

OMB SUPPORTING STATEMENT
for
Targeted Evaluations of State
Vocational Rehabilitation Agency Practices

U. S. Department of Education
Office of Special Education and Rehabilitative Services (OSERS)
Rehabilitation Services Administration (RSA)

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A. Justification

1. Importance of the Information

The collection of information for which we are requesting approval is a survey of 80 state vocational rehabilitation (VR) agencies.¹ The survey is one component of a study entitled *Targeted Evaluations of State VR Agency Practices*, which is being conducted by RTI International and its subcontractor, InfoUse, on behalf of the Department of Education's (ED's) Rehabilitation Services Administration (RSA), which administers the state/federal VR program. The overarching purpose of the study is to strengthen the partnership through which RSA and state VR agencies improve employment outcomes for individuals with disabilities. In addition to the survey, study activities include site visits to 9 state VR agencies, selected on the basis of survey results, and analysis of RSA datasets.

In this study, RSA is focusing on several aspects of VR agencies' organizational structures and management practices that have not been closely examined at the national level. As shown in *Exhibit 1*, evaluation questions address:

1. ***Third-party cooperative arrangements*** through which state VR agencies enter partnerships involving funds transfers whose intent is to deliver specialized rehabilitation services to target groups, such as transitional youth or individuals with severe and persistent mental illness.
2. ***Quality assurance (QA) procedures*** used by state VR agencies to ensure that they deliver quality services in accordance with established policies and procedures. Quality assurance may include case file reviews; strategic planning and performance measurement; case management systems; program evaluation and special studies; personnel assignments, training, and performance evaluation; management and monitoring of vendor contracts; input from consumers and other customers; and a variety of other procedures.

The proposed collection of information will allow analysts to examine the effects of specific practices on VR program outcomes and individuals served. Survey data can be used in conjunction with existing administrative records (the RSA-911 database) to compare the outcomes achieved by consumers in cooperative programs with those achieved by consumers as a whole. The survey will also provide information to assist RSA in helping state VR agencies ensure effective and efficient delivery of VR services, and will identify promising practices that could be adopted by other state VR agencies.

In this section of the supporting statement, we describe the need for this collection request. We first briefly describe issues in each of the two topic areas. We then describe the need for the survey, and how the information it provides will assist RSA and state agencies in improving the performance of the VR program.

¹ Because some states have separate agencies that serve only persons who are blind or visually impaired, the number of agencies exceeds the number of states. The term "state" refers to the 50 states, District of Columbia, Puerto Rico, and territories of the United States.

Exhibit 1. Evaluation Questions

<i>Third-party cooperative arrangements</i>
1. How widespread is the use of cooperative arrangements?
2. What proportion of the states' matching funds is derived from 3rd party cooperative arrangements?
3. What are the effects of cooperative arrangements upon: (1) state matching funds, (2) numbers and types of consumers served, (3) types of services provided, (4) order of selection, (5) programmatic outcomes?
4. What are the effects of cooperative arrangements upon the state services in comparison to other states?
<i>Quality assurance</i>
1. To what extent do agencies perform QA and other functions to ensure that services are delivered in accordance with statutes and regulations and in keeping with agencies' policies and practices?
2. How well are QA functions performed?
3. What effects or outcomes are attributable to QA and/or similar program functions?
4. To the extent it is possible to determine from this evaluation, what practices are effective?

Issues in the Topic Areas

The survey instrument will collect information to address the majority of the evaluation questions presented above. (Additional information will be collected through site visits to a limited number of state VR agencies and analysis of RSA datasets.) Its design is based on our understanding of issues in each topic area, as described below.

Cooperative Arrangements

The Rehabilitation Act of 1973, as amended (Section 361.28), allows state VR agencies to enter into cooperative arrangements for delivery of VR services to targeted groups of VR-eligible individuals. However, several conditions must be met:

- Services delivered through the agreement are not the services customarily provided by the cooperating agency but “. . .are new services that have a vocational rehabilitation focus or existing services that have been modified, adapted, expanded, or reconfigured to have a vocational rehabilitation focus.”
- Consumers receiving services must be applicants to or recipients of VR services from the state VR agency.
- The VR agency must supervise the services and providers of those services.

- Service arrangements must be consistent with order of selection² and other state plan requirements of the VR agency.
- If services are not statewide, the VR agency must obtain a waiver of statewideness.

Under these arrangements, state VR agencies may partner with educational organizations and institutions, agencies serving persons with mental illness or developmental disabilities, and other entities. States may use funds provided by other agencies under these agreements to meet federal requirements for matching funds.

Coordination and partnerships with other agencies can be beneficial in terms of effective and efficient delivery of VR services. As indicated in an earlier study conducted by RTI,³ state VR agencies may implement such arrangements in order to expand their consumer base, increase consumer choice, improve services to hard-to-serve groups, or improve agency performance. However, use of these arrangements to provide matching funds can also potentially have harmful effects, including:

- ***Skewing the distribution of disability types served by the agency.*** With a large number of cooperative arrangements involving local education agencies or mental health agencies, a state VR agency may be serving a higher proportion of transitional youth or individuals with mental illness, or both, than characterizes the distribution of those types of disabilities in the state. Hence by implication individuals with other types of disabilities may not be benefiting fully from VR services, since the result may be a reduction in available resources for persons with other disabilities.
- ***Quality of services delivered under cooperative arrangements.*** In states with large numbers of such agreements for the same types of programs, a particular program design may be replicated in many localities without attention to factors that may impinge on its effectiveness, such as local economic conditions or service resources.
- ***Cost effectiveness.*** In some instances, programs operated under cooperative arrangements may be more costly than the same or comparable services operated by other vendors. These differences may result from increased overhead, administrative oversight requirements, and staff costs associated with the cooperative programs.
- ***Conflicts with other policies and regulations.*** The requirement for programs operated under cooperative arrangements to serve specific target groups may be hindered by order of selection or other competing requirements, hence reducing the ability of such programs to operate at capacity and thereby reducing their cost efficiency.

² Under order of selection, a state VR agency without sufficient resources to serve all eligible individuals must first serve those with “most significant” disabilities.

³ Tashjian, M.D., Hayward, B.J., Elliott, B.G., Levine, D., and Schmidt-Davis, J. 2004. *Study of variables related to state vocational rehabilitation agency performance. Revised draft final report.* Research Triangle Park, NC: RTI International.

Quality Assurance

In the past, RSA's monitoring of state VR agencies focused primarily on compliance issues, including reviews of a sample of consumer case files in each agency. Responding to RSA's emphasis, VR agencies also focused their accountability activities on case reviews, seldom going beyond this step to look at agency performance in other areas.

Following reorganization and refocusing at RSA, monitoring and other activities are now encouraging agencies to look at performance rather than principally focusing on compliance. The agency's 2007 monitoring activities addressed the issue of quality assurance among other topics, with the intent to help agencies look at their data in a different way – to understand what the data mean broadly for agency operations, outcomes, and effectiveness. These monitoring activities indicated that many VR agencies need assistance in understanding and implementing quality assurance across all aspects of their operations.

Need for the Survey

In this section, we document the need for the information that the survey will collect on the two topics.

Cooperative Arrangements

An important purpose of the survey is to collect current information about state VR agencies' use of cooperative arrangements for match purposes. The most recent year for which this information is currently available for all agencies is FY 2003: during that year, 9 of 80 state VR agencies used funding from cooperative arrangements for 10 percent or more of their match. Partial data for FYs 2004 and 2005 indicate that, while some agencies reduced their reliance on cooperative arrangements over the 3-year period, others began using this practice. Without updated information, RSA officials cannot assess the extent to which reliance on cooperative arrangements for match purposes may be affecting program performance.

RSA officials knowledgeable about VR agencies' use of cooperative arrangements believe that these arrangements may have observable effects on agency operations and outcomes if they exceed a certain "critical" point. Because these effects (positive or negative) are most likely to be observable in agencies that obtain relatively high percentages of matching funds from cooperative arrangements, study activities (including not only the survey but also supplemental analyses of RSA datasets and comprehensive site visits to a small number of selected agencies) will focus on such agencies. Consequently, an initial "screener" question in the survey instrument is designed to determine the percentage of match attributable to cooperative arrangements.⁴ Agencies that obtain at least 10 percent of

⁴ **This screener question was originally based on the percentage of funds from all public sources, including political subdivisions, transfers from other state agencies, and cooperative arrangements. However, after reviewing data for Fiscal Year 2003, we have determined that it is possible for an agency to meet that criterion without receiving any funds at all from cooperative arrangements (i.e., the agency might obtain at least 10 percent of its matching funds from political subdivisions and transfers from other state agencies). Since the focus of the study, and that of all Section A questions, is on cooperative arrangements, we have revised the screener question to refer only to funds from cooperative arrangements.**

their matching funds from cooperative arrangements will be asked to complete the balance of the survey's Section A, which collects details about:

1. *Availability of state matching funds*; i.e., whether additional state funding might reduce the agency's reliance on cooperative arrangements as a source of matching funds in the future.
2. *The number and types of partner agencies participating in cooperative arrangements*, amount of funding provided by each type of agency, and whether the arrangements operate under waivers of statewideness.
3. *Methods for administering cooperative programs*, including performance requirements, oversight activities, criteria for assessing performance, and corrective actions for programs that do not meet requirements.
4. *Agencies' purposes and perspectives regarding cooperative arrangements*, including their advantages and disadvantages.
5. *Characteristics of consumers served in cooperative programs* (i.e., disability type and significance, age, number receiving SSI/SSDI, race/ethnicity, and educational attainment). This information will allow researchers to investigate issues concerning possible skewing of service delivery as a result of reliance on cooperative arrangements for matching funds.
6. *Specific services provided to consumers served in cooperative programs*, for comparison to services provided to consumers as a whole.
7. *Effects of cooperative programs on order of selection*; i.e., whether reliance on cooperative arrangements as a source of match may affect the state VR agency's ability to serve all eligible consumers.
8. *Effects of order of selection on cooperative programs*; i.e., whether order of selection may affect the ability of cooperative programs to operate at full capacity.
9. *Outcomes achieved by consumers in cooperative programs.*⁵

We do not believe that asking agencies that derive less than 10 percent of their matching funds from cooperative arrangements to provide all of the information listed above would justify the burden involved for those agencies, nor would analysis of these data be a cost-effective use of the finite amount of funds available to the contractor. However, we do agree with OMB's suggestion of October 16, 2008 that it may be appropriate to request a limited amount of information from agencies that derive less than 10 percent (but at least some) of their match from cooperative arrangements. Consequently, we have revised the survey instrument's skip pattern so that agencies obtaining less than 10 percent (but at least some) of their match from cooperative arrangements will answer questions about

⁵ A description of purposes and uses of Quality Assurance data is contained in Section 2.

topics 1, 4, 7, and 8 above, as well as indicating whether information on the statewide distribution of the population by disability type and significance is available (Question 28). Agencies that do not obtain any matching funds from cooperative arrangements will complete only the screener question (Question 1) and then skip to Section B.

Quality Assurance

Federal officials require details about the QA systems currently used by state VR agencies in order to determine how they can best help agencies improve program performance. In executive interviews conducted by RTI, RSA staff members who oversee state VR agency operations indicated that a comprehensive QA system would cover all aspects of agency operations, including casework, vendor performance, consumer outcomes, fiscal and contract management, personnel policies, employer relations, and consumer choice and satisfaction. Further, an effective system should start with analysis of operations and problems, followed by setting measurable goals for both processes and outcomes, monitoring of effects (including possible negative impacts), and changes in policy and operations as indicated by evaluation.

Based on these premises, the survey instrument for which clearance is requested collects information about QA practices in the following areas:

- ***Case file reviews***--whether reviews focus strictly on compliance issues or contribute to program improvement, and areas for improvement suggested by this activity.
- ***Strategic planning and performance measurement***, including measures used to monitor agency performance, standards for timely delivery of certain services or the length of time a case may remain in particular statuses; use of performance-based budgeting systems in which agency budgets are linked to performance goals; and areas for improvement suggested by these activities.
- ***Case management systems***--ways in which they facilitate QA activities and methods for verifying the accuracy of reported data.
- ***Program evaluation and special studies***--specific aspects or components of the VR program studied and areas for improvement identified on the basis of formal evaluations or studies.
- ***Personnel assignments, training, and performance evaluation***-- including whether the agency employs staff members whose time is devoted primarily to QA activities, percentage of counselors meeting Comprehensive System of Personnel Development (CSPD)⁶ requirements, and use of outcome measures in counselor performance reviews.

⁶ Federal legislation requires state VR agencies to describe a comprehensive system of personnel development in State Plans for providing vocational rehabilitation services.

- ***Management and monitoring of vendor contracts***, including contracting and monitoring procedures and methods for obtaining consumer feedback on vendor services.
- ***Input from consumers and other customers*** in evaluation of agency performance and areas for improvement identified through analysis of consumer satisfaction data.

The survey will also collect examples of QA materials (e.g., written policies and procedures, manuals, and case review protocols), which other agencies seeking to improve their performance may adopt or adapt for their own purposes if they choose to do so.

2. Purposes and Uses of the Data

RSA will use survey data on cooperative arrangements to examine the effects of these arrangements on (1) state matching funds; (2) numbers and types of consumers served; (3) types of services provided; (4) order of selection; and (5) programmatic outcomes. Information on state VR agencies' quality assurance practices will enable federal officials to determine how they can best help agencies improve program performance.

3. Information Technology

RTI will use electronic distribution lists to distribute the survey to agencies as a Word or PDF document. Agencies may, at their option, complete the survey in electronic form and return it to RTI by e-mail or print the document, complete it by hand, and return it by FAX or postal service.

4. Efforts to Identify Duplication

No similar information is currently available.

5. Methods Used to Minimize Burden on Small Entities

This information collection will not have an economic impact on small entities.

6. Consequences of Not Collecting the Information

Without the information collected by this survey, RSA will not have details about the quality assurance practices currently used by state VR agencies and the level of knowledge of state VR agency staff responsible for this function. As a result, RSA will be unable to determine how best to target its technical assistance activities and to assist state VR agencies to the fullest extent possible. RSA will also be unable to determine whether use of cooperative arrangements for match purposes has a deleterious effect on program performance.

7. Special Circumstances

No special circumstances are required.

8. Consultation Outside the Agency

RTI researchers conducted a number of executive interviews to obtain background information relevant to the two topics and identify issues that should be considered in developing the study's data collection and analysis plans. Individuals interviewed include RSA officials who are responsible for administering the VR program and who serve as liaisons to state VR agencies. Others consulted included officers of the Council of State Administrators of Vocational Rehabilitation and the National Council of State Agencies for the Blind, two professional associations that represent the state VR agencies.

9. Payments or Gifts to Respondents

No payments or gifts are to be provided to respondents.

10. Assurances of Confidentiality

No assurances of confidentiality to agencies are necessary. The only individually identifying information that will be collected is the name of the staff member completing the survey. The survey instrument will include a statement that the individual's name will be used only for RTI's internal purposes, in case follow-up questions are necessary. Published reports will not contain any information that permits identification of individual human subjects.

11. Sensitive Questions

Information to be collected is not of a sensitive nature.

12. Estimate of Response Burden

The proposed survey requires agencies to obtain information from existing databases, case management systems, or manual records. There are no direct costs to agencies; however, we may calculate the costs in terms of time spent in responding to the survey.

Based on our experience with similar surveys, we have estimated the time required to respond at 90 minutes. At an estimated average hourly salary of \$30.00, the total burden for all 80 agencies is \$3,600. The rate of \$30.00 per hour represents the average, fully-loaded wage rate (i.e., includes pre-tax wages, fringe benefits, and overhead costs) for four different classes of labor ranging from clerical to managerial labor. The average wage rate accounts for the amount of time different types of agency personnel (i.e., clerical, technical, professional, and managerial) are expected to expend in responding to the survey.

13. Estimate of Cost Burden of Collecting Information

There are no capital costs nor is there any equipment purchase necessary for this collection.

14. Estimate of Annualized Cost to the Federal Government

This data collection is to be conducted under an existing contract between RSA and RTI International of Research Triangle Park, NC. Costs to the federal government for the study's data collection task, including the survey, site visits to state VR agencies, and several other activities are \$258,240.

15. Change in Burden

This is a new collection; there are no changes or adjustments in burden.

16. Tabulation and Analysis Plan and Schedule

The survey for which clearance is requested is one component of a study entitled *Targeted Evaluations of State VR Agency Practices*, which includes a number of other activities. The study began on October 1, 2007 and is scheduled to end on September 30, 2009. The survey of state VR agencies will take place in **November and December** 2008, followed by site visits to a small number of agencies in early 2009 to explore the two topics in greater detail. Evaluation reports will be submitted to RSA in June 2009.

17. Display Expiration Date for OMB Approval

RSA will display the expiration date for OMB approval of the information collection.

18. Exceptions to Certification Statement

There are no exceptions to the certification statement.

B. Statistical Methods

1. Respondent Universe

No statistical methods will be used for this data collection. At present, there are 80 state VR agencies. RTI will ask all of these agencies to respond to the survey.

2. Sample Design

None; the data collection will include the universe of agencies.

3. Methods for Maximizing Response Rate

Although agencies are not required as a condition of federal funding to respond to the survey, RSA will inform them about the study, encourage their participation, and explain the importance of collecting valid and reliable data. Should the survey fail to achieve a response rate

of at least 80 percent, RTI will undertake prompting efforts, including e-mail messages and telephone calls, to increase the rate.

4. Test of Procedures and Methods

No tests of procedures and methods were needed.

5. Consultation on Statistical Aspects of the Design

No consultation was needed.

Appendix A

Paperwork Burden Statement

Targeted Evaluations of State Vocational Rehabilitation (VR) Agency Practices

Survey of State Vocational Rehabilitation Agencies

Paperwork Burden Statement

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information is **XXXX--XXXX**. The time required to complete this information collection is estimated to average **90** minutes per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate or suggestions for improving this form, please write to U.S. Department of Education, Washington DC, 20202. If you have any comments or concerns regarding the status of your individual submission of this form, write directly to Steven Zwillinger, Rehabilitation Services Administration, U.S. Department of Education, Potomac Center Plaza, 550 12th Street, SW, Room 5066, Washington, DC, 20202.