## BY THE U.S. GENERAL ACCOUNTING OFFICE

## Report To The Secretary Of Health, Education, And Welfare

## Better Reevaluations Of Handicapped Persons In Sheltered Workshops Could Increase Their Opportunities For Competitive Employment

In enacting the Rehabilitation Act of 1973, the Congress was concerned that handicapped persons placed in sheltered workshops remained there too long and did not receive enough assistance in obtaining competitive employment. To resolve these concerns, the act requires that State vocational rehabilitation agencies periodically reevaluate the potential of these persons and try to place them in competitive employment or training, whenever possible.

In 1977, as many as 11,400 persons-about 42 percent of those requiring reevaluations-were not reevaluated. In addition, most of the reevaluations GAO reviewed in two States did not cover important aspects of the handicapped persons' competive employment potenial.

The Rehabilitation Services Administration should clearly define responsibility for program leadership, guidance, and monitoring State efforts, so that reevaluations will provide better opportunities for competitive employment as the Congress intended.



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United States General Accounting Office Washington, DC 20548

Human Resourcés Division

B-197054

The Honorable Patricia Roberts Harris
The Secretary of Health, Education Accordance
and Welfare
AGC00623

Dear Mrs. Harris:

This report contains the results of our review of the Rehabilitation Services Administration's (RSA's) management of annual reevaluations of handicapped persons placed in sheltered employment to determine their potential for competitive employment, as required by title I of the Rehabilitation Act of 1973. The report discusses the need for more concerted efforts by RSA and some States to assure that annual reevaluations are made and are comprehensive so that handicapped persons are given the employment opportunities the Congress intended.

We discussed the report with RSA officials and considered their comments in the report's preparation. This report contains recommendations to you on page 29. As you know, section 236 of the Legislative Reorganization Act of 1970 requires the head of a Federal agency to submit a written statement on actions taken on our recommendations to the Senate Committee on Governmental Affairs and the House Committee on Government Operations not later than 60 days after the date of the report and to the House and Senate Committees on Appropriations with the agency's first request for appropriations made more than 60 days after the date of the report.

We are furnishing copies of this report to the four Committees mentioned above and to other interested Committees and Subcommittees. Copies are also being sent to the Assistant Secretary for Human Development Services; the Commissioner of RSA; your Inspector General; and the Director, Office of Management and Budget.

Sincerely yours,

Tregory J. JAhart

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GENERAL ACCOUNTING OFFICE REPORT TO THE SECRETARY OF HEALTH, EDUCATION, AND WELFARE BETTER REEVALUATIONS
OF HANDICAPPED PERSONS
IN SHELTERED WORKSHOPS
COULD INCREASE THEIR
OPPORTUNITIES FOR
COMPETITIVE EMPLOYMENT

#### DIGEST

With better management oversight, the Rehabilitation Services Administration (RSA) and some States can be more effective in providing maximum competitive employment opportunities for handicapped persons in sheltered workshops. Annual reevaluations of these persons, as required by the Rehabilitation Act of 1973, will help determine their potential, but RSA and the States need to do more to make sure this is carried out. (See pp. 3 and 5.)

GAO estimates that as many as 11,400 handicapped persons were not reevaluated in 1977. In addition, many reevaluations were not comprehensive, and others were not performed annually as required by Department of Health, Education, and Welfare (HEW) regulations. (See pp. 10, 11, and 19.)

GAO noted the following conditions:

- --RSA has not clearly established headquarters' responsibility for management oversight of reevaluations and has not adequately instructed its regional offices for assisting States in developing their reevaluation process or for monitoring State's performance--this was evident in Regions V (Chicago) and VII (Kansas City). (See pp. 5 to 9.)
- --RSA was slow in providing States with instructions needed to implement re-evaluation. HEW published proposed regulations in May 1974 and final regulations in November 1975. However, RSA

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did not provide detailed guidelines until August 1976, nearly 3 years after the act was signed. (See pp. 5 and 6.)

- --Guidelines for reevaluation are not comprehensive. They provide that persons who are placed in sheltered employment and classified as rehabilitated by the State are to be reevaluated. As a result, States did not reevaluate persons who were classified as not rehabilitated. In addition, because the guidelines did not clearly define conditions for limited scope reevaluations, States were confused as to when and how reevaluations could be reduced in scope. (See pp. 5 and 6.)
- --States are required to report the total number of reevaluations made, but not the number of persons subject to reevaluation. Therefore, RSA was not able to determine whether the States were making all the required reevaluations. (See p. 6 and 7.)
- --RSA did not follow up on States that were not reporting reevaluations and did not use data on the relative performance of the States to identify successful programs or those in need of assistance. (See p. 7.)

GAO analyzed national data on sheltered employment procedures and implementing instructions for reevaluations, and the reevaluations themselves. GAO found that:

- --Some States excluded persons from reevaluation because they were placed in sheltered employment before reevaluations began. (See pp. 11 to 14.)
- --Five States in RSA Regions V and VII do not classify persons in a work activities center (a sheltered workshop program) as rehabilitated and, thus, these persons are not reevaluated. (See pp. 14 and 15.)

#### GAO also found that:

- --Only 4 of 89 reevaluations completed by Illinois and Missouri met headquarters criteria for determining the competitive employment potential of the handicapped person. (See pp. 19 to 22.)
- --Although reevaluations are to be made at least annually, 20 (about 26 percent) were completed from 4 to 30 months late. In addition, 38 persons had been in sheltered employment 2 or more years, but 27 of them received only one reevaluation. (See pp. 22 to 25.)

Even with an improved reevaluation process, many handicapped persons may remain in sheltered employment for reasons beyond the control of State vocational rehabilitation agencies. However, these should not be considered permanent conditions. We live in a changing environment—the application of the right counseling technique, the opening of new jobs, the expansion of public transportation, and changing laws may make competitive employment more available and desirable for handicapped persons in sheltered employment. (See pp. 26 and 27.)

### RECOMMENDATIONS TO THE SECRETARY OF HEW

Because many handicapped persons in sheltered employment have not received adequate reevaluations of their capabilities for competitive employment, the Secretary of HEW should direct the Commissioner of RSA to:

--Clarify headquarters responsibility for managing the reevaluation program and provide regional offices the guidance needed to assist States.

- --Revise guidelines to require that reevaluations be performed for all former vocational rehabilitation clients in sheltered employment, including persons placed in work activities centers but not classified as rehabilitated by the State agency.
- --Revise guidelines to clearly establish that reevaluations should be continued so long as the handicapped persons remain in sheltered employment, and provide additional guidance to States regarding the conditions under which limited scope reevaluation may be warranted.
- --Require the States to develop and report the number of persons requiring reevaluation.
- --Review and test State reports to learn whether they are reliable, why some States are more successful in achieving movement to competitive employment, and to learn how reevaluation aided the movement; and determine why some States are not reporting reevaluations.
- --Monitor State procedures and provide assistance to assure that annual re-evaluations are made and that they are comprehensive and timely.
- --Identify States which did not reevaluate clients placed in sheltered employment before reevaluation procedures were implemented and require that any such persons still in sheltered employment be reevaluated.

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	ABBREVIATIONS	
GAO	General Accounting Office	
HEW	Department of Health, Education, and Welfare	
RSA	Rehabilitation Services Administration	

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#### CHAPTER 1

#### INTRODUCTION

The vocational rehabilitation program was established by the Smith-Fess Act, June 2, 1920 (41 Stat. 735), to prepare handicapped individuals for gainful employment. The program initially offered limited services for the physically handicapped. However, later laws expanded the program to provide comprehensive services to handicapped persons, including the mentally disabled.

On September 26, 1973, the Rehabilitation Act of 1973 (29 U.S.C. 701) was signed into law. The act mandated that special emphasis be placed on serving the severely handicapped. Before services can be provided the person must have a physical or mental disability which imposes a substantial handicap to employment. Also, there must be a reasonable expectation that rehabilitative services will enable the person to engage in a gainful occupation.

#### ADMINISTRATION AND FUNDING

The vocational rehabilitation program has historically operated as a Federal-State program. The Federal role is one of leadership and funding, while the States administer the program and share the funding.

The Rehabilitation Services Administration (RSA), 1/within the Office of Human Development Services, Department of Health, Education, and Welfare (HEW), directs the program at the Federal level. RSA provides leadership to the States in planning, developing, and coordinating their programs, and evaluates State performance. Each State must submit a plan for providing vocational rehabilitation services for RSA approval. The State agency and its field offices are responsible for providing or arranging for all services and assistance to the handicapped under this program.

The Federal share of costs is 80 percent for most aspects of the program and is apportioned among the States on the basis of population and per capita income. For fiscal year 1978, State and Federal costs for basic support services amounted to about \$1 billion.

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<sup>1/</sup>RSA will be transferred to the new Department of Education, authorized by Public Law 96-88 signed on October 17, 1979.

State vocational rehabilitation agencies—those specializing in services for the blind and general agencies serving all handicapped persons—reported the successful rehabili tation of 291,728 persons for fiscal year 1978 in the following employment categories.

Open labor market	225,358
Self-employment	8,099
State-managed vending stands	573
Homemaker	41,518
Unpaid family worker	2,735
Extended employment in	
sheltered workshops	13,445

The Fair Labor Standards Act (29 U.S.C. 214), administered by the Department of Labor, permits sheltered workshops to employ persons whose earnings or productive capacity is impaired by age, physical deficiency, or injury, at less than the applicable minimum wage. About 143,000 handicapped workers were in extended employment in 3,431 workshops nationwide in 1978.

In a sheltered workshop study, published in 1979, Labor defined extended employment as long-term employment in the workshop for persons whose functional limitations or handicapping conditions make employment outside the workshop an unrealistic goal, or the person needs extended work conditioning in preparation for nonsheltered competitive employment. Greater emphasis is usually placed on wage earning and less on training for severely handicapped persons in extended employment.

Two types of sheltered workshop programs--regular programs and work activities centers--provide extended employment for handicapped persons. Persons in the regular workshop program (where there is greater emphasis on productivity) are generally less handicapped and receive higher wages.

Movement of people from the workshop into competitive employment is usually more dependent on community job opportunities, efforts to develop and/or identify job opportunities, and readiness of the handicapped person rather than on the type of workshop employment provided.

The term "sheltered employment" in this report refers to handicapped persons in extended employment in either of the sheltered workshop programs.

## PERIODIC REEVALUATION OF PERSONS IN EXTENDED EMPLOYMENT IS REQUIRED

State vocational rehabilitation agencies place clients that they consider incapable of normal competitive employment in extended employment in sheltered workshops. Most are severely handicapped, and many are mentally retarded. The handicapped persons are placed in sheltered employment after receiving vocational rehabilitation services, such as evaluation, training, counseling, and medical services.

To assure that these former vocational rehabilitation clients do not remain in sheltered employment longer than necessary, the Rehabilitation Act of 1973 requires that their potential for competitive employment be periodically reevaluated. The act requires that each State provide for (1) periodic review and reevaluation of the status of handicapped individuals placed in extended employment in sheltered workshops to determine the feasibility of their employment, or training for employment, in the competitive labor market and (2) maximum efforts to place them in employment or training whenever feasible.

The Senate Committee on Labor and Public Welfare (now named Committee on Labor and Human Resources) said in Senate Report No. 93-318 dated July 16, 1973, that:

"The State plan must provide for a periodic review of all those individuals who have been placed in extended employment in rehabilitation facilities, especially sheltered workshops, with the aim to remove them from this type of employment and move them into the competitive labor market as quickly as possible. It is the Committee's position that the sheltered workshop is an acceptable place for transitional employment for handicapped individ-But overwhelming testimony in the hearings suggested that \* \* \* too many individuals are placed in workshops in a 'terminal' employment situation. The Committee suggests that this is not a wise course to follow in rehabilitation. There is a substantial body of testimony that far too many States overuse the workshop as a substitute for employment and not enough effort is made to run a vigorous employment placement program. \* \* \* \*

To implement these provisions of the 1973 act, HEW published proposed regulations in May 1974 and issued final regulations in November 1975. RSA supplemented the regulations with program guidelines in August 1976. The regulations and guidelines require that State vocational rehabilitation agencies make reevaluations of persons in extended employment in sheltered workshops at least annually.

The scope of our review is in chapter 7.

#### CHAPTER 2

#### RSA MANAGEMENT OVERSIGHT HAS NOT

#### BEEN ADEQUATE TO ASSIST STATES IN

#### PERFORMING REEVALUATIONS

RSA headquarters and regional officials are responsible for leadership, guidance, and assistance to States in developing and evaluating their reevaluation efforts. RSA's management oversight of reevaluations has not been adequate, and RSA has not monitored States' implementation of reevaluations or assessed their performance. As a result RSA has not provided States with the necessary guidance and assistance for making effective reevaluations.

#### RSA'S MANAGEMENT OF REEVALUATIONS

RSA's Division of Facilities had not monitored States' implementation of their reevaluations, and RSA had not provided (1) specific guidance to regions on their responsibility for assisting States and evaluating their efforts and (2) adequate guidance to States. In addition, RSA has not developed adequate reporting requirements to monitor States' reevaluation programs and has not used reports from States to assist them in improving their programs.

#### Responsibility and guidance

The responsibility for providing leadership, guidance, and monitoring of reevaluations has not been clearly established within RSA. According to headquarters Division of Facilities' officials—who developed the guidelines for implementing reevaluations, published in August 1976—after a 1978 RSA reorganization, they did not know who was responsible for reevaluations. As a result, RSA regional officials were not given adequate instructions about their role in assisting States or monitoring their reevaluation performance. The Division of Resource Management's director agreed that there had been confusion about responsibility for reevaluations.

HEW, in implementing the reevaluations provisions of the act, published proposed rules in May 1974 and final regulations

in November 1975. The regulations provided that reevaluations of persons in sheltered employment be made at least annually. RSA, however, did not issue detailed guidance to the States until August 1976, nearly 3 years after the act was passed. The guidelines provided that only persons classified as rehabilitated by the State vocational rehabilitation agency should be reevaluated. Because many States do not classify persons in work activities centers as rehabilitated, these persons may not receive the benefits available through periodic reevaluation. The Department of Labor reported that there were 85,519 persons in work activities centers in 1976, and identified 20,000 (23 percent) of these persons as referrals from State vocational rehabilitation agencies.

In addition, the guidelines did not provide States with adequate data on when, and under what conditions reevaluations could be limited in scope. As a result, some States did not perform subsequent annual reevaluations, and vocational rehabilitation counselors told us that they did not understand whether reevaluations should be continued. (For further discussion, see pp. 23 to 25.)

## Review and analysis of reevaluation reports

RSA program guidelines require that each State report annually on how many reevaluations they made. The report is sent to RSA headquarters and regions and includes the number of persons

- --placed into competitive or self-employment,
- --maintained in the facility or workshop,
- --referred for additional vocational rehabilitation services,
- --placed into postemployment status, and
- --not available for review and reevaluation.

Although this report is the basis for RSA's monitoring of the reevaluation program, it does not include information needed to adequately assess the program. RSA has not used the reports to determine where the program could be improved. In addition, reports submitted by the two States we reviewed did not accurately show the results of the reevaluation program.

## Reports do not include enough information

RSA does not know whether States are making all required reevaluations because the annual report that States prepare does not include the number of reevaluations due. If the report's format is revised to include the total number of persons subject to reevaluation in each State, RSA would have an appropriate benchmark for measuring the number of reevaluations made.

## Reports not used to evaluate States' efforts

Our review of national statistics compiled by RSA's Division of Program Data and Analysis showed that 12 of 83 State agencies did not report any reevaluations for fiscal year 1978, although they had placed 1,139 persons in sheltered employment during fiscal year 1977. The reports also showed that among States reporting movement to competitive employment (or self-employment), the rate of movement varied from 0.5 percent (33 persons) in New York to 82 percent (216 persons) in New Hampshire. The national average was 7 percent (1,313 persons), and 17 State agencies reported that more than 15 percent had moved to competitive employment. Eleven general agencies and 19 agencies serving blind persons reported no placements into competitive employment. (For information on each State agency, see app. I, p. 33.)

#### Division officials told us that:

- --They reviewed the reports and had noted that some States were reporting no reevaluations.
- --They had noted that some States were reporting much greater success than others in moving persons to competitive employment.
- --This information had not been provided to the Division of Facilities for its use in evaluating the States' efforts or for assisting States with their reevaluations.

#### Reports contained inaccurate data

We reviewed the reports submitted by Illinois and Missouri and a sample of the case files supporting the data reported.

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The reports from these two States did not accurately show results of their reevaluations.

They reported that 55 and 28 persons, respectively, had moved from extended employment to competitive employment in fiscal year 1978. Reviewing 32 of these cases (18 in Illinois and 14 in Missouri) showed that 3 handicapped persons had been assisted by vocational rehabilitation counselors during the reevaluation process in finding competitive employment. Of the remaining 29 cases:

- --Nineteen had not been reevaluated because the handicapped person had begun competitive employment before the vocational rehabilitation counselor initiated the annual reevaluation. In 10 of these cases, the person had been in the workshop less than 1 year.
- --For seven persons, the case file did not support the placement in competitive employment. In five of these cases, there was evidence that the person had not moved to competitive employment.
- --One person was initially placed in competitive employment, rather than sheltered employment, and should not have been included in the report.
- --Two persons found competitive employment on their own about 1 year after the initial reevaluation.

## REGIONAL ASSISTANCE AND MONITORING OF STATE REEVALUATIONS

RSA staff in Regions V and VII had not adequately monitored the implementation of reevaluations by the 10 States in their regions, and they had provided little assistance to States in planning or developing reevaluations.

Regional staff told us they had responded to telephone inquiries from States about reevaluations and had discussed reevaluation requirements in meetings and general training sessions with State personnel. However, they had not monitored the reevaluation procedures or practices used by the 10 States in their region, although both States we reviewed had problems in identifying all persons to be reevaluated and in making comprehensive reevaluations. (See pp. 14 to 25.) In addition, 14 of the 16 State agencies we obtained information on had not included all former vocational rehabilitation clients in their reevaluations. (See p. 11.)

RSA's State Agency Management Review System, which is intended by RSA headquarters to be used by the regional staff to evaluate States' management of the vocational rehabilitation program, includes reevaluations as one item to be evaluated. However, the review system does not provide for detailed review of the reevaluation process, and officials in Regions V and VII said that analysis had not been made of the reevaluations in the 10 States in their regions.

#### CHAPTER 3

#### FORMER VOCATIONAL REHABILITATION

#### CLIENTS EXCLUDED FROM REEVALUATION

We estimate that nationally as many as 11,400 persons—about 42 percent of the persons requiring reevaluation—were not reevaluated in 1977. Persons were excluded from reevaluation because:

- --Some States did not reevaluate persons placed in sheltered employment before the State implemented a reevaluation process.
- --RSA guidelines excluded persons in work activities centers who were not classified as rehabilitated by the State rehabilitation agency.
- --State procedures were not adequate to assure that all persons needing reevaluation were reevaluated.

#### MANY PERSONS NOT REEVALUATED

RSA does not have data to show how many former vocational rehabilitation clients in sheltered employment should have been reevaluated but were not, so we estimated the number using data gathered in workshop studies for HEW and the Department of Labor.

Department of Labor statistics for fiscal year 1976 show that there were 145,016 persons in sheltered workshops; 22,210 were in evaluation and training programs, and 122,806 were in regular program workshops and work activities centers. The Department of Labor estimated, 1/ based on a random sample of 3,500 handicapped persons in sheltered workshops in 1976, that 39,078 had been referred by State rehabilitation agencies. (Regular program workshop referrals--19,025; work activities centers referrals--20,053.) In a study for the Secretary of HEW, published in July 1975, 2/ Greenleigh Associates reported

<sup>1/</sup>U.S. Department of Labor, "Sheltered Workshop Study," Volume II Study of Handicapped Clients in Sheltered Workshops, Washington, D.C., March 1979, Table 6, p. A-31; p. 71.

<sup>2/</sup>Greenleigh Associates, Inc., "The Role of the Sheltered Workshops in the Rehabilitation of the Severely Handicapped," Washington, D.C., July 1975, Volume II, p. 65.

that the annual turnover for clients in all workshops was 31 percent. Using these data for client tenure in the workshops, we estimate that 12,114 (31 percent of 39,078) persons would leave the workshop before a reevaluation was due. Thus, about 26,964 (39,078-12,114) persons referred by agencies should have been reevaluated in 1977.

State agencies reported that only 15,584 reevaluations were made in fiscal year 1977, or about 11,400 fewer than should have been done.

Part of the 11,400 reevaluations not reported may be due to 14 State agencies that did not report any reevaluations in 1977. Some of these States may have completed reevaluations, but may not have had a reporting system which would identify the number of reevaluations made.

## STATES EXCLUDED CLIENTS PLACED BEFORE THEY IMPLEMENTED REEVALUATIONS

Fourteen of the 16 State agencies we obtained reevaluation data on had not reevaluated all former clients placed in sheltered employment. One State agency did not provide us with data on whether it included all former clients, and one State agency said it reevaluated all former clients.

The Congress intended that all former clients placed in sheltered employment be reevaluated to determine their potential for competitive employment, or training for such employment. However, not until August 1976 did RSA guidance to States clearly specify that all former clients placed in sheltered employment and classified as rehabilitated by the State rehabilitation agency should be reevaluated. The guidelines require that:

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"All former clients of the State rehabilitation agency shall be contacted in person by the State agency to explain that a reevaluation will be conducted \* \* \*."

In addition, a December 1976 memorandum from the Commissioner of RSA to the Director of the Region IV Office of Rehabilitation Services stated:

"\* \* \* It is anticipated that over a reasonable time frame, such as by the October
1978 reporting period, all former clients,

regardless of when they were closed into sheltered employment will have been reviewed."

Although both the guidelines and the memorandum require reevaluation of all former clients, a Region V official told us in February 1979 that they had not interpreted the guidelines or the December 1976 memorandum to require reevaluation of all former clients. At the conclusion of our fieldwork in July 1979, he agreed, however, that all former clients should have been reevaluated.

A Region VII memorandum issued in November 1976 to State rehabilitation agencies in Region VII left reevaluation of persons placed before October 1975 to State agencies.

"Based on consultation with our central office, \* \* \*. In FY '77, State agencies must review the status of all clients who were placed in noncompetitive extended employment during the period October 1, 1975 to September 30, 1976. \* \* \* While the Act does not prescribe how far back a State agency should go back in its reviews, clearly underlying the Act is Congress' belief that there exists a backlog of clients who 'have been forgotten' or 'lost' in sheltered employment. Thus, State agencies must consider the intent of Congress in establishing a policy on this matter. We expect, though, that at the very least, State agencies will review the Status of all clients placed in sheltered employment during the period October 1, 1975 to September 30, 1976."

Vocational rehabilitation agencies in Missouri and Illinois used different methods to identify the universe of persons to be reevaluated. In the autumn of 1975, Missouri general agency officials attempted to identify all former clients in the workshops before implementing reevaluations. The agency obtained from the State's Section of Sheltered Workshops a list of persons which the agency had certified for placement in the workshops since July 1974 and used it to implement the reevaluation process in January 1976.

However, agency officials estimated that 10 percent of about 2,600 people in the workshops in July 1974 were certified for placement in the workshops by their agency. The others

had been referred by other agencies before July 1974 when the Division of Vocational Rehabilitation became the only State agency authorized to certify persons for placement in the State's workshop program.

Procedures implemented by the Missouri Division of Vocational Rehabilitation did not require that persons placed in sheltered employment before July 1974 be reevaluated. We estimate that, of the 2,600 persons in sheltered employment in July 1974, about 260 (10 percent) were excluded from reevaluation.

The Illinois Department of Vocational Rehabilitation did not attempt to identify all former clients in the workshops as of a given date. Department instructions issued in August and September 1975 implementing reevaluations did not specifically require reevaluation of persons placed in extended employment before September 1975. According to an agency official, the decision to reevaluate such persons was left to field supervisors and counselors. About 1,100 persons were placed in sheltered employment in Illinois workshops for the 3-year period ended in June 1974. It seems likely that many who were in the workshops as of October 1979 have not been reevaluated. Out of 15 Illinois sample cases of persons placed in sheltered employment between July 1974 and August 1975 that we reviewed, 10 had not been reevaluated.

We requested RSA officials in Regions V and VII to ascertain from State vocational rehabilitation agencies the dates used for initiating reevaluation of their former clients. Persons placed in sheltered employment before the following dates were excluded from reevaluations.

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#### General agencies

<u>State</u>	<u>Date</u>	
Missouri	July 1974	
Nebraska	July 1974	
Iowa	January 1975	
Kansas	January 1975	
Michigan	January 1975	
Illinois	August 1975	
Indiana	November 1975	
Minnesota	October 1976	
Wisconsin	January 1977	

#### Separate agency for blind persons

IowaJune 1973NebraskaJuly 1976KansasOctober 1976MissouriOctober 1976

Dates are not shown for Ohio, which had not established procedures for reevaluation when we completed our fieldwork; for the Michigan agency serving the blind, which could not provide a date; or for the Minnesota agency serving the blind because their procedures required reevaluation of all former clients.

## RSA GUIDELINES EXCLUDED PERSONS IN SHELTERED EMPLOYMENT IN WORK ACTIVITIES CENTERS CLASSIFIED AS NOT REHABILITATED

RSA's August 1976 guidelines limited the requirement for reevaluation of handicapped persons placed in sheltered employment to persons who were classified by the State agency as successfully rehabilitated. However, some State agencies classify many persons placed in sheltered employment in work activities centers as not rehabilitated. As a result, these persons are denied the opportunity for reevaluation and consideration for competitive employment required by the act.

Work activities centers have been defined by the Fair Labor Standards Act as providing therapeutic activities for the more severely handicapped persons whose productive capacity is "inconsequential." However, rehabilitation officials from both States told us that many of these persons have much more than an "inconsequential" productive capacity. This seems to be supported by a Labor study published in 1979, which shows that about 7 percent of the 109,000 persons in work activities centers--20,000 of whom are former vocational rehabilitation clients--had been placed in competitive employment. In a September 1979 discussion draft, 1/ HEW observed that the definition of work activities should be revised to recognize the contemporary model of work activities centers in which productivity is the focus, but training and other services are usually provided.

<sup>1/&</sup>quot;Discussion Draft - Current Issues, Policy Problems, and Action Considerations: Training and Employment Services for Handicapped Individuals in Community Sheltered Workshops," September 1979.

Officials from RSA Regions V and VII told us that the State agencies in these regions varied as to the classification of persons placed in work activities centers. Some considered these persons as rehabilitated and others did not, as follows:

## Rehabilitation Status of Persons Placed in Work Activities Centers by State Rehabilitation Agencies

# Rehabilitated Iowa Minnesota a/Missouri Allinois Kansas Allinois Indiana Kansas Michigan Ohio Wisconsin

<u>a</u>/Agencies serving blind persons in these two States do not classify persons placed in work activities centers as rehabilitated.

We asked Illinois State agency officials how many persons they had placed in work activities centers, but they were not able to provide us with an estimate. They told us that they are considering classifying persons in work activities centers as rehabilitated and reevaluating them.

## PROCEDURES NOT ADEQUATE TO ASSURE THAT ALL PERSONS REQUIRING REEVALUATION ARE REEVALUATED

Because procedures were not adequate to show whether all required reevaluations were being made, some former clients might have been excluded from reevaluation. Initial State agency procedures implemented for reevaluations in Illinois and Missouri did not provide for establishing a central record of persons subject to reevaluation and/or a record of whether they had been reevaluated. In these States the case files of 35 persons who we reviewed were not reevaluated to determine their potential for competitive employment.

Of the 169 cases we reviewed in the two States, 111 required reevaluation--49 in Illinois and 62 in Missouri. (See app. II and III, pp. 34 to 36.) However, there was no reevaluation of 23 persons in Missouri and 12 in Illinois. Ten

of the Illinois cases not reevaluated were closed before August 1975, when Illinois implemented its reevaluation procedures. We asked four counselors and two supervisors why reevaluations had not been made in 11 of the 35 cases. In six cases the counselors or supervisors provided us with no explanation as to why a reevaluation had not been made. In the remaining five cases they told us they did not know a reevaluation was required.

To determine whether all persons requiring reevaluation were being identified by the Missouri vocational rehabilitation agency, we compared records maintained by the State Section of Sheltered Workshops with State vocational rehabilitation agency records. Comparison of these records for four Missouri workshops employing about 330 persons showed that 8 persons who had been in the workshop from 1-1/2 to 4 years had not been identified for reevaluation by the State vocational rehabilitation agency.

The State agency improperly recorded four of the eight persons as placed in competitive employment because of either counselor or clerical error. No State agency record existed for the four other persons, and a State agency official told us he believed that the counselor did not include them in his active caseload when they were certified for placement in the workshop. We discussed this with responsible State agency officials who took action to schedule all eight persons for reevaluation.

Officials from the State Section of Sheltered Workshops and from the State rehabilitation agency told us that they are establishing controls to ensure that vocational rehabilitation counselors do not certify persons for placement in a sheltered workshop without establishing a case record. Moreover, the State vocational rehabilitation agency and State workshop program officials told us that they will establish procedures for the workshop program to periodically report to the State agency those former vocational rehabilitation clients in the workshops, so that all are identified for reevaluation.

The above comparison also showed that eight other persons had been referred to the four workshops by individuals

or agencies other than the vocational rehabilitation agency. 1/ There is no tabulation to show how many other such persons may be included in the 4,000 people in the State's sheltered workshop program. However, a new procedure established during our review under the State's sheltered workshop program may help to assure that all persons in the workshops—not just former vocational rehabilitation clients—have an opportunity for reevaluation.

Under this new procedure, the potential for competitive employment of all workers who have earned \$750 or more for 2 consecutive quarters are evaluated. If the evaluation indicates potential, the person is referred to the State vocational rehabilitation agency for possible services and placement. Workshop officials recently reevaluated about 50 persons using this new procedure. They estimated that 12 to 14 of these handicapped persons will be referred back to the vocational rehabilitation agency to determine whether further services would lead to competitive employment.

## Procedures in other States not adequate

In addition to the information we obtained from the vocational rehabilitation agencies in Illinois and Missouri, RSA Regions V and VII staff provided us with copies of written procedures used for reevaluation in other States. Ohio had not developed procedures, and Michigan's procedures did not comply with RSA guidelines.

An Ohio State agency official told us that they had not developed statewide reevaluation procedures. They plan to use letters to contact former clients by the end of 1980.

Michigan's system, based on sending letters to former clients to initiate reevaluation, does not comply with RSA's requirement that all former clients be contacted in person and reevaluated.

<sup>1/</sup>Until July 1974, institutions, schools, hospitals, and the rehabilitation agency could certify persons for placement in the workshops. Subsequently only the vocational rehabilitation agency could certify persons for placement in Missouri's workshop program.

Michigan makes a reevaluation if the former client responds to the letter. However, the handicapped person may not receive the letter or may not understand the purpose of the reevaluation. The letter does not explain that the purpose of the reevaluation is to determine the client's potential for competitive employment or training for competitive employment, and it provides little encouragement to take advantage of the opportunity. The letter states:

"It has now been one year since the Bureau of Rehabilitation closed your case because you were working and did not need our services.

We hope that you are still satisfactorily employed. If you are not, we would be glad to discuss with you any problems you may be having.

You may contact our office at the address and telephone number at the top of this letter if you need help at this time. We will assume that you are not in need of our services if we do not hear from you within 30 days."

A Michigan official said they recognize that the above procedure is not in compliance with RSA guidelines and are now revising it.

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#### CHAPTER 4

#### FORMER CLIENTS DID NOT ALWAYS

#### RECEIVE COMPREHENSIVE, TIMELY,

#### OR SUCCESSIVE ANNUAL REEVALUATIONS

RSA guidelines require that reevaluations be comprehensive and be performed annually. However, only 4 of 89 reevaluations reported by Illinois and Missouri from our sample were comprehensive enough to meet RSA requirements.

In addition, RSA guidelines require annual reevaluations, but 27 of 38 persons requiring a second or third reevaluation did not receive them. The RSA guidelines provide that reevaluations may be reduced in scope in succeeding years, but do not specify when or how this should be done. As a result, we believe that reevaluations of handicapped persons have not been adequate to determine their potential for competitive employment, as the act requires.

#### REEVALUATIONS SHOULD BE COMPREHENSIVE

According to RSA's August 1976 guidelines, reevaluations should include the following:

- An examination of the individual's case record, including a review of the reasons for placement into extended employment.
- 2. A review of the individual's employment history in the facility during the past year, including productivity and work adjustment. This review shall entail interviews with the individual, facility production supervisors, professional staff, and if necessary, client representatives.
- 3. A determination if any progress or change has occurred in the individual's readiness for competitive employment.
- 4. A determination as to whether additional rehabilitation services may lead to competitive employment.

Our review of the 111 persons requiring reevaluation over a 3-year period in the two State samples showed that 76 persons were reevaluated a total of 89 times. Sixty-three persons were reevaluated once, and 13 were reevaluated twice. There was no documentation in the case files to support 12 reevaluations reported by the Illinois rehabilitation agency. Of the remaining 77 reevaluations which were documented, only 4 met all four RSA requirements as shown in the following table.

Number of	Number of	reevaluations
requirements met	Illinois	Missouri
Λ	14	6
1	7	10
2	3	13
. 3	10	10
4	_3	1
Total	<u>37</u>	40

Seventeen of these reevaluations were completed before RSA issued the August 1976 guidelines; they met as many requirements as those completed later.

The 1973 act requires State agencies to determine the feasibility of competitive employment and make maximum efforts to place persons in such employment or training when it is appropriate. However, 32 of the 77 reevaluations did not address the progress or change which had occurred in the individual's readiness for competitive employment, and 40 failed to address whether additional rehabilitation services might lead to competitive employment.

A properly designed form to document reevaluations can assist counselors in assuring that reevaluations are comprehensive and meet RSA's requirements. The forms used by the two Missouri agencies were not adequately designed.

Missouri general agency reevaluations were often documented on a general purpose form used to record personal or telephone contacts. Reevaluation comments on the form ranged from fairly comprehensive to extremely limited. For example, one report included the following comments:

--\* \* \* has been working at the workshop continuously since his date of closure 5/1/76. He is a steady employee and

shows no problems on the job. He needed glasses at one point, and bought them out of his own wages. He continues to live at home.

- --\* \* \* is presently earning 65 cents/hour. One year ago he was earning 55 cents/hour. This indicates his production has not improved significantly, but workshop staff indicated he is doing as well as could be expected of him.
- --As there appears to be no behavior, work, or medical problems, there is no indication this young man will need any further services.

An extremely limited report stated:

\* \* \* has been acting bizarre for sometime. She has improved since we had the doctor see her about a month ago. Production is very good. [The workshop sees] no problem with keeping her on at present.

Although 4 of the 12 field offices we visited in Missouri had developed their own reevaluation forms, only one addressed all RSA requirements. During our fieldwork, the general State agency developed a standardized form for all field offices which addresses the RSA requirements.

Officials of the Missouri agency providing services to blind persons told us that they are also considering developing a form which would address the RSA requirements. The form now used was not intended specifically for reevaluations and provides little insight into whether RSA requirements were addressed.

The Illinois State agency requires four forms to be completed for each reevaluation, one of which does address the RSA requirements:

--A preprinted form, which serves as both the notification that a reevaluation is due and the input to the annual report to RSA on reevaluations made.

- --A standardized State agency form designed to help assure the four basic RSA requirements are met.
- --An amendment to the former clients individualized written rehabilitation program.
- -- A report of contact.

Counselors and supervisors in some Illinois field offices were not using the required reevaluation forms. For example, the Illinois State agency developed a standardized form in May 1977 to help assure that the four basic requirements were met. Although the form was available in the storeroom of one field office, the office supervisor told us that he had never seen one and that none of the counselors used them.

Documentation of Illinois reevaluations varied. In some cases, it was merely the preprinted form for reporting that a reevaluation had been made, rather than the reevaluation report itself. In others it was a brief comment on an amendment to the individualized written rehabilitation program.

#### TIMELINESS

The RSA guidelines require reevaluations to be made at least once a year. Illinois and Missouri rehabilitation agency instructions also require annual reevaluations. However, not all reevaluations were made when they were due.

Our samples at the 3 State agencies included 77 reevaluations of which 20 were not completed when due.

State agency	Number of reevaluations	Months late
Illinois Missouri general Missouri blind	14 5 _1	4 to 8 8 to 30 25
Total	20	

Illinois State agency procedures dated May 1977 require that the State agency send quarterly notices of reevaluations due. The reliability of the notification system was a problem often mentioned to us by Illinois' rehabilitation personnel. Field office officials and counselors told us that

the quarterly notices were not being received on time. One supervisor said that the notices for four different quarters were all received at once. Supervisors and counselors told us that the automated system producing the notices was not reliable, and some counselors continued to use their own manual systems. Neither of the two Missouri agencies had a system to notify counselors when reevaluations were due. Field offices or the counselors maintained their own systems to determine when reevaluations were due.

#### SUCCESSIVE ANNUAL REEVALUATIONS

The act requires reevaluations to continue periodically so long as the handicapped person remains in sheltered employment, and HEW regulations require that reevaluations be made at least annually. Although RSA guidelines provide for reducing the scope of annual reevaluations in succeeding years, they do not clearly specify when or how it should be done.

"While there is no maximum number of review [sic] that may be feasible, reasonable limitations may be placed on the number of annual reviews. Where an individual has been reviewed for three consecutive years, for example, and the reviews indicate that no significant change has taken place in the handicapped individual's job readiness or prospect for competitive employment, a fourth or succeeding year's review may consist solely of an examination of client records. Handicapped persons who request a review and reevaluation, however, shall receive this service regardless of the number of previous evaluations."

Counselors in both States told us they were confused about whether annual reevaluations should be made in succeeding years and for the most part did not make them.

Our sample of 169 persons included 38 persons who had been in the workshops for 2 or more years. Twenty-seven of those 38 persons received only one reevaluation--8 in Illinois and 19 in Missouri. We asked 12 counselors why no additional reevaluations were made in 18 of these 27 cases. Their responses showed that:

- --Missouri general agency counselors had determined that no further reevaluation was warranted in 2 cases, and in 10 other cases they were not aware of the requirement for more than one reevaluation.
- --Illinois counselors did not know why subsequent reevaluations were not performed in two cases. In three cases they said that they had not been notified that another reevaluation was due, and in another, the case had been transferred from one counselor to another.

There is a need to ensure that, when caseload responsibility is transferred from one counselor to another, it includes all cases requiring reevaluation. Our review in Missouri and Illinois showed that 15 counselors had taken over another counselor's caseload, but the new counselors had not assumed responsibility for 28 cases included in our sample which required reevaluations.

Counselors in both States told us that they did not clearly understand whether annual reevaluations should be continued. Some counselors told us that only one reevaluation was required, while others said there was no limit.

Comments from State vocational rehabilitation personnel and workshop officials varied, but generally supported the need for guidance as to when and how reevaluations could be reduced in scope. Many said any reevaluation after the first one should be left to the judgment of the counselor. Some said that, for those handicapped persons who will never progress enough to leave the workshop, reevaluation is unneces-They said that they would rely on the person or the workshop to contact them, if conditions improved enough to justify reevaluation. One suggested a total reassessment at 5-year intervals with interim reevaluations at the judgment of the counselor. Although one workshop official said reevaluations were important enough to be performed quarterly rather than annually, another said that people progress at different rates, and not everyone needs to be reevaluated annually. A State vocational rehabilitation official said that reevaluations could be discontinued when the counselor, workshop officials, and the client or his representative all agree that no further reevaluation is required.

State agency officials in both States said that better training and instructions should be provided to explain why reevaluations were required and how they should be performed. During our fieldwork, Missouri general agency officials established a new centralized system to initiate and control annual reevaluations. Illinois officials told us that they were planning actions to improve the reliability of their automated system for initiating and controlling reevaluations.

#### CHAPTER 5

#### FACTORS IMPACTING ON

#### EFFECTIVENESS OF REEVALUATIONS

The basic purpose of annual reevaluations is to aid the movement, when warranted, of handicapped persons from sheltered employment to competitive employment, or training for such employment. Of the 14 persons in the two State samples who had moved to competitive employment, only I had been reevaluated. Eight persons had moved to competitive employment before a reevaluation was due, and five should have been reevaluated but were not. While reevaluations can be improved to better aid the movement of some persons to competitive employment, there are factors beyond the control of State vocational rehabilitation agencies, which can hinder or preclude movement to competitive employment.

Based on our review of case file and reevaluation reports and discussions with workshop and State agency representatives, 23 persons—6 in Illinois and 17 in Missouri—who were still in the workshops during our fieldwork had possible current or future potential for competitive employment. The potential for competitive employment was not recorded in a reevaluation report in 16 of the 23 cases. However, other data in the case files supported the potential for competitive employment, and counselors told us that they were aware of the persons' employment potential.

The motivation and desire of handicapped persons and their parents or guardians can influence whether the handicapped person moves to a higher employment level. If the person does not want to leave the workshop, there may be little the vocational rehabilitation agency can do. The same is true if parents or guardians do not want the person to leave. Handicapped persons or their parents or guardians did not want higher level employment or training for such employment in 12 sample cases. However, vocational rehabilitation or workshop officials said that 7 of the 12 persons were capable of competitive employment.

Other parents or guardians chose the opposite extreme and tried to put three persons in our sample into competitive employment too soon. Two persons did not appear to have current potential for competitive employment. The other did, but was not ready to compete according to the vocational rehabilitation counselors.

The lack of transportation can also be a hindrance to obtaining competitive employment. For example, one workshop official told us that a local airport would be a prime employer if transportation were available.

We were often told by counselors and workshop officials that the loss of Social Security Disability Insurance and other benefits is a major disincentive in moving to competitive employment. An agency official cited the following example.

A handicapped person in a sheltered workshop who could have been competitively employed was reluctant to accept it because of the benefits he was receiving. The person had a history of mental illness, but was able to work without supervision. He was earning \$50 a week in the workshop and receiving \$400 a month from Social Security Disability Insurance benefits. He was also receiving Medicare benefits. His total income—including benefits—was more than he could earn at the minimum wage in a local factory.

Several officials suggested that Social Security Disability Insurance benefits should be gradually reduced instead of being totally cutoff at once. In our May 13, 1976, report "Improvements Needed in Rehabilitating Social Security Disability Insurance Beneficiaries" (MWD-76-66), we reported that among the potential disincentives to a person's accepting vocational rehabilitation services were disability benefit payments; eligibility for Medicare, public assistance, food stamps, and Medicaid; and workmen's compensation benefits. Payments under these other programs in total may be more than the person can expect to earn in competitive employment.

#### CHAPTER 6

### CONCLUSIONS AND RECOMMENDATIONS

#### CONCLUSIONS

Reevaluations had little discernible effect in aiding the persons in our samples who obtained competitive employment. However, with better RSA management oversight, reevaluations can be more effective in providing the maximum opportunities for competitive employment intended by the Congress.

RSA needs to clarify headquarters responsibility for managing the reevaluation program and providing leadership and guidance to States. RSA also needs to amend program guidelines so that it is clear that all former vocational rehabilitation clients in sheltered employment, whether classified as rehabilitated or not, are to be reevaluated. Guidelines should also be revised to assure that reevaluations are continued so long as the person remains in sheltered employment, but to permit limited scope reevaluations when warranted.

RSA needs to take several actions before it can adequately assess State reevaluation efforts. RSA must know the number of persons requiring reevaluation in each State. Currently States' reports do not provide a basis to determine whether all required reevaluations have been made. RSA should test State reports to learn whether they are reliable. It should also analyze and evaluate the reports to determine why some States are more successful than others in moving people from extended to competitive employment, and to learn how reevaluations are aiding this movement. RSA should find out why some States are not reporting. RSA also needs to monitor State reevaluation procedures and provide assistance where needed to ensure that they are adequately designed and implemented, so that all required reevaluations are made and are complete, documented, and timely.

Because the Congress intended that all former clients be reevaluated, persons excluded from reevaluation because they were placed in sheltered employment before the States implemented a reevaluation process should be identified and reevaluated. Even with an improved reevaluation process, there may be many handicapped persons who remain in sheltered employment for reasons beyond the control of State vocational rehabilitation agencies. However, these should not be considered permanent conditions. We live in a changing environment, and the application of the right counseling technique, the opening of new jobs, the expansion of public transportation, and changing laws may make competitive employment more available and desirable for handicapped persons in sheltered employment.

## RECOMMENDATIONS TO THE SECRETARY OF HEW

Because many handicapped persons in sheltered employment have not received adequate reevaluations of their capabilities for competitive employment, we are recommending that the Secretary of HEW direct the Commissioner of RSA to:

- --Clarify headquarters responsibility for managing the reevaluation program and provide RSA regional offices the guidance they need to assist States in establishing effective reevaluation programs.
- --Revise guidelines to require reevaluations to include all former vocational rehabilitation clients in sheltered employment, including persons placed in work activities centers but classified as not rehabilitated by the State agency.
- --Revise guidelines to clearly establish that reevaluations should be continued so long as the handicapped persons remain in sheltered employment and provide additional guidance to States regarding the conditions under which limited scope reevaluation may be warranted.
- --Require the States to develop and report the number of persons requiring reevaluation to provide a basis for measuring their reevaluation efforts.
- --Review and test State reports to learn whether they are reliable, why some States are more successful in achieving movement to competitive employment, and to learn how reevaluation aided the movement; and determine why some States are not reporting reevaluations.

- --Monitor State procedures and provide assistance to assure that annual reevaluations are made and that they are comprehensive and timely.
- --Identify States which did not reevaluate clients placed in sheltered employment before reevaluation procedures were implemented and require that any such persons still in sheltered employment be reevaluated.

#### CHAPTER 7

#### SCOPE OF REVIEW

We made our review at RSA headquarters in Washington, D.C.; RSA offices in Region V (Chicago, Illinois) and Region VII (Kansas City, Missouri); and State vocational rehabilitation agencies in Illinois and Missouri. The review in Missouri included both the general agency (Division of Vocational Rehabilitation Services) and a separate agency providing services for blind persons (Missouri Services for the Blind). It also included the Sheltered Workshop Section of the Missouri Department of Elementary and Secondary Education. We visited 19 field offices and 18 sheltered workshops in the two States.

We researched the legislative history of the requirement for periodic reevaluation to determine congressional intent. We obtained national program statistics and policy information, reviewed Federal regulations and RSA guidelines and procedures for reevaluations, and interviewed RSA officials about implementing policies and procedures. We reviewed the procedures and implementing instructions for reevaluations for 16 State agencies in the two RSA regions.

We judgmentally selected 6 rural and 13 urban field offices in the two States and used sheltered employment placements by these field offices as our universe. We randomly selected such placements by the selected field offices in Illinois and Missouri for fiscal years 1975, 1976, and 1977. Of the 180 cases selected, 11 Illinois cases were not reviewed because the persons were not placed in sheltered employment, although they were reported as such, or the case files could not be located. We reviewed the remaining 169 cases to determine whether reevaluations were made and whether they met RSA criteria.

In the two States we examined vocational rehabilitation agency records and files pertinent to the reevaluation process and interviewed agency officials and counselors. At workshops our review included examinations of the work history records of persons in our sample, interviews with officials about the persons' competitive employment potential, and observation of the persons' role in workshop operations.

We discussed our findings with cognizant State and Federal officials and considered their comments in preparing this report. We also discussed our work with HEW and State auditors and reviewed selected audit reports on vocational rehabilitation programs.

APPENDIX I

# REEVALUATIONS AND PLACEMENTS REPORTED BY REHABILITATION AGENCIES TO RSA FOR FISCAL YEAR 1978

	General Vocational Rehabilitation Agency Placed Into competitive			Vocational Rehabilitation Agency for blind persons Placed into competitive			
<u>Şt</u> ate	Number of reevaluations	or selt- employment	Per- cent	Number of reevaluations	or self- employment	Per- çent	
Connecticut	hG2	4 7	7.8	3 4	Ü	0	
Delaware	Li.	0	0	3.8	1)	Ü	
Florida	234	56	23.9	15	2	13.3	
[dano	45 336	18 8	17.8 5.4	0 3	U O	ს 0	
lowa Kansas	176	10	5.7	16	5	6.16	
Louisiana	268	12	4.5	18	ΰ	0	
Massachusetts	564	90	16.0	0	Ű	6	
Michigan	70	7	10.0	26	5	19.2	
Minnesota	2,305	136	5.9	10	2	20.0	
Mississippi	41	16	39.0	180	3	1.7	
Missouri	682	28	4.1	8	0	0	
Montana	83 98	1.4 2	16.9 2.0	1 3	υ 0	0	
Nebraska Nevada	98 60	2	3.3	2	0	0	
New Jersey	1,691	97	5.7	49	2	4.1	
New York	6,036	33	. 5	100	9	9.0	
North Carolina	123	19	15.4	232	0	0	
Oregon	190	28	14.7	3	0	0	
Pennsylvania	235	48	20.4	28	0	0	
Rhode Island	235	4	1.7	29	0	0	
South Carolina Tennessee	106 136	15 16	$\frac{14.2}{11.8}$	0 4	0 0	O O	
Tennessee	193	18	9. ₹	390	11	2.8	
Utah	32	2	6.3	2	0	2.0	
Vermont	Q.	0	0	0	Ū	0	
Virginia	(,	0	()	21	0	0	
Washington	793	89	11.2	36	1	2.8	
Alabama	166	29	17.5				
Alaska Arizona	8	0 0	0				
Arkansas	90	64	71.1				
California	283	16	5.				
Colorado	90	4	4.4				
District of							
Columbia	101	4	4.0				
Georgia	56	21	37.5				
Guam	U	Ö	()				
Hawall Illinois	54 408	3 55	5.6 13.5		Note		
Indiana	109	7	6.4		Note		
Kentucky	97	Ú	0.4	Separa	te data for I	blind	
Maine	14	4	∠8.6	•	s were not r		
Maryland	3.8	5	13.2	by the	se States.	•	
New Hampshire	264	216	41.8				
New Mexico	38	9	23.7				
North Dakota Ohio	2 9 0	5 U	17.4				
Oklahoma	4.2	4	9.5				
Puerto Rico	0	Ü	2.7				
South Dakota	45	2	4.4				
Trust territories	U	Ü	0				
Virgin Islands	1.0	0	0				
West Virginia	36	L	2.8				
Wisconsin	108	7	6.5				
MAcurua	4.7	2	4.3				
Total	17,467	1_227.3	7.3	1,248	<u>40</u>	3.2	

APPENDIX II APPENDIX II

DISABILITY, SEX, AND AGE OF PERSONS IN SAMPLE

	Cases reviewed			
	Missouri			
			Blind	
	Illinois	General	( <u>note a</u> )	
Primary disability:				
Moderate to severe mental				
retardation	21	46		
Mild mental retardation	14	11		
Psychotic disorders	9	7		
Psychoneurotic disorders	6	4		
Alcholism and other				
character, personality,				
and behavior disorders	3	3		
Visual impairments	3		15	
Epilepsy	2	5		
Cerebral palsy	3	1		
Other orthopedic deformi-				
ties	7	3		
All other disabilities	_1	5		
Total	60	٥r	16	
IOCal	<u>69</u>	<u>85</u>	<u>15</u>	
Persons with more than one				
disability	15	30	10	
-				
Severity of disability:				
Severe	63	77	13	
Not severe	6	_8	_2	
m - 1 - 1	<b>5.0</b>			
Total	<u>69</u>	85	<u>15</u>	
Sex:				
Male	31	42	5	
Female	38	43	10	
	<u> </u>			
Total	<u>69</u>	<u>85</u>	<u>15</u>	

APPENDIX II APPENDIX II

			Cases reviewed			
				Missouri		
					Blind	
			Illinois	General	( <u>note a</u> )	
Age	at	case closure:				
_	15	to 19	2	22	0	
	20	to 29	25	37	8	
	30	to 39	8	4	2	
	40	to 49	23	14	3	
	50	to 59	9	5	1	
	60	to 69	2	_3	_1	
		Total	<u>69</u>	<u>85</u>	<u>15</u>	

<sup>&</sup>lt;u>a</u>/Missouri has a separate agency providing vocational rehabilitation service to blind persons.

APPENDIX III APPENDIX III

#### REEVALUATION OF SAMPLE CASES

	Number of cases		
		Misso	
	Illinois	General	Blind
Requiring reevaluation: Reevaluated (note a)	37	35	4
Not reevaluated	b/12	<u>15</u>	_8_
	49	<u>50</u>	12
Not requiring reevaluation: Persons left workshop before annual reevaluation was			
required  Case reopened before re-	15	27	1
evaluation was required	_0	_4	2
	<u>15</u>	<u>31</u>	<u>3</u>
Other:			
State agencies could not deter- mine when the person left the workshop and, therefore, whether reevaluation was			
required	<u>5</u>	4	<u>0</u>
Total	<u>69</u>	<u>85</u>	15

<sup>&</sup>lt;u>a</u>/There were 89 reevaluations--63 persons were reevaluated once, and 13 persons were reevaluated twice.

 $<sup>\</sup>underline{b}/\text{Ten}$  of the cases were closed before August 1975, when the State first established reevaluation procedures.

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