

Commission to Study the Division of Rehabilitation Services (DORS)

Meeting Session #4

December 8, 2022

Maryland State Department of Education
Division of Rehabilitation Services



PRESENTATION OUTLINE

1. Overview of Commission Responsibilities
2. Commission Topic #5: Methods for improving accountability and transparency of the Division of Rehabilitation Services - Conclusion
3. Commission Topic #3: Methods for improving the amount of time to provide vocational rehabilitation and transitional services
4. Review of draft Commission interim recommendations and discussion



Overview of Commission Responsibilities

1. Overview of Commission Responsibilities
2. Accountability and Transparency of DORS Programs and Services (Topic #5)
3. Time To Provide VR Services (Topic # 3)
4. Review and Discussion of Draft Commission Interim Recommendations

The important role of Commission members, discussions, and recommendations.

Legislative Context

- The Maryland General Assembly has set the following expectations:
 - The Maryland General Assembly passed HB 660 in Spring 2022.
 - HB 660 requires that a “Commission to Study the Division of Rehabilitation Services” be established.
 - The new Commission is to meet at least 5 times and discuss a set of 10 different topics.
 - After the Commission evaluates and makes recommendation on each topic, the Commission is to submit a report to the General Assembly and Governor.
 - An interim report is due by December 15, 2022.
 - The final report is due by March 15, 2023.

Required Topics for Discussion for the Commission

1. Methods for improving stakeholder input on the Division of Rehabilitation Services' programs and services
2. Methods for improving the relationship and communication between transition professionals working at the Division of Rehabilitation Services and the Developmental Disabilities Administration
3. Methods for improving the amount of time it takes to provide vocational rehabilitation and transitional services
4. Methods for improving public-private partnerships to assist more Division of Rehabilitation Services' clients
5. Methods for improving accountability and transparency of the Division of Rehabilitation Services' programs and services
6. Whether the eligibility criteria for the Division of Rehabilitation Services' programs and services should be altered
7. Whether the Division of Rehabilitation Services should continue to be a division of the State Department of Education or should be transferred to another State agency
8. If the Commission determines that the Division of Rehabilitation Services should continue to be a division of the State Department of Education, whether the Division of Rehabilitation Services should have a governing board separate from the State Board of Education
9. Whether there are specific budgetary requests that could support the job training programs provided by the Division of Rehabilitation Services
10. Any other improvements to the Division of Rehabilitation Services' programs and services the Commission considers appropriate

Today's Focus Topics

3. Methods for improving the amount of time it takes to provide vocational and transitional services.
5. Methods for improving the accountability and transparency of the Division of Rehabilitation Services programs and services.

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1. Overview of Commission Responsibilities
 2. **Accountability and Transparency of DORS Programs and Services (Topic #5)**
 3. Time To Provide VR Services (Topic # 3)
 4. Review and Discussion of Draft Commission Interim Recommendations

Accountability and Transparency of DORS Programs and Services (Topic #5)

Accountability and transparency of the programs and services that the Division of Rehabilitation Services provides are important to improving the performance of the vocational rehabilitation program.

DORS Accountability

- DORS reports on a **quarterly basis** to the Rehabilitation Services Administration (RSA) on all clients and the activity that occurred for the quarter. DORS data is then compiled into an annual report that is posted on the RSA website.
- DORS reports on a **quarterly basis** to the Maryland State Rehabilitation Council on DORS quarterly performance, which includes the results of the consumer satisfaction survey. Every Rehabilitation Council meeting allows time for public comments and input.
- DORS is subject to **single state audit**, which audits various aspects of DORS' two major programs. In the most recent audit, **there were no major findings**
- DORS is subject to **Office of Legislative Audits (OLA)** every three years. OLA audits various aspects of the VR program. The most recent OLA audit **had no major audit findings**.
- DORS is subject to monitoring reviews by RSA who reviews all aspects of the DORS program. **There were no financial findings and only policy update recommendations from the last RSA monitoring review.**

DORS Transparency

- **All audit** and monitoring reports are public documents, thus available to the public.
- DORS, as with all State agencies, provides information concerning agency performance with the Governor's Office and the General Assembly under the **Managing for Results requirements**.
- Comprehensive Statewide Needs Assessment is posted on the DORS website.
- DORS holds **annual public meetings** to allow for the public to hear about programs and services offered through DORS and to provide input into those services.
- DORS **meets three times a year** with the Community Rehabilitation Provider Advisory Committee, which is open to all providers to attend to learn what is happening within DORS and to discuss issues with the leadership of DORS.
- DORS staff attend numerous transitioning fairs, job fairs, and conferences around the State to discuss DORS services.

DORS Accountability and Transparency: Current and Future Initiatives

- DORS is posting on its website the results of its quarterly consumer satisfaction survey results. In 2022, DORS consumers rated DORS services or programs either **satisfactory or neutral 83% of the time.**
- DORS is working with San Diego State University on a data analytic tool which will enable DORS to analyze data from the last five years and identify trends of **services that are provided and the outcomes that were produced.** This will include **data presented by disability, race, and gender, both statewide and by county.**
- DORS is partnering with Parents Place on listening sessions with parents, including those in the Hispanic/Latino community. **DORS will be sharing the recommendations with the State Rehabilitation Council.**

What recommendations should DORS consider to increase accountability and transparency?



Time to Provide VR Services (Topic # 3)

1. Overview of Commission Responsibilities
2. Accountability and Transparency of DORS Programs and Services (Topic #5)
3. **Time To Provide VR Services (Topic # 3)**
4. Review and Discussion of Draft Commission Interim Recommendations

How is DORS ensuring that it provides vocational rehabilitation and transitional services as soon as possible?

Referrals, Applications, and Services

- **Number of referral cases** handled by DORS between January 1, 2022 and November 29, 2022:
 - DORS received **8,718 VR referrals**.
 - **Only 4,562 referrals (52%) resulted in an application.**
 - DORS received **3,919 Pre-ETS referrals**.
 - **Only 1,520 referrals (39%) moved forward for services.**
- **Reasons for drop off** between referrals and applications:
 - **Lack of family support** to assist with following through on the necessary documentation.
 - **Not connected to a community provider** who can either provide the information or assist the individual in following up on obtaining the necessary documentation.
 - **No interest in pursuing VR or Pre-ETS services.**
 - **Inaccurate** information entered into the online referral form, which results in application package not being received.
 - **Duplicate** referrals being sent.

Timeline to Provide VR Services

- **Federal requirements** to provide VR services:
 - A VR agency has **60 days** to make an **eligibility decision** once an application has been received.
 - In FY 22, **DORS** is making an eligibility decision in **37 days** on average.
 - **96.1%** of all VR eligibility decisions are made within 60 days. The national average is 94.6%.
 - A VR agency has **90 days** to develop an **Individual Plan for Employment**, once determined eligible for services.
 - In FY 22, **DORS** counselors are developing a Plan in **66 days** on average.
 - **94.3%** of all Plan developments are completed within 90 days. The national average is 95.5%.
- During FY22, DORS had between **38 to 43 VR counselor and supervisor vacancies**.

Factors That Can Influence Time To Service (1 of 5)

One factor is the **availability of current medical documentation** in order to make the correct eligibility decision.

- **Example:** The Behavioral Health Administration (BHA) provides specific DORS counselors **access into their case management system to pull current medical information for individuals** who have been referred by a BHA provider.
 - With the proper documentation, it takes an average of **23 days to make an eligibility decision and 31 days to move that individual into an Individual Plan for Employment.**
- If an individual who has applied for VR services and **does not** have any medical documentation, then **DORS will need to obtain a medical assessment before making an eligibility determination.**
 - Without the proper documentation, it takes an average of **51 days for DORS to make that eligibility determination and 63 days to move that individual into an Individual Plan for Employment.**

Factors That Can Influence Time To Service (2 of 5)

DORS staff caseloads:

- **Nationally**, the average caseload size for a **VR counselor** is between **85 to 100 cases**.
 - **North Carolina VR** is recruiting new counselors to manage an average caseload of **60**.
- Currently the **average active caseload size for a VR Counselor in Maryland** is **137**, even when **fully staffed**.
 - **If the delayed cases are added**, the caseload size would grow to be **150**.
 - This ranges between **37% to 61% higher than most VR agencies** across the nation.
- To meet the **national** average caseload size of 85-100 cases per counselor, **DORS would need to add at least 60 new counselor positions (State PINs)** to support this workload level.
- To meet **North Carolina's** average caseload of 60 cases per counselor, **DORS would need to add at least 188 new counselor positions (State PINs)** to support this workload level.

Factors That Can Influence Time To Service (3 of 5)

Estimated cost for DORS to serve individuals with a Significant or Most Significant disability:

• 60 counselors' salaries and benefits	\$4,800,000
• 14 positions to expand community services	<u>\$1,577,000</u>
Total	\$6,377,000

Factors That Can Influence Time To Service (4 of 5)

- **Individual circumstances:**
 - **Lack of family support** to assist with following through on the necessary documentation.
 - **Not connected to a community provider** who can either provide the information or assist the individual in following up on obtaining the necessary documentation.
- **Mailing of documents:**
 - The movement of paper documents back and forth between DORS and the individual can add up to **two weeks or more to the overall process.**

Factors That Can Influence Time To Service (5 of 5)

Provider circumstances:

- **Providers have created a waitlist** to provide services for DORS consumers.
 - Providers are **short staffed**.
 - Some providers are **providing limited in-person services**, thus limiting the number of individuals that they can serve at a given time.
- Between the period of July 1 and September 30, 2022, **DORS has issued 2,965 authorizations to providers and vendors** for Vocational and Pre-Employment Transitioning Services. As of 12/7/2022, **1,797 of those authorizations have no documentation that services have been provided yet.**

Improvements DORS Has Made (1 of 3)

- **Prior to December 2020, all referrals were on paper.** A secretary would manually enter the referral information into the case management system.
 - **Referrals often took weeks** to enter the information due to workloads and to mail the application package to the individual.
- **In December 2020, DORS moved to an all-online referral form** that automatically interfaces with the case management system. The application package is **mailed to individuals within two business days.**
- **On July 1, 2022, the starting salaries went from \$42,035 to \$54,665.**
 - **Existing VR Counselors and Supervisors received a 2 grade and 4 step increase**, which increased their salary approximately 20% and an additional 4.5% increase starting November 1, 2022.
- In July 2022, DORS had a total of 56 vacancies with 13 pending hires in the VR program. As of November 30, 2022, DORS has a 33 vacancies and 10 pending hires. Of the 33 vacancies only 7 are VR counselor positions.

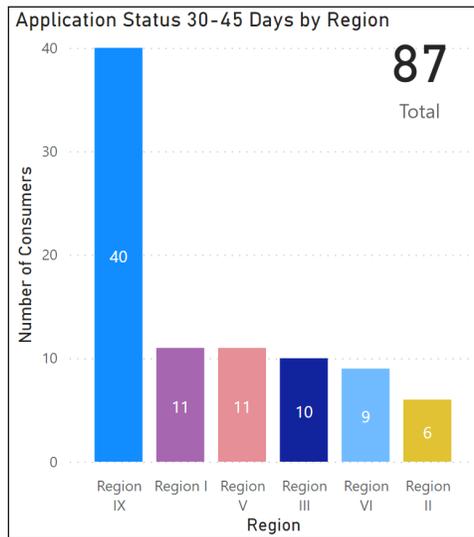
Improvements DORS Has Made (2 of 3)

- On February 1, 2022, DORS implemented its new Eligibility Determination Unit (EDU). The EDU focuses solely on determining eligibility for VR services or determining whether a student with a disability qualifies for Pre-ETS.
- Partnership with the Center on Transitioning and Career Innovation to assist the EDU by handling the delegable workload for Pre-Employment Transitioning Services. This partnership will help with connecting with students and families quicker. Most recent data from the start of the partnership is showing that 55% of the Pre-ETS referrals have submitted the necessary documentation for services compared to 39% at the start.

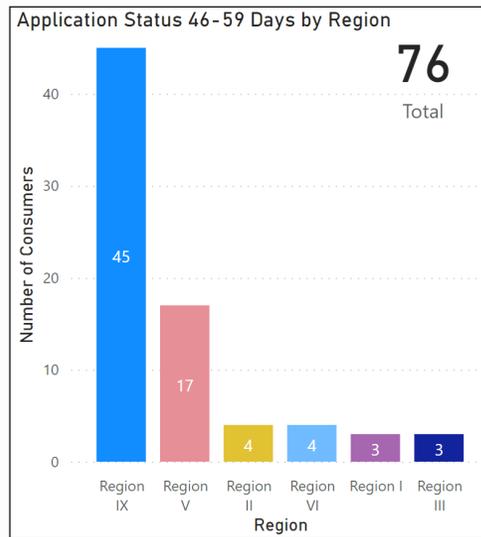
Improvements DORS Has Made (3 of 3)

DORS uses Power BI to visualize data to help supervisors and managers track a case's progress through each stage in the process and ensure compliance with Federal time requirements.

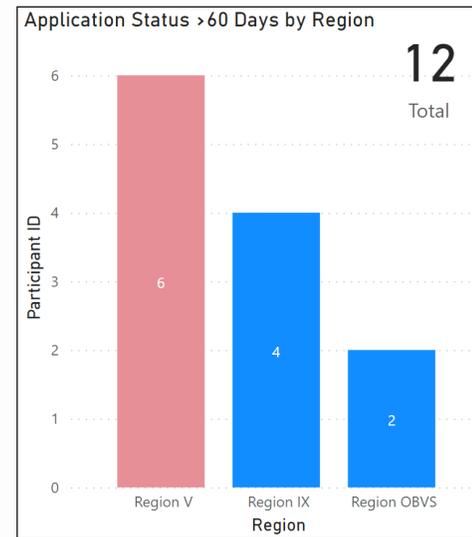
Application Status Report



Region	Totals
Region I	11
Region II	6
Region III	10
Region IX	40
Region V	11
Region VI	9
Total	87



Region	Totals
Region I	3
Region II	4
Region III	3
Region IX	45
Region V	17
Region VI	4
Total	76



Region	Totals
Region IX	4
Region OBVS	2
Region V	6
Total	12

DORS Current and Future Improvements

- **Electronic signature**: Beginning on October 26, 2022, the **EDU will begin rolling out the use of the Citrix electronic signature package**. This will be followed by the **Office of Blindness and Vision Services, then selected Field Services Offices**.
 - This will **reduce the amount of time of having to mail documents for client signatures**.
- **Emailing of client VR application package**: The applicant will receive the application directly and then will **submit their paperwork through a secure portal**. This includes a notification about the DORS/CTCI partnership.
 - This will **eliminate the delay caused by having to mail information**. DORS is looking to start this in January 2023.
- **Two way-directional texting**: A new texting communication system to **provide individuals with follow-ups and reminders about upcoming events involving their cases**.
 - The procurement is **nearing completion** with the expectation that this will go to the Board of Public Works in January 2023. **Testing and first stage implementation** is expected by July/August 2023.

What additional strategies and resources are needed to reduce the time needed to provide vocational rehabilitation and transitional services to meet Federal requirements and reduce consumer waiting time for planned services?



Review Of Draft Commission Interim Recommendations

1. Overview of Commission Responsibilities
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Discussion and feedback on the draft recommendations to be included in the interim Commission report.



Commission Topic: #1

How does DORS ensure stakeholder input for programs and services?

Topic #1: Methods Of Improving Stakeholder Input

Draft Recommendations:

- DORS is a member of the Developmental Disability Council, as such, DORS and the DD Council can partner to provide information to the DD community and the underserved populations of the State about DORS services and programs.
- Utilize various existing organizations, such as, the State Agencies Transitioning Collaborative, the Maryland Department of Disabilities' Listserv, or Parent's Place of Maryland to disseminate information to partner organizations, parents, and students.
- Dissemination of transitioning information through the Local Education Agencies (LEA) Transition Coordinators.
- Two-way communication at the LEA level about services that are being provided by DORS.
- In the DORS online referral form, embed a survey link to obtain additional information from individuals' thoughts on completing the form.
- Have DORS do a plain language review of documents to assure that information being communicated is clear so that individuals have an understanding of what is being asked of them. Solicit stakeholder feedback from various organizations on the changes to the forms and documents.



**Commission
Topic: #2**

**How can the
Developmental Disabilities
Administration and
the Division of
Rehabilitation Services
improve their working
relationship?**

Review of Current Collaboration Efforts

- **DDA/DORS MOU**
 - Current MOU signed in 2018
- **Competitive Integrated Employment (CIE)**
 - Joint training of DDA and DORS staff to discuss CIE.
- **Flow of DDA and DORS funded services**
 - Established a funding path for DDA consumers to access DORS funding for employment.
- **DDA - Employment services to support the goal of CIE**
 - Established the specific services that will be supported by DDA to obtain CIE.
- **DORS - Employment services to support the goal of CIE**
 - The use of Pre-Employment Transitioning Services and VR trainings and supported services to obtain CIE.

Review of Opportunities for Improvement

- Increase DORS partnership with DDA-approved employment CRPs.
- Increase the number of referrals from DDA providers leading to an increase in the number of individuals who are employed in a competitive integrated environment.
- The submission of current documentation, such as medical, psychological, or school records, along with the Application may lead to an increase in expedited eligibilities by DORS, which then leads to a more rapid engagement with DORS.
- With the turnover in staff both at DDA and DORS, there is a need to increase joint training for staff.

How should DORS and DDA strengthen their working relationship?



**Commission
Topic: #4**

**How does DORS utilize
public-private
partnerships to assist
Division of Rehabilitation
Services' clients?**

Topic #4: Methods For Improving Public-Private Partnership

Draft Recommendations:

- Have **links to resources for employers and individuals.**
- Explore **partnerships** from across the State to **increase community-based services and training** provided by DORS, including those in the **non-traditional settings such as the arts, theater, or music.**
- Develop **partnerships between hospitals and universities** like Morgan State University and the University of Maryland Baltimore County have with St. Agnes Hospital to **increase opportunities in the medical field.**
- Spell out the process so **employers know about their ability to partner with DORS for training and employment opportunities.**



Commission Topic: #6

**Should the eligibility
criteria for the Division
of Rehabilitation
Services' programs and
services should be
altered?**

Topic #6: Whether Eligibility Criteria For Services Should Be Changed

The criteria to determine eligibility to receive Vocational Rehabilitation (VR) services is the same nationwide. The specific criterion for eligibility is spelled out in federal regulations, 34 CFR 361.42. As such, DORS nor the State has the authority to change the criteria used to determine eligibility for individuals who apply for VR services.



Commission Topic: #9

**How should Maryland
be investing to better
support DORS job
training programs?**

Topic #9: Specific Budgetary Requests

Draft Recommendations

- Maryland should ensure that **DORS** is provided sufficient **State funding** in order to **meet the federal VR grant Match requirements** each year.
 - **Statutory language should be introduced** to require the State to provide the necessary **21.3% Match and any additional funding that if needed** to meet Maintenance of Effort requirements.



**Commission
Topic: #10**

**Should DORS criteria
for Order of Selection
be changed?**

Review of the Five Categories

Washington State has five categories in its Order of Selection

Significance Level	Meet Definition of Significantly Disabled	Categories of Functional	Duration of Services	Number of Services
Category 1	Yes	4 or more	Requires VR Services over an extended period of time	Requires multiple services
Category 2	Yes	3	Requires VR Services over an extended period of time	Requires multiple services
Category 3	Yes	2	Requires VR Services over an extended period of time	Requires multiple services
Category 4	Yes	1	Requires VR Services over an extended period of time	Requires multiple services
Category 5	No	1 or more	No Extended duration of VR Services	Multiple Services not required

Review of the Four Categories

Five states have Order of Selection systems with 4 categories.

Significance Level	Meet Definition of Significantly Disabled	Categories of Functional	Duration of Services	Number of Services
Category 1	Yes	Category 1 - Eligible individuals with the most significant disabilities that have limitations in three (3) or more major areas of functional limitations.	Requires VR Services over an extended period of time	Requires multiple services
Category 2	Yes	Eligible individuals with significant disabilities that have limitations in two (2) major areas of functional limitations.	Requires VR Services over an extended period of time	Requires multiple services
Category 3	Yes	Eligible individuals with significant disabilities that have limitations in one (1) major area of functional limitations	Requires VR Services over an extended period of time	Requires multiple services
Category 4	No	Non-significant disability	No Extended duration of VR Services	Multiple Services not required

Review of Maryland's Order of Selection (1 of 3)

- **Category 1 – Most Significant**

- An individual with a **"most significant" disability** is an individual who is available and willing to participate in the DORS Vocational Rehabilitation program, meets the definition of significant disability, and has a disability which seriously affects three or more functional capacities.

- **Example:**

- Consumer has a diagnosis of Bipolar Disorder, Personality Disorder, and recovering substance abuse. Consumer reports that due to her depression she stays in bed days on end at times, and she also reports past hospitalizations for her mental illness (Interpersonal Skills). Consumer stated she resides with her fiancé who supports her financially and he also helps her with daily living tasks (Self Care). Consumer reports she has not worked in approximately 16 years (Limited Work Skills).

Review of Maryland's Order of Selection (2 of 3)

- **Category 2 – Significant**
 - An individual with a **“significant” disability** is an individual who is available and willing to participate in the DORS Vocational Rehabilitation program and meets the definition of significant disability; has a disability which seriously affect one or more functional capacities.
- **Example**
 - Consumer has progressively lost her hearing. Consumer provided a recent hearing evaluation and hearing aid recommendation. She communicates verbally and does not know sign language. Consumer is requesting services for DORS to assist with hearing aids so that she can use them as an accommodation on the job.

Review of Maryland's Order of Selection (3 of 3)

- **Category 3- Non-Severe**

- An individual with a “**Non-Severe**” disability is an individual who is available and willing to participate in the DORS Vocational Rehabilitation program who has been determined eligible for VR services but has not been determined to have a significant or most significant disability.

- **Examples**

- Sam's medical documentation points to low back pain controlled with rest and ibuprofen. No other disability information or functional limitation provided.
- Jeff is a 17-year-old student who has a 9th grade reading and math level. Documentation of ADHD but no meds or counseling.

Topic #10: Other improvements for DORS services and programs

Draft Recommendations:

- For the DORS waitlist, **create an understanding within the disability community that the VR program is for individuals who are seeking employment in a competitive integrated setting.**

Upcoming Meetings

- Time will be 1:00 pm to 3:30 pm
- Monday, January 23, 2023 - Commission Topic # 7
- Monday, February 13, 2023 - Commission Topic #8
- Monday, March 6, 2023 - Review of final recommendations