI-Blind, SSI-Disabled, AFDC, Other)	Diagnostic and evaluation;
Monthly amount of public assistance received <u>at referral</u>	Restoration (physical or mental);
Length of time, prior to <u>referral</u> , during which the client received public assistance	College or university;
Appropriateness of the Federal Special Program Identification checks (TF, Vet, MAW, PO, WIN, SEC4, SF, SD)	Other academic elementary or high school;
SSDI status <u>at closure</u>	Business school or college;
SSI status <u>at closure</u>	Vocational school;
Work status <u>at closure</u>	On-the-job training;
Weekly earnings <u>at closure</u>	Personal and vocational adjustment;
Receipt or nonreceipt of public assistance <u>at closure</u>	Miscellaneous training;
Type(s) of public assistance received at <u>closure</u> (SSDI, SSI-Aged, SSI-Blind, SSI-Disabled, AFDC, Other)	Maintenance;
	Other services;
	Services to other family members

^aThe R-300 Verification Instrument appears in Section I.C. of the Modified Case Review Schedule.

STANDARD 10: ELIGIBILITY

Eligibility decisions shall be based on accurate and sufficient diagnostic information, and VR shall continually review and evaluate eligibility decisions to ensure that decisions are being made in accordance with laws and regulations.

The determination of an applicant's qualifications for eligibility is a critical point in the VR process for both the client and the agency. This standard seeks to protect client interest by requiring state agencies to install procedures for monitoring eligibility decisions in a sample of cases and ensuring that the decisions are appropriate, in compliance with legal requirements, and supported by the proper diagnostic information. This standard pertains to two broad RSA goals. First, inasmuch as the eligibility determination process rests on a legal footing, the standard pertains to the goal of compliance with the legislation. Second, it pertains to the goal of cost-effectiveness, since it is a misuse of money to serve ineligible persons, particularly if other, eligible clients are turned away due to an incorrect determination of ineligibility. Thus, in establishing a procedural standard for the review of eligibility determination, we are concerned with the appropriateness of the decision and its accordance with laws and regulations. We expect information from this review to address two facets of this concern: (1) that clients who are not eligible for VR services not be accepted for services, and (2) that clients who are eligible are indeed accepted.

While monitoring and review of eligibility decisions by supervising counselors or managers will provide a check on that determination, states have varying supervisory structures and roles and should be allowed to retain flexibility in their monitoring practices. Thus, although cross-checks on impending eligibility decisions are important to conduct, they are not a requirement for this standard.

The Case Review Schedule serves as the data source for this standard. Table 11 shows the CRS items used to address Standard 10; the table is organized by the various relevant sections of the CRS.

Table 11
Case Review Schedule (CRS) Items Used
for Standard 10 (Eligibility)

SECTION II: EVALUATION OF REHABILITATION POTENTIAL.

A: Preliminary Diagnostic Study - Status 02

Does the preliminary diagnostic study...

4. include an appraisal of the current general health status of the client?
5. include a psychiatric or psychological examination in all cases of mental or emotional disorder?
6. include such examinations and diagnostic studies as necessary to:
 - a. determine eligibility?
 - b. determine the need for extended evaluation?
7. place primary emphasis upon the determination of the client's potential for achieving a vocational goal?
8. support the determination that the client has a medically-recognized physical or mental disability?
9. support the determination that the medically-recognized disability constitutes a substantial handicap to employment for the client?
10. support the determination that VR services may reasonably be expected to benefit the client in terms of employability?
11. support the determination that an extended evaluation is necessary to determine that VR services may reasonably be expected to benefit the client in terms of employability?

Table 11 (continued)

SECTION II: EVALUATION OF REHABILITATION POTENTIAL	
B: Extended Evaluation - Status 06	
Does the case record...	
14.	contain a certification for extended evaluation to determine rehabilitation potential?
Does the IWRP for extended evaluation (state form)...	
19.	present the general basis for a determination that an extended evaluation of rehabilitation potential is necessary to make a determination of eligibility?
33.	show that a thorough assessment of the client's progress was made at least once in every 90-day period during the provision of services under the extended evaluation?
Does the case record...	
40.	contain a certification of eligibility for the continuance of VR services?
42a.	show that the decision to terminate services was made in full consultation with the client, or as appropriate, with the parent, guardian, or other representative?
42d.	show that the provision was made for a periodic review, at least annually, of the ineligibility decision?

Table 11 (continued)

SECTION III: ELIGIBILITY - STATUS 10

Does the certification of eligibility...

- 1c. indicate that the client has met the basic eligibility requirements?

How well does the counselor documentation in the case record...

3. establish the presence of a physical or mental disability with necessary medical, psychiatric, psychological, and other information?
7. show that the substantial handicap to employment exists, even though the client is employed, because the client is unable to obtain a gainful occupation consistent with the client's capacities and abilities?
8. show the likelihood of VR services enabling the client to achieve vocational goals consistent with the client's capacities and abilities?

Table 11 (continued)

SECTION VII: TERMINATION OF CASES - STATUS 08

(Numbers in parentheses indicate Case Review item numbers)

CASE CLOSED STATUS 08 FROM 00/02 - INTERVENING REASONS

Does the case record...

- (2) document specific reasons for the closure action?
- (5) show that the client, or as appropriate, the parent, guardian, or other representative, was advised of the reasons for closure and the closure action taken?

CASE CLOSED STATUS 08 FROM 00/02 - INELIGIBILITY

Does the certification of ineligibility..

- (6a) indicate the date of certification?
- (6c) include the reasons for the determination of ineligibility?

Does the case record...

- (7) show that the client does not have a medically recognized physical or mental disability?
- (8) show that the client does not have a substantial handicap to employment?
- (9) show that beyond any reasonable doubt the client is not expected to benefit in terms of employability from VR services?
- contain data supporting the ineligibility determination, including:
- (10a) a summary of medical and other case data obtained during the preliminary diagnostic study?
- (10d) documentation of a review of the ineligibility determination not later than 12 months following such determination
- (11) show that the ineligibility determination was made only after full consultation with the client, or as appropriate, with the parent, guardian, or other representative?
- (12) document that the client was notified in writing of the closure action taken?
- document that the client was informed in writing of client rights and remedies, including:
- (13a) the right to administrative review and fair hearing?
- (13c) the right to participate in the annual review of the ineligibility determination.
- (14) document any action and decision involving the client's request for an administrative review of agency action or fair hearing?

CASE CLOSED STATUS 08 FROM 06 - INELIGIBILITY

Does the certification of ineligibility...

- (17a) indicate the date of certification?
- (17c) include the reasons for the determination of ineligibility?
- Does the case record...
- (18) show that beyond any reasonable doubt the client cannot be expected to benefit in terms of employability from VR services?
- (20) contain the rationale for the ineligibility determination as an amendment to the INWRP?
- (21) show that the ineligibility determination was made only after full consultation with the client, or as appropriate with the parent, guardian, or other representative?
- (23) document that the client was informed in writing of the closure action taken?
- (24) document any action and decision involving the client's request for an administrative review of agency action or fair hearing?
- (25) document that the ineligibility determination was reviewed not later than 12 months following such determination?

Table 11 (continued)

SECTION VII: TERMINATION OF CASES - STATUSES 30 and 28

Does the certification of ineligibility...

28a. indicate the date of certification?

28c. include the reasons for the determination of ineligibility?

Does the case record...

34. contain the rationale for the ineligibility determination as an amendment to the program?

35. show that the ineligibility determination was made only after full consultation with the client, or as appropriate, with the parent, guardian, or other representative?

36. document that the client was notified in writing of the closure action taken?

Does the case record show that the client was informed in writing of...

37a. the right to administrative review and fair hearing?

37b. the right to participate in the annual review of the ineligibility determination?

Does the case record...

38. document any action and decision involving the client's request for an administrative review of agency action or fair hearing?

39. document that the determination that the client was no longer eligible was reviewed not later than 12 months following such determination?

STANDARD 11: TIMELINESS

VR shall ensure that eligibility decisions and client movement through the VR process occur in a timely manner appropriate to the needs and capabilities of the clients.

This standard seeks to avoid delays in the VR process that are likely to impede or hinder successful rehabilitation of the client. Rather than set a performance standard using time-in-status to define "undue delay," this Procedural Standard requires that each state have a monitoring or flagging mechanism for cases remaining in statuses over a given length of time, and a procedure to evaluate the appropriateness of any case delay. Many of the state VR agencies already have variations of such a system in place.

This standard pertains to the RSA goal of providing quality case services, for two reasons. First, one aspect of the quality of a client's service experience is the speed with which his or her case is handled: did the client feel that the counselor "cared" about him (as evidenced by the fact that the counselor "kept on top of things" and "kept things moving along"), or did the counselor seem to put him on a lower priority? The client's perception of his treatment by VR can have an impact on his attitude toward VR and about the usefulness of participation in VR. Second, research on successful rehabilitation outcomes has suggested a relationship between timeliness and success (perhaps as a consequence of the perceptions discussed above).

The issue of timely case movement or "undue delays" (as it is phrased in the current standards) has been one of long discussion and controversy. While there is literature to support the correspondence between certain times in process (particularly time to eligibility decision) and outcome, there have also been questions about interrater reliability in the area of judging timeliness of case movement through case review. Nevertheless, an overall review of timely case movement on a client-by-client basis is best handled through case review, if items can be identified which have good interrater reliability.

Much effort has gone into attempts to define, and establish standards for, timeliness of case service progress. As noted, research on successful rehabilitation outcomes has supported the concern for timeliness in

establishing a relationship between the time required for an eligibility decision and ultimate client outcome. Previous attempts to monitor the timeliness of service provision by way of a standard on "undue delay" have been hampered, however, by several problems. The first is the definitional and reliability problem. "Undue delay" and its converse, "expeditious" or "quick and efficient" case management, mean different things to different people. The current standards use the approach of arbitrary time periods to define "timely" case movement: eight months has been defined as the limit for timely eligibility decisions; 22 months for timely completion of the VR process. This approach has been widely and justifiably criticized for its lack of sensitivity to the legitimate differences in individual cases: a complex case, perhaps involving long-term educational services, might well require more than 22 months, without any delay. Where a case has been subject to a delay, the situation is further complicated by the differing implications of different causes for delay: lack of client responsiveness, inattention or inefficiency on the part of the counselor or the VR agency, and problems outside of VR (failure of a vendor to deliver, unavoidable waiting lists in training programs). Each imply very different responsibility for time lapses and cannot equally be ascribed to VR agency "failure."

Thus, use of "objective" measures of timeliness has suffered from arbitrariness and frequent inappropriateness of established time cut-offs for many clients. Other approaches to objective measurement, such as recording planned initiation and completion dates for each service, and monitoring compliance with the schedule, suffer from cumbersomeness in execution. On the other hand, subjective judgments of timeliness have been vulnerable to criticisms of unreliability in application. However, this unreliability may well have arisen due to the incorporation of two distinct concepts into the previously used "undue delay" judgments. This term, "undue delay," includes concepts of both time lapse and judgment of blame, culpability or unjustifiable time lapse. (The word "delay" itself sometimes connotes willfulness or negligence, and the modifier "undue" definitely implies such problems.) Case reviewers might well differ in judgments as to the cause of a delay, and thus whether VR should be held accountable; and for this reason, reviewers may differ in their classification of a case, one

citing an undue delay, another seeing an unfortunate time lapse, but being unwilling to label it an undue delay if client motivation or outside vendors played a role.

In response to the problem of a dual focus in assessing timeliness, a new timeliness assessment instrument has been developed which relies upon reviewer judgment, but which divides case assessments of timeliness into two segments: first, a notation of whether delay has occurred in terms of time lapse between necessary activities in a case; and second, an assessment of the reasons for the lapse. The relevant questions are appended to the Case Review Schedule and concern critical phases of case progress -- eligibility determination, development of service plan, and service delivery and termination. In addition, the Timeliness Assessment instrument allows for notation of whether a case was handled with "undue speed:" that is, if the case moved too fast, in the reviewer's judgment, given the circumstances of the case. While undue speed may be a less pressing concern than undue delay, the issue did come up during the standards pretest, and the Timeliness Assessment instrument has been revised to address the issue.

The Timeliness Assessment Instrument can be used by states in conjunction with the case-flagging mechanism for open cases, required by Standard 11. A mechanism must be set up by each state to flag each case which has remained in a given status longer than a specified period of time. Review of the client's situation should then take place (in a format decided by the state) to determine if case movement is appropriate, but no reporting to RSA would be required.

As part of its project to revise the VR Program Standards, Berkeley Planning Associates (BPA) developed a model for improvement of case-flagging practice and use of time in status standards at the state level. A state should not flag too many cases, because such flagging would be inefficient. However, flagging too few cases will possibly leave too many untimely cases in the system without examination. The model, therefore, is based on examining the number of cases being flagged with the states' existing flagging standards, in relationship to an analysis of the

service process and the overall caseload, and refining state flagging standards.¹

Figure 4 shows the steps to follow in the analysis of undue delay in the caseload. A case is selected for review, following the sampling design used by the state agency for timeliness review (100% of all cases, or state random sampling procedure). State timeliness standards (allowed times in process) will be used in this model. The model calls for upwards or downwards adjusting of these times in process standards (increases or decreases in the maximum time allowed in each status) based on two additional standards for the caseload itself:

1. Not more than 20% of the flagged cases should be timely.

If more than 20% of the flagged cases are judged as timely when they are reviewed, the system is flagging cases unnecessarily, and the flagging standards should be less stringent (times allowed in the statuses could be increased).

2. Assuming the conditions in (1) above hold, at least 5% but not more than 10% of all cases should be flagged.

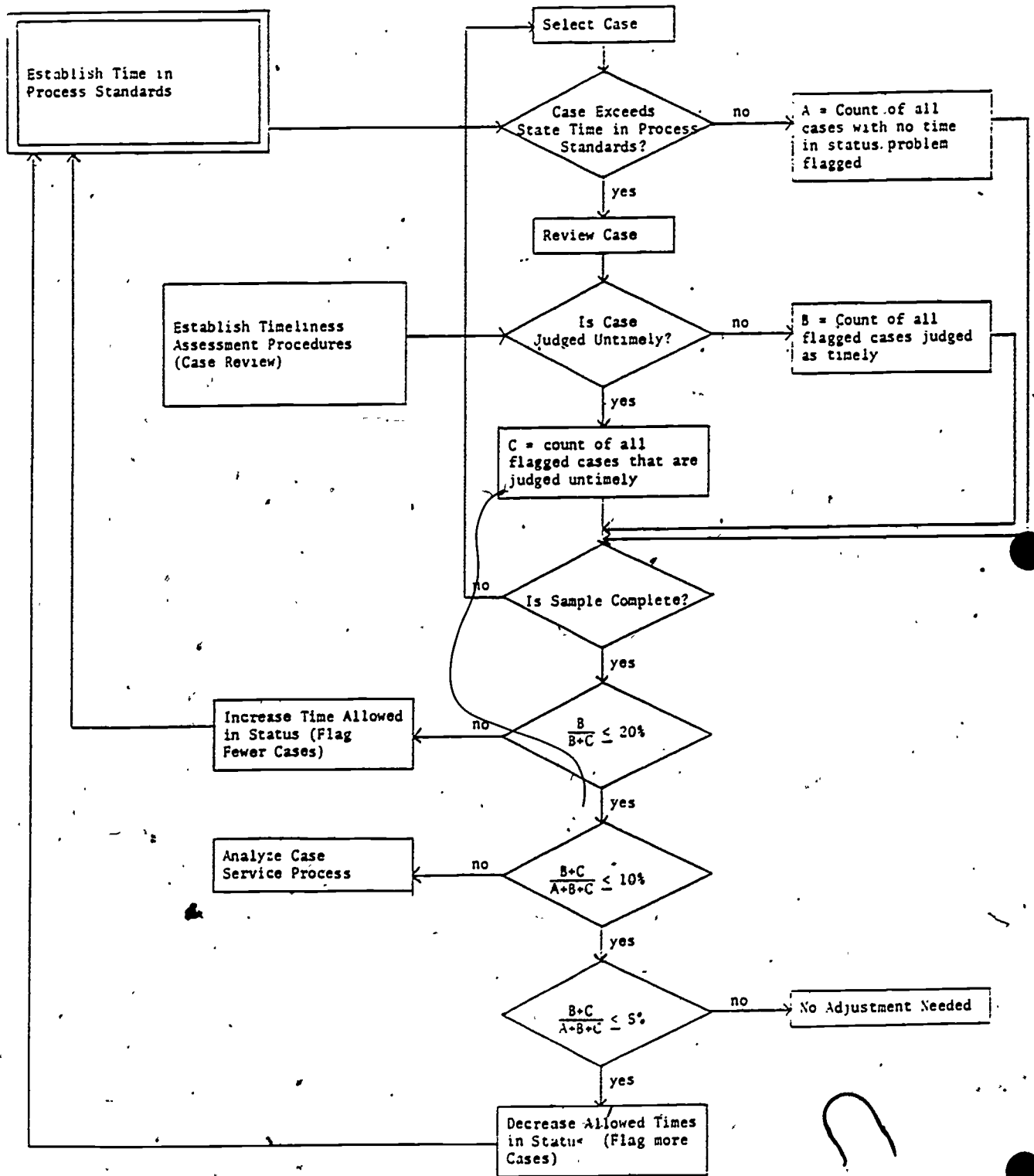
If such excessive flagging occurs, and the flagging represents cases judged untimely, then there is a problem with the service delivery system itself, and an analysis of the process is called for. If less than 5% of cases are flagged, the flagging system should be more stringent (times allowed in statuses should be decreased).

The model in Figure 4 uses both quantitative information on times in status and subjective information from the Timeliness Assessment Instrument to decide about cases.² In the first stage, a case is selected for attention. If time in process is all right for the case, it is returned to the file. If time in process exceeds agency standards, the case

¹The full analysis leading to the proposed model can be found in BPA's report, Review of State VR Agency Procedures for Case Flagging and Quality Assurance (September 1981), available from RSA.

²The model is, however, concerned only with times-in-status which are too long; it does not address "rushed" cases. Cases handled with "undue speed" are a separate issue requiring special state attention.

Figure 4: Model Case Flagging System



is flagged and reviewed as to the timeliness of the process. As we have pointed out, while there is a relationship between timeliness and time in process, it is not a one-to-one relationship, so it is possible that flagged cases will be judged timely. If so, they also can be returned to the file. For both these groups returned to the file (labeled A and B on Figure 4), the number of such cases should be recorded. Likewise, the number of untimely cases flagged should be counted. (In the figure, this is C.) Cases should be flagged and reviewed until the planned sample size ($A + B + C$) is achieved.

Once the sample is complete, the system asks three questions of the cases. First, do the timely cases (B) exceed 20% of all flagged ($B + C$) cases? If yes, the system may be flagging too many cases, and times allowed for each status could be increased. If, however, $B/(B + C)$ is less than 20%, the system asks whether less than 10% of the total caseload was flagged. If so, then the time in process standards appears in equilibrium for the state (not too many cases are being flagged; of the cases that are flagged, most of them are indeed untimely cases). If, on the other hand, more than 10% of the cases are flagged, there is a problem in the service process itself, since these cases have been judged as untimely and there are too many untimely cases for efficient monitoring and efficient operations. This calls for an examination of the service process itself, perhaps using the decision support system to analyze the state caseload process and pinpoint timeliness issues in relationship to client outcomes and costs. In addition, this problem may call for upward adjustment of the times allowed in statuses, to flag fewer cases. However, checking for the appropriate times must be done in another iteration so that a check can be made as to whether both the 20% and 10% standards are met for a given new standards level.

Finally, the state should routinely flag between 5% and 10% of its cases, to assure that flagging standards are set low enough. If less than 5% of cases are flagged, the standards should be made more stringent (allowed times in status decreased) before the next round of review.

Using this approach, states can adjust their times in status standards upwards or downwards to be more meaningful and to result in an efficient process that spots problematic cases without excessive monitoring.

The above discussion shows how Standard 11 can be of use within state agencies. In addition, RSA will conduct the Timeliness Assessment in each state agency -- independent of the agency's case flagging mechanism -- as part of its Procedural Standards data collection. The results will inform RSA of the extent of untimely case service in a state, and the results will be forwarded to the agency.

The Timeliness Assessment Instrument appears as Section VIII of the Case Review Schedule. Table 12 shows the information items obtained for each reviewed case by the Timeliness Assessment Instrument.

Table 12
Information Items Obtained by the Timeliness
Assessment Instrument for Reviewed Cases^a

1. Was the case handled in a timely manner (i.e., without undue speed or undue delay)?
2. If undue speed:
 - a. Reasons for judging the case as moving too fast.
3. If undue delay:
 - a. Were the reasons for delay documented in the clients' case record?
 - b. Reasons for delay.

^aThe Timeliness Assessment Instrument appears in Section VIII of the Modified Case Review Schedule.

STANDARD 12: IWRP

VR shall provide an Individualized Written Rehabilitation Program for each applicable client, and VR and the client shall be accountable to each other for complying with this agreement.

Several aspects of the Individualized Written Rehabilitation Program are addressed in this Procedural Standard: (a) compliance with the requirement that an IWRP be fully developed for clients accepted for services or extended evaluation; (b) assurance of the protection of client rights and client awareness of the remedies available for mitigating dissatisfaction; (c) joint client/counselor development of the job goal and the service plan; (d) mutual client/counselor responsibility for follow-through on the agreement and annual review of its progress and appropriateness; and (e) the appropriate handling of plan revisions.

This standard bears a relation to the RSA goals of ensuring compliance and quality case services. Obviously, given the regulations mandating provision of an IWRP to all accepted clients, this standard's relation to the compliance goal is clear. While the regulations concerning the IWRP stipulate compliance with the provisions of the law, elevating the issue to the level of a procedural standard will ensure compliance with the legislative intent of the IWRP.

Inclusion of this standard could be justified simply on the basis of the strong regulation regarding compliance with the IWRP provisions of the 1973 Rehabilitation Act. However, perhaps an even more important reason to include this standard is the fact that research has shown a positive association between compliance with the IWRP requirements and successful outcomes of the VR process. Since research has supported the premises underpinning the IWRP by showing that the process and the possession of the IWRP affect client outcomes positively, adherence to the IWRP requirements becomes a powerful norm for quality case management in VR, as well as a protection of client interests and rights.

The basic Case Review Schedule serves as the data source for this standard. Table 13 shows the CRS items used to address Standard 12.

Table 13
Case Review Schedule (CRS) Items Used
for Standard 12 (IWRP)

SECTION II: EVALUATION OF REHABILITATION POTENTIAL

B: Extended Evaluation - Status 06

18. Is there an IWRP for extended evaluation in the case record?

Does the IWRP for extended evaluation (state form)...

19. present the general basis for a determination that an extended evaluation of rehabilitation potential is necessary to make a determination of eligibility?
20. Set forth the terms and conditions for the provision of service, including:
- a. client responsibilities in carrying out the program, such as attendance, cooperation, etc.?
 - b. the extent of client participation in the cost of services?
21. document that the client was informed of client rights and remedies, including:
- a. the right to be fully consulted regarding any changes or amendments in the rehabilitation program?
 - b. the right to administrative review in case of dissatisfaction with services?
 - d. the right to participate in the annual review of the program?
 - e. the right to participate in the annual review of the ineligibility decision?
22. reflect that the IWRP for extended evaluation was maintained as a separate part of the case record?
23. show that the client received a copy of the IWRP and substantial amendments?
26. indicate that the program was developed and amended with the client's participation, or as appropriate, with the parent, guardian, or other representative?
28. state the intermediate rehabilitation objectives?

Table 13 (continued)

SECTION II.B (continued)

Does the IWRP for extended evaluation (state form)...

29. state the VR services to be provided which are necessary for the determination of rehabilitation potential?
30. contain the projected date for the initiation of each service?
31. contain the anticipated duration for each service planned?
32. provide the projected time within which rehabilitation objectives may be achieved?
33. show that a thorough assessment of the client's progress was made at least once in every 90-day period during the provision of services under the extended evaluation?
34. state the objective criteria upon which an evaluation of the client's progress is based?
35. state the procedure by which the client is evaluated?
36. contain a schedule for the periodic review and progress evaluation?
37. contain a record of the results of scheduled reviews and progress evaluations?
38. show that a formal, annual review has been conducted if the IWRP has achieved at least first anniversary status?
39. document the client's views, or, as appropriate, the views of the parent, guardian, or other representative concerning the objectives and ~~or~~ services being provided?

Does the case record...

- 42a. show that the decision to terminate services was made in full consultation with the client, or as appropriate, with the parent, guardian, or other representative?
- 42b. show that the rationale for the decision to terminate services was recorded as a certified amendment to the IWRP for extended evaluation?
- 42c. show that a certification of ineligibility was then executed?
- 42d. show that the provision was made for a periodic review, at least annually, of the ineligibility decision?

Table 13 (continued)

SECTION I.B. (continued)

Questions 43 through 51 have two parts:

Item B: Does the case record document that the service was planned for the client?

Item C: Does the case record document that the service was given to the client?

Each item is asked in reference to the following services (keyed to CRS question numbers).

43. Diagnostic and Related Services
44. Counseling and Guidance
45. Physical Restoration
46. Mental Restoration
47. Vocational and Other Training
48. Maintenance
49. Transportation
50. Services to the Family
51. Specialized Services for Blind, Deaf, Severe Disabilities
52. Telecommunications
53. Occupational Licenses, Tools, Equipment
54. Other Goods and Services

Table 13 (continued)

SECTION V: INDIVIDUALIZED WRITTEN REHABILITATION PROGRAM -STATUS 12 AND ABOVE

1. Is there an IWRP in the case record?

Does the IWRP (state form)...

2. present the general basis for a determination of eligibility?
3. set forth the terms and conditions for the provision of services, including:
 - a. client responsibilities in carrying out the program, such as cooperation, attendance, etc.?
 - b. the extent of client participation in the cost of services?
4. document that the client was informed of client rights and remedies, including:
 - a. the right to be fully consulted regarding any changes or amendments in the rehabilitation program?
 - b. the right to administrative review in case of dissatisfaction with services?
 - d. the right to participate in the annual review of the program?
 - e. the right to participate in the annual review of the ineligibility decision?
5. reflect that the IWRP was maintained as a separate part of the case record?
6. show that the client received a copy of the IWRP and substantial amendments?
9. indicate that the program was developed and amended with the client's participation or, as appropriate with the parent, guardian, or other representative?
11. place primary emphasis on the determination and achievement of a vocational goal?
12. state the long-range employment goal?
13. state the intermediate rehabilitation objectives?

Table 13 (continued)

SECTION V (continued)

Does the IWRP (state form)...

14. state the specific VR services to be provided to achieve the intermediate objectives and the employment goal?
15. contain the projected date for the initiation of each service?
16. contain the anticipated duration for each service planned?
17. provide the projected time within which rehabilitation objectives and goals may be achieved?
18. state the objective criteria upon which an evaluation of the client's progress toward an employability goal is based?
19. state the procedure by which the client is evaluated?
20. contain a schedule for the periodic reviews and progress evaluations?
21. contain a record of the results of the scheduled reviews and evaluations?
22. show that a formal, annual review has been conducted, if the IWRP has achieved at least first anniversary status?
23. document the client's views, or as appropriate, the views of the parent, guardian, or other representative concerning the goals, objectives, and VR services being provided?

Table 13 (continued)

SECTION V (continued)

Does the case record...

- 24a. show that the decision to terminate services was made in full consultation with the client or as appropriate, with the parent, guardian, or other representative?
- 24b. show that the rationale for the decision to terminate services was recorded as a certified amendment to the IWRP?
- 24c. show that a certification of ineligibility was then executed?
- 24d. show that the provision was made for a periodic review, at least annually, of the ineligibility decision?
- 25. contain a closure statement as an amendment to the program for a case closed rehabilitated?

Does the closure statement...

- 25a. a description of the basis upon which the client was determined to be rehabilitated?
- 25. Is there an amended IWRP for Post Employment Services?

Table 13 (continued)

SECTION VI: DELIVERY OF SERVICES - STATUSES 14, 16, 18, 20, 22 and 32

Questions 1-14 have two parts:

Item B: Does the case record document that the service was planned for the client?

Item C: Does the case record document that the service was given to the client?

Each item is asked in reference to the following services (keyed to CRS question numbers).

Services:

1. Evaluation and Diagnostic Services
2. Counseling and Guidance
3. Physical Restoration
4. Mental Restoration
5. Vocational and Other Training
6. Maintenance
7. Transportation
8. Services to the Family
9. Specialized Services for Blind, Deaf, Severe Disabilities
10. Telecommunications
11. Occupational Licenses, Tools, Equipment
12. Other Goods and Services
13. Placement
14. Post-Employment

Table 13 (continued)

SECTION VII: TERMINATION OF CASES - STATUSES 30 and 28

Does the case record...

34. contain the rationale for the ineligibility determination as an amendment to the program?^a
35. show that the ineligibility determination was made only after full consultation with the client, or as appropriate, with the parent, guardian, or other representative?^b

^aThis is the same wording as used in item 20 (not shown) pertaining to clients closed 08 from 06; except that the word "IWRP" is substituted for "program."

^bThis is the same wording as used in Item 22 (not shown) pertaining to clients closed 08 from 06.

STANDARD 13: GOAL PLANNING

Counselors shall make an effort to set realistic goals for clients. Comprehensive consideration must be given to all factors in developing appropriate vocational goals such that there is a maximum of correspondence between goals and outcomes: competitive goals should have competitive outcomes and non-competitive goals should have noncompetitive outcomes.

Competitive employment may not be the appropriate placement for all clients. Nevertheless, VR regulations require that all placements be into "gainful activity" and that placements be consistent with the clients' "capacities and abilities," whether in competitive, sheltered, or noncompetitive employment.

There is much speculation in the field over the abuse of "homemaker" and "unpaid family worker" categories; specifically regarding the use of these categories to ensure success rather than because the placement is appropriate. While maximizing the proportion of successful closures (as in data element 3(i)) is important to the purpose of VR, it does not ensure that noncompetitive placements are suitable for the client. This standard addresses the concern that noncompetitive closure categories not be used to salvage "successes" for clients who were unsuccessful in their planned competitive goals.

However, this standard is not intended to "freeze" counselors and their clients into goals as set out in the original IWRP. Such an effect would be a misapplication of the IWRP process. The IWRP is intended to be a statement of a realistically attainable goal which, if necessary, can be modified for a variety of valid reasons as the client progresses through the VR process. That is, the IWRP serves as a guideline rather than as a hard and fast rule.

As such, state agencies should not use the results found for the standard in such a way as to overemphasize the importance of matching the outcome to the goal. This would serve as a disincentive to setting ambitious (i.e., competitive employment) goals in the original IWRP, and would reduce the flexibility of the counselor in refining the goal in response to client progress during the rehabilitation process. Instead, if "problems" emerge on the standards the results should be used in conjunction with data on client characteristics and services provided to investigate how

counselors can be more effective in the task of "fitting" clients' potentials to feasible ultimate outcomes. In this way, the standard is used appropriately to facilitate effective goal-planning rather than simply to focus on whether goals matched outcomes.

Standard 13 uses four variations on a common theme as data elements:

- (i) $\frac{\# \text{ of 26 closures with competitive goal AND competitive outcome}}{\# \text{ of 26 closures}}$
- (ii) $\frac{\# \text{ of 26 closures with competitive goal BUT noncompetitive outcome}}{\# \text{ of 26 closures}}$
- (iii) $\frac{\# \text{ of 26 closures with noncompetitive goal AND noncompetitive outcome}}{\# \text{ of 26 closures}}$
- (iv) $\frac{\# \text{ of 26 closures with noncompetitive goal BUT competitive outcome}}{\# \text{ of 26 closures}}$

The RSA-300 provides the data necessary to address this standard. The location of the data is shown in Exhibit 1. Because this standard uses R-300 data, it can be reported annually.

COMPUTING THE PROCEDURAL STANDARDS DATA ELEMENTS

As stated earlier in this chapter, the data elements for the Procedural Standards consist, for the most part, of individual information items pertaining to specific aspects of the standard in question. In the Procedural Standards reports, these information items will be presented in terms of a series of "percentage achieved" scores; for example, the percent of reviewed case records which "document that the client was informed of client rights and remedies, including the right to be fully consulted regarding any changes or amendments in the rehabilitation program" (CRS, Item V.4.a, used for Standard 12). Likewise, all other items from the CRS will be computed and reported as a "percentage achieved" score.¹ With this, program managers will be able to see the extent to which an agency is in compliance (or has valid R-300 data, or serves its clients in a timely manner) in terms of a number of separate indicators. This will allow program managers to pinpoint specific problems occurring in the case-handling and data-recording processes of the agency.

The one exception to the "percentage achieved" method occurs on Standard 13. As noted in the discussion of that standard, its data elements consist of four similar ratios, each of which compare clients' IWRP goals to their ultimate outcomes. The RSA-300 provides the required data.

Given the straightforward interpretation of the Procedural Standards data elements, the instructions for computing the data elements can be stated simply:

- 1) collect the necessary data; and
- 2) compute the percentages, using valid cases only.

The only remaining task is to specify the information items used for the Procedural Standards. Table 14 provides the specifications. The table lists the Procedural Standards (and, for Standard 13, the four data elements), the data source and item specifications, and the page references for the data items and instructions for completing the data items.

¹As with the Performance Standards data elements, the "percentage achieved" scores must be computed using valid cases only. In the example given above, for instance, we would divide the number of cases for which the case record documented that the client had been "informed of rights and remedies regarding IWRP changes," by the number of clients reaching Status 12. All other cases are "invalid" (for this particular data element) and are not to be used in computing the percentage score.

Table 14
Summary of Standards, Data Sources, and Data Specifications
for the VR Program Procedural Standards

Standard	Data Source	Data Specifications	Page Reference	
			Data Items	Instructions for Data Items
<p>9. R-300 Validity</p> <p>Information collected on clients by the R-300 and all data reporting systems used by RSA shall be valid, reliable, accurate, and complete.</p>	Modified Case Review Schedule	Section I.C (R-300 Verification Instrument)	141 - 144	175
<p>10. Eligibility</p> <p>Eligibility decisions shall be based on accurate and sufficient diagnostic information, and VR shall continually review and evaluate eligibility decisions to ensure that decisions are being made in accordance with laws and regulations.</p>	Modified Case Review Schedule	Section II.A.: 4-11 Section II.B.: 14, 19, 33, 40, 42a, 42d Section III: 1c, 3, 7, 8 Section VII: 2, 5, 6a, 6c, 7, 8, 9, 10a, 10d, 11, 12, 13a, 13c, 14, 17a, 17c, 18, 20, 21, 23, 24, 25, 28a, 28c, 34, 35, 36, 37a, 37b, 38, 39	145 146 - 149 150 - 151 157 - 164	176 - 177 178 - 186 187 - 190 202 - 209
<p>11. Timeliness</p> <p>VR shall ensure that eligibility decisions and client movement through the VR process occur in a timely manner appropriate to the needs and capabilities of the clients.</p>	Modified Case Review Schedule	Section VIII.A and VIII.B (Timeliness Assessment Instrument)	165 - 166	210 - 211
<p>12. IWRP</p> <p>VR shall provide an Individualized Written Rehabilitation Program for each applicable client and VR and the client shall be accountable to each other for complying with this agreement.</p>	Modified Case Review Schedule	Section II.B: 18, 19, 20a, 20b, 21a, 21b, 21d, 21e, 22, 23, 26, 28-39, 42a, 42b, 42c, 42d, 43-54B, 43-54C Section V: 1, 2, 3a, 3b, 4a, 4b, 4d, 4e, 5, 6, 9, 11-23, 24a, 24b, 24c, 24d, 25a, 26 Section VI: 1-14B, 1-14C Section VII: 20, 22, 34, 35	146 - 149 153 - 155 156 157 - 164	178 - 186 192 - 196 197 - 201 202 - 209

Table 14 (continued)

Standard	Data Source	Data Specifications	Page Reference	
			Data Items	Instructions for Data Items
<p>13. Goal Planning</p> <p>Counselors shall make an effort to set realistic goals for clients. Comprehensive consideration must be given to all factors in developing appropriate vocational goals such that there is a maximum of correspondence between goals and outcomes: competitive goals should have competitive outcomes and noncompetitive goals should have noncompetitive outcomes.</p> <p>Data Elements:</p> <p>(i) # of 26 closures with competitive goal <u>AND competitive outcome</u> # of 26 closures</p> <p>(ii) # of 26 closures with competitive goal <u>BUT noncompetitive outcome</u> # of 26 closures</p> <p>(iii) # of 26 closures with noncompetitive goal <u>AND noncompetitive outcome</u> # of 26 closures</p> <p>(iv) # of 26 closures with noncompetitive goal <u>BUT competitive outcome</u> # of 26 closures</p>	<p>RSA-300:</p> <p>Work Status of INRP Goal</p> <p>Work Status at Closure</p> <p># 26 closures</p>	<p>Item 3.B [Competitive employment = codes 1 (wage and salary workers) and 3 (self-employed, not BEP)]</p> <p>Item 4.I [Competitive employment = same as for Item 3.B]</p> <p>Item 4.P.2 (total number)</p>	63 - 70	65

DATA SOURCES FOR THE PROCEDURAL STANDARDS: CASE REVIEW SCHEDULE

As noted in the introduction to this chapter, most of the data for the Procedural Standards will come from a process of case review; the only exception is Standard 13, which will use R-300 data as described in the sections on the R-300 and on Standard 13. For Standards 9 - 12, the case review process will be conducted using a modification of the Case Review Schedule (CRS) developed by the San Diego State University RCEP IX.

As part of its project to revise the VR Program Standards, Berkeley Planning Associates (BPA) reviewed the CRS and selected those items needed to adequately address Standards 10 (Eligibility) and 12 (IWRP). In addition, items were selected which were felt to be of use in the problem identification stages of the decision-support system (see pp. 14-21) for a discussion of this system). Finally, BPA developed two new instruments -- the R-300 Verification Instrument and the Timeliness Assessment Instrument -- to address the Procedural Standards not already covered by the CRS. BPA merged those two new instruments with the items from the existing CRS -- selected to address Standards 10 and 12, and the problem identification activity -- to form a new Modified Case Review Schedule (MCRS). The MCRS serves as the unified data source for Standards 9 - 12.

The MCRS is presented in Exhibit 9. Following this, Exhibit 10 provides the detailed instructions for completing the separate MCRS items. Below, we briefly describe each of the sections of the MCRS: their use in the Procedural Standards, and the information they elicit.

Sections I.A and I.B: Identifying Information and Significant Case Data

These sections provide information to identify the client (e.g., his or her case number) for use in analyzing the other MCRS data and for merging the data with other documents (such as the client's R-300). As well, Section I.B records certain significant dates relevant to the client's program experience (e.g., date of service initiation). These are used as supplemental information for Standards 9 - 12.

Section I.C: R-300 Verification Instrument

The R-300 Verification instrument is designed to respond to Standard 9. It assesses the degree to which information submitted to RSA on critical

items of the R-300 was corroborated by casefile information. All of the data items on the R-300 Verification instrument are necessary to ensure the integrity of the data source on which many of the Performance Standards' data elements are based. One of the purposes of Standard 9 is to verify the R-300 information such that users of the R-300 data can have confidence in the accuracy of the data reported to the states, the department administration, and the Congress. In the Procedural Standards, "verification of accuracy" refers to a manual confirmation procedure intended to insure that file information supports and corroborates the R-300 documents.

Section II.A: Evaluation of Rehabilitation Potential:
Preliminary Diagnostic Study - Status 02

This section, used for Standard 10, assesses the extent to which the case record documents the occurrence of the various activities needed to conduct an effective preliminary diagnostic study. This study, completed during the application phase, should contain all of the information necessary to make a reasonable assessment of a client's eligibility for VR services. Among these necessary pieces of information are all relevant medical and psychiatric examinations, and other evidence that supports the client's need and eligibility for rehabilitation services. Without this information, agencies will not be able to select the disabled individuals who can most benefit from available -- but limited -- VR services.

Section II.B: Evaluation of Rehabilitation Potential:
Extended Evaluation - Status 06

Section II.B is used for Standards 10 and 12, and for problem identification. In regards to Standard 10 (Eligibility), Section II.B seeks documentation that the state agency has followed proper procedure in placing applicants into extended evaluation, status 06. In particular, the concerns are that case records include:

- a certification for extended evaluation to determine rehabilitation potential;
- the basis for the need for extended evaluation;
- evidence of the occurrence of thorough assessments of progress, at least every 90 days; and

- documentation of the eligibility decision resulting from extended evaluation.

Provision of this information helps ensure that extended evaluation is used only when appropriate, that the client moves through extended evaluation in a timely manner, and that the minimal recording needs for Status 06 are maintained.

In regards to Standard 12 (IWRP), this section seeks to document that the IWRP's for clients placed into extended evaluation contain all of the information required under Status 06. In this context, the concerns of the Procedural Standards are that IWRP's for cases entering 06 do the following:

- define the terms and conditions for the provision of services;
- document that the client was informed of specific rights, including the right to participate in the development of the program;
- specify a vocational goal and a timeframe for its achievement;
- specify evaluation procedures and criteria;
- document the final eligibility decision and, for those clients closed as ineligible:
 - document that the client participated in the decision;
 - and
 - document that provision was made for periodic review.

Provision of this information helps ensure adherence to the IWRP provisions, and helps ensure that clients move through Status 06 in a timely manner and are aware of their rights to continued services or review if declared ineligible.

Section III: Eligibility - Status 10

While it is important to document in the preliminary diagnostic study the extent to which applicants meet the basic eligibility criteria, it is even more important to ensure that all clients accepted for services meet all of the requirements for eligibility. The purpose of Section III is to document that a certification of eligibility was completed for each accepted client, and that counselor documentation in the case record confirms:

- the existence of a disability;
- the existence of a substantial handicap to employment; and

- the likelihood that VR services will benefit the clients.

Given the fundamental importance of these three items in eligibility decisions, Section III's relevance to Standard 10 should be readily apparent.

Section IV: Evaluation of Rehabilitation Potential:
Thorough Diagnostic Study -- Status 02 and 10

This section is used solely for problem identification. It includes questions on the quality and scope of the thorough diagnostic study.

Section V: Individualized Written Rehabilitation Program - Status 12

Section V is used for Standard 12 (IWRP). In a sense, the purpose of the IWRP is to establish an alliance between the agency and the client for the provision of certain services toward the achievement of a specific vocational goal. As such, it is important that the IWRP contains all the information necessary to establish such an alliance. Section V attempts to document, among other things:

- that the client was informed of the terms and conditions for the provision of services;
- that the client was informed of client rights;
- that the client participated in the full planning and review process; and
- that the IWRP contains essential information such as goals, timeframes, evaluation procedures, and schedules, etc.

Inclusion of this information in the IWRP clarifies the roles, relationships, and duties of agency and client toward achieving the vocational goal. This is the essence of the IWRP process.

Section VI: Delivery of Services - Statuses 14, 16, 18, 20, 22, and 32

This section, used for Standard 12, complements the information provided in Section V. When these two are taken together, they describe the overall VR process, consisting of the plan (i.e., the terms, conditions, and information set forth in the IWRP needed to provide services) and the specific program of services undertaken to achieve the vocational goal embodied in the

IWRP. By knowing the extent to which planned services are actually delivered, we can determine the extent of effective "follow through" on the service planning process, in keeping with the spirit of the IWRP legislation.

Section VII: Termination of Cases

Section VII relates to Standards 10 and 12. As might be expected given its focus on eligibility, the questions used for Standard 10 focus on non-successful closures: 08's (from both 02 and 06), 28's, and 30's. For these closure statuses, Standard 10 attempts to assess (through review of case record documentation) the following compliance issues:

- Does the case record document the ineligibility/termination decision, and the basis for that decision?
- Have clients been granted their legal rights to participate in the ineligibility/termination decision?
- Have clients been informed of their right to an annual review of the decision? and
- Have the required annual reviews occurred, and the results documented?

The need for this information is two-fold. First, it is reasonable to expect that supervisory personnel might want to review any given case involving ineligibility or unsuccessful termination for any given counselor. Management personnel should have the ability to review cases sampled at random (i.e., across all counselors, as in an audit-type procedure), or to target reviews to particular counselors (as might be needed for less experienced counselors). Either way, it follows that for any case of ineligibility or unsuccessful closure, the closure action and the basis for it must be adequately documented in the case record.

This information in Section VII is important for a second reason, which stems from VR's desire to protect the rights of its applicants and clients. The best way to ensure such client protection is to require proof in the case record that the necessary steps have occurred: for example, a "Bill of Rights" signed by the client; a schedule for review, signed perhaps by the client; and "Results of Review" form, which could be signed by the client.

In short, VR agencies need to know the reasons for unsuccessful closures, and need to ensure that ineligibles and unsuccessful closures are aware of their rights to review. Once this is ensured, then informed clients -- whose circumstances have changed such that they are eligible -- hopefully will re-enter the system later and be successfully rehabilitated.

In addition to its uses in assessing eligibility-determination processes, Section VII is also used for Standard 12, on the IWRP. The questions used here seek to ensure:

- that the rationale for closure decisions are recorded on the IWRP; and
- that the client (or his/her appropriate representative) was consulted prior to the closure decision.

Provision of this information ensures that the agency has a source from which it can draw information about past ineligibility decisions, to make sure they were made in a consistent manner, and to ensure that client rights were protected during the closure process.

Finally, several questions pertaining to 26 closures are included in Section VII. These questions will be used for problem identification.

Section VIII: Timeliness Assessment Instrument

The Timeliness Assessment instrument responds directly to Standard 11. It is designed to link subjective assessments of the timeliness of case movement to objective data on the length of time spent in various statuses by different disability types. The assessments are used in conjunction with data on client characteristics and services provided, to investigate how agencies might avoid undue delays in the service process.

EXHIBIT 9
Modified Case Review Schedule
(MCRS)

The uses of the MCRS are as follows:

- Sections I.A and I.B: identifying and supplemental information
- Section I.C: address Standard 9 (R-300 Validity)
- Sections II.A - VII: address Standard 10 (Eligibility) and 12 (IWRP), and provide in-depth information for decision-support system
- Sections VIII.A and VIII.B: address Standard 11 (Timeliness)

In Sections II.A through VII the reader will find, in the left-hand margin next to each item, a notation as to the uses of the item, as follows:

10 = Standard 10

12 = Standard 12

D = decision-support system.

Exhibit 9 (cont.)

i

MODIFIED
CASE REVIEW SCHEDULETable of Contents

SECTION I:	CASE INFORMATION
	A. Case Identification
	B. Significant Data
	C. R-300 Verification
SECTION II:	EVALUATION OF REHABILITATION POTENTIAL
	A. Preliminary Diagnostic Study -- Status 02
	B. Extended Evaluation -- Status 06
SECTION III:	ELIGIBILITY -- STATUS 10
SECTION IV:	EVALUATION OF REHABILITATION POTENTIAL THOROUGH DIAGNOSTIC STUDY -- STATUSES 02 AND 10
SECTION V:	INDIVIDUALIZED WRITTEN REHABILITATION PROGRAM (IWRP) -- STATUS 12 AND ABOVE
SECTION VI:	DELIVERY OF SERVICES -- STATUSES 14, 16, 18, 20, 22, AND 32
SECTION VII:	TERMINATION OF CASES
	A. Case Closed Status 08 from 00/02 -- Intervening Reasons
	B. Case Closed Status 08 from 00/02 -- Ineligibility
	C. Case Closed Status 08 from 06 -- Ineligibility
	D. Case Closed Status 30 or Status 28 -- Not Rehabilitated
	E. Case Closed Status 26 -- Rehabilitated
SECTION VIII:	TIMELINESS RESEARCH AND COMMENTS
	A. Timeliness
	B. Reviewer Comments

Exhibit 9 (cont.)

1

INSTRUCTIONS FOR SECTIONS I - VIII

To complete the questions in Section I through VIII, please follow these special instructions:

1. Read the directions at the top of each page and within each page, when provided.
2. Answer every question unless otherwise instructed (see Manual: Modified Case Review Schedule Instructions).
3. Mark the appropriate answer space to the right of the question.
4. Do not fill in more than one space for any single row. That is, give only one response to each question.
5. Use a soft lead pencil (No. 2 is ideal) and observe these important requirements:

Make heavy black marks that fill the circle.

Erase completely any answer you wish to change.

Make no stray-markings of any kind.

6. This schedule is designed for machine scoring of your responses. Questions are answered by marking the appropriate answer spaces as illustrated in this example:

Question - Which is the only marking instrument that will be read properly:

Ballpoint Pen

Black Lead Pencil

Other

①

●

③

Correct Answer

Exhibit 9 (cont.)

SECTION I: CASE INFORMATION A: CASE IDENTIFICATION	ANSWER COLUMN (Write in Space Provided)																				
<div style="border: 1px solid black; padding: 5px; margin: 0 auto; width: 80%;"> <p>NOTE: IMPORTANT INSTRUCTIONS</p> <p>For individuals who were previously clients, review only from date case most recently opened.</p> <p>Answer all items using code numbers in square(s) provided. Refer to code sheets in manual for items noted with (code) and enter appropriate code on this page.</p> </div>																					
1. Reviewer Initials	_____																				
2. Reviewer: (1) State; (2) Federal; (3) Other (specify) _____	<input type="checkbox"/>																				
3. Reviewer: (1) Administrator; (2) Supervisor; (3) Counselor; (4) Other (specify) _____	<input type="checkbox"/>																				
4. Date of Review:	<table style="display: inline-table; border-collapse: collapse;"> <tr> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> </tr> <tr> <td style="text-align: center; font-size: 8px;">MO</td> <td style="text-align: center; font-size: 8px;">DAY</td> <td style="text-align: center; font-size: 8px;">YR</td> </tr> </table>				MO	DAY	YR														
MO	DAY	YR																			
5. State Agency (code):	<input style="width: 30px; height: 20px;" type="text"/>																				
6. Case Number:	<table border="1" style="display: inline-table; border-collapse: collapse; text-align: center;"> <tr> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> </tr> </table>																				
7. Case Status:	<input style="width: 30px; height: 20px;" type="text"/>																				
SECTION I: CASE INFORMATION B: SIGNIFICANT DATA																					
13. Date certified as accepted for vocational rehabilitation services:	<table style="display: inline-table; border-collapse: collapse;"> <tr> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> </tr> <tr> <td style="text-align: center; font-size: 8px;">MO</td> <td style="text-align: center; font-size: 8px;">DAY</td> <td style="text-align: center; font-size: 8px;">YR</td> </tr> </table>				MO	DAY	YR														
MO	DAY	YR																			
14. Date initial IWRP written and approved:	<table style="display: inline-table; border-collapse: collapse;"> <tr> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> </tr> <tr> <td style="text-align: center; font-size: 8px;">MO</td> <td style="text-align: center; font-size: 8px;">DAY</td> <td style="text-align: center; font-size: 8px;">YR</td> </tr> </table>				MO	DAY	YR														
MO	DAY	YR																			
15. Date of initiation of VR services:	<table style="display: inline-table; border-collapse: collapse;"> <tr> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> </tr> <tr> <td style="text-align: center; font-size: 8px;">MO</td> <td style="text-align: center; font-size: 8px;">DAY</td> <td style="text-align: center; font-size: 8px;">YR</td> </tr> </table>				MO	DAY	YR														
MO	DAY	YR																			



Exhibit 9 (cont.)

SECTION I: CASE INFORMATION C: R-300 VERIFICATION	ANSWER COLUMN
<p>(r.f.) Does the client's case record contain a copy of the case service report R-300 or the equivalent state statistical reporting form?</p>	<p>YES NO ① ②</p>
<p>NOTE: IMPORTANT INSTRUCTIONS</p> <p>If the client's case file does not contain an R-300 or an equivalent form, proceed to Section II, page 7 to complete the section on evaluation of rehabilitation potential.</p> <p>If the case file <u>does</u> contain an R-300 or its equivalent, please respond to all items in Section I. C.</p>	
<p>NOTE: IMPORTANT INSTRUCTIONS</p> <p>Respond to items (d.r.) and (c.d.) using date information gathered from the case record. In the event the information is not found in the case record, use available data from the R-300 or its equivalent. If the data is not recorded (N/R) anywhere in the case file, fill in circle 5 in the far right column.</p> <p>Then respond to the information items 20-58 by filling in the number in the answer column that indicates your findings relative to the agreement of data found on the R-300 (or equivalent) to that found in the case record. The following is a delineation of potential responses and their definitions:</p> <p>1 = Verified; R-300 data included and consistent with that found in case record</p> <p>2 = Not Verified; R-300 data different from that found in case record</p> <p>3 = Case Record Only; Data recorded in case record only, not on R-300</p> <p>4 = R-300 Only; Data recorded on R-300 only not in case record</p> <p>5 = Not Recorded (N/R); Data not recorded in either case record or R-300</p> <p>6 = Not Applicable (N/A) Data not applicable to client</p>	
<p>Is the following information on the R-300, or its equivalent, consistent with that found in the case record?</p> <p>(d.r.) Date client was referred to state VR agency: <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/></p> <p style="margin-left: 100px;">NO DAY YR</p> <p>(c.d.) Closure date: <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/></p> <p style="margin-left: 100px;">NO DAY YR</p> <p>20. The client's Social Security number</p> <p>21. The client's SSDI status <u>at referral</u></p> <p>22. The client's SSI status <u>at referral</u></p>	<p>Verified Not Verified Case Record Only R-300 Only N/R N/A</p> <p>① ② ③ ④ ⑤ ① ② ③ ④ ⑤ ① ② ③ ④ ⑤ ① ② ③ ④ ⑤ ① ② ③ ④ ⑤ ① ② ③ ④ ⑤</p>



Exhibit 9 (cont.)

SECTION I: CASE INFORMATION
C: R-300 VERIFICATION, continued

ANSWER COLUMN

Is the following information on the R-300, or its equivalent, consistent with that found in the case record?

	Verified	Not Verified	Case Record Only	R-300 Only	N/R	N/A
23. The major (primary) disabling condition	①	②	③	④	⑤	
24. The client's secondary disability	①	②	③	④	⑤	⑥
25. The client's work status <u>at referral</u>	①	②	③	④	⑤	
26. The client's earnings the <u>week prior to referral</u>	①	②	③	④	⑤	
27. The client's receipt or non-receipt of public assistance <u>at referral</u> . (Documentation of non-receipt would occur when the R-300 records no public assistance received <u>and</u> the case record provides no documentation of receipt.)	①	②	③	④		
28. The type(s) of public assistance received <u>at referral</u>						
a. SSDI	①	②	③	④	⑤	⑥
b. SSI-aged	①	②	③	④	⑤	⑥
c. SSI-blind	①	②	③	④	⑤	⑥
d. SSI-disabled	①	②	③	④	⑤	⑥
e. AFDC	①	②	③	④	⑤	⑥
f. Other (specify) _____	①	②	③	④	⑤	⑥
29. The monthly amount of public assistance received at referral	①	②	③	④	⑤	⑥
30. The length of time, prior to <u>referral</u> , during which the client received public assistance	①	②	③	④	⑤	⑥
31. The appropriateness of the Federal Special Program identification checks						
a. Social Security Trust Funds (TF)	①	②	③	④	⑤	⑥
b. Veterans (VET)	①	②	③	④	⑤	⑥
c. Migratory Agricultural Workers (MAW)	①	②	③	④	⑤	⑥
d. Offender (PO)	①	②	③	④	⑤	⑥
e. Work Incentive Program (WIN)	①	②	③	④	⑤	⑥
f. Expansion Grant Project (SEC4)	①	②	③	④	⑤	⑥
g. Supplemental Security Income Funds (SF)	①	②	③	④	⑤	⑥
h. Severely Disabled (SD)	①	②	③	④	⑤	⑥
32. The client's SSDI status <u>at closure</u>	①	②	③	④	⑤	
33. The client's SSI status <u>at closure</u>	①	②	③	④	⑤	
34. The client's work status <u>at closure</u>	①	②	③	④	⑤	
35. The client's weekly earnings <u>at closure</u>	①	②	③	④	⑤	
36. The client's receipt or non-receipt of public assistance <u>at closure</u> . (Documentation of non-receipt would occur when the R-300 records no public assistance received <u>and</u> the case record provides no documentation of receipt.)	①	②	③	④	⑤	

Exhibit 9 (cont.)

SECTION I: CASE INFORMATION
C: R-300 VERIFICATION, continued

ANSWER COLUMN

Is the following information on the R-300, or its equivalent, consistent with that found in the case record?

	Verified	Not Verified	Case Record Only	R-300 Only	N/R	N/A
37. The type(s) of public assistance received <u>at closure</u>						
a. SSDI	①	②	③	④	⑤	⑥
b. SSI-aged	①	②	③	④	⑤	⑥
c. SSI-blind	①	②	③	④	⑤	⑥
d. SSI-disabled	①	②	③	④	⑤	⑥
e. AFDC	①	②	③	④	⑤	⑥
f. Other (specify) _____	①	②	③	④	⑤	⑥
38. The monthly amount of public assistance received <u>at closure</u>	①	②	③	④	⑤	⑥
39. The client's occupation <u>at closure</u>	①	②	③	④	⑤	
40. The correct DOT code for that occupation? (Check in Dictionary of Occupational Titles)	①	②	③	④	⑤	
41. The client's outcome status	①	②	③	④	⑤	
42. Reason for nonrehabilitated closure	①	②	③	④	⑤	⑥
43. The total cost of all case services	①	②	③	④	⑤	⑥
44. The total cost of all case services provided in rehabilitation facilities	①	②	③	④	⑤	⑥
45. The total cost of case services charged to Social Security Trust Funds	①	②	③	④	⑤	⑥
46. The total cost of case services charged to Supplemental Security Income funds	①	②	③	④	⑤	⑥

Exhibit 9 (cont.)

SECTION I: CASE INFORMATION
C: R-300 VERIFICATION, continued

SERVICES PROVIDED	ITEM SERVICE	47	48	49	50	51	52	53	54	55	56	57	58
		Diagnostic & Evaluation	Restoration (Physical or Mental)	College or University	Other Academic Elementary or High School	Business School or College	Vocational School	On-the-job Training	Personal and Vocational Adjustment	Miscellaneous Training	Maintenance	Other Services	Services to Other Family Members
<p>INSTRUCTIONS: Please answer the following questions (A and B) for each of the service categories 47-58 listed at the right.</p> <p>A. Indicate your findings regarding the agreement of data found on the R-300, or its equivalent, to that found in the case record relative to the <u>receipt</u> of the following services.</p> <p>Verified</p> <p>Not Verified</p> <p>Case Record Only</p> <p>R-300 Only</p> <p>N/R</p> <p>N/A</p>													
	①	①	①	①	①	①	①	①	①	①	①	①	①
	②	②	②	②	②	②	②	②	②	②	②	②	②
	③	③	③	③	③	③	③	③	③	③	③	③	③
	④	④	④	④	④	④	④	④	④	④	④	④	④
	⑤	⑤	⑤	⑤	⑤	⑤	⑤	⑤	⑤	⑤	⑤	⑤	⑤
	⑥	⑥	⑥	⑥	⑥	⑥	⑥	⑥	⑥	⑥	⑥	⑥	⑥
<p>B. Indicate your findings regarding the agreement of data found on the R-300, or its equivalent, to that found in the case record relative to the <u>cost status</u> of the following services.</p> <p>Verified</p> <p>Not Verified</p> <p>Case Record Only</p> <p>R-300 Only</p> <p>N/R</p> <p>N/A</p>													
	①	①	①	②	①	①	①	①	①	①	①	①	①
	②	②	②	②	②	②	②	②	②	②	②	②	②
	③	③	③	③	③	③	③	③	③	③	③	③	③
	④	④	④	④	④	④	④	④	④	④	④	④	④
	⑤	⑤	⑤	⑤	⑤	⑤	⑤	⑤	⑤	⑤	⑤	⑤	⑤
	⑥	⑥	⑥	⑥	⑥	⑥	⑥	⑥	⑥	⑥	⑥	⑥	⑥

Exhibit 9 (cont.)

SECTION II: EVALUATION OF REHABILITATION POTENTIAL A. PRELIMINARY DIAGNOSTIC STUDY -- STATUS 02		ANSWER		
		YES	NO	N/A
<p>For questions 4 through 11, please answer with:</p> <p>1 = YES</p> <p>2 = NO</p> <p>3 = NOT APPLICABLE (N/A)</p>				
<i>Does the preliminary diagnostic study . . .</i>				
(10)	4. include an appraisal of the current general health status of the client?	①	②	③
(10)	5. include a psychiatric or psychological examination in all cases of mental or emotional disorder?	①	②	③
6. include such examinations and diagnostic studies as necessary to:				
(10)	a. determine eligibility?	①	②	③
(10)	b. determine the need for extended evaluation?	①	②	③
(10)	7. place primary emphasis upon the determination of the client's potential for achieving a vocational goal?	①	②	③
(10)	8. support the determination that the client has a medically recognized physical or mental disability?	①	②	③
(10)	9. support the determination that the medically recognized disability constitutes a substantial handicap to employment for the client?	①	②	③
(10)	10. support the determination that VR services may reasonably be expected to benefit the client in terms of employability?	①	②	③
(10)	11. support the determination that an extended evaluation is necessary to determine that VR services may reasonably be expected to benefit the client in terms of employability?	①	②	③
(10)	12. contain data supporting a determination that the client is severely disabled?	①	②	③
<p>NOTE: IMPORTANT INSTRUCTIONS</p> <p>If case is certified eligible for extended evaluation, go to Section II.B., question 14, page 8 to complete subsection on Extended Evaluation.</p> <p>If case is certified eligible, go to Section III, question 1, page 12, to complete section on Eligibility.</p> <p>If case data does not support the determination that the client is eligible, although the client is certified as such, set case aside for review by full review team.</p> <p>If case is closed in Status 08, go to Section VII, page 19 to complete the appropriate subsection on Status 08 closures.</p>				



Exhibit 9 (cont.)

8

SECTION II: EVALUATION OF REHABILITATION POTENTIAL		ANSWER		
B. EXTENDED EVALUATION -- STATUS 06		YES	NO	N/A
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> For items 14 through 42, please answer with: 1 = YES 2 = NO 3 = NOT APPLICABLE (N/A) </div>				
<u>Certification for Extended Evaluation</u>				
<i>Does the case record . . .</i>				
(10)	14. contain a certification for extended evaluation to determine rehabilitation potential:	①	②	
<i>If YES, does the certification for extended evaluation . . .</i>				
(10)	a. indicate the date of certification?	①	②	
<u>Individualized Written Rehabilitation Program (IWRP) for Extended Evaluation</u>				
(12)	18. Is there an IWRP for extended evaluation in the case record?	①	②	
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> NOTE: IMPORTANT INSTRUCTIONS If there is an IWRP for extended evaluation in the case record, answer questions 19 through 42 below. If there is no IWRP for extended evaluation in the case record, go on to question 43, page 11. </div>				
<i>Does the IWRP for extended evaluation (state form) . . .</i>				
(10, 12)	19. present the general basis for a determination that an extended evaluation of rehabilitation potential is necessary to make a determination of eligibility?	①	②	
(12)	20. set forth the terms and conditions for the provision of service, including:			
(12)	a. client responsibilities in carrying out the program, such as attendance, cooperation, etc.?	①	②	
(12)	b. the extent of client participation in the cost of services?	①	②	
(D)	c. the extent to which the client is eligible for similar benefits under other programs?	①	②	
(D)	d. the availability of VR funds?	①	②	
(D)	e. the availability of openings at facilities and schools?	①	②	
(D)	f. the possibility of delay in a phase of the program?	①	②	
(D)	g. the provision for changes in the program due to new information and changing conditions?	①	②	

Exhibit 9 (cont.)

SECTION II: EVALUATION OF REHABILITATION POTENTIAL		ANSWER		
B. EXTENDED EVALUATION -- STATUS 06, continued		YES	NO	N/A
	<i>Does the IWRP for extended evaluation,</i>			
	21. document that the client was informed of client rights and remedies, including:			
(12)	a. the right to be fully consulted regarding any changes or amendments in the rehabilitation program?	①	②	
(12)	b. the right to administrative review in case of dissatisfaction with services?	①	②	
(D)	c. the availability of resources within the client assistance project, where appropriate?	①	②	
(12)	d. the right to participate in the annual review of the program?	①	②	
(12)	e. the right to participate in the annual review of the ineligibility decision?	①	②	
(12)	22. reflect that the IWRP for extended evaluation was maintained as a separate part of the case record?	①	②	
(12)	23. show that the client received a copy of the IWRP and substantial amendments?	①	②	
(D)	24. show that the program was initiated after the certification for extended evaluation?	①	②	
(12)	26. indicate that the program was developed and amended with the client's participation, or as appropriate, with the parent, guardian, or other representative?	①	②	
(12)	28. state the intermediate rehabilitation objectives?	①	②	
(12)	29. state the VR services to be provided which are necessary for the determination of rehabilitation potential?	①	②	
(12)	30. contain the projected date for the initiation of each service?	①	②	
(12)	31. contain the anticipated duration for each service planned?	①	②	
(12)	32. provide the projected time within which rehabilitation objectives may be achieved?	①	②	
(10, 12, D)	33. show that a thorough assessment of the client's progress was made at least once in every 90-day period during the provision of services under the extended evaluation?	①	②	③
(12)	34. state the objective criteria upon which an evaluation of the client's progress is based?	①	②	
(12)	35. state the procedure by which the client is evaluated?	①	②	
(12)	36. contain a schedule for the periodic reviews and progress evaluations?	①	②	
(12)	37. contain a record of the results of scheduled reviews and progress evaluations?	①	②	
(12)	38. show that a formal, annual review has been conducted if the IWRP has achieved at least first anniversary status?	①	②	③
(12)	39. document the client's views, or, as appropriate, the views of the parent, guardian, or other representatives concerning the objectives and VR services being provided?	①	②	

Exhibit 9 (cont.)

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SECTION II: EVALUATION OF REHABILITATION POTENTIAL B. EXTENDED EVALUATION -- STATUS 06, continued		ANSWER		
		YES	NO	N/A
<div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>NOTE: IMPORTANT INSTRUCTIONS</p> <p>If the client has been determined eligible as a result of extended evaluation, answer question 40.</p> <p>If the client has been determined ineligible as a result of extended evaluation, answer question 42.</p> </div>				
<i>Does the case record . . .</i>				
(10)	40. contain a certification of eligibility for the continuance of VR services?	①	②	
<i>Does the IWRP for extended evaluation . . .</i>				
(10, 12)	42. contain a closure statement as an amendment to the program for the client determined <u>ineligible</u> because of a lack of rehabilitation potential?	①	②	
<i>If YES, does the case record . . .</i>				
(10, 12)	a. show that the decision to terminate services was made in full consultation with the client, or as appropriate, with the parent, guardian, or other representative?	①	②	
(12)	b. show that the rationale for the decision to terminate services was recorded as a certified amendment to the IWRP for extended evaluation?	①	②	
(12)	c. show that a certification of ineligibility was then executed?	①	②	
(10 12)	d. show that the provision was made for a periodic review, at least annually, of the ineligibility decision?	①	②	

Exhibit 9 (cont.)

SECTION II: EVALUATION OF REHABILITATION POTENTIAL
 8. EXTENDED EVALUATION -- STATUS 06, continued

DELIVERY OF SERVICES		ITEM	43	44	45	46	47	48	49	50	51	52	53	54
SERVICE			Diagnostic and Related Services	Counseling and Guidance	Physical Restoration	Mental Restoration	Vocational and Other Training	Maintenance	Transportation	Services to the Family	Specialized Services for Blind, Deaf, Service Disabilities	Telecommunications	Occupational licenses, Tools, Equipment	Other Goods and Services
(12)	B. Does the case record document that the service was planned for the client?	Yes	①	①	①	①	①	①	①	①	①	①	①	①
		No	②	②	②	②	②	②	②	②	②	②	②	②
(12)	C. Does the case record document that the service was given to the client?	Yes	①	①	①	①	①	①	①	①	①	①	①	①
		No	②	②	②	②	②	②	②	②	②	②	②	②
		N/A	③	③	③	③	③	③	③	③	③	③	③	③
(D)	E. Was full consideration given to any similar benefits available to the client to meet, in whole or in part, the cost of the service?	Yes	①	①	①	①	①	①	①	①	①	①	①	①
		No	②	②	②	②	②	②	②	②	②	②	②	②
		N/A	③	③	③	③	③	③	③	③	③	③	③	③

INSTRUCTIONS: Please answer questions B, C, and E for each of the service categories listed at the right.

NOTE: IMPORTANT INSTRUCTIONS
 If the case is certified eligible, go to Section III, question 1, page 12, to complete section on Eligibility.
 If case data does not support the determination that the client is eligible although the client is certified as such, set case aside for review by full review team.
 If case is closed in Status 08, go to Section VII, page 19, to complete the appropriate subsection on Status 08 closures.



SECTION III: ELIGIBILITY -- STATUS 10		ANSWER		
		YES	NO	N/A
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> For question 1, please answer with: 1 = YES 2 = NO 3 = NOT APPLICABLE (N/A) </div>				
<i>Does the case record . . .</i>				
(10)	1. contain a certification of eligibility?	①	②	
<i>If YES, does the certification of eligibility . . .</i>				
(10)	a. indicate the date of certification?	①	②	
(10)	c. indicate that the client has met the basic eligibility requirements?	①	②	
(D)	2. contain data supporting a determination that the client is severely disabled?	①	②	③
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> For questions 3 through 8, please answer with: 1 = LESS THAN ADEQUATE 2 = ADEQUATE 3 = NOT APPLICABLE (N/A) </div>				
<u>Physical or Mental Disability</u>				
<i>How well does the counselor documentation in the case record . . .</i>				
(10)	3. establish the presence of a physical or mental disability with necessary medical, psychiatric, psychological, and other information:	①	②	
(D)	4. show that the physical or mental disability materially limits, contributes to limiting, or if not corrected, would probably result in limiting a client's activities or functioning?	①	②	
<u>Substantial Handicap to Employment</u>				
<i>How well does the counselor documentation in the case record . . .</i>				
(D)	5. analyze the specific ways in which the following factors, as appropriate to the client, impede the client's occupational performance by preventing the client from obtaining, retaining, or preparing for employment consistent with the client's capacities and abilities?			
	a. medical factors?	①	②	③
	b. psychological factors?	①	②	③
	c. vocational factors?	①	②	③
	d. educational factors?	①	②	③
(D)	6. show that the related factors which bear upon successful vocational participation were considered?	①	②	③
(10)	7. show that the substantial handicap to employment exists, even though the client is employed, because the client is unable to obtain a gainful occupation consistent with the client's capacities and abilities?	①	②	③

Exhibit 9 (cont.)

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SECTION III: ELIGIBILITY -- STATUS 10, continued	ANSWER		
	YES	NO	N/A
<u>Reasonable Expectation</u>			
<i>How well does the counselor documentation in the case record . . .</i>			
(10) 8. show the likelihood of VR services enabling the client to achieve vocational goals consistent with the client's capacities and abilities?	①	②	

Exhibit 9 (cont.)

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SECTION IV: EVALUATION OF REHABILITATION POTENTIAL THROUGH DIAGNOSTIC STUDY -- STATUTES 02 AND 10		ANSWER		
		*YES	NO	N/A
<i>Does the thorough diagnostic study . . .</i>				
(D)	1. determine the <u>nature</u> of VR services needed by the client?	①	②	
(D)	2. determine the <u>scope</u> of VR services which are needed to attain the vocational goals of the client?	①	②	
(D)	5. consist of a comprehensive evaluation, to the degree needed, of pertinent medical, psychological, vocational, educational, and other related factors which bear on the client's handicap to employment?	①	②	

Exhibit 9 (cont.)

SECTION V. INDIVIDUALIZED WRITTEN REHABILITATION PROGRAM (IWRP) -- STATUS 12 AND ABOVE		ANSWER		
		YES	NO	N/A
<p>For questions 1 through 23, please answer with:</p> <p>1 = YES</p> <p>2 = NO</p> <p>3 = NOT APPLICABLE (N/A)</p>				
(12)	1. Is there an IWRP in the case record?	①	②	
<p>NOTE: IMPORTANT INSTRUCTIONS</p> <p>If there is an IWRP in the case record, answer questions 2 through 23 below.</p> <p>If there is no IWRP in the case record and services are being provided, go to Section VI, page 18.</p> <p>If there is no IWRP in the case record and no services are being provided, go to Section VII, page 19.</p>				
<i>Does the IWRP (state form) . . .</i>				
(12)	2. present the general basis for a determination of eligibility?	①	②	
	3. set forth the terms and conditions for the provision of services, including:			
(12)	a. client responsibilities in carrying out the program, such as cooperation, attendance, etc.?	①	②	
(12)	b. the extent of client participation in the cost of services?	①	②	
(0)	c. the extent to which the client is eligible for similar benefits under other programs?	①	②	
(0)	d. the availability of VR funds?	①	②	③
(0)	e. the availability of openings at facilities and schools?	①	②	③
(0)	f. the possibility of delay in a phase of the program?	①	②	③
	4. document that the client was informed of client rights and remedies, including:			
(12)	a. the right to be fully consulted regarding any changes or amendments in the rehabilitation program?	①	②	
(12)	b. the right to administrative review in case of dissatisfaction with services?	①	②	
(0)	c. the availability of resources within the client assistance project, where appropriate?	①	②	③
(12)	d. the right to participate in the annual review of the program?	①	②	
(12)	e. the right to participate in the annual review of the ineligibility decision?	①	②	
(12)	5. reflect that the IWRP was maintained as a separate part of the case record?	①	②	
(12)	6. show that the client received a copy of the IWRP and substantial amendments?	①	②	

Exhibit 9 (cont.)

SECTION V. INDIVIDUALIZED WRITTEN REHABILITATION PROGRAM (IWRP) -- STATUS 12 AND ABOVE, continued		ANSWER		
		YES	NO	N/A
<i>Does the IWRP (state form) . . .</i>				
(0)	7. show that the program was initiated after the execution of the certification for eligibility?	①	②	
(12)	9. indicate that the program was developed and amended with the client's participation or, as appropriate, with the parent, guardian, or other representative?	①	②	
(12)	11. place primary emphasis on the determination and achievement of a vocational goal?	①	②	
(12)	12. state the long-range employment goal?	①	②	
(12)	13. state the intermediate rehabilitation objectives?	①	②	
(12)	14. state the specific VR services to be provided to achieve the intermediate objectives and the employment goal?	①	②	
(12)	15. contain the projected date for the initiation of each service?	①	②	
(12)	16. contain the anticipated duration for each service planned?	①	②	
(12)	17. provide the projected time within which rehabilitation objectives and goals may be achieved?	①	②	
(12)	18. state the objective criteria upon which an evaluation of the client's progress toward an employability goal is based?	①	②	
(12)	19. state the procedure by which the client is evaluated?	①	②	
(12)	20. contain a schedule for the periodic reviews and progress evaluations?	①	②	
(12)	21. contain a record of the results of the scheduled reviews and evaluations?	①	②	③
(12)	22. show that a formal, annual review has been conducted, if the IWRP has achieved at least first anniversary status?	①	②	③
(12)	23. document the client's views, or as appropriate, the views of the parent, guardian, or other representative concerning the goals, objectives, and VR services being provided?	①	②	
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 10px auto;"> <p>NOTE: IMPORTANT INSTRUCTIONS</p> <p>If case is closed non-rehabilitated, answer question 24.</p> <p>If case is closed rehabilitated, answer question 25.</p> <p>If case is closed rehabilitated and post-employment services have been planned, answer question 26.</p> </div>				
<i>Does the IWRP . . .</i>				
(12)	24. contain a closure statement as an amendment to the program when the case is closed non-rehabilitated because the client is not capable of achieving a vocational goal?	①	②	
<i>If YES, does the case record . . .</i>				
(12)	a. show that the decision to terminate services was made in full consultation with the client, or, as appropriate, with the parent, guardian, or other representative?	①	②	



Exhibit 9 (cont.)

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SECTION V. INDIVIDUALIZED WRITTEN REHABILITATION PROGRAM (IWRP) -- STATUS 12 AND ABOVE, continued		ANSWER		
		YES	NO	N/A
24. continued				
(12)	b. show that the rationale for the decision to terminate services was recorded as a certified amendment to the IWRP?	①	②	
(12)	c. show that a certification of ineligibility was then executed?	①	②	
(12)	d. show that the provision was made for a periodic review, at least annually, of the ineligibility decision?	①	②	
(12)	25. contain a closure statement as an amendment to the program for a case closed rehabilitated?	①	②	
<i>If YES, does the statement include:</i>				
(12)	a. a description of the basis upon which the client was determined to be rehabilitated?	①	②	
(D)	e. any plans for the provision of post-employment services after a suitable objective has been achieved?	①	②	
(12)	26. Is there an amended IWRP for Post-Employment Services?	①	②	
<i>If YES, does the amended IWRP . . .</i>				
(D)	a. provide the basis on which plans for post-employment services have been developed?	①	②	
(D)	b. describe the outcome to be achieved or the outcome of post-employment services?	①	②	
(D)	c. describe the type and extent of post-employment services to be or being provided?	①	②	

SECTION VI. DELIVERY OF SERVICES -- STATUSES 14, 16, 18, 20, 22, AND 32

ITEM	1	2	3	4	5	6	7	8	9	10	11	12	13	14
SERVICE	Evaluation and Diagnostic Services	Counseling and Guidance	Physical Restoration	Mental Restoration	Vocational and Other Training	Maintenance	Transportation	Services to the Family	Special Services for Blind, Deaf, and S.D.	Telecommunications	Occupational Licenses, Tools, Equipment	Other Goods and Services	Placement	Post-Employment
(12, D) B. Does the case record document that the service was planned for the client?	Yes	①	①	①	①	①	①	①	①	①	①	①	①	①
	No	②	②	②	②	②	②	②	②	②	②	②	②	②
	N/A	③	③	③	③	③	③	③	③	③	③	③	③	③
(12, D) C. Does the case record document that the service was given to the client?	Yes	①	①	①	①	①	①	①	①	①	①	①	①	①
	No	②	②	②	②	②	②	②	②	②	②	②	②	②
	N/A	③	③	③	③	③	③	③	③	③	③	③	③	③
If YES,) F. Was the service provided consistent with employment at closure?	Yes	①	①	①	①	①	①	①	①	①	①	①	①	①
	No	②	②	②	②	②	②	②	②	②	②	②	②	②
	N/A	③	③	③	③	③	③	③	③	③	③	③	③	③
(D) G. Was full consideration given to any similar benefits available to the client to meet, in whole or in part, the cost of the service?	Yes	①	①	①	①	①	①	①	①	①	①	①	①	①
	No	②	②	②	②	②	②	②	②	②	②	②	②	②
	N/A	③	③	③	③	③	③	③	③	③	③	③	③	③

INSTRUCTIONS: Please answer questions B, C, F, and G for each of the service categories (Items 1-14) listed at the right.



SECTION VII: TERMINATION OF CASES -- STATUS 08 FROM 00/02 -- INTERVENING REASONS

ANSWER
YES NO N/A

NOTE: IMPORTANT INSTRUCTIONS.

Please proceed to the appropriate subsection according to the case status at closure as indicated below. If the case is in an open status, go on to Section VIII, page 27. If the case is closed in Status 08 from Status 00/02 for intervening reasons,* answer questions 2 through 5, page 19. If the case is closed in Status 08 from Status 00/02 due to ineligibility, answer questions 6 through 16, page 20. If the case is closed in Status 08 from Status 06, answer questions 17 through 27, page 21. If the case is closed in Status 30 or Status 28, answer questions 28 through 41, pages 22 and 23. If the case is closed in Status 26, answer questions 42 through 58, pages 24 through 26.

For questions 1 through 5, please answer with:

- 1 = YES
2 = NO
3 = NOT APPLICABLE (N/A)

*Intervening reasons means that client becomes unavailable for interview, evaluation, and diagnostic studies, or other services essential for making eligibility/ineligibility determinations because the client died, moved out of state or was impossible to contact, or was institutionalized under circumstances that rendered the client unavailable.

Case Closed Status 08 from 00/02 -- Intervening Reasons

Does the case record . . .

- (10) 2. document specific reasons for the closure action?
If YES, does the case record document that the client became unavailable for interview, evaluation, and diagnostic studies, or other services essential for making eligibility/ineligibility determinations because the client:
(D) a. died?
(D) b. moved out of state or was impossible to contact?
(D) c. was institutionalized under circumstances which rendered the client unavailable?
(D) 3. show that the client was referred to other agencies and facilities, as appropriate?
(D) 4. show that the action taken and outcome were reported to other agencies, as appropriate?
(D) 5. show that the client, or as appropriate, the parent, guardian, or other representative, was advised of the reasons for closure and the closure action taken?

Answers for questions 2-5: 1, 2, 1, 2, 1, 2, 1, 2, 1, 2, 1, 2, 3

GO ON TO SECTION VIII, PAGE 27.

SECTION VII: TERMINATION OF CASES -- STATUS 08 FROM 00/02 -- INELIGIBILITY		ANSWER		
		YES	NO	N/A
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> For questions 6 through 16, please answer with: 1 = YES 2 = NO 3 = NOT APPLICABLE (N/A) </div>				
<u>Case Closed Status 08 from 00/02 -- Ineligibility</u>				
<i>Does the case record . . .</i>				
(10)	6. contain a certification of ineligibility?	①	②	
	<i>If YES, does the certification of ineligibility . . .</i>			
(10)	a. indicate the date of certification?	①	②	
(10)	c. include the reasons for the determination of ineligibility?	①	②	
(10)	7. show that the client does not have a medically recognized physical or mental disability?	①	②	③
(10)	8. show that the client does not have a substantial handicap to employment?	①	②	③
(10)	9. show that beyond any reasonable doubt the client is not expected to benefit in terms of employability from VR services?	①	②	③
	10. contain data supporting the ineligibility determination, including			
(10)	a. a summary of medical and other case data obtained during the preliminary diagnostic study?	①	②	
(10)	b. an analysis specifying the reasons for the ineligibility determination?	①	②	
(10)	d. documentation of a review of the ineligibility determination not later than 12 months following such determination?	①	②	③
(10)	11. show that the ineligibility determination was made only after full consultation with the client, or as appropriate, with the parent, guardian, or other representative?	①	②	
(10)	12. document that the client was notified in writing of the closure action taken?	①	②	
	13. document that the client was informed in writing of client rights and remedies, including:			
(10)	a. the right to administrative review and fair hearing?	①	②	
(D)	b. the availability of resources within the client assistance project, where appropriate?	①	②	③
(10)	c. the right to participate in the annual review of the ineligibility determination?	①	②	
(10)	14. document any action and decision involving the client's request for an administrative review of agency action or fair hearing?	①	②	③
(D)	15. show that the client was referred to other agencies and facilities, as appropriate?	①	②	③
(D)	16. show that the action taken and outcome were reported to other agencies, as appropriate?	①	②	③

GO ON TO SECTION VIII, PAGE 27.

SECTION VII: TERMINATION -- STATUS 08 FROM 06 -- INELIGIBILITY

ANSWER
YES NO N/A

For Questions 17 through 27, please answer with:
 1 = YES
 2 = NO
 3 = NOT APPLICABLE (N/A)

Case Closed Status 08 from 06 -- Ineligibility

Does the case record . . .

		①	②	③
(10)	17. contain a certification of ineligibility?	①	②	
	<i>If YES, does the certification of ineligibility . . .</i>			
(10)	a. indicate the date of certification:	①	②	
(10)	c. include the reasons for the determination of ineligibility?	①	②	
(10)	18. show that beyond any reasonable doubt the client cannot be expected to benefit in terms of employability from VR services?	①	②	③
(D)	19. show that the interruption of services precluded the continuation of the INRP for extended evaluation?	①	②	③
(10, 12)	20. contain the rationale for the ineligibility determination as an amendment to the INRP?	①	②	
(0)	21. show that the ineligibility determination was made only after full consultation with the client, or as appropriate, with the parent, guardian, or other representative?	①	②	③
(12)	22. show that the INRP contains the views of the client, or as appropriate, the parent, guardian, or other representative concerning the ineligibility determination?	①	②	③
(10)	23. document that the client was informed in writing of the closure action taken?	①	②	
(10)	24. document any action and decision involving the client's request for an administrative review of agency action or fair hearing?	①	②	③
(10)	25. document that the ineligibility determination was reviewed not later than 12 months following such determination?	①	②	③
(D)	26. show that the client was referred to other agencies and facilities, as appropriate?	①	②	③
(D)	27. show that the action taken and outcome were reported to other agencies, as appropriate?	①	②	③

GO ON TO SECTION VIII, PAGE 27.

Exhibit 9 (cont.)

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SECTION VII: TERMINATION OF CASES -- STATUSES 30 and 28 -- NOT REHABILITATED		ANSWER		
		YES	NO	N/A
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> For questions 28 through 41, please answer with: 1 = YES 2 = NO 3 = NOT APPLICABLE (N/A) </div>				
<u>Case Closed Status 30 or Status 28 -- Not Rehabilitated</u>				
<i>Does the case record . . .</i>				
(10)	28. contain a certification of ineligibility? <i>If YES, does the certification of ineligibility . . .</i>	①	②	
(10)	a. indicate the date of certification?	①	②	
(10)	c. include the reasons for the determination of ineligibility?	①	②	
(D)	29. show that suitable employment cannot be achieved?	①	②	③
(D)	30. show that employment resulted without benefit derived from VR services?	①	②	③
	31. document that one of the following situations necessitated closing the case as not rehabilitated?			
(D)	a. the client decided not to follow through?	①	②	
(D)	b. contact was lost with the client?	①	②	
(D)	c. there was new information or complications?	①	②	
(D)	32. document that when there was new information or complications, the client was referred to another agency, as appropriate?	①	②	③
(D)	33. document that when the client moved to another state, effort was made to continue or arrange VR services?	①	②	③
(10, 12)	34. contain the rationale for the ineligibility determination as an amendment to the program? (For case closed Status 30 from Status 10, answer N/A.)	①	②	③
(10, 12)	35. show that the ineligibility determination was made only after full consultation with the client, or as appropriate, with the parent, guardian, or other representative?	①	②	③
(10)	36. document that the client was notified in writing of the closure action taken?	①	②	
(10)	37. document that the client was informed in writing of client rights and remedies? (For case closed Status 30 from Status 10, answer N/A.) <i>If YES, does the case record show that the client was informed in writing of . . .</i>	①	②	③
(10)	a. the right to administrative review and fair hearing?	①	②	
(10)	b. the right to participate in the annual review of the ineligibility determination?	①	②	
(10)	38. document any action and decision involving the client's request for an administrative review of agency action or fair hearing?	①	②	③
(10)	39. document that the determination that the client was no longer eligible was reviewed not later than 12 months following such determination?	①	②	②

Exhibit 9 (cont.)

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SECTION VII: TERMINATION OF CASES -- STATUSES 30 AND 28 -- NOT REHABILITATED, continued	ANSWER		
	YES	NO	N/A
<i>Does the case record . . .</i>			
(D) 40. show that the client was referred to other agencies and facilities, as appropriate?	①	②	③
(D) 41. show that the action taken and outcome were reported to other agencies, as appropriate?	①	②	③

GO TO SECTION VIII, PAGE 27.

Exhibit 9 (cont.)

SECTION VII: TERMINATION OF CASES -- STATUS 26		ANSWER		
		YES	NO	N/A
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> For questions 42 through 51 please answer with: 1 = YES 2 = NO 3 = NOT APPLICABLE (N/A) </div>				
<u>Case Closed Status 26 - Rehabilitated</u>				
Does the case record . . .				
(D)	42. contain a closure statement as an amendment to the IWRP?	①	②	
If YES, does the statement include:				
(D)	a. a description of the basis upon which the client was determined to be rehabilitated?	①	②	
(D)	b. the type of occupation?	①	②	
(D)	c. the length of time the client has been engaged in the occupation?	①	②	
(D)	d. a description of why it is determined that the client has made a satisfactory adjustment?	①	②	
(D)	e. any plans for the provision of post-employment services after a suitable objective has been achieved?	①	②	
(D)	44. show that the client was provided with appropriate VR services in accordance with the IWRP?	①	②	
(D)	45. show that the client has completed the total program of services as described in the client's rehabilitation program, including amendments?	①	②	
(D)	46. show that the client has been placed in employment consistent with the employment objective for which services have prepared the client?	①	②	
(D)	47. show that the suitable employment objective achieved by the client has been maintained for a minimum of 60 days?	①	②	
(D)	48. document that the client was informed in writing of the closure action taken?	①	②	
(D)	49. show that the action taken and outcome were reported to other agencies, as appropriate?	①	②	③
(D)	50. show that the client was referred to other agencies and facilities, as appropriate?	①	②	③
(D)	51. show that as part of the process of being determined rehabilitated, the client was informed . . .			
(D)	a. of eligibility to receive necessary post-employment services?	①	②	
(D)	b. of the purpose for such post-employment services?	①	②	
(D)	c. of any plans for such post-employment services?	①	②	
(D)	d. that the client should contact the counselor, especially during the first year following the determination as rehabilitated, before leaving the job, or if problems arise jeopardizing the job?	①	②	

Exhibit 9 (cont.)

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SECTION VII: TERMINATION OF CASES -- STATUS 26

ANSWER
LESS ADEQ. N/A

For questions 52 through 58, please answer with:

1 = LESS THAN ADEQUATE

2 = ADEQUATE

3 = NOT APPLICABLE (N/A)

How well does the counselor documentation in the case record . . .

(D)	52. show that there is a relationship between the services rendered and the vocational outcome?	①	②	
(D)	53. show that substantial services (those having a discernible impact on the client's employability) were rendered to the client?	①	②	
	54. show that substantial placement services were provided to the client toward the acquisition of a suitable occupation, including:			
(D)	a. an evaluation of the client's job readiness?	①	②	③
(D)	c. instruction in making job applications?	①	②	③
(D)	d. instruction in client conduct during interviews?	①	②	③
(D)	e. employer contact?	①	②	③
(D)	h. consultation with employers or supervisors, as required?	①	②	③
	i. efforts in the area of selective placement if the client is severely disabled?	①	②	③
	55. show that the following conditions of a suitable placement have been met, insofar as possible:			
(D)	a. the client and the employer are each satisfied?	①	②	③
(D)	b. the client is maintaining adequate interpersonal relationships?	①	②	
(D)	c. the client is maintaining acceptable behavior in the job environment?	①	②	
(D)	d. the occupation is consistent with the client's capacities and abilities, considering the client's choice?	①	②	
(D)	e. the client possesses acceptable skills to perform or continue the work satisfactorily?	①	②	
(D)	f. the employment and working conditions will not aggravate the client's disability?	①	②	
(D)	g. the client's employment situation will not jeopardize the health or safety of the client or others?	①	②	
(D)	h. the employment is regular and reasonably permanent?	①	②	
(D)	i. the client receives a wage commensurate with that paid others for similar work under legal requirements?	①	②	③

Exhibit 9 (cont.)

26

SECTION VII. TERMINATION OF CASES -- STATUS 26, continued		ANSWER		
		LESS	ADEQ.	N/A
<i>How well does the counselor documentation in the case record . . .</i>				
56. support the reason and justification for closing the case, including:				
(D)	a. the employment status of the client?	①	②	
(D)	b. the basis on which employment was determined to be suitable?	①	②	
57. show that when the client accepts a job which fails to meet one or more of the suitability criteria (specified in 55 a-i, above), the counselor has:				
(D)	a. explained the unsuitable aspect(s) of the job	①	②	③
(D)	b. indicated that the client has made the job choice in light of these facts?	①	②	③
(D)	c. informed the client of the right to reapply for services if the job proves unsuitable or the need arises for further services?	①	②	③
(D)	58. support the justification for closing the case when suitable criteria were not met, including the consideration of alternatives?	①	②	③

GO ON TO SECTION VIII, PAGE 27.

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SECTION VIII: TIMELINESS RESEARCH AND COMMENTS
A: TIMELINESS

INSTRUCTIONS: As indicators of timeliness in the various phases in the rehabilitation process, consider where applicable the information listed below pertaining to each of the status increments in columns A, B, and C, when responding to questions 1-4.

- A. Status 00-08/10 Referral-In/Eligibility Undue speed or time lapses between referral/application of the client and the initial client interview, the request for information, the receipt of information on the client, additional diagnostic services, extended evaluation (if applicable), and any gaps between or during these events and the final eligibility decision and notification.
- B. Status 10-12 (Eligibility-Plan Approval) Undue speed or time lapses between eligibility determination and IWRP approval, amount of frequency of client contact during plan development.
- C. Status 12-26/28/30 (Plan Approval-Closure) Undue speed or time lapses between IWRP approval and initiation of services, duration of service receipt, contact with service providers, schedules for counseling, authorizations for payment/purchase, client-counselor contact, job availability, employer contacts, case record documentation and regular intervals and gaps in the process, especially between Status 22, placement, and closure (where applicable).

1. Was the client served in a timely manner? (i.e., without undue speed and without undesirable or unintended time lapses)
2. If no, was the case served with:
 - a. undue speed? (Record reasons for this judgment in Section VIII B.)
 - b. undue time lapses?
3. If a delay occurred, was the delay sufficiently explained in the case record?
4. If explained, was the delay caused by: (answer each)
 - a. No response by client?
 - b. Client indecision?
 - c. Client unavailability?
 - d. No contact by counselor?
 - e. No action by counselor?
 - f. No counselor assigned?
 - g. Administrative delays?
 - h. Lack of resources?
 - i. Delay in receiving reports?
 - j. Interagency delays?
 - k. Lack of placement opportunities?
 - l. Other? (specify) _____

ANSWER COLUMNS								
A(00-10/10)			B(10-12)			C(12-26/28/30)		
Yes	No	N/A	Yes	No	N/A	Yes	No	N/A
1	2		1	2		1	2	
1	2	3	1	2	3	1	2	3
1	2	3	1	2	3	1	2	3
1	2	3	1	2	3	1	2	3
1	2	3	1	2	3	1	2	3
1	2	3	1	2	3	1	2	3
1	2	3	1	2	3	1	2	3
1	2	3	1	2	3	1	2	3
1	2	3	1	2	3	1	2	3
1	2	3	1	2	3	1	2	3
1	2	3	1	2	3	1	2	3
1	2	3	1	2	3	1	2	3
1	2	3	1	2	3	1	2	3
1	2	3	1	2	3	1	2	3
1	2	3	1	2	3	1	2	3
1	2	3	1	2	3	1	2	3
1	2	3	1	2	3	1	2	3

EXHIBIT 10
Instructions for Modified
Case Review (MCRS)

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EXHIBIT 10
MODIFIED CASE REVIEW SCHEDULE
INSTRUCTIONS

The Modified Case Review Schedule (MCRS) is an evaluation form which is based on the Federal Regulations and Guidelines for the provision of Vocational Rehabilitation (VR) services through the State VR agency. This MCRS is composed of the following major sections and subsections which correspond with numbers and headings from the Case Review Schedule (CRS), developed by the San Diego State University RCEP IX. The MCRS includes only those CRS items needed to inform the Procedural Standards and the VR decision-support system.

- Section I: Case Information
 - A. Case Identification
 - B. Significant Data and Supportive Evaluation
 - C. R-300 Verification

- Section II: Evaluation of Rehabilitation Potential
 - A. Preliminary Diagnostic Study
 - B. Extended Evaluation

- Section III: Eligibility

- Section IV: Evaluation of Rehabilitation Potential Thorough Diagnostic Study -- Status 02 and 10

- Section V: Individualized Written Rehabilitation Program

- Section VI: Delivery of Services

- Section VII: Termination of Cases
 - A. Case Closed Status 08 from 00/02 -- Intervening Reasons
 - B. Case Closed Status 08 from 00/02 -- Ineligibility
 - C. Case Closed Status 08 from .06 -- Ineligibility
 - D. Case Closed Status 30 and Status 28 -- Not Rehabilitated
 - E. Case Closed Status 26 -- Rehabilitated

- Section VIII: Timeliness Assessment and Comments
 - A. Timeliness
 - B. Reviewer Comments

Exhibit 10 (page ii)

The intent of the original CRS was to determine if case service requirements and practice as specified in the Code of Federal Regulations (CFR) and the Rehabilitation Services Manual (RSM) are documented in the case record. The modified CRS includes selected items from the original CRS with the intent of responding to the concerns of four Procedural Standards. These standards include:

- (9) Information collected on clients by the R-300 and all data reporting systems used by RSA shall be valid, reliable, accurate, and complete.
- (10) Eligibility decisions shall be based on accurate and sufficient diagnostic information, and VR shall continually review and evaluate eligibility decisions to ensure that decisions are being made in accordance with laws and regulations.
- (11) VR shall ensure that eligibility decisions and client movement through the VR process occur in a timely manner appropriate to the needs and capabilities of the clients.
- (12) VR shall provide an Individualized Written Rehabilitation Program for each applicable client, and VR and the client shall be accountable to each other for complying with the agreement.

Each CRS question is referenced to the CFR and/or RSM. Further, certain CRS questions are referenced to the State Supplement Section of the CRS Manual where information on the state policy is provided. This referencing to state policy occurs where the federal requirements show that the states have the option of further defining the federal requirements which are provided within the CFR and RSM.

Instructions for completing the CRS will be provided according to the following:

General Instructions, pages 1-4.

Instructions Pertaining to Each Section, pages 5-42.

Exhibit 10 (page 1)GENERAL INSTRUCTIONS^a

1. Questions/Answer Scales:

- a. Please read the partial question or lead-in which appears in italics at the beginning of each page, and at the beginning of a subsection within a page, as the preface to each question.

The items in Section I, II, III, IV, V, VI, VII, and VIII present three types of questions. One type of question seeks to validate information submitted on the R-300 form with information recorded in the client's case folder. Prior to the questions is a lead-in which asks: *Is the following information on the R-300, or its equivalent, consistent with that found in the case record?*

This type of question is not asking whether documentation is in the case record, but whether documentation corroborates the R-300 information.

The reviewer responds by filling in the appropriate answer circle:

- | | |
|---------------------------|---|
| ① = Verified; | R-300 data included and consistent with that found in case record |
| ② = Not Verified; | R-300 data different from that found in case record |
| ③ = Case Record Only; | Data recorded in case record only, not on R-300 |
| ④ = R-300 Only; | Data recorded on R-300 only, not in case record |
| ⑤ = Not Recorded (N/R); | Data not recorded in either case record or R-300 |
| ⑥ = Not Applicable (N/A); | Data not applicable to client. |

- b. The second type of question begins with a partial question or lead-in such as: *Does the case record. . . . Does the preliminary diagnostic study. . . . Does the IWRP. . .* This type of question is asking whether or not information or documentation is in the case record. The reviewer responds by filling in the appropriate answer circle:

^a Note: "CRS" shall mean "MCRS" for these and all other instructions.

Exhibit 10 (page 2)

① = Yes

The case record documents, contains, shows, describes, includes, indicates, provides the requested information.

② = No

The case record does not document, contain, show, describe, include, indicate, provide the required information.

③ = Not Applicable (N/A)

The question is not applicable to this case record.

- c. The third type of question begins with a partial question or lead-in, such as: *How well does the counselor documentation in the case record. . . or, To the degree necessary, how well does the counselor documentation in the case record appraise. . .* This type of question requires that the reviewer make a judgment about the case record documentation and respond by filling in the appropriate answer circle:

① = Less than Adequate

The case record shows, describes, appraises, establishes, provides, documents, supports the requested information in a less than adequate manner. In the event that the requested information is not documented or not recorded, the appropriate response is less than adequate.

② = Adequate

The counselor documentation shows, analyzes, appraises, establishes, supports the requested information in an adequate manner; or the data in the case record describes the requested information in an adequate manner.

③ = Not Applicable (N/A)

The question is not applicable to this case record.

When responding to this type of question, the reviewer's task is to evaluate the adequacy or quality of the documentation.

- d. The answer choices within the appropriate answer scale may differ from one CRS question to the next. The Not Applicable (N/A) answer choice is offered for those CRS questions which are not required as case service/documentation practices in

Exhibit 10 (page 3)

the Federal Regulations and Guidelines, or where the federal requirement includes a time limit which may not be applicable to the case status or progression at the time of the case review.

2. Directions:

- a. Please read the directions at the top of the page and within the page, when provided, to determine the appropriate answer scale.
- b. Please answer all questions unless otherwise instructed. Specific Instructions are provided within the CRS at the beginning of particular sections, subsections and groups of questions indicating the appropriate questions to respond to and/or to omit. That is, if a section, subsection or group of questions does not apply, the section may be skipped. The total CRS is not completed for any one case.
- c. Specific instructions for marking the answer circles are located on page 1 of the MCRS.

3. Suggestions:

Throughout the process of developing, updating, and field testing the CRS, a number of suggestions have evolved for applying the CRS to cases. To assist the reviewer, the following suggestions are provided:

- a. Become familiar with the case record prior to beginning the CRS by scanning the documentation and reading important sections of the case record.
- b. Refer to the CRS Manual Instructions for clarification and specific instructions throughout the course of the case review.
- c. In evaluating the case record documentation, it is important to be aware of the differences in case recording. For example, the clarity, style, organization, and neatness of a case record may easily influence the evaluation. Insofar as the clarity, style, organization and neatness of the documentation can be separated from the presence and/or quality of the documentation, these differences should not be reflected in the results of the evaluation.

4. Definitions:

- a. Case Record,-- the case folder or case file which contains the case service records of the client.

Exhibit 10 (page 4)

- b. Counselor Documentation -- this refers to the counselor's progress notes on the client, synthesis of data obtained from other sources, and analysis or assessment of case data in relation to the client.
- c. Data -- this refers to the information obtained from other sources, such as objective reports from facilities and schools, test results, reports from consultants.
- d. R-300 -- this refers to the federal case service report, or the state's equivalent form, required for each client applying for VR services.

Exhibit 10 (page 5)

- Section I: Case Information
A. Case Identification
B. Significant Data

The Case Information Section requires that specific information be obtained from the application, certification form, case service report (R-300 or its equivalent), individualized written rehabilitation program and amendments, closure statement, and other pertinent documents to be recorded in the squares provided.

Completion of the questions in Section I requires the identification and consistent use of the state's source documents.

If federal or state reviewers or state VR agency staff complete this section, the source documents and procedures should be identified and explained in the State Supplement according to the state's policy.

INSTRUCTIONS/GUIDELINES

NOTE: IMPORTANT INSTRUCTIONS

The instructions on the CRS are provided to assist the reviewer in completing the review process.

- 1-10. Information provided by these items is used to identify the case for data analysis purposes and to assist the reviewer in the completion of other sections of the CRS.

Exhibit 10 (page 6)Section I: Case Information
C. R-300 Verification

Dates and information recorded in this section may be referred to by the reviewer while completing other sections of the CRS.

INSTRUCTIONS/GUIDELINES

(r.f.) The answer to this question will govern the completion of Section I: C. R-300 Verification as well as the pertinence of verifying the information provided in items dr. and cd.

NOTE: IMPORTANT INSTRUCTIONS

The instructions on the MCRS are provided as a key to marking appropriate responses as outlines for items dr. → 58.

(dr.) and (cd.) Record dates in the following manner:

• Month Day Year

This will facilitate data analysis.

14-58 The items are included as a verification of the accuracy and validity of information found on the R-300 or its equivalent. The following matrix cross-references the CRS item numbers with the federal R-300 item numbers.

Reference: PROCEDURAL STANDARD #9.

MCRS Item Number	(Revised) R-300 Item Number	MCRS Item Number	(Revised) R-300 Item Number	MCRS Item Number	(Revised) R-300 Item Number
dr.	1.C.	32	4.G.	46	4.E.4
cd.	4.A.	33	4.H.	47	4.Q.10
14	3.A.				
20.	2.A.	34	4.I.	48	4.Q.11
21	2.B.	35	4.J.	49	4.Q.12
22	2.C.	36	4.K.	50	4.Q.13
23	2.I.1	37	4.K.	51	4.Q.14
24	2.I.2	38	4.K.	52	4.Q.15
25	2.O.	39	4.L.	53	4.Q.16
26	2.P.	40	4.L.	54	4.Q.17
27	2.R.a	41	4.P.	55	4.Q.18
28	2.R.a	42	4.P.	56	4.Q.19
29	2.R.b	43	4.E.1	57	4.Q.20
30	2.R.c	44	4.E.2	58	4.Q.21
31	4.D.	45	4.E.3		

Exhibit 10 (page 7)

Section II: Evaluation of Rehabilitation Potential

A. Preliminary Diagnostic Study -- Status 02

The Evaluation of Rehabilitation Potential consists of a Preliminary Diagnostic Study, an Extended Evaluation (if necessary), and a Thorough Diagnostic Study. The Preliminary Diagnostic Study is conducted to determine eligibility. This subsection (II.A.) addresses only the requirements for the Preliminary Diagnostic Study.

To evaluate the documentation for the Preliminary Diagnostic Study within the Evaluation of Rehabilitation Potential Section, only the information collected from referral through acceptance for vocational rehabilitation services or acceptance for extended evaluation should be considered.

Referral and acceptance dates are recorded in Section I: Case Information.

INSTRUCTIONS/GUIDELINES

4. The medical information obtained should be sufficient to evaluate or appraise the current health status of the client, the specifics of the disabling condition, and to identify other impairments which might affect rehabilitation potential. Existing medical information may be used if it is adequate. Reference: Code of Federal Regulations (CFR) 1361.34(b); RSM 1505.03A, 1515.08, 1515.14.

The above includes adequacy and recency. Adequacy is established based on the comprehensiveness and recency of the information. Recency has the outer time limit of within one year. Cases with disabling conditions which are more subject to change should have more recent medical information. Reference: RSM 1515.13.

The state policy, based on appropriate input from medical consultants, should be used to judge the medical information in individual case records. Adequacy of the state policy should be commented on as part of an overall summary of the total case review.

State policy: see State Supplement Section of the Manual.

5. A psychiatric or psychological examination is required as part of the preliminary diagnostic study in all cases where there is an emotional or mental disorder. The RSM specifies that this examination must be a "thorough evaluation made by a physician skilled in the diagnosis and treatment of such disorders, or by a psychologist licensed or certified in accordance with state laws and regulations." Reference: CFR 1361.34(b); RSM 1505.03A, 1515.18.
6. Necessary examinations include a general medical examination or equivalent (such as a report from a recent hospital, clinic examination) and those additional diagnostic studies which are required to make a determination of eligibility, or the

Exhibit 10 (page 8)

determination that extended evaluation is required. Diagnostic studies could include medical, psychological, vocational studies, etc.

State policy regarding necessary examinations should be used to further evaluate the individual case records. Reference: CFR 1361.34(b); RSM 1515.08.

State policy: see State Supplement.

7. Since the purpose of the provision of vocational rehabilitation services is to enable disabled clients to prepare for and engage in gainful employment, a preliminary diagnostic study must document (a) the presence of the medically recognized physical or mental disability; (b) how the identified disability is substantially handicapping to that client; and (c) the client's potential to enter gainful employment as a result of vocational rehabilitation services. All points, (a), (b) and (c), must be documented or the preliminary diagnostic study would not place primary emphasis upon the client's potential for achieving a vocational goal. References: CFR 1361.34(b); RSM 1505.03B.
8. Reference: CFR 1361.34(a)(1), 1361.1(S), 1361.38(a); RSM 1505.03A.
9. Reference: CFR 1361.34(a)(1), 1361.1(bb), 1361.38(a); RSM 1505.03B.
10. Reference: CFR 1361.34(a)(2), 1361.38(a); RSM 1505.03C.
11. Reference: CFR 1361.34(a)(2), 1361.38(a).

NOTE: IMPORTANT INSTRUCTIONS

The instructions on the CRS are provided to assist the reviewer in proceeding to the appropriate CRS subsection or section.

12. A client can be identified as severely disabled at any time during the rehabilitation process if the client meets the definition of severely disabled. If the client is not identified as severely disabled at this point in the process, the response to this question (II.A.12) should be N/A.

Exhibit 10 (page 9)Section II: Evaluation of Rehabilitation Potential
B. Extended Evaluation -- Status 06

The Evaluation of Rehabilitation Potential consists of a Preliminary Diagnostic Study, an Extended Evaluation (if necessary), and a Thorough Diagnostic Study. This subsection (II.B.) addresses only the requirements for the Extended Evaluation to determine rehabilitation potential, including the requirements pertaining to certification, the individualized written rehabilitation program (IWRP), and the delivery of services under extended evaluation. The requirements for terminating the case from extended evaluation are contained in CRS Section VI: Termination of Cases.

To evaluate the documentation for Extended Evaluation, only the information collected from the referral date through the termination of extended evaluation date should be considered. The termination date should coincide with the date indicated on the certification of eligibility or ineligibility, whichever is appropriate to the termination action taken. Referral and termination/acceptance dates are recorded in CRS Section I: Case Information.

INSTRUCTIONS/GUIDELINESCertification for Extended Evaluation

According to the Federal Guidelines, "certification is the assurance by the state agency that in each case the basic conditions prescribed in the Regulations and set forth in the state plan have been met. . . information to substantiate the certification must be included in each case record." Reference RSM 1505.05A.

14. Reference: CFR 1361.37(b); RSM 1505.05A.

a. Reference: CFR 1361.37(b); RSM 1505.05A.

Individualized Written Rehabilitation Program (IWRP) for Extended Evaluation

The purpose of the IWRP requirement in the Rehabilitation Act is "to continue, extend, and formalize the case planning and management practice of setting forth goals and objectives, and means and time frames for achieving them, as well as to assure client participation and protection of client rights. . ." Reference: RSM 1507.02.

Exhibit 10 (page 10)

The procedures which are set forth in the Code of Federal Regulations and the Rehabilitation Services Manual for the IWRP apply to the program for each handicapped client eligible for VR services and to each handicapped client eligible for such services under an extended evaluation to determine rehabilitation potential.

18. The reviewer should respond YES to this question if the case record contains an IWRP form (including pre-printed information) or a combination of forms which are identified as the IWRP. For identification of the IWRP form(s), refer to the state policy. Reference: CFR 1361.38(e); RSM 1507.02, 1507.05.

State policy: see State Supplement.

NOTE: IMPORTANT INSTRUCTIONS

The instructions on the CRS are provided to assist the reviewer in proceeding to the appropriate questions in CRS Section II.B.

- 19-21. CRS II.B., Questions 11-13, pertain to information which the CFR and RSM suggest may be contained or covered in the pre-printed information that the state has included in its IWRP form. Those questions which are identified as covered in the state form pre-printed information should only be responded to once at the beginning of the review of the total sample of cases. Those questions which are identified as not covered in the state form pre-printed information should be responded to for each case in the review sample.

The inclusion or exclusion of the suggested pre-printed information in the IWRP (state form) does not reflect the presence or quality of the counselor's documentation; rather, the review of the information contained in questions 11-13 provides a review of the state's policy as reflected in the IWRP (state form). Reviewers may comment on the completeness or adequacy of the IWRP (state form) in Section VII: Reviewer Comments.

19. The general basis for a determination that an extended evaluation is necessary to make a determination of eligibility is presented in the IWRP to provide the client with basic information needed by the client to exercise client rights. According to the RSM, the general basis for such determination could be presented in a standard pre-printed statement in the IWRP. The completed record of such determination is contained elsewhere in the case record since it is often long, technical, and involves diagnostic and evaluative data. Reference: CFR 1361.39(c)(1); RSM 1507.07A.

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20. The terms and conditions may be included as standard content in a pre-printed statement in the IWRP along with any content specific to the individual client. Reference: RSM 1507.07B.
- a. Reference: CFR 1361.39(c)(7); RSM 1507.07B.
 - b. Reference: CFR 1361.39(c)(7); RSM 1507.07B, 1513.05.
 - c. Reference: CFR 1361.39(c)(7).
 - d. Reference: RSM 1507.07B
 - e. Reference: RSM 1507.07B
 - f. Reference: RSM 1507.07B
 - g. Reference: RSM 1507.07B
21. Client rights may be set forth in standard prepared statements, but the case record should reflect that the client understands these rights. Reference: CFR 1361.39(c)(8); RSM 1507.07B.
- a. Reference: RSM 1507.07B.
 - b. Reference: CFR 1361.39(c)(8); RSM 1507.07B.
 - c. Reference: CFR 1361.39(d); RSM 1507.08.
 - d. Reference: CFR 1361.39(e)(3); RSM 1507.10C.
22. This question is grouped with the questions pertaining to the state form, since the separateness of the IWRP in the case record is a reflection of the IWRP design or state policy. Reference: CFR 1361.38(e); RSM 1507.05.
23. The RSM specifies that written copies of amendments need to be provided to the client only in the case of substantial amendments. One example of a substantial amendment is the scheduling of a new service and the dropping of a previously planned service. For identification of the client's copy of the IWRP, refer to state policy. Reference: CFR 1361.39(a); RSM 1507.05, 1507.06, 1507.11.
- State policy: see State Supplement section of the Manual.
24. According to the RSM, "a program is required concurrent with, or reasonably soon after...the certificate of acceptability for extended evaluation." Reference: CFR 1361.39(a), 1361.39(b); RSM 1507.04.
26. Reference: CFR 1361.39(a); RSM 1507.02, 1507.06, 1507.07B, 1507.10B.

Exhibit 10 (page 12)

28. Intermediate rehabilitation objectives are steps or levels of achievement for the client and are not services. Services are the means by which the client may achieve the intermediate rehabilitation objective. For example, the correction of a medical problem (i.e., to be physically restored) may require a physical restoration service such as surgery. Reference: CFR 1361.39(c)(2); RSM 1507.07C.
29. Vocational rehabilitation services are furnished to enable the client to achieve the intermediate rehabilitation objectives. The IWRP states specific services to be provided or, at times, it may "categorically" describe a service which is planned. Reference: CFR 1361.39(c)(3); RSM 1507.07D.
30. Reference: CFR 1361.39(c)(4); RSM 1507.07D.
31. Reference: CFR 1361.39(c)(4); RSM 1507.07D.
32. Reference: CFR 1361.39(c)(4); RSM 1507.07D.
33. Reference: CFR 1361.36(d).
34. Objective criteria for evaluating the client's progress toward the intermediate rehabilitation objectives must be stated in terms which are meaningful to the client. Reference: CFR 1361.39(c)(5); RSM 1507.07F.
35. This CRS item refers to the procedure or methods which the counselor uses to evaluate the client's progress toward the intermediate rehabilitation objectives. As stated in the RSM, methods may include the case review, discussion with the client, and objective reports of progress. Part of the procedure may be established in standard prepared statements in the IWRP, along with statements of a particular application to the client. Reference: CFR 1361.39(c)(5); RSM 1507.07F.
36. The schedule for periodic review and evaluation should consider the nature of the client's situation as well as overall agency procedure. The schedule may be partially established in standard prepared statements. Reference: CFR 1361.39(c)(5); RSM 1507.07F.
37. A summary of the results of periodic reviews and progress evaluations is entered in the IWRP as a record of such reviews and evaluations. Reference: CFR 1361.39(c)(5); RSM 1507.07F.
38. The IWRP for extended evaluation must be formally reviewed at least annually with the client's involvement in the redevelopment of the program, as appropriate. As suggested in the RSM, one of the scheduled progress evaluations may be expanded to provide a formal, annual review. Reference: CFR 1361.39(c)(11); RSM 1507.08.

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39. Reference: CFR 1361.39(c)(6); RSM 1507.07E.

NOTE: IMPORTANT INSTRUCTIONS

These instructions on the CRS are provided to assist the reviewer in proceeding to the appropriate CRS question(s) at the conclusion of Section II.B.

40. Reference: CFR 1361.37(a); RSM 1505.05A.

42. Reference: CFR 1361.39(e); RSM 1507.10.

a. Reference: CFR 1361.39(e)(1); RSM 1507.10A.

b. The rationale for the decision and other pertinent facts will be recorded as an amendment to the program. The amendment will include the basis for the ineligibility determination and will indicate the client's involvement in the decision. Reference: CFR 1361.39(e)(2); RSM 1507.10B.

c. Reference: CFR 1361.39(e)(2); RSM 1507.10B.

d. A review of the case with respect to the ineligibility decision is based on the possibility of changed conditions and new information about the client's rehabilitation potential. Situations in which a periodic review would be precluded are those in which a client has refused services or a periodic review, the client is no longer present in the state, the client's whereabouts are unknown, or the client's medical condition is rapidly progressive or terminal. Reference: CFR 1361.39(e)(3); RSM 1507.10C.

Delivery of Services

The Delivery of Services questions require responses to all of the VR services available under extended evaluation in terms of whether or not the services were planned for the client. Further, an evaluation of whether each of the VR services is given to the client is required.

INSTRUCTIONS/GUIDELINES

The Delivery of Services questions for the Extended Evaluation subsection use a different question and answer format. Question B permits only a YES or NO response, while Questions C and E permit a YES, NO, or N/A response.

Exhibit 10 (page 14)

The reviewer is requested to make judgments about each service. The reviewer should respond to Questions B, C, and E for each service (items 43-54) that was given under extended evaluation.

- Question B: The reviewer is instructed to respond YES or NO for each service to show whether or not that service was planned. Reference CFR 1361.38(a).
- Question C: The reviewer is instructed to respond YES or NO to show whether or not the service was given; or N/A to indicate that the question of the service being given is not applicable to the status of the case at the time of the review. As an example, for a case which has physical restoration services planned, but has not progressed to the point of the service being given, the appropriate response is N/A. Reference: CFR 1361.38(a).
- Question E: The reviewer is asked to make a judgment as to whether or not "full consideration" was given to similar benefits that are available to help meet the cost of the service.

Services

43. Diagnostic and related services are those services incidental to the determination of eligibility for VR services and the nature and scope of VR services to be provided. Reference: CFR 1361.40(a)(1).
44. Counseling and guidance services include personal adjustment counseling to maintain a counseling relationship throughout the client's program of service; and referral to help the client obtain needed services from other agencies when such services are not available under the Rehabilitation Act. Reference: CFR 1361.40(a)(2).
- 45-46. Physical and mental restoration services are defined as "those services which are necessary to correct or substantially modify, within a reasonable period of time, a physical or mental condition which is stable or slowly progressive." However, when physical and mental restoration services are provided under an extended evaluation of rehabilitation potential, the provision that the condition is stable or slowly progressive does not apply.

These services include:

- a. medical or corrective surgery treatment;
- b. diagnosis and treatment for mental or emotional disorders;

Exhibit 10 (page 15)

- c. dentistry;
- d. nursing services;
- e. necessary hospitalization and clinic services;
- f. convalescent or nursing home care;
- g. drugs and supplies;
- h. prosthetic, orthotic, or other assistive devices essential to obtaining, retaining employment;
- i. eyeglasses and visual services;
- j. podiatry;
- k. physical therapy;
- l. occupational therapy;
- m. speech or hearing therapy;
- n. psychological services;
- o. medical or medically-related social work services;
- p. treatment of acute or chronic medical complications;
- q. special services for treatment of individuals suffering from end-stage renal disease; and
- r. other medical or medically-related rehabilitation services.

Reference: CFR 1361.1(r)(1-18); RSM 1513., 1513.05(3), 1513.11, 1513.13.

47. Vocational and other training services include personal vocational adjustment, books, tools and other training materials. Reference: CFR 1361.1(ee)(iv), 1361.40(a)(4).
48. Maintenance is defined as: "Payments, not exceeding the estimated cost of subsistence," which are "provided at any time from the date of initiation of vocational rehabilitation services through the provision of post-employment services." Maintenance is provided to cover a client's basic living expenses, such as food, shelter, clothing and other subsistence expenses. Maintenance is provided only in order to enable a handicapped client to derive the full benefit of other VR services being provided under an IWRP. Maintenance may be paid during any stage of the rehabilitation process. Reference: CFR 1361.1(m), 1361.40(a)(5); RSM 1527.02.

Exhibit 10 (page 16)

State policy: see State Supplement. Reference: RSM 1527.02, 1527.03.

49. Transportation is defined as "necessary travel, and related expenses including subsistence during travel for clients and their attendants for the purpose of providing vocational rehabilitation services." This may include relocation and moving expenses which are necessary for the achievement of a vocational rehabilitation objective.

Transportation services may include:

- a. fares or travel costs associated with using public or private conveyances;
- b. subsistence or per diem in lieu of subsistence while in travel status;
- c. attendants or escorts for the severely handicapped and the attendants' travel costs;
- d. relocation and moving expenses; and
- e. other related expenses to transportation.

Reference: CFR 1361.1(cc), 1361.40(a)(6); RSM 1529.05, 1529.06.

50. Services to family members are provided when "necessary to the adjustment or rehabilitation" of the client. These services may include any of the VR services available to clients under CFR 1361.1(ee)(1). Reference: CFR 1361.40(a)(7), 1361.1(ee)(1), 1361.38(g).

51. Specialized services for blind, deaf and other severe disabilities include:

- a. reader services, rehabilitation teaching services, and orientation and mobility services for the blind;
- b. interpreter services for the deaf.

Reference: CFR 1361.40(a)(8,9).

52. Telecommunications, sensory and other technological aids and devices are technological advances, and the resulting devices and related services which are applied to client needs to facilitate their achievement of vocational rehabilitation goals. Reference: CFR 1361.40(a)(10); RSM 1535.05.

53. Occupational licenses, tools, equipment, initial stocks and supplies may be provided under certain conditions to help determine eligibility for rehabilitation services such as in extended

Exhibit 10 (page 17)

evaluation. According to RSM 1545.04, "care should be exercised, however, when providing these services during an extended evaluation period, as in most cases they are considered employment-oriented services. . . to increase the individual's opportunities for successful employment. . ." State agencies may wish to develop guidelines explaining the special conditions under which occupational licenses, tools, etc., may be provided under an extended evaluation period. Reference: CFR 1361.40(a)(14); RSM 1545.04.

State policy: see State Supplement.

54. Other goods and services are those services which can reasonably be expected to benefit a client in terms of the client's evaluation of rehabilitation potential. Reference: CFR 1361.40 (a)(15).

Exhibit 10 (page 18)

Section III: Eligibility -- Status 10

The Eligibility Section requires certification that the client has met the basic conditions for eligibility for VR services:

- (1) the presence of a physical or mental disability;
- (2) the condition that the physical or mental disability constitutes or results in a substantial handicap to employment for the client, and
- (3) a reasonable expectation that vocational rehabilitation services may benefit the client in terms of employability.

Reference: CFR 1361.33(b)(1-2).

According to RSM 1505.03B, a vocational handicap means "a limitation imposed by a disability that renders vocational success more difficult," and the "principal consideration for the vocational rehabilitation program is the direct relationship between disability and employability, i.e., the effect a disability has on an individual's employability."

These references are provided to emphasize the relationship between the disability and the client's employability which must be documented as part of the eligibility determination. The Eligibility Section requires the counselor's analysis and supporting documentation as to why the client is determined eligible for vocational rehabilitation services.

To evaluate the documentation for the Eligibility Section, only the information collected from the referral date through the date certified as accepted for vocational rehabilitation services should be considered.

Referral and acceptance dates are recorded in CRS Section I: Case Information.

INSTRUCTIONS/GUIDELINES

1. According to the RSM, "certification is the assurance by the state agency that in each case the basic conditions prescribed in the Regulations and set forth in the State Plan have been met." Reference: CFR 1361.33(b)(1-2), 1361.37(a); RSM 1505.05A, 1505.06A.

a. Reference: CFR 1361.37(a); RSM 1505.05A.

NOTE: Items 3 through 8 require an evaluation of the quality of the documentation. The reviewer is requested to evaluate how well the basic conditions of eligibility for VR services are established, shown, and assessed in the case record.

Exhibit 10 (page 19)Physical or Mental Disability

3. An evaluation of less than adequate should be made if the required data is not in the case record or if the data (medical report, psychological report) is minimal (e.g., only an IQ score).

An evaluation of adequate should be made if all the required data supporting the existence of a disability is in the case record, including the general medical information and any other required data/documentation on specialty examinations (IQ score, description of adaptive behavior, assessment of reading level, etc.). Further, this data should be appraised by the VR counselor in relationship to the client's disability. Reference: CFR 1361.33(b); RSM 1505.06A(a).

4. An evaluation of less than adequate should be made if the case record provides only a description or listing of the limitations to the client's activities or functioning.

An evaluation of adequate should be made if the counselor's analysis of how the disability affects the client's functioning is made. Reference: CFR 1361.1(s); RSM 1505.03A.

Substantial Handicap

In relation to the VR program, substantial means that the disability or its limitations impose a considerable or significant handicap to the client's occupational performance.

- 5a 5d. The RSM Chapter 1505.06 specifies that the case record must include, as a minimum, the "agency's analysis showing the specific ways in which the medical, psychological, vocational, and other related factors impede the individual's occupational performance. . . ."

Since not all of the factors specified in 5a-5d are operative or would impede all clients, the reviewer must determine the appropriateness of each category of factors in evaluating the adequacy of the counselor's analysis.

An adequate analysis must be based on the presence of descriptive data and the relation of this to the client. As an example, in order to evaluate that the documentation provides an adequate analysis of the medical factors (question 4a, referred to above), the case record must first contain descriptive data, such as medical reports and specialist reports (if applicable) as a basis for the analysis. Secondly, the medical factors must be related to the client in terms of their impact on the client's occupational performance.

Exhibit 10 (page 20)

The factors specified in 5a-5d pertain to the following:

- a. medical -- physical disability;
- b. psychological -- mental and emotional disabilities;
- c. vocational -- vocational adjustment including patterns of work behavior (e.g., worker traits, length of time on previous jobs, supervisory and co-worker relationships, attendance and punctuality, transferability of skills, productivity and/or quality of work); and
- d. educational -- educational background in relation to vocational objective, including preparation (e.g., training).

If the case record only contains descriptive data pertaining to the factors cited above, the appropriate response is less than adequate. If the descriptive data, examinations reports, test results, and observations are analyzed in terms of their impact on the client's occupational performance, the appropriate response is adequate. Reference: RSM 1505.06.

6. In assessing the vocational handicap, or the limitations imposed by the disability which impede the client's occupational performance, other related factors which bear upon successful vocational participation should be considered. Any related factors which are appropriate to the client should be considered. These factors may include, but are not limited to, the following:
 - a. lack of marketable skills;
 - b. low educational level;
 - c. community and employer prejudices and attitudes concerning disability;
 - d. long-term unemployment;
 - e. unstable work record; and
 - f. poor attitudes toward work, family and community.

Reference: RSM 1505.03B.

7. This question refers to the situation in which a disabled client is employed substantially below potential and is provided VR services to help the client engage in an occupation more consistent with the client's capacities and abilities. This guideline, as explained in RSM 1505.03, addresses the problems of underemployment, marginal and insecure employment of the handicapped. To show that this situation meets VR eligibility

Exhibit 10 (page 21)

requirements, the case record should also document that the client has medically recognizable physical or mental disability(ies) which impose(s) a substantial handicap to employment. Reference: RSM 1505.03B.

Reasonable Expectation

8. To determine that there is a "likelihood," the state agency must "evaluate and ascertain potential capacity of the individual for employment, taking into consideration the effect the agency's services may have on reducing or correcting the disability" or on lessening the employment handicap. Reference: RSM 1505.03C.

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Exhibit 10 (page 22)

Section IV: Evaluation of Rehabilitation Potential Through Diagnostic Study -- Statuses 02 and 10

1. The "nature" of vocational rehabilitation services refers to what specific services are needed by the client to attain the client's vocational goals. Reference: CFR 1361.35(a).
2. The "scope" of vocational rehabilitation services refers to how much or the extent of these services that are needed by the client to attain the client's vocational goals. Reference: CFR 1361.35(a-b).
5. To respond to this item the reviewer is requested to determine if the thorough diagnostic study consists of a comprehensive evaluation. In order to respond YES to this item, the reviewer must determine if pertinent medical, psychological, vocational, educational, and other related factors have been included and considered in the evaluation to the degree necessary for the particular case. Reference: CFR 1361.35(a).

Exhibit 10 (page 23)Section V: Individualized Written Rehabilitation Program (IWRP) ---
Status 12 and Above

The purpose of the IWRP requirement in the Rehabilitation Act is "to continue, extend, and formalize the case planning and management practice of setting forth goals and objectives, and means and time frames for achieving them, as well as to assure client participation and protection of client rights. . ." Reference: RSM 1507.02.

To evaluate the documentation for the IWRP, only the information collected from referral through the development and implementation of the program and amendments should be considered. Referral and IWRP dates are recorded in CRS Section I: Case Information.

INSTRUCTIONS/GUIDELINES

1. The reviewer should respond YES to this question if the case record contains an IWRP form (including pre-printed information) or a combination of forms which are identified as the IWRP. For identification of the IWRP form(s), refer to the state policy. Reference: CFR 1361.38(e); RSM 1507.02, 1507.05.

State policy: see State Supplement.

NOTE: IMPORTANT INSTRUCTIONS

The instructions on the CRS are provided to assist the reviewer in proceeding to the appropriate questions in CRS Section IV or to the appropriate CRS Section.

- 2-5. CRS IV, questions 2-5, pertain to information which the CFR and RSM suggest may be contained or covered in the pre-printed information that the state has included in its IWRP form. Those questions which are identified as covered in the state form pre-printed information should only be responded to once at the beginning of the review of the total sample of cases. Those questions which are identified as not covered in the state form pre-printed information should be responded to for each case in the review sample.

The inclusion or exclusion of the suggested pre-printed information in the IWRP (state form) does not reflect the presence or quality of the counselor's documentation; rather, the review of the information contained in questions 2-5 provides a review of the state's policy as reflected in the IWRP (state form). Reviewers may comment on the completeness or adequacy of the IWRP (state form) in Section VII: Reviewer Comments.

Exhibit 10 (page 24)

2. The general basis of eligibility is presented in the IWRP to provide the client with basic information about the client's eligibility status. According to the RSM, the general basis of eligibility could be presented in a standard pre-printed statement in the IWRP. The completed record of eligibility is contained elsewhere in the case record since it is often long, technical, and involves diagnostic and evaluative data. Reference: CFR 1361.39(c)(1); RSM 1507.07A.
3. The terms and conditions may be included as standard content in a pre-printed statement in the IWRP along with any content specific to the individual client. Reference: RSM 1507.07B.
- a. Reference: CFR 1361.39(c)(7); RSM 1507.07B.
 - b. Reference: CFR 1361.39(c)(7); RSM 1507.07B, 1513.05.
 - c. Reference: CFR 1361.39(c)(7).
 - d. Reference: RSM 1507.07B.
 - e. Reference: RSM 1507.07B.
 - f. Reference: RSM 1507.07B.
4. Client rights may be set forth in standard prepared statements, but the case record should reflect that the client understands these rights. Reference: CFR 1361.39(c)(8); RSM 1507.07B.
- a. Reference: RSM 1507.07B.
 - b. Reference: CFR 1361.39(c)(8); RSM 1507.07B.
 - c. Reference: CFR 1361.39(d); RSM 1507.08.
 - d. Reference: CFR 1361.39(e)(3); RSM 1507.10C.
5. This question is grouped with the questions pertaining to the state form since the separateness of the IWRP in the case record is a reflection of the IWRP design or state policy. Reference: CFR 1361.38(e); RSM 1507.05.
6. The RSM specifies that written copies of amendments need to be provided to the client only in the case of substantial amendments. One example of a substantial amendment is the scheduling of a new service and the dropping of a previously planned service. For identification of the client's copy of the IWRP, refer to state policy. Reference: CFR 1361.39(a); RSM 1507.05, 1507.06, 1507.11.

State policy: see State Supplement.

Exhibit 10 (page 25)

7. According to the RSM, "A program is required concurrent with, or reasonably soon after execution of the certificate of eligibility for VR services..." Reference: CFR 1361.39(a), 1361.39(b); RSM 1507.04.
9. Reference: CFR 1361.39(a); RSM 1507.02, 1507.06, 1507.07B, 1507.10B.
11. According to the RSM, "The basic program and all changes shall relate case data to an employment goal." Reference CFR 1361.39(c); RSM 1507.07C.
12. The long-range employment goal has been described as a vocational outcome which is consistent with the client's capabilities and toward which the client and counselor are jointly working. Reference: CFR 1361.39(c)(2); RSM 1507.07C.
13. Intermediate rehabilitation objectives are related to the attainment of the long-range employment goal in that they are steps which must be achieved before the long-range employment goal can be attained. These steps or levels of achievement for the client are not services; rather, services are the means by which the client may achieve the intermediate objective. For example, the correction of a medical problem (i.e., to be physically restored) may require a physical restoration service such as surgery. Reference: CFR 1361.39(c)(2); RSM 1507.07C.
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14. Vocational rehabilitation services are furnished to enable the client to achieve the intermediate rehabilitation objectives and the employment goal. The IWRP states specific services to be provided or, at times, it may "categorically" describe a service which is planned. As an example, the RSM cites training in a clerical field as a categorical description of a planned service rather than naming the specific course of study. Reference: CFR 1361.39(c)(3); RSM 1507.07D.
15. Reference: CFR 1361.39(c)(4); RSM 1507.07D.
16. Reference: CFR 1361.39(c)(4); RSM 1507.07D.
17. Reference: CFR 1361.39(c)(4); RSM 1507.07D.
18. Objective criteria for evaluating the client's progress toward an employability goal must be related to the intermediate objectives of the IWRP and must be stated in terms which are meaningful to the client. As an example, if an intermediate objective is the achievement of a skill such as typing, the criteria might be attendance, obtaining a specified grade average, and achievement of a certain typing speed. Reference: CFR 1361.39(c)(5); RSM 1507.07F.

Exhibit 10 (page 26)

19. This question refers to the procedure or methods which the counselor uses to evaluate the client's progress toward goals and objectives. As stated in the RSM, methods may include the case review, discussion with the client, and objective reports of progress. Parts of the procedure may be established in standard prepared statements in the IWRP along with statements of particular application to the individual client. Reference: CFR 1361.39(c)(5); RSM 1507.07F.
20. The schedule for periodic review and evaluation should consider the nature of the individual client's situation as well as overall agency procedure. The schedule may be partially established in standard prepared statements. Reference: CFR 1361.39(c)(5); RSM 1507.07F.
21. A summary of the results of periodic reviews and progress evaluations is entered in the IWRP as a record of such reviews and evaluations. Reference: CFR 1361.39(c)(5); RSM 1507.07F.
22. The IWRP must be formally reviewed at least annually with the client's involvement in the redevelopment of the program, as appropriate. As suggested in the RSM, one of the scheduled progress evaluations may be expanded to provide a formal, annual review. Reference: CFR 1361.39(c)(11); RSM 1507.08.
23. Reference: CFR 1361.39(c)(6); RSM 1507.07E.

NOTE: IMPORTANT INSTRUCTIONS

These instructions on the CRS are provided to assist the reviewer in proceeding to the appropriate CRS question(s) at the conclusion of Section IV.

24. Once a client has been determined eligible, the law requires special procedures if the client is later determined to be ineligible because of a lack of rehabilitation potential (or the inability to achieve a vocational goal). CRS questions 24a-24d specify such procedures. Reference: CFR 1361.39(e); RSM 1507.10.
- a. Reference: CFR 1361.39(e)(1); RSM 1507.10A.
- b. The rationale for the decision and other pertinent facts will be recorded as an amendment to the program. The amendment will include the basis for the ineligibility determination and will indicate the client's involvement in the decision. Reference: CFR 1361.39(c)(2); RSM 1507.10B.

Exhibit 10 (page 27)

- c. Reference: CFR 1361.39(c)(7); RSM 1507.10B.
 - d. A review of the case with respect to the ineligibility decision is based on the possibility of changed conditions and new information about the client's rehabilitation potential. Situations in which a periodic review would be precluded are those in which a client has refused services or a periodic review, the client is no longer present in the state, the client's whereabouts are unknown, or the client's medical condition is rapidly progressive or terminal. Reference: CFR 1361.39(c)(3); RSM 1507.10C, 1549.
25. Reference: RSM 1507.07H.3.
- a. Reference: CFR 1361.39(c)(10); RSM 1507.07H.3, 1549.06.
 - e. Reference: CFR 1361.39(c)(11); RSM 1507.07I.
26. The amended IWRP for post-employment services must contain all the requirements of an IWRP. Reference CFR 1361.38(e), 1361.39(c)(11); RSM 1507.07I.
- a. Reference: CFR 1361.39(c)(11); RSM 1507.07I
 - b. Reference: CFR 1361.38(1); RSM 1543.12
 - c. Reference: RSM 1543.12

Exhibit 10 (page 28)

Section VI: Delivery of Services -- Statuses 14, 16, 18, 20, 22 and 32

The Delivery of Services Section requires initial responses to all of the available VR services in terms of their necessity and whether or not the services were planned for the client. Further, an evaluation of each of the VR services is required for the service given to prepare the client for employment.

To evaluate the documentation for the Delivery of Services Section, the information collected from the referral date through the termination or closure date may be considered. Referral and closure dates are recorded in Section I: Case Information.

INSTRUCTIONS/GUIDELINES

The Delivery of Services Section uses a different question and answer format than other sections in the Case Review Schedule. Question B permits only a YES or NO response, while Question C permits a YES, NO or N/A response.

The reviewer is requested to make judgments about each service. The reviewer should respond to Questions A and B for each service (Items 1-14).

Question B: The reviewer is instructed to respond YES or NO for each service to show whether or not that service was planned. Reference CFR 1361.38(a).

Question C: The reviewer is instructed to respond YES or NO to show whether or not the service was given, or N/A to indicate that the question of the service being given is not applicable to the status of the case at the time of the review. As an example, if a case in Status 10 has vocational training services planned, but the case has not progressed to the point of the service being given, the appropriate response then is N/A. Reference: CFR 1361.38(a).

Question F: The reviewer is asked to make a judgment regarding the consistency of the service with the client's employment at closure.

The reviewer may not necessarily agree with the client's employment; however, the reviewer's task is to evaluate the consistency of the service in terms of the client's employment at closure, not to evaluate the employment.

Reference: CFR 1361.39(c)(3); RSM 1549.06B.

Question G: The reviewer is asked to make a judgment as to whether or not "full consideration" was given to similar benefits that are available to help meet the cost of the service.

Reference: CFR 1361.45(b)(1-4), 1361.38(i); RSM 2015.02, 2015.03, 2015.04, 2015.05, 2015.06.

Exhibit 10 (page 29)Services

1. Evaluation and diagnostic services are those services incidental to the determination of eligibility for VR services and the nature and scope of VR services to be provided. Reference: CFR 1361.40(a)(1).
2. Counseling and guidance services include personal adjustment counseling to maintain a counseling relationship throughout the client's program of service; and referral to help the client obtain needed services from other agencies when such services are not available under the Rehabilitation Act. Reference: CFR 1361.40(a)(2).
- 3-4. Physical and mental restoration services are defined as "those services which are necessary to correct or substantially modify, within a reasonable period of time, a physical or mental condition which is stable or slowly progressive." These services include:
 - a. medical or corrective surgery treatment;
 - b. diagnosis and treatment for mental or emotional disorders;
 - c. dentistry;
 - d. nursing services;
 - e. necessary hospitalization and clinic services;
 - f. convalescent or nursing home care;
 - g. drugs and supplies;
 - h. prosthetic, orthotic, or other assistive devices essential to obtaining/retaining employment;
 - i. eyeglasses and visual services;
 - j. podiatry;
 - k. physical therapy;
 - l. occupational therapy;
 - m. speech or hearing therapy;
 - n. psychological services;
 - o. medical or medically related social work services;

Exhibit 10 (page 30)

- p. treatment of acute or chronic medical complications;
- q. special services for treatment of individuals suffering from end-stage renal disease; and
- r. other medical or medically-related rehabilitation services.

Reference: CFR 1361.1(r)(1-18); RSM 1513, 1513.05(3); 1513.13, 1513.13.

5. Vocational and other training services include personal and vocational adjustment, books, tools and other training materials. Reference: CFR 1361.1(ee)(iv), 1361.40(a)(4).

6. Maintenance is defined as "Payments, not exceeding the estimated cost of subsistence," which are "provided at any time from the date of initiation of vocational rehabilitation services through the provision of post-employment services." Maintenance is provided to cover a client's basic living expenses such as food, shelter, clothing, and other subsistence expenses. Maintenance is provided only in order to enable a handicapped individual to derive the full benefit of other vocational rehabilitation services being provided under an IWRP. Maintenance may be paid during any stage of the rehabilitation process, including the period of follow-up for a specific job opportunity. Reference: CFR 1361.1(m), 1361.40(a)(5); RSM 1527.02.

State policy: see State Supplement Section of the Manual.
Reference: RSM 1527.02, 1527.03.

7. Transportation is defined as "necessary travel and related expenses, including subsistence during travel for clients and their attendants for the purpose of providing vocational rehabilitation services." This may include relocation and moving expenses which are necessary for the achievement of a vocational rehabilitation objective. Transportation services may include:
- a. fares or travel costs associated with using public or private conveyances;
 - b. subsistence or per diem in lieu of subsistence while in travel status;
 - c. attendants or escorts for the severely handicapped and the attendants' travel costs;
 - d. relocation and moving expenses; and
 - e. other related expenses to transportation.

Reference: CFR 1361.1(cc), 1361.40(a)(6); RSM 1529.05, 1529.06.

Exhibit 10 (page 31)

8. Services to family members are provided when "necessary to the adjustment or rehabilitation" of the client. These services may include any of the VR services available to clients under CFR 1361.1(ee)(1). Reference: CFR 1361.40(a)(7), 1361.1(ee)(1), 1361.38(g).
9. Specialized services for blind, deaf and other severe disabilities include:
- reader services, rehabilitation teaching services, and orientation and mobility services for the blind;
 - interpreter services for the deaf.
- Reference: CFR 1361.40(a)(8,9).
10. Telecommunications, sensory and other technological aids and devices are technological advances, and the resulting devices and related services which are applied to individual client needs to facilitate their achievement of rehabilitation goals. Reference: CFR 1361.40(a)(10); RSM 1535.05.
11. Occupational license is defined as "any license, permit, or other written authority required by the state, city or other governmental unit to be obtained in order to enter an occupation or enter a small business." This service category also includes tools, equipment, initial stocks (including livestock) and supplies. The purpose of these services is to increase the client's prospects of successful employment or self-employment following completion of the rehabilitation program. Reference: CFR 1361.1(p); RSM 1545.02, 1545.03A-D.
- RSM Chapter 1545.07 specifies case recording requirements in relation to the occupational licenses, tools and equipment service category. The client's IWRP "should show the need for such services and how these services, in combination with other planned services, would enable him to engage in the vocational objective of the rehabilitation program." Reference: RSM 1545.07.
12. Other goods and services are those "which can reasonably be expected to benefit a handicapped individual in terms of employability." Reference: CFR 1361.40(a)(15).
13. Placement services are defined as "organized and identifiable attempts to establish or improve the linkage of a client and a work situation." While placement in suitable employment is the goal of rehabilitation in the vocational rehabilitation program and may be concentrated toward the end of the rehabilitation process, the RSM states that "there should be a substantial amount of planning and attention given to placement early in the case services program."

Exhibit 10 (page 32)

The following are examples of types of placement services:

- a. collaboration with Employment Services and other organizations involved in manpower assistance;
- b. providing information related to employment during client assessment and IWRP development;
- c. employer contact and job development;
- d. task analysis and job restructuring;
- e. study and interpretation of employment trends and economic forecasting;
- f. individual and group instruction of clients in job-seeking skills, current and potential job openings and development of a job-seeking plan;
- g. individual and group counseling of clients on job retention skills;
- h. personal assistance in conducting job interviews;
- i. consulting and advising on job adjustment and/or client/employer conflicts;
- j. assistance with Affirmative Action programs and projects;
- k. technical assistance and consultation on the placement process; and
- l. assistance with, and consultation on, removal of architectural and transportation barriers to employment.

Reference: CFR 1361.40(a)(12); RSM 1541.03(2), 1541.04, 1541.06(A-L).

14. Post-employment services are defined as "all services provided after clients have been determined to be rehabilitated," and include follow-up, follow-along, and other post-employment services. The scope of post-employment services "include any vocational rehabilitation service or combination of services necessary to assist the individual in maintaining employment if the service or several services do not entail a complex or comprehensive rehabilitation effort unrelated to the original individualized written rehabilitation program." Reference: CFR 1361.40(a)(13); RSM 1543.03, 1543.05.

Exhibit 10 (page 33)

Section VII: Termination of Cases -- Statuses 08, 30, and 28.

The Termination of Cases requires certain procedures to be followed in finalizing the outcome of the case. The Termination of Cases Section addresses these requirements in relation to cases closed in Statuses 08, 30, and 28. If the case is closed Status 26, proceed to Section VIII: Timeliness Assessment and Comments.

To evaluate the documentation for the Termination of Cases Section, the information collected from the referral date through the termination or closure date should be considered. Referral and termination dates are recorded in CRS Section I: Case Information.

INSTRUCTIONS/GUIDELINES

NOTE: IMPORTANT INSTRUCTIONS

These instructions are provided to assist the reviewer in proceeding to the appropriate CRS subsection according to the case status at closure.

The reviewer is asked to select the appropriate closure status for the case being reviewed and respond only to the corresponding subsection.

The Termination of Cases subsections are:

Status 08 from 00/02	-- Intervening Reasons
Status 08 from 09/02	-- Ineligibility
Status 08 from 06	-- Ineligibility
Status 30 or 28	-- Not Rehabilitated
Status 26	-- Rehabilitated

Case Closed Status 08 from 00/02 -- Intervening Reasons

- 2(a-c) A case closed in Status 08 from 00/02 for the reasons cited in the instructions of this question does not constitute a decision of ineligibility. While the Case Service Report R-300 is sufficient to close the case, documentation must include specific reasons for the closure action. "This means that the case file contains information on the counselor's attempts to contact the client which were unsuccessful."
Reference: RSM 1549.04B, 1505.05B, 3005.02(7).
3. Reference: RSM 1549.03(f), 1505.05B.
4. Reference: RSM 1549.03(g).
5. Reference: RSM 1549.03(d).

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Section VII: Termination of Cases)

Case Closed Status 08 from 00/02 -- Ineligibility

6. Reference: CFR 1361.37(c), 1361.39(e)(2); RSM 1549.03(a), 1505.05B.
- a. Reference: CFR 1361.37(c); RSM 1505.05B.
 - b. Reference: CFR 1361.37(c); RSM 1505.05B.
7. A client may be found ineligible for VR services if the client does not have a medically recognized physical or mental disability. Although this question addresses a requirement for eligibility and is a required question for a conformance evaluation, the reviewer should respond N/A if this condition for eligibility was met. Reference: CFR 1361.37(c); RSM 1549.04A, 1505.05B.
8. A client may be found ineligible if the medically recognized physical or mental disability does not constitute a substantial handicap to employment for the client. Although this question addresses a requirement for eligibility and is a required question for a conformance evaluation, the reviewer should respond N/A if this condition for eligibility was met. Reference: CFR 1361.37(c); RSM 1549.04A, 1505.05B.
9. A client may be found ineligible for VR services if it has been determined beyond any reasonable doubt that the client cannot be expected to benefit in terms of employability from VR services. Although this question addresses a requirement for eligibility and is a required question for a conformance evaluation, the reviewer should respond N/A if this condition for eligibility was met. Reference: CFR 1361.37(c); RSM 1549.04A, 1505.05B.
10. The RSM specifies that for clients determined ineligible, the case record must include, as a minimum, the information requested in points a. through c. of this question.
- a. Reference: RSM 1549.05A(a)
 - b. Reference: RSM 1549.05A(b)
 - c. Reference: RSM 1549.05A(d)
11. A clear opportunity for full consultation must be offered unless such consultation is precluded because the client has refused, has moved, the client's whereabouts are unknown, or the client's medical condition is rapidly progressive or terminal. Reference: CFR 1361.39(e)(1); RSM 1549.03(b), 1505.05B, 1507.10A.

Exhibit 10 (page 35)

12. Reference: CFR 1361.37(c); RSM 1549.03(d), 1505.05B.
13. Reference: CFR 1361.37(c); RSM 1549.03(d), 1505.05B.
 - a. Reference: CFR 1361.37(c); RSM 1505.05B, 2020.05, 2020.06.
 - b. Reference: DFR 1361.37(c); RSM 1549.03(e).
 - c. Reference: CFR 1361.39(e)(3); RSM 1507.10C.
14. Reference: CFR 1361.38(m).
15. Reference: CFR 1361.37(c); RSM 1549.03(F), 1505.05B.
16. Reference: RSM 1549.03(g).

Exhibit 10 (page 36)

Section VII: Termination of Cases

Case-Closed Status 08 from 06 -- Ineligibility

17. Reference: CFR 1361.37(c), 1361.39(e)(2); RSM 1549.03(a), 1505.05B.
- a. Reference: CFR 1361.37(c); RSM 1505.05B.
- b. Reference: CFR 1361.37(c); RSM 1505.05B.
18. This question concerns both (1) the finding that the client is ineligible since it has been determined that the client is not expected to benefit in terms of employability from VR services, and (2) the determination at the end of the full 18-month limit for the extended evaluation period that the client is not eligible. Reference: CFR 1361.36(e)(2); RSM 1549.05A,B.
19. When an interruption of services occurs during an extended evaluation period which precludes continuation of the IWRP, or an amended IWRP for extended evaluation, the case should be closed as ineligible. An interruption of services may occur for a variety of reasons. Reference: CFR 1361.36(e)(2); RSM 1549.05C.
20. Reference: CFR 1361.39(e)(2); RSM 1549.03(c), 1507.10B.
21. A clear opportunity for full consultation must be offered unless such consultation is precluded, because the client has refused, has moved, the client's whereabouts are unknown, or the client's medical condition is rapidly progressive or terminal. Reference: CFR 1361.39(e)(1); RSM 1549.03(b), 1505.05B, 1507.10A.
22. When the full participation of the client has been secured, in making the ineligibility decision, the client's views shall be recorded in the IWRP. Reference: CFR 1361.39(e)(1).
23. Reference: RSM 1549.03(d), 1505.05B.
24. Reference: CFR 1361.38(m), 1361.46.
25. The periodic review, at least annually, shall afford the clear opportunity for full reconsideration of the ineligibility decision, except in situations where a periodic review would be precluded because the client has refused services or a periodic review, has moved, the client's whereabouts are unknown, or the client's medical condition is rapidly progressive or terminal. Reference: CFR 1361.39(e)(3), 1361.37(c), 1361.38(n); RSM 1507.10C.
26. Reference: RSM 1549.03(f), 1505.05B.
27. Reference: RSM 1549.03(g).

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Section VII: Termination of Cases

Case Closed Status 30 and Status 28 -- Not Rehabilitated

28. Reference: CFR 1361.37(c), 1361.39(e)(2); RSM 1549.03(a), 1505.05B.
- a. Reference: CFR 1361.37(c); RSM 1505.05B.
 - b. Reference: CFR 1361.37(c); RSM 1505.05B.
- 29-30. When the State agency determines that suitable employment cannot be achieved or that employment resulted without benefit derived from VR services, the case should be closed in Status 28 or Status 30, as appropriate. Reference: RSM 1549.07.
- The criteria for determining suitable employment are specified in RSM 1541.09. Suitable employment may include homemaking if the work activities performed by the client have benefits derived from VR services which "improve the client's ability to function in these tasks." Reference: RSM 1541.106.
31. This question requires the reviewer to indicate the primary situation which resulted in the case being closed as not rehabilitated. For example, if the case record documents that the client decided not to follow through, the reviewer would respond YES to a. and N/A to b. and c. Reference: RSM 1549.07.
- a. If the client decided not to follow through, the case record should show that before the case was closed the State agency attempted to assure that the client:
 - (1) understood the purpose of the program and available services; and
 - (2) was informed that the client may reapply. Reference: RSM 1549.07.
 - b. If contact was lost with the client, the case record should show:
 - (1) that the counselor attempted to maintain sufficient client contact; and
 - (2) that additional sources of information were used, if appropriate, in locating such clients. Reference: RSM 1549.07.
 - c. If there was new information or complications, the case record should show that the State agency reconsidered:
 - (1) the prospect of the client attaining suitable employment; and
 - (2) all available services, including those from other sources, before terminating the client. Reference: RSM 1549.07.
32. As specified in the RSM, "When the client can be referred to another agency, the referral should involve more than merely advising the client to make application to the other agency." Reference: RSM 1549.07.
33. Reference: RSM 1549.07(i).

Exhibit 10 (page 38)

34. For a case closed in Status 30 from Status 10, the rationale for the ineligibility determination as an amendment to the IWRP is not required. Reference: CFR 1361.39(e)(2); RSM 1549.03(c), 1507.10B.
35. A clear opportunity for full consultation must be offered unless such consultation is precluded because the client has refused, has moved, the client's whereabouts are unknown, or the client's medical condition is rapidly progressive or terminal. Reference: CFR 1361.39(e)(1); RSM 1549.03(b), 1505.05B, 1507.10A.
36. Reference: RSM 1549.03(d), 1505.05B.
37. Reference: RSM 1549.03(d), 1505.05B.
 - a. Reference: CFR 1361.39(c)(8), 1361.37(c), RSM 1505.05B, 2020.05, 2020.06.
 - b. Reference: CFR 1361.39(e)(3); RSM 1507.10C.
38. Reference: CFR 1361.38(m).
39. Reference: CFR 1361.39(e)(3), 1361.38(n); RSM 1507.10C.
40. Reference: CFR 1361.37(c); RSM 1549.03(f), 1505.05B.
41. Reference: RSM 1549.03(g).

Exhibit 10 (page 39)Section VII: Termination of Cases
Case Closed Status 26 - Rehabilitated

42. Reference: RSM 1507.07H.3.
- a. Reference: CFR 1361.39(c)(10); RSM 1507.07H.3, 1549.06.
 - b. Reference: RSM 1507.07H.3.
 - c. Reference: RSM 1507.07H.3.
 - d. Reference: RSM 1507.07H.3.
 - e. Reference: CFR 1361.39(c)(11); RSM 1507.07I.
44. According to RSM 1549.06C, where facts do not support the appropriateness of VR services to the ultimate employment of the client, the case should be closed as not rehabilitated (Status 28). Appropriateness of VR services is linked with the services specified in the IWRP. Reference: CFR 1361.41(a)(3); RSM 1549.06C.
45. According to the RSM, a vocational goal and services to achieve the goal are jointly determined through the evaluation process and the development of the individualized written rehabilitation program. "Unless some complications arise, the client completes this total program of services..." Reference: RSM 1549.06B.
46. According to the RSM, "unless some complications arise, the client... is placed in employment consistent with the established objective for which services have prepared the individual." Reference: RSM 1549.06B.
47. Reference: CFR 1361.41(a)(4); RSM 1549.06C, 1541.09.
48. Reference: RSM 1549.03(d).
49. Reference: RSM 1549.03(g).
50. Reference: RSM 1549.03(f).
51. a-d. The RSM specifies that "in all instances," as a part of the process of being determined rehabilitated, the client must be informed of eligibility to receive necessary post-employment services of the purposes and any plans for post-employment services, and of the responsibility to contact the counselor should situations arise with the job suggesting a possible need for post-employment services. Reference: RSM 1543.09(a-c), 1549.03(k).
52. The case record should show a relationship between the services rendered and the vocational outcome in that the services were necessary and had a positive effect on the client's preparation for, or placement in, employment. Reference: RSM 1549.06B.

Exhibit 10 (page 40)

53. Substantial service is defined as "any vocational rehabilitation service provided within a counseling and guidance relationship that contributes in any identifiable positive way" to the client's rehabilitation. The substantiality of a service is best determined by its contribution to the client's vocational rehabilitation.
54. Pertaining to placement services, "substantiality may be assessed within a broad constellation of activities directed toward the acquisition of a suitable occupation." The placement services specified in 54 a-i represent activities which may be conducted with the client, depending on which activity or combination is appropriate for the particular client. Reference: RSM 1541.08 (a-i).
55. To determine that an occupation is suitable, after a reasonable adjustment period it must be confirmed that the conditions specified in 55 a-i have been met, insofar as possible. Reference: CFR 1361.41(a)(4); RSM 1541.09(1-5), 1549.06.
56. a. Reference: CFR 1361.38k; RSM 1549.06.
b. Reference: CFR 1361.38k, RSM 1549.03(h), 1549.06.
58. The case record should clearly document the justification for closing the case when the suitability criteria, specified in CRS VII 55 a-i, were not met. The justification should also indicate the alternatives, which were considered. Reference: RSM 1541.09 31/c.

Exhibit 10 (page 41)

Section VIII: Timeliness Assessment and Comments

A. Timeliness

- 1-3. Vocational Rehabilitation agencies shall ensure that eligibility decisions and client movement through the VR process occur in a timely manner appropriate to the needs and capabilities of the client. Reference: PROCEDURAL STANDARD #11.

Reviewer judgment is called for in responding to the following questions. Three critical phases of case progress are addressed here: (a) eligibility determination; (b) development of the IWRP; and (c) service delivery through termination.

Through an analysis of information gathered in this section, coupled with data relative to the actual times cases have remained in any one of the three phases (from Section I: Case Information), more objective parameters for a standardized case flagging system can be developed.

NOTE: IMPORTANT INSTRUCTIONS

These instructions provide the reviewer with various factors to be considered when assessing timeliness during the three critical phases described.

Exhibit 10 (page 42)Section VIII: Timeliness Assessment and Comments
B. Comments

This section requests the reviewer to provide any comments about the case record review which were not addressed in the Case Review Schedule question-answer format. This includes reviewer feelings about any aspect of the case or the case review and documentation of any problems encountered in the review.

IV. THE VR PROGRAM STANDARDS
REPORTING SYSTEM

The standards reporting system brings together the various sources of standards input data so that a particular agency's attainment for a specific time period can be compared to its objectives for the period. In addition, the reporting system will provide the program managers with the capability to flag and investigate problematic attainment, as we shall describe subsequently. To do these two things, the reporting system has been designed to:

- keep track of past performance as well as current expectations;
- present the findings in an easy to use, easy to understand way, without unwieldy reports, emphasizing graphical presentations as well as plain numbers; and
- make sure that the reporting of results occurs in a timely fashion, so that future performance can be influenced.

The new data collection requirements for the standards system have been described earlier in these Guidance Materials. The procedures and sources have been integrated with the Management Information System (MIS) being developed separately by RSA and Abt Associates. The MIS, while obviously serving many additional objectives as well, will be able to produce reports providing information to state agencies that would show performance in terms of the standards and also be usable in identifying how to improve performance. However, even if the MIS unexpectedly were to be delayed in implementation, the standards system is compatible with the kinds of data compilations routinely generated even now in many state agencies' internal information systems. Thus, the evaluation standards system could be adapted by individual state agencies for their use, quite independently of RSA's development of the national MIS.

Tables 15, 16, and 17 illustrate the reports that will be routinely generated by the MIS for the Performance Standards. The first set of reports (one state's example is seen in Table 15) shall show achievement on each of the standards for a given agency. In addition to showing this year's

performance, the table also will show the state's goal for the year, its last year's performance, and the previous year's national norm. With this information agencies can see how successful they were in meeting their goals for each of the data elements. They can also compare this year's performance with last year's to see where they have and have not improved. Finally, agencies can assess their current performance in relation to recent national norms. This type of report gives program managers an overall view of agency performance while at the same time pointing out specific strengths and weaknesses, currently and over time. A particular advantage of such reports is that their "turnaround" time can be relatively short. That is, program managers will receive the reports relatively soon after submitting their data to the MIS (allowing, of course, reasonable time for data preparation, input and analysis). The short turnaround time is possible because the reports use only the individual agency's data (and a previous year's national norm). Computing current year national or regional norms requires data submissions from all relevant states. Thus, turnaround time for reports like that shown in Table 1 will be a function primarily of the agency's timeliness in submitting data.

In addition, reports shall be prepared for each data element which will display all agencies performance on each particular element. Table 16 shows an example for data element 1(i). This year's goal as well as performance in the four previous years will be presented. Agencies can use the information to compare their performance and their goals to other similar agencies. By providing data for the four previous years, trends over time can be analyzed. Agencies and RSA will be able to determine if performance has steadily improved over time or if this year's performance is noticeably different than previous years.

Finally, Table 17 shows an example report of national performance for each data element for all agencies, and for general, combined, and blind agencies. This allows a program-wide view of performance in VR.

These three types of reports will be generated routinely for all of the agencies and all of the data elements. In addition, RSA and the agencies will have the capability to use the MIS to generate special purpose reports and analyses. For example, the basic reports could be run separately for special

populations. These may take the form of statistical reports or of graphic displays.

Finally, the MIS will provide access to a large number of supporting information items useful in analyzing the interpreting the routine reports. These information items feed into the decision-support system, discussed earlier. Based on any problems which emerge in the agency's standards performance, program managers will inspect particular information items keyed to the various standards data elements.

The Statistical Analysis Plan for the MIS, developed by Abt Associates, details all of the types of reports and graphics users will be able to generate.¹ Exhibits 11-13 illustrate some of the types of displays the MIS can generate.

¹ Abt Associates Inc.; Comprehensive Management Information System for the State/Federal Vocational Rehabilitation Program, Draft Statistical Analysis Plan; Revised October, 1981; RSA Contract #105-78-4012.

Table 15

ACHIEVEMENT ON PERFORMANCE STANDARDS

YEAR: 1981

STATE: CALIFORNIA

	THIS YEAR	THIS YEAR'S GOAL	1980	1980 NATL NORM
1. COVERAGE				
(i) Clients served per 100,000 population	XXX.X	XXX.X	XXX.X	XXX.X
(ii) Percent severely disabled served	XX.XX	XX.XX	XX.XX	XX.XX
2. COST-EFFECTIVENESS AND BENEFIT COST RETURN				
(i) Expenditures per competitively employed closure	XXX,XXX	XXX,XXX	XXX,XXX	XXX,XXX
(ii) Expenditure per 26 closure	XXX,XXX	XXX,XXX	XXX,XXX	XXX,XXX
(iii) Ratio of total VR benefits to total VR costs	XX.XX	XX.XX	XX.XX	XX.XX
(iv) Total net benefit from VR services	XXXX.X	XXXX.X	XXXX.X	XXXX.X
3. REHABILITATION RATE				
(i) Percent 26 closures	XX.XX	XX.XX	XX.XX	XX.XX
(ii) Annual change in number of 26 closures	XXXX	XXXX	XXXX	XXXX
4. ECONOMIC INDEPENDENCE				
(i) Percent 26 closures with weekly earnings at/above Federal minimum wage	XX.XX	XX.XX	XX.XX	XX.XX
(ii) Comparison of earnings of competitively employed 26 closures to earnings of employees in state	X.XX	X.XX	X.XX	X.XX
5. VOCATIONAL ACTIVITY				
(i) Percent 26 closures competitively employed	XX.XX	XX.XX	XX.XX	XX.X
(ii) Percent competitively employed 26 closures with weekly earnings at/above Federal minimum wage	XX.XX	XX.XX	XX.XX	XX.X
(iii) Percent noncompetitively employed 26 closures showing improvement in functioning and life status	XX.XX	XX.XX	XX.XX	XX.XX

Table 15 (continued)

ACHIEVEMENT IN PERFORMANCE STANDARDS (CONT.)

YEAR: 1980

STATE: CALIFORNIA

	<u>THIS YEAR</u>	<u>THIS YEARS GOAL</u>	<u>1980</u>	<u>1980 NATL NORM</u>
6. CLIENT CHANGE				
(i) Comparison of earnings before and after VR services	XXX.XX	XXXX.XX	XXXX.XX	XXXX.XX
(ii) Changes in other statuses and functioning ability	XXX.X	XXX.X	XXX.X	XXX.X
7. RETENTION				
(i) Percent of closures retaining earnings at follow-up	XX.XX	XX.XX	XX.XX	XX.XX
(ii) Comparison of 26 closures with public assistance as primary source of support at closure and at follow-up	XX.XX	XX.XX	XX.XX	XX.XX
(iii) Percent noncompetitive employed by closures retaining closure skills at follow-up	XX.XX	XX.XX	XX.XX	XX.XX
8. SATISFACTION				
(i) Percent closed clients satisfied with overall VR experience	XX.XX	XX.XX	XX.XX	XX.XX
(ii) Percent closed clients satisfied with:				
counselor	XX.XX	XX.XX	XX.XX	XX.XX
physical restoration	XX.XX	XX.XX	XX.XX	XX.XX
job training services	XX.XX	XX.XX	XX.XX	XX.XX
placement services	XX.XX	XX.XX	XX.XX	XX.XX
(iii) Percent of closures judging services received as useful in obtaining their job/ homemaker situation or in current performance	XX.XX	XX.XX	XX.XX	XX.XX

Table 16

ACHIEVEMENT ON PERFORMANCE STANDARDS: STATE COMPARISON

GENERAL AND COMBINED AGENCIES

STANDARD: 1. COVERAGE

DATA ELEMENT: (1) Clients Served per 100,000 Population

NATIONAL NORM: XXX.X

AGENCY	THIS YEAR	THIS YEAR GOAL	1980	1979	1978	1977
ALABAMA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
ALASKA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
ARIZONA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
ARKANSAS	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
CALIFORNIA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
COLORADO	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
CONNECTICUT	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
DELAWARE	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
DIST. OF COLUMBIA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
FLORIDA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
GEORGIA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
GUAM	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
HAWAII	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
IDAHO	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
ILLINOIS	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
INDIANA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
IOWA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
KANSAS	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
KENTUCKY	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
LOUISIANA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
MAINE	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
MARYLAND	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
MASSACHUSETTS	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
MICHIGAN	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
MINNESOTA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
MISSISSIPPI	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
MISSOURI	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X

Table 16 (continued)

ACHIEVEMENT ON PERFORMANCE STANDARDS: STATE COMPARISON (cont.)

GENERAL AND COMBINED AGENCIES

STANDARD: 1. COVERAGE

DATA ELEMENT: (1) Clients Served per 100,000 Population

NATIONAL NORM: XXX.X

AGENCY	THIS YEAR	THIS YEARS GOAL	1980	1979	1978	1977
MONTANA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
NEBRASKA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
NEVADA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
NEW HAMPSHIRE	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
NEW JERSEY	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
NEW MEXICO	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
NEW YORK	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
NORTH CAROLINA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
NORTH DAKOTA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
OHIO	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
OKLAHOMA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
OREGON	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
PENNSYLVANIA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
PUERTO RICO	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
RHODE ISLAND	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
SOUTH CAROLINA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
SOUTH DAKOTA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
TENNESSEE	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
TEXAS	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
UTAH	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
VERMONT	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
VIRGINIA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
WASHINGTON	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
WEST VIRGINIA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
WISCONSIN	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
WYOMING	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
VIRGIN ISLANDS	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X

Table 16 (continued)

ACHIEVEMENT ON PERFORMANCE STANDARDS: STATE COMPARISON

BLIND AGENCIES

STANDARD: 1. COVERAGE

DATA ELEMENT: (1) Clients Served per 100,000 Population

NATIONAL NORM: XXX.X

AGENCY	THIS YEAR	THIS YEARS GOAL	1980	1979	1978	1977
CONNECTICUT	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
DELAWARE	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
FLORIDA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
IDAHO	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
IOWA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
KANSAS	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
KENTUCKY	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
MASSACHUSETTS	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
MICHIGAN	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
MINNESOTA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
MISSISSIPPI	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
MISSOURI	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
MONTANA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
NEBRASKA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
NEW JERSEY	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
NEW YORK	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
NORTH CAROLINA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
OREGON	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
PENNSYLVANIA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
RHODE ISLAND	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
SOUTH CAROLINA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
TENNESSEE	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
TEXAS	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
UTAH	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
VERMONT	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
VIRGINIA	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X
WASHINGTON	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X	XXX.X

Table 17

ACHIEVEMENT ON PERFORMANCE STANDARDS

ALL AGENCIES

YEAR: 1981

	<u>NATL</u> <u>NORM</u>	<u>GEN-</u> <u>ERAL</u>	<u>BLIND</u>	<u>COM-</u> <u>BINED</u>
1. COVERAGE				
(i) Clients served per 100,000 population	XXX.X	XXX.X	XXX.X	XXX.X
(ii) Percent severely disabled served	XX.XX	XX.XX	XX.XX	XX.XX
2. COST-EFFECTIVENESS AND BENEFIT COST RETURN				
(i) Expenditures per competitively employed closure	\$XX,XXX	\$XX,XXX	\$XX,XXX	\$XX,XXX
(ii) Expenditure per 26 closure	\$XX,XXX	\$XX,XXX	\$XX,XXX	\$XX,XXX
(iii) Ratio of total VR benefits to total VR costs	XX.XX	XX.XX	XX.XX	XX.XX
(iv) Total net benefit from VR services	XXXX.X	XXXX.X	XXXX.X	XXXX.X
3. REHABILITATION RATE				
(i) Percent 26 closures	XX.XX	XX.XX	XX.XX	XX.XX
(ii) Annual change in number of 26 closures	XXXX	XXXX	XXXX	XXXX
4. ECONOMIC INDEPENDENCE				
(i) Percent 26 closures with weekly earnings at/above Federal minimum wage	XX.XX	XX.XX	XX.XX	XX.XX
(ii) Comparison of earnings of competitively employed 26 closures to earnings of employees in State	X.XX	X.XX	X.XX	X.XX
5. GAINFUL ACTIVITY				
(i) Percent 26 closures competitively employed	XX.XX	XX.XX	XX.XX	XX.X
(ii) Percent competitively employed 26 closures with hourly earnings at/above Federal minimum wage	XX.XX	XX.XX	XX.XX	XX.XX
(iii) Percent noncompetitively employed 26 closures showing improvement in functioning and life status	XX.XX	XX.XX	XX.XX	XX.XX

Table 17 (continued)

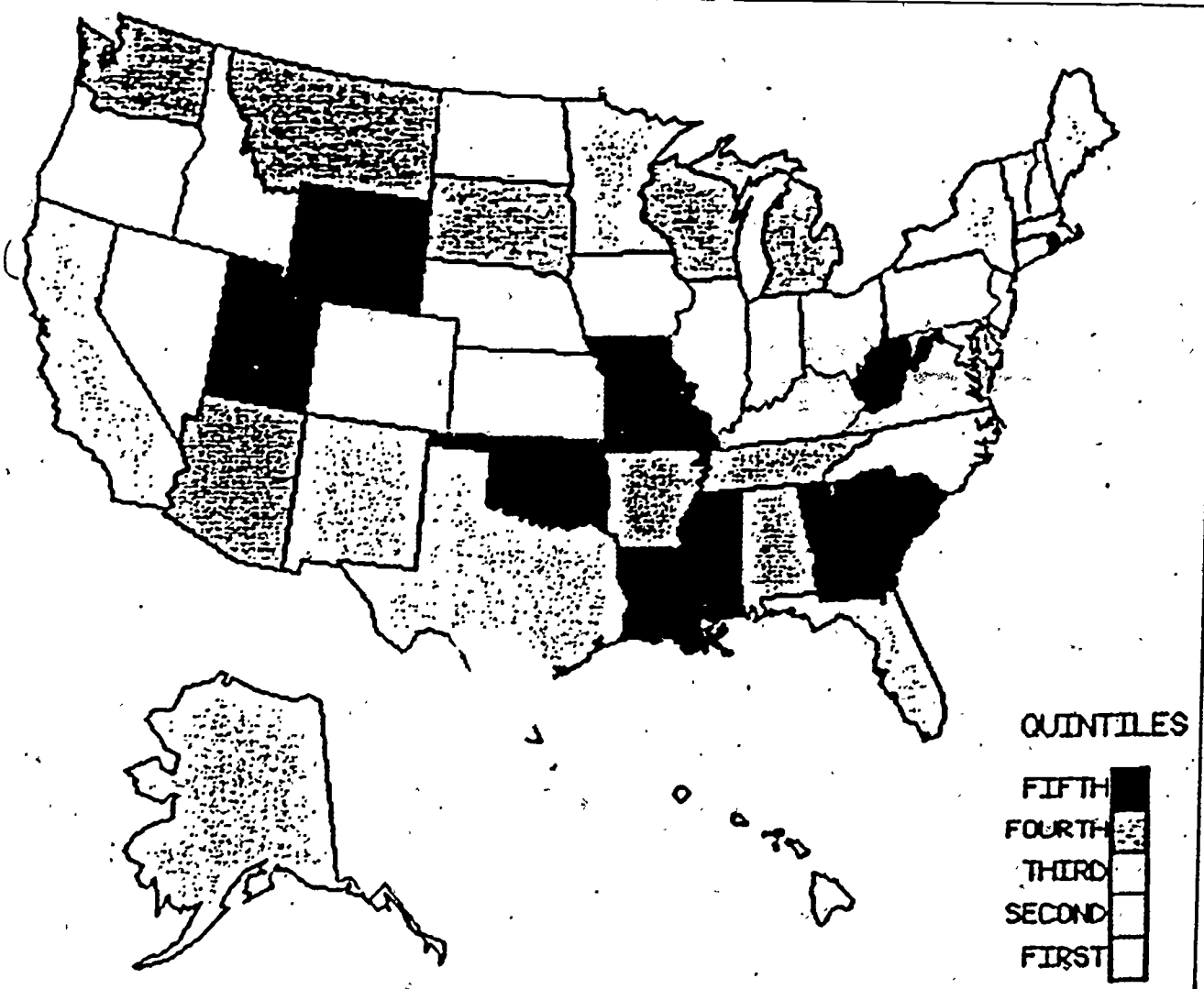
ACHIEVEMENT ON PERFORMANCE STANDARDS (CONT.)

ALL AGENCIES

YEAR: 1981

	<u>NATI- NORM</u>	<u>GEN- ERAL</u>	<u>BLIND</u>	<u>COM- BINED</u>
6. CLIENT CHANGE				
(i) Comparison of earnings before and after VR services	XXXX.XX	XXXX.XX	XXXX.XX	XXXX.XX
(ii) Changes in other statuses and functioning ability	XXX.X	XXX.X	XXX.X	XXX.X
7. RETENTION				
(i) Percent 26 closures retaining earnings at follow-up	XX.XX	XX.XX	XX.XX	XX.XX
(ii) Comparison of 26 closures with public assistance as primary source of support at closure and at follow-up	XX.XX	XX.XX	XX.XX	XX.XX
(iii) Percent noncompetitively employed 26 closures retaining closure skills at follow-up	XX.XX	XX.XX	XX.XX	XX.XX
8. SATISFACTION				
(i) Percent closed clients satisfied with overall VR experience	XX.XX	XX.XX	XX.XX	XX.XX
(ii) Percent closed clients satisfied with:				
counselor	XX.XX	XX.XX	XX.XX	XX.XX
physical restoration	XX.XX	XX.XX	XX.XX	XX.XX
job training services	XX.XX	XX.XX	XX.XX	XX.XX
placement services	XX.XX	XX.XX	XX.XX	XX.XX
(iii) Percent 26 closures judging services received as useful in obtaining their job/whichever situation or in current performance	XX.XX	XX.XX	XX.XX	XX.XX

Exhibit 11
National Picture Depicting State (Agency) Level Data



QUINTILES

FIFTH

FOURTH

THIRD

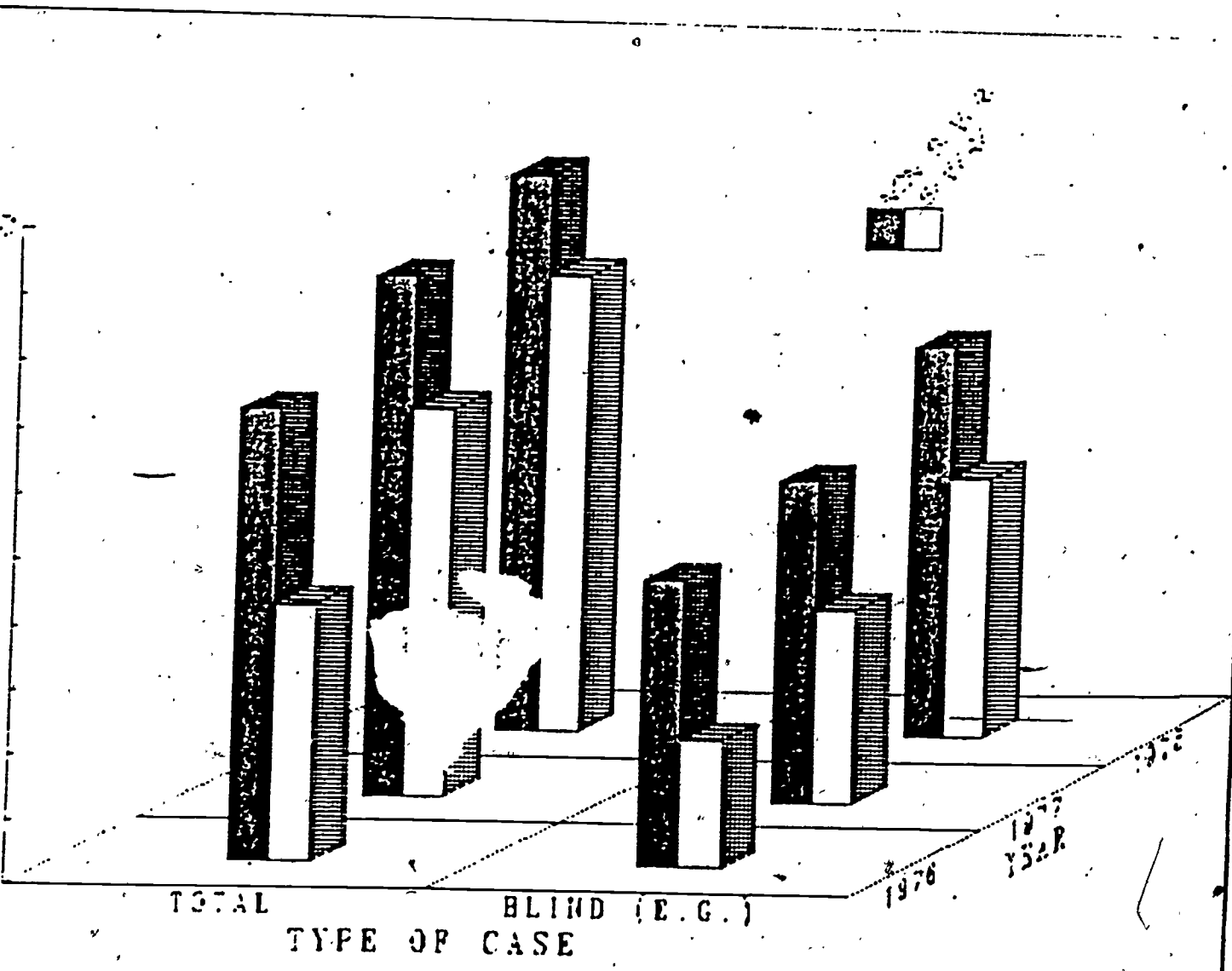
SECOND

FIRST

Computer graphics by
Analytic Services Group, Abt Associates, Inc.

Reprinted from Abt Associates' Statistical Analysis Plan (revised October 1981), page 7-7.

Exhibit 12
State Agency Performance for Severely Disabled and
Non-Severely Disabled for the Past Three Years

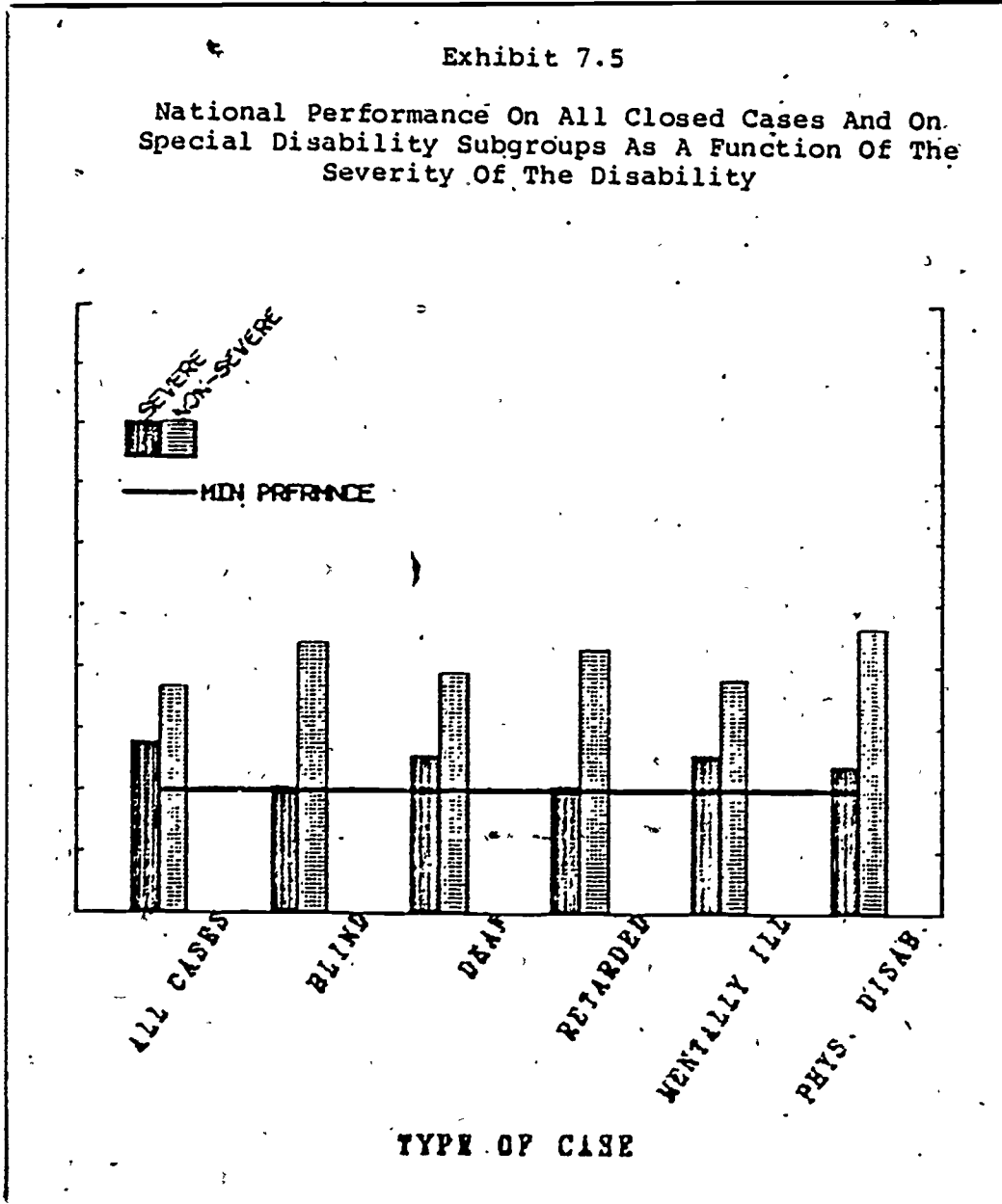


Reprinted from Abt Associates
October 1981), page 7-35.

Statistical Analysis Plan (Revised

Computer graphics by Analytic Services Group, Abt Associates Inc.

Exhibit 13
National Picture Sorting Data
by the Type and Severity of Disability



Reprinted from Abt Associates' Statistical Analysis Plan (revised October 1981), page 7-9.

APPENDIX 1:
PROGRAM DATA REQUIREMENTS
FOR CURRENT VERSION OF BENEFIT-COST MODEL:
DATA ELEMENTS 2(iii) AND 2(iv)

I. Minimum Necessary Data

Item	Data Specifications
<p><u>Closure Status</u></p> <p>1. Number of 08 (except closed from status 00) closures _____</p> <p>26 _____ closures _____</p> <p>28 _____ closures _____</p> <p>30 _____ closures _____</p>	
<p><u>Age Distribution</u></p> <p>2. Percentage of 26 closures by age at referral in each of the ten five-year age groups from 15-19 through 60-64:^a</p> <p>1-14 _____</p> <p>15-19 _____</p> <p>20-24 _____</p> <p>25-29 _____</p> <p>30-34 _____</p> <p>35-39 _____</p> <p>40-44 _____</p> <p>45-49 _____</p> <p>50-54 _____</p> <p>55-59 _____</p> <p>60-64 _____</p> <p>65+ _____</p>	
<p><u>Earnings</u></p> <p>3. Percentage of 26 closures with paid earnings</p> <p>at referral: _____</p> <p>at closure: _____</p> <p>4. Average weekly earnings at referral, of 26 closures with earnings, at referral: _____</p> <p>Average weekly earnings at closure, of 26 closures with earnings, at closure: _____</p>	
<p><u>Work Status</u></p> <p>5. Percentage of 26 closures classified as homemakers</p> <p>at referral: _____</p> <p>at closure: _____</p> <p>6. Percentage of 26 closures classified as unpaid family workers at referral: _____</p> <p>Percentage of 26 closures classified as unpaid family workers at closure: _____</p>	
<p><u>Time in Process</u></p> <p>7. Average time in months of 26 closures:</p> <p>from referral to closure: _____</p> <p>from acceptance to closure: _____</p>	

CONTINUED

I. Minimum Necessary Data (cont.)

Item	Data Specifications
<p>Costs</p> <p>8. Total program costs, i.e., expenditures under Section 110, I and E (section 120), SSI, and SSDI, during the fiscal year: _____</p>	<p>RSA-2: III.C.8 (section 110) IV.4 (Trust Fund plus SSI) V.C.7 (I + E)</p>
<p>9. Total case service costs for all clients, under the above programs (except I and E) during the fiscal year _____</p>	<p>RSA-2: II.B.1.H (110) II.D.1.H (Trust Fund) II.F.1.H (SSI)</p>
<p>10. Total case service costs for 26 closures, under the above programs (except I and C) during the fiscal year: _____</p>	<p>State accounting system</p>
<p>11. Average life of the case-case service costs for 26 closures: _____</p>	<p>State accounting system or RSA-300: 26 closures: Item 4.P.2 Item 4.E.1 (average for all 26s)</p>

^aFor non-vocational gain, 5-year cohorts for all age groups are needed.

I.J. Data for Further Sharpening the Calculations

Item	Data Specifications																																																							
Earnings																																																								
1. Percentage of 26 closures with earnings at referral in each of the ten five-year age groups from 15-19 through 60-64.	RSA-300: 26 closures: Item 4.P.2 Earnings at referral: Item 2.P Age: Item 1.E																																																							
2. Percentage of 26 closures with earnings at closure in each of the ten five-year age groups from 15-19 through 60-64.	RSA-300: 26 closures: Item 4.P.2 Earnings at closure: Item 4.J Age: Item 1.E																																																							
3. Average weekly earnings at referral, of 26 closures with earnings at referral, in each of the ten five-year age groups from 15-19 through 60-64.	Same as 1, above.																																																							
4. Average weekly earnings at closure, of 26 closures with earnings at closure, in each of the ten five-year age groups from 15-19 through 60-64.	Same as 2, above.																																																							
Data Format																																																								
<table border="1"> <thead> <tr> <th></th> <th>1. Percentage with Earnings at Referral</th> <th>2. Percentage with Earnings at Closure</th> <th>3. Earnings at Referral</th> <th>4. Earnings at Closure</th> </tr> </thead> <tbody> <tr><td>15-19</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>20-24</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>25-29</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>30-34</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>35-39</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>40-44</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>45-49</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>50-54</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>55-59</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>60-64</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> </tbody> </table>		1. Percentage with Earnings at Referral	2. Percentage with Earnings at Closure	3. Earnings at Referral	4. Earnings at Closure	15-19	_____	_____	_____	_____	20-24	_____	_____	_____	_____	25-29	_____	_____	_____	_____	30-34	_____	_____	_____	_____	35-39	_____	_____	_____	_____	40-44	_____	_____	_____	_____	45-49	_____	_____	_____	_____	50-54	_____	_____	_____	_____	55-59	_____	_____	_____	_____	60-64	_____	_____	_____	_____	
	1. Percentage with Earnings at Referral	2. Percentage with Earnings at Closure	3. Earnings at Referral	4. Earnings at Closure																																																				
15-19	_____	_____	_____	_____																																																				
20-24	_____	_____	_____	_____																																																				
25-29	_____	_____	_____	_____																																																				
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50-54	_____	_____	_____	_____																																																				
55-59	_____	_____	_____	_____																																																				
60-64	_____	_____	_____	_____																																																				
5. Percentage of 26 closures with earnings at closure who are male: _____	RSA-300: 26 closures: Item 4.P.2 Earnings at closure: Item 4.J Sex: Item 1.F																																																							
Follow-Up																																																								
6. Follow-up data on the percentage of 26 closures with earnings some period after closure, i.e., percentage with earnings: _____, and the period of time after closure the data was collected: _____	Follow-up survey: Question 3																																																							
7. Follow-up data on the earnings of 26 closures some period after closure, i.e., average weekly earnings: _____ and the period of time after closure the data was collected: _____	Same as 6, above																																																							

II. Data for Further Sharpening the Calculations (cont.)

Item	Data Specifications
<p><u>Costs</u></p> <p>8. Percentage of total case service costs for all clients that is used to provide maintenance support to clients:</p> <p>_____</p>	<p>RSA-2:</p> <p>II.B.1.D (sect. 110)</p> <p>II.D.1.D (Trust Fund)</p> <p>II.F.1.D (SSI)</p>
<p>9. Percentage of program repeaters, i.e., current 26 closures who have received rehabilitation services in the last three years and have been previously closed in 26 status:</p> <p>_____</p>	<p>RSA-300:</p> <p>26 closures: Item 4.P.2</p> <p>Previous closure: Item 2.J</p>