



## Comprehensive Study on Rehabilitation Technology and Financial Need Testing

Kentucky Department of Vocational Rehabilitation  
Division of Program Planning and Development

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# Rehabilitation Technology and Financial Need Testing

## **Introduction, study features and design**

The Leadership Team was asked to consider a decision regarding the recommendation of the Field Administrator's Team that rehabilitation technology (RT) services should be subject to a financial need test. To assist in the process, the Division of Program Planning and Development gathered data from four sources: a staff survey, a survey of the Statewide Counsel for Vocational Rehabilitation, a statistical analysis of two thousand forty-one (2,041) consumer service records that received RT in FY 2000 to 2002 and a statistical analysis of a random sample of two hundred forty (240) consumer service records selected from that group.

## **The survey**

A decision was made to utilize the DVR Distribution List to email the survey to staff in opposition to the cost of a mass mailing that would include postage and paper. On December 12, 2002, a copy of the Rehabilitation Technology (RT) Services Survey was sent via email to all DVR staff. The original closing date of December 20, 2002, was extended to January 10, 2003, as it was determined that individuals may have missed an opportunity to respond because of issues related to the Holiday break. During this extended period, one respondent submitted updated information, which was reflected in the database.

The survey itself consisted of seven (7) statements to which the staff was asked to respond (See Appendix 1). With the exception of statement five (5), which required a yes or no answer, space was provided to record an "other" response for additional comments. This provided maximum ability for the respondents to express their individual points of view. The survey also included a confidentiality statement and instructions for returning the completed survey via email as an attachment. An option was also provided to print and return it by facsimile.

Emailed responses were printed and numbered in sequence to the order in which they were received and recorded into an ACCESS Database. These emailed responses were saved in an electronic file to monitor for repeat submissions and were deleted after responses were no longer being accepted. In this manner, hard copies could be matched to the ACCESS Database to check for accuracy while preventing identification of individual staff to ensure confidentiality. Cover sheets from faxed responses were discarded and any other identifying information removed. They were also numbered and entered into the ACCESS Database in the same manner as emailed copies. Many of the faxed copies had no identifying information. Therefore, it was not possible to monitor facsimiles for duplicate responses.

## Department Staff

Personnel records indicate that DVR had four hundred seventy-one (471) employees in December 2002. That increased to four hundred seventy-four (474) by January 2003. Each of these employees had the capacity to receive the survey through email. One hundred sixty-four (164) replies were recorded for a thirty-four percent (34%) response rate. Question one (1) asked respondents to indicate their job classification by checking a box corresponding to those listed in the table below. Counselors and other direct service providers such as Counselors for the Deaf and Communication Specialists made a *majority* with eighty-four (84) or 51% of combined responses. By comparison, Administration staff were grouped together for a total of twenty-eight (28) or 17% of the responses. Twenty-six (26) or 16% of the responses were recorded for Assistant staff. Job Placement Specialists, RT Staff and 'Other' titles accounted for twenty-six (26) or 16% of the responses.

### **Identification of Job Title (Number and Percentage of Responses)**

Counselor	70 (42%)
Counselor for the Deaf	5 (3%)
Communication Specialist	9 (5%)
<b>Total</b>	84 ( <b>51%</b> )

Central Office Administrator	12 (7%)
Field Administrator	16 (9%)
<b>Total</b>	28 ( <b>17%</b> )

Central Office Assistant	2 (1%)
Field Assistant	24 (14%)
<b>Total</b>	26 ( <b>16%</b> )

Job Placement Specialist	10 (6%)
Rehabilitation Technology Staff	7 (4%)
Other	9 (5%)
<b>Total</b>	26 ( <b>16%</b> )

Table for Question #1 of Survey (See Appendix 2 for "Other" titles)

Staff responses to question two (2) of the survey revealed that the majority did not regard prescription glasses as RT, twenty-seven (27) or 16%. Opinions were somewhat split about hearing aids, eighty (80) or 48% considered hearing aids to be RT. Power wheelchairs were considered RT by one hundred and eight (108) or 65% while computers secured one hundred twenty-five (125) or 76%. The remainder of services received positive response rates of over 80%. An opportunity was provided to identify other services that may be considered RT (see appendix 2). There were 14 comments recorded listing services that are in the category of RT with the exception of two responses for attendant care and one for job coaching.

**Services Considered Rehabilitation Technology  
(Number and Percentage of Responses)**

Prescription Glasses	Hearing Aids	Power Wheelchair	Computers	Ramps/Structural Modifications
27 (16%)	80 (48%)	108 (65%)	125 (76%)	134 (81%)
Alerting Devices	Home Modifications	Communication Devices	Vehicle Modifications	Work Station Accommodations
138 (84%)	141 (85%)	144 (87%)	151 (92%)	154 (93%)
Specialized Keyboard	Assistive Software	Adaptive Equipment	Other	
156 (95%)	162 (98%)	163 (99%)	14 (8%)	

Table for Question #2 of Survey (See appendix 2 for "Other" services considered RT)

Responses to question three (3) revealed staff opinions about what services, in addition to RT, should be subject to a financial needs test. According to the majority, Carl D. Perkins Rehabilitation Center should remain exempt from a financial needs test. Educational aids and books and supplies received moderate consideration while RT and Vehicle Modifications were clearly in the majority to be considered for a financial needs test. Staff identified "other" services (see appendix 2) for a financial needs test, which were varied in response ranging from an opinion that no services should have a financial needs test to applying it for all DVR services.

**Services Identified to be Subject to a Financial Needs Test  
(Number and Percentage of Responses)**

Carl D. Perkins Rehabilitation Center	Tutors, Note Takers, and Assistive Technology Educational Aids	Books and Supplies, Tools, and Equipment (for training)
38(23%)	67(40%)	74(45%)
Rehabilitation Technology	Vehicle Modifications	Other
87(53%)	94(57%)	13(7%)

Table for Question #3 of Survey (See appendix 2 for "Other" services identified to be subject to...)

Responses to question four (4) polled staff opinions about services that are currently subject to a financial needs test, specifically if these services should be exempt from such an assessment. Sufficient support was not found to change present policy indicating staff approval for these services to remain subject to a financial needs test. One additional comment was recorded about other goods and services (see appendix 2).

**Services Identified to be Exempt from a Financial Needs Test  
(Number and Percentage of Responses)**

Maintenance	Tuition	Services to Family Members	Transportation
4(2%)	7(4%)	8(4%)	9(5%)
Occupational Licenses, Tools and Equipment, Livestock & Supplies	Physical & Mental Restoration	Other Goods and Services	
10(6%)	16(9%)	1(0.6%)	

Table for Question #4 of Survey (See Appendix 2 for "Other" goods and services identified to...)

Question five (5) specifically asked if a financial needs assessment should be applied to RT and sixty-six percent (66%) of the staff indicated yes while thirty-three percent (33%) indicated no.

**A Financial Needs Assessment Should Be Applied to RT  
(Number and Percentage of Responses)**

Yes	No
109 (67%)	55 (33%)

Additionally, the tables below offer a breakdown of responses according to staff classification. It reflects that seventy-six percent (76%) of Counselors, including Counselors for the Deaf and Communications Specialists are in favor of RT being subject to a financial needs assessment. Field Administrators had a ninety-three percent (93%) approval rating.

**Comparison Approval Ratings supporting  
Financial Needs Assessment for RT services.**

Counselors, Counselors for the Deaf & Communications Specialists	<u>"Compared to"</u>	Field Administrators
64/84 (76%)		15/16 (93%)

Within subgroups, Rehabilitation Counselors for the Deaf demonstrated the least support with twenty percent (20%) being in favor of applying a financial needs test to RT services. Forty-one percent (41%) of Central Office Administrators and forty-two percent (42%) of RT Staff were in favor. The remainder of the subgroups listed in the table below had a fifty percent (50%) or higher approval rating. It should be taken into consideration that the number of responses for some subgroups may have been too low to be considered statistically significant.

**Subgroup Responses by Title**  
(Ratio within subgroup and Percentage)

Counselor for the Deaf	Central Office Administrator	RT Staff	Central Office Assistant	Counselor
1/5 (20%)	5/12 (41%)	3/7 (42%)	1/2 (50%)	42/70 (60%)
Communication Specialist	Job Placement Specialist	Field Assistant	Field Administrator	Other
6/9 (66%)	7/10 (70%)	21/24 (87%)	15/16 (93%)	8/9 (88%)

On how to apply a financial needs assessment to RT, staff responses to question six (6) suggest the majority, at fifty-five percent (55%), approved of applying a sliding scale; twenty-five percent (25%) were in favor of applying the scale completed on the Application Worksheet (see Appendix 3); and ten percent (10%) of the respondents selected “other” (see Appendix 2). The table below demonstrates these percentages.

**Identification of How to Apply a Financial Needs Assessment to RT**  
(Number and Percentage)

Apply a sliding scale with a maximum percentage point.	Apply the financial needs assessment completed during application.	Other
91(55%)	42(25%)	18(10%)

(See Appendix 2 for “Other” suggestions)

Staff were requested to respond to this question regardless of whether they thought a financial needs test was appropriate or not. Additionally, those who may have selected a sliding scale were requested to indicate what maximum percentage point of participation seemed most appropriate. However, some respondents that chose a sliding scale did not identify a maximum percentage point and others who selected a different method than sliding scale did identify one. This may have been a result of a design flaw in the survey. The table below displays the totals of those who selected a particular percentage.

**Number of Respondents Identifying Which Percentage To Use in Applying a Sliding Scale**

Percentage	Total
Below 75%	6
75%	38
75 – 79%	6
80 – 84%	1
85 – 89%	5
90 – 94%	2
95 – 99%	4
100%	17

Within the group that selected ‘other’ and who submitted an explanation for their answer (nineteen [19] comments were recorded), four (4) themes emerged as important considerations of how to apply a financial need assessment. They are: ensuring an allowance for exceptions, verifying income, applying a test only after expenditures reach a fixed sum, and addressing consistency issues.

Question seven (7) provided an opportunity for comments about the survey in general (see appendix 2). Forty-three (43) comments were recorded (see appendix 2) and roughly five (5) themes emerged. Ten (10) comments supported a financial needs test. Twelve (12) comments contained reasons for being against it. Ten (10) comments dealt with the method and four (4) with the consistency of application. Six (6) comments were labeled “other.” One (1) comment had elements to support and oppose the financial needs test.

#### Statewide Counsel for Vocational Rehabilitation

A revised version of the Rehabilitation Technology Survey (see appendix 4) was provided to the members of the Statewide Counsel for Vocational Rehabilitation (SCVR). Of the twenty-six (26) members, eleven (11) or 42% of the surveys were collected. With the exception of prescription glasses, the majority of SCVR respondent’s considered all services listed in the table below as RT.

#### **Services Considered Rehabilitation Technology (Number and Percentage of Responses)**

Prescription Glasses	Hearing Aids	Ramps/Structural Modifications	Home Modifications	Power Wheelchair
5 (45%)	7 (64%)	7 (64%)	8 (73%)	9 (82%)
Alerting Devices	Adaptive Equipment	Computers	Work Station Accommodations	Vehicle Modifications
9 (82%)	9 (82%)	10 (91%)	10 (91%)	10 (91%)
Assistive Software	Communication Devices	Specialized Keyboard	Other	
10 (91%)	11 (100%)	11 (100%)	-	



The following table reveals the SCVR respondent's opinions about what services should be subject to a financial needs test. The majority agree that vehicle modifications and RT services should be subject to a financial needs test.

**Services Identified to be Subject to a Financial Needs Test  
(Number and Percentage of Responses)**

Carl D. Perkins Rehabilitation Center	Tutors, Note Takers, and Assistive Technology Educational Aids	Books and Supplies, Tools, and Equipment (for training)
3 (23%)	4 (40%)	5 (45%)
Vehicle Modifications	Rehabilitation Technology	Other
7 (57%)	8 (53%)	-

Services listed in the table below are currently subject to a financial needs test and, as demonstrated, the majority of SCVR respondents did not support changing this policy.

**Services Identified to be Exempt from a Financial Needs Test  
(Number and Percentage of Responses)**

Maintenance	Services to Family Members	Transportation	Physical & Mental Restoration
0 (0%)	0 (0%)	1 (9%)	1 (9%)
Occupational Licenses, Tools and Equipment, Livestock & Supplies	Other Goods and Services	Tuition	
1 (9%)	1 (9%)	3 (27%)	

When specifically asked if a financial needs test should be applied to RT services, eight (8) or 73% of the SCVR respondents indicated yes and three (3) or 27% indicated no.

**A Financial Needs Assessment Should Be Applied to RT  
(Number and Percentage of Responses)**

Yes	No
8 (73%)	3 (27%)

Eight (8) or 72% of SCVR respondents were in favor of applying some sort of sliding scale to RT services. No clear majority indicated what percentage of sliding scale to use and four (4) or 36% did not respond to this question. Two (2) surveys had handwritten comments from the respondent that they did not understand this section of the survey. The following tables display information

that was obtained concerning how to apply a financial needs test to RT if one is initiated.

**Identification of How to Apply a Financial Needs Assessment to RT  
(Number and Percentage)**

Apply a sliding scale with a maximum percentage point.	Apply the financial needs assessment completed during application.	Other
1 (9%)	8 (72%)	0 (0%)

**Number of Respondents Identifying Which Percentage  
To Use in Applying a Sliding Scale**

Percentage	Total
Below 75%	2
75%	1
75 – 79%	0
80 – 84%	1
85 – 89%	1
90 – 94%	0
95 – 99%	0
100%	0

Comments obtained from the SCVR survey resembled staff comments that the use of equipment and not the service or item itself identify something as RT. For example, a computer may or may not be considered RT depending on why and how it is to be used by the consumer. There was a request regarding the application of a financial needs test to RT to consider a consumer's income along with disability related expenses and not just income alone. One respondent supported DVR for evaluating RT exemption policies and reported spending ten thousand dollars (\$10,000) privately for van modifications while knowing of consumers who made more money who obtained such services at no charge.

**Statistical analysis of all consumer case records that received RT in the past three years**

A total of two thousand forty-one (2,041) consumers were identified as having received rehabilitation technology services and equipment in FY 2000 to 2002. These individuals were identified through the authorization summary files for the three fiscal years. Any individual who received a service or piece of equipment that was authorized using Budget Unit Numbers 5730/5830 (FY 2000) or Budget Unit Numbers 6730/6830 (FY 2001-2002) was included. These budget unit numbers identified expenditures from the rehabilitation technology budget in those years.

### Random sample

Using a web-based random size calculator, it was determined that two hundred forty (240) consumer case records would compose a statistically valid random sample of the population of two thousand forty-one (2,041) consumer service records involving one or more rehabilitation technology service. A computer program randomly selected the two hundred forty (240) cases for review. Data was collected from the Case Management System as well as pieces of information from the consumer's file. Copies of the Application Worksheet (see Appendix 3) and most recent Student Aid Report (as applicable) were obtained. An ACCESS Database was created to record and analyze pertinent facts. Two cases were excluded from the random sampling. One case had services miscoded as RT and the other had vital information that could not be located. The remaining two hundred thirty-eight (238) records are still considered to be a statistically valid sample.

### **Overview of RT program and services including expenditures and outcomes**

The Department maintains a Rehabilitation Technology Branch to perform rehabilitation technology assessments, make recommendations to consumers and counselors, provide training, and insure adequate follow up and support. The branch consists of four rehabilitation technology coordinators, two rehabilitation engineers, and two driver rehabilitation specialists. Rehabilitation technology services are also provided at the Carl D. Perkins Comprehensive Rehabilitation Center.

For the purposes of this report, rehabilitation technology is the systematic application of assistive technologies, engineering methodologies, or scientific principles to meet the needs of and address the barriers confronted by individuals with disabilities, rehabilitation, employment, transportation, independent living, and recreation. Rehabilitation technology includes mechanical, electronic, and microprocessor-based equipment, non-mechanical and non-electronic aids, specialized instructional materials, services and other compensatory strategies for people with disabilities. It also includes compensatory strategies as well as aids and devices.

Rehabilitation technology is the process, or comprehensive set of services, that accompany an appropriate piece of equipment for a person with a disability. This process can include provision of information, evaluation and recommendations, fitting, training, maintenance, and follow-up with a prescribed or fabricated aid or device.

## General Characteristics of Rehabilitation Technology Services

Rehabilitation Technology services appears to be highly effective in assisting individuals with disabilities to obtain or maintain employment. The following facts and figures were taken from a statistical analysis of two thousand forty-one (2,041) consumers service records that received RT in FY 2000 to 2002. Note that as of September 30, 2002, one thousand forty one (1,047) of those records represented consumers that were still active. Of the remaining nine hundred ninety-four (994) records that were closed, eight hundred sixty-one (861) achieved a positive employment outcome (PEO) with average earnings of three hundred forty eight dollars (\$348) per week.

Total Closed Cases	Positive Employment Outcomes	Average Weekly Earnings	Status '28'	Status '30'
994	861	\$348.00	106	27

Additionally, RT services resulted in a wide variety of occupations for VR consumers who achieved a PEO. For example, the following table demonstrates that the outcomes from RT services, in terms of PEOs, are comparable to the agency's overall performance for FY-2002. For both, the top three (3) occupations of PEOs were Professional/Technical/Managerial, Clerical Sales, and Service occupations. However, the percentages were varied within each population. For individuals who received RT services and obtained professional, technical or managerial positions, the percentage was six percent (6%) higher and among service jobs, it was four percent (4%) lower than all Department PEOs. This would seem to indicate that individuals who received RT services obtained better jobs in terms of pay and benefits. This appears to be supported by other data as well. For instance, the weekly pay at closure of individuals who received RT services is three hundred forty-eight dollars (\$348). This is nearly one hundred dollars (\$100) higher than the weekly pay at closure of all Department PEOs in FY 2002, which is two hundred sixty two dollars (\$262). In addition, fifty-two and eight tenths percent (52.8%) of the individuals who received RT services obtained health insurance coverage through their jobs compared to forty-one and seven tenths percent (41.7%) of all Department PEOs in FY 2002.

A higher level of education may partially explain the difference in the quality of jobs obtained by individuals who received RT services and other Department PEOs. Many requests for RT services come from consumers in college programs. Of the two thousand forty-one (2,041) individuals who received RT services in the three years studied, six hundred thirty-three (633), or 31.0%, also received some assistance from the Department in attending a two-year or four-year college program. Of the thirty-two thousand nine hundred forty-six (32,946) active cases in FY 2002, nine thousand seventy-nine (9,079), or 27.6% had received some assistance from the Department in attending a two-year or four-year college program.

Another possible explanation for the higher quality jobs, particularly the higher wages, is that RT services are often provided to individuals to maintain an existing job. As a result, when the case is closed, individuals are earning more money than they would be if they were receiving a starting salary on a new job. Of the eight hundred sixty-one (861) individuals who received RT services, fifty-six percent (56%) were employed (including self-employed) when they applied for services compared to only twenty-three percent (23%) of all Department PEOs in FY 2002.

### **PEOs of RT Services as Compared to Dept. Overall in FY-2002**

Occupations of Positive Employment Outcomes	#	%	Dept-wide % in 2002
Professional/Technical/Managerial	249	28.9%	22.2%
Clerical/Sales	191	22.2%	22.1%
Service	162	18.8%	23.0%
Agricultural/Forestry/Sales	17	2.0%	2.1%
Processing	53	6.2%	5.0%
Machine Trades	45	5.2%	4.9%
Benchwork	29	3.4%	5.4%
Structural Work	49	5.7%	7.2%
Miscellaneous	65	7.5%	8.0%
Unknown	1	0.1%	

Social Security recipients accounted for twenty-three percent (23%) of the PEOs achieved with RT services while the agency's overall performance in FY- 2002 was sixteen percent (16%). At the same time, they accounted for forty-nine percent (49%) of the status '28' and '30' closures as compared to the agency's overall performance of twenty-nine percent (29%). It was expected that the non-success rate would be high among Social Security recipients. In addition, the total number of these cases receiving RT services that were closed before the plan was written or closed unsuccessfully was one hundred thirty-one (131) individuals or 6% of all cases receiving RT services. It is significant that RT services were seven percent (7%) more effective in obtaining or maintaining employment than the agency's overall performance.

The rehabilitation rate\* among social security recipients who receive RT services was seventy-nine and four tenths percent (79.4%). The rehab rate among all Department social security recipients in FY 2002 was forty-nine and one tenths percent (49.1%). This seems to indicate that the provision of rehabilitation technology services can greatly contribute to the success of social security recipients.

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\* The rehabilitation rate is calculated by dividing the number of PEOs by the number of PEOs plus the number of unsuccessful closures after a plan has been initiated [Status 26s ÷ (Status 26s + Status 28s)].

**PEOs and Unsuccessful Closures of SSI/SSDI Recipients  
As Compared to Dept. Overall in FY-2002**

Consumer Service Records	Positive Employment Outcome	Status '28' And Status '30'
SSI Allowed	112	45
SSDI Allowed	103	27
SSI/SSDI Allowed	18	7
Total SSA Recipients	197	65
Total Closed Cases	861	131
Percent	22.9%	48.9%
Dept. FY 2002 Percentage	15.7%	28.9%

By comparing priority codes, similar trends among RT services and the agencies overall performance continues to be demonstrated. As seen in the table below, RT services are responsible for serving a slightly higher percentage of individuals that have the most significant disabilities.

**Priority Code Listing for RT Services  
As Compared to Dept. Overall in FY-2002**

Priority Code	#	%	Dept. % FY 2002*
1	741	36.3%	32.2%
2	727	35.6%	30.4%
3	416	20.4%	27.1%
4	146	7.2%	9.8%
5	1	0.05%	0.4%
6	0	0	0.05%
Unspecified	10	0.5%	0
Total	2041	100%	100%

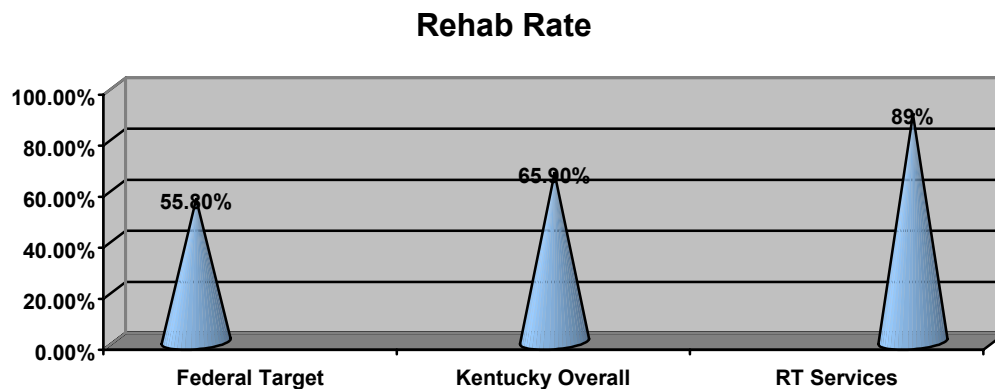
\* Active cases (status 10 and above only)

The following table shows that the average cost of expenditures increase when a consumer's disability is more significant. For example, average expenditures in FY 2002 were the highest for those consumers with the most significant disabilities.

**Overall Department Average Expenditures per Individual for FY 2002**

Unspecified	MSD	Priority#2	Priority#3	Priority#4	Priority#5	Priority#6
\$45	\$694	\$562	\$533	\$540	\$363	\$13

The Rehabilitation Services Administration has six (6) standards and indicators it uses to evaluate the performance of the state vocational rehabilitation agencies. One standard and indicator is the rehabilitation rate (rehab rate). The federal target for rehab rate in 2002 was fifty-five and eight tenths percent (55.8%). While Kentucky's overall rehab rate was sixty-five and nine tenths percent (65.9%), the rehab rate for individuals who received RT services was even higher at eighty-nine percent (89%). In effect, Kentucky's overall rehab rate was ten and one tenths percent (10.1%) above the federal target whereas the rehab rate for RT was thirty-three and two tenths percent (33.2%) higher.



In conclusion, RT services appear to be highly effective in assisting vocational rehabilitation consumers to obtain or maintain employment. This seems to be particularly true with individuals who are social security recipients. Higher educational levels, previous work experience, and current employment at the time of application for services may also be factors in the enhanced success rates of individuals who receive RT services.

### **What are the characteristics of consumers utilizing RT services?**

The following facts and figures were extracted from an analysis of a random sample consisting of two hundred thirty-eight (238) consumer service records involving the delivery of one or more RT services.

#### Positive Employment Outcomes (PEOs)

Eighty-five (85) or approximately 36% of the sample group achieved a positive employment outcome (PEO). Over half of those individuals who achieved a PEO were working at the time of referral (53%) and over a third wanted to maintain the same employment (37%).

The majority of individuals achieving a PEO were either in a single household (29.4%) or a household of 2 persons (28.2%). Households of three (16.5%), four

(12.9%), or five (7.1%) individuals accounted for fewer PEOs. Combined, households of seven or more accounted for 5.9% of PEOs. Half of the individuals achieving a PEO (50.6%) had a sensory/communication disability and hearing loss accounted for 65.1% of this subgroup. Nearly one-third (32.9%) listed a physical impairment followed by mental impairments, which accounted for 16.5% of the PEOs.

### Disability Type

Each record was identified by its primary four-digit Federal RSA 911 disability code and grouped under one of the categories listed below. Physical impairments (43%) had the highest percentage of primary disabilities followed by sensory/communication (39%) and mental impairments (17%).

#### **Random Sample Primary Disability Type**

Physical	Sensory/Communication	Mental
104 (43%)	93 (39%)	41 (17%)

The majority of these records (63%) did not indicate a secondary disability. However, physical impairments (18%) had the highest percentage of secondary disabilities followed by mental (14%) and sensory/communication (4%) impairments.

#### **Random Sample Secondary Disability Type**

No Secondary	Physical	Mental	Sensory/Communication
150 (63%)	43 (18%)	35 (14%)	10 (4%)

### Employment at Application

At the time of application, a consumer's vocational preference and work history is recorded on the Application Worksheet (see Appendix 3). This information was collected from each of the two hundred thirty-eight (238) consumer service records in the sample group. The resulting statistical analysis revealed that sixty-three (63) or 26% of consumers were employed at the time of application and forty-nine (49) or 20% wanted assistance to maintain their current employment. From those forty-nine (49) individual records, we know the following:

- The primary impairment included thirty-three (33) or 67% of cases with sensory/communication impairments, fourteen (14) or 28% with physical impairments, and two (2) or 4% with mental impairments.
- Sixteen (16) cases were active while thirty-three (33) were closed. This included thirty-one (31) PEOs, one (1) case that was closed at application and one (1) case closed unsuccessfully after receiving services.



Therefore, RT services helped achieve a ninety-three percent (93%) retention rate for individuals who were employed at the time of application and wanted to keep the same job, a significant percentage (67%) of which had sensory/communication impairments.

#### Rehabilitation Technology Services Provided

Records from the sample group were identified by a list of authorization expenditure codes associated with the RT program and then grouped by the categories listed in the table below. For example, expenditure codes from the sensory category included all those services related to hearing, speech and visual impairments such as telecommunication devices, hearing aids and/or alerting devices. Each category is thought to be self-explanatory and inclusive of those services related to its heading. The "Other" category included vocational evaluations, other exams, tools and equipment, miscellaneous, and other codes not explicitly identified as belonging to another category. A total of five hundred sixty-six (566) authorizations were recorded.

The top three categories in terms of the most authorizations generated were sensory, computer, and driver evaluation and training services. The average cost to the consumer ranged from three hundred forty dollars and twenty-two cents (\$340.22) for sensory services to seven thousand three hundred forty-eight dollars and thirty-three cents (\$7,348.33) for vehicle modifications (see table below).

#### **Number and Average Cost of RT Service by Type of RT Service**

Type of RT Service	Number of Authorizations	Average Cost
Sensory	128	\$340.22
Computer	142	\$609.66
Vehicle Modification	44	\$7,348.33
Rehab Technology	45	\$630.03
Home Modification	16	\$3,192.46
Driver Evaluation/Training	105	\$760.02
Other	86	\$137.23

#### SSI/SSDI

The following table shows that of the two hundred thirty-eight (238) records sampled, seventy-three (73) or 30.7% were receiving SSI/SSDI at the time of referral. At the time of closure, fifty-five (55) or 23.1% were receiving these benefits.

### **Comparison of SSI/SSDI Recipients at the Time of Referral to the time of Closure**

Sample Group	SSI/SSDI Recipients at the time of referral	SSI/SSDI Recipients at the time of closure
238	73 (30.7%)	55 (23.1%)

Eighteen (18) or 24.7% of the Social Security recipients achieved a PEO. Thirteen (13) were still receiving SSI/SSDI at closure while four (4) discontinued their benefits. One (1) record was recorded at closure as never being an SSDI applicant, which may have been more appropriately coded as an individual who discontinued the benefit.

Fifteen (15) individuals were pending a decision about being awarded SSI/SSDI at the time of application. Twelve (12) of these records show that the decision was still pending at the time of closure, two (2) of which resulted in a PEO. One (1) record listed the individual's social security status as unknown at application and at closure.

In addition, any individual receiving SSI/SSDI is exempt from a financial needs test in accordance to 34 CFR 361.54. Therefore, nearly one-third of eligible individuals who received RT services cannot be required to financially participate in the delivery of these services. This will be a consideration relating to the potential cost savings of applying a financial needs test to RT services.

### **Impact of Financial Needs Testing on Individuals Receiving RT Services**

The Department currently utilizes two methods of determining how much, if any, excess income an individual has to contribute to the cost of rehabilitation. The financial participation required for the majority of services not exempted from financial needs testing is determined by using a formula based on the number of people in the applicant's household and the allowed living expense, which is documented on the Application Worksheet (See Attachment 3). The authority for economic needs testing comes from Federal Regulations CFR 361.53 and CFR 361.54 as well as State Administrative Regulations 781 KAR 1:120 Section 11(16) and 781 KAR 1:030 Section 2.

The procedures to complete this process involve the counselor's discretion to include or exclude an individual based on the applicant's household circumstances. Then, the total monthly gross income is determined for the entire household. This may include income from salary and wages, farm income, business income, SSDI, SSI, Public Assistance (including any types of grants and/or food stamps, assistance grant such as TANF, County Welfare, etc), VA benefits, unemployment benefits, Worker's Compensation, pensions (VA, retirement, disability, etc.), income from property, interest and dividends, trust income, maintenance (alimony), child support, and all other taxable and

nontaxable income, including gifts. Counselors can also use discretion to request verification of income, if necessary.

All monthly excess income is expected to be applied toward the consumer's rehabilitation program. However, counselors must take into consideration the services and expenses already being paid by the consumer. Acceptable uses of excess income may include any service that may contribute to the consumer's Individualized Plan for Employment. Examples of such application of excess income **may** include:

- Physical restoration services, such as office visits, lab work, unreimbursed medical expenses, and prescription medications;
- Mental restoration services, such as therapy, counseling, lab work, and prescription medications;
- Medical devices/equipment, such as hearing aids, glasses, prosthetics/orthotics, wheelchairs, and repairs to such devices/equipment;
- Medical supplies;
- Transportation;
- Health insurance premiums, co-payments, deductibles; and
- Training costs, including the percentage of tuition and fees that consumers should pay, additional maintenance costs related to training, other training expenses paid by the consumer.

The counselor should apply excess income monthly during the term of the rehabilitation program to the cost of any services that are not subject to financial needs testing.

A different economic needs procedure is used to determine financial participation in the cost of tuition. In this instance, a sliding scale is utilized based on the individual's yearly family income and is calculated on the Training Expenditure Worksheet (see Appendix 5).

The next three sections of this report will examine the implications of applying an economic needs test utilizing the procedures followed at application, a seventy-five percent (75%) sliding scale and a one hundred percent (100%) sliding scale. Whatever method is considered, it should be understood that Federal Regulations require that policies must ensure the level of an individual's participation in the cost of vocational rehabilitation services be reasonable; based on the individual's financial need, including consideration of any disability-related

expenses paid by the individual; and not be so high as to effectively deny the individual a necessary service (34 CFR 361.54).

#### Economic needs testing at application

Of the two hundred thirty-eight (238) cases sampled, fifty-six (56) or 24% would be subject to a financial needs test based on the procedures followed at application. The following table provides information about the sample group at application. Note that ten percent (10%) of all consumers who require RT services have \$0.00 income at the time of application. Nearly one (1) in four (4) of those individuals with a household of one (1) have \$0.00 income at the time of application.

#### **Monthly Family Income at Application**

Number in Household	Number of Consumers	Percentage with "0" Income	Average Income	Range of Income
1	61	24% (15)	\$898.18	\$0 - \$3,193
2	51	1% (1)	\$2,013.90	\$0 - \$5,833
3	58	8% (5)	\$2,383.05	\$0 - \$7,500
4	36	8% (3)	\$2,262.72	\$0 - \$8,000
5	18	5% (1)	\$3,294.39	\$0 - \$9,166
6	8	0% (0)	\$3,139.50	\$1,000 - \$8,000
7	3	0% (0)	\$3,866.67	\$2,600 - \$5,000
8	1	0% (0)	\$3,232.00	N/A
9	1	0% (0)	\$648.00	N/A
10 or more	1	0% (0)	\$1,913.00	N/A
<b>TOTAL</b>	<b>238</b>	<b>10% (25)</b>	<b>\$2,012.52</b>	<b>\$0.00 - \$9,166</b>

The table below shows the relationship between those who are and those who are not subject to a financial needs test along with the range of the expected monthly participation. Based on this study, fifty-six of two hundred thirty-eight (56/238) or 24% of consumers would be subject to a financial needs test if applied at application. Additionally, nine of these fifty-six (9/56) or 16% would not be required to participate financially because they were SSI/SSDI recipients. Therefore, it can be predicted that 19% of all consumers receiving RT services would be required to pay up to an average of one thousand four hundred thirty dollars (\$1,430) per month or approximately one-third of their average income of four thousand three hundred eighty-six dollars and ten cents (\$4,386.10) per month toward those purchases. It is not possible to predict the actual amount of financial participation each consumer would be required to contribute since fees for RT services vary greatly and disability related expenses must be considered on an individual basis.

## Financial Needs Testing at Application and Monthly Participation

Number in Household	Number not subject to FNT	Number Above Limit Receiving SSI/DI	Number subject to FNT	Average Monthly Participation	Range of Monthly Participation
1	50	2	9	\$600.00	\$41 – \$1,434
2	39	2	10	\$1,744.00	\$637 – \$3,533
3	40	5	13	\$1,662.00	\$391 – \$4,591
4	30	0	6	\$1,714.00	\$66 – \$4,618
5	12	0	6	\$2,043.00	\$21 – \$5,243
6	6	0	2	\$1,785.00	\$35 – \$3,535
7	2	0	1	\$434.00	\$434
8	1	0	0	-	-
9	1	0	0	-	-
10 or above	1	0	0	-	-
<b>TOTAL</b>	182	9	47	-	-
<b>TOTAL %</b>	77%	4%	19%	-	-
<b>AVERAGE</b>	-	-	-	\$1,430.00	-
<b>RANGE</b>	-	-	-	-	\$21 - \$5,243

This study also looked at the type of services provided to individuals who would be subject to financial needs participation if it were to be applied to RT services at application. The table below demonstrates the type of RT services provided to consumers who would be subject to financial participation.

## Service Type for RT Consumers Required to Participate Financially

Type of Service	Total Number of Consumers*	Total Cost of Expenditures	Average Cost Per Service
Sensory Services	20	\$9,505.09	\$475.25
Computer Services	13	\$28,537.67	\$2,195.20
Vehicle Modification	15	\$217,711.45	\$14,514.10
Rehabilitation Technology	5	\$4,959.41	\$991.88
Home Modification	2	\$17,528.80	\$8,764.40
Driver Evaluation & Training	12	\$15,501.85	\$1,291.82
Other	10	\$1,598.60	\$159.86

\*May include duplicate count since a single consumer may receive more than one RT service.

The following is a brief explanation of the types of RT services that were included in each of the categories:

- Sensory services: assistive technology devices/services, rehabilitation engineering, telecommunication devices for the deaf (Note: *This only includes hearing aids if purchased out of the RT budget. The majority of hearing aids were purchased out of counselor budgets*).

- Computer services: microcomputers, associated peripherals, software, consulting/programming fees.
- Vehicle modification included van modifications, hand controls, etc.
- Rehabilitation technology: assistive technology devices and rehabilitation engineering.
- Home modification: ramps, bathroom modifications, widening doorways.
- Driver Evaluation & Training: evaluations/diagnostics and training
- Other: miscellaneous services, other training or exams.

The largest impact to consumers in terms of services if RT were subject to financial needs testing at application is to sensory equipment and services including only those hearing aids that were purchased out of the RT budget. Of the twenty-three percent (23%) of individuals who would have to contribute financially, forty-three percent (43%) (24 out of the 56 sample cases) would participate in the purchase of sensory equipment or services. The smallest impact in terms of services would be to home modifications that would only require four percent (4%) (2 out of the 56 sample cases) of those required to contribute to the cost of rehabilitation to participate in the purchase of home modifications.

The average expenditure per service category is documented above. The costs range from one hundred thirty-three dollars and twenty-one cents (\$133.21) for "Other" purchases to eight thousand seven hundred eight dollars and forty-one cents (\$8,708.45) for Vehicle Modifications. In terms of cost savings, utilizing this method of calculating financial need, the Department would realize approximately an eight percent (8%) reduction in RT expenditures.

### Sliding scale

This study considered the impact of applying a financial needs test to RT similarly to the way participation in the cost of tuition is currently determined. The following table reflects the scale found on the Training Expenditure Worksheet (see Appendix 5). Each unit contains a percentage in parenthesis that indicates the distribution of consumers from the sample group. For example, it may be inferred that twenty-three percent (23%) of consumers will have a family size of one (1) with a median income of up to twenty-six thousand, three hundred eighty-one dollars (\$26,381) (Column A). Likewise the last column indicates the total percentage of consumers for each family size.

### Distribution of Consumers Applying a 75% Sliding Scale

Family of	Column A Median Income Up to \$ amount, 75% Tuition	Column B Between Column A & B, 50% Tuition	Column C Between Column B & C, 15% Tuition	Column D This \$ amount and Above 0	Total % of Con- sumers
1	26,381 (23%)	31,658 (0.8%)	36,934 (1.3%)	36,934 (0.4%)	(26%)
2	34,499 (16%)	41,399 (1.3%)	48,298 (0.4%)	48,298 (3.4%)	(21%)
3	42,616 (18%)	51,140 (2.1%)	59,663 (1.7%)	59,663 (2.1%)	(24%)
4	50,734 (14%)	60,881 (0%)	71,028 (0%)	71,028 (0.8%)	(15%)
5	58,851 (5.8%)	70,622 (0%)	82,392 (1.3%)	82,392 (0.4%)	(8%)
6	66,969 (2.9%)	80,363 (0%)	93,756 (0%)	93,756 (0.4%)	(3%)
7	68,490 (1.3%)	82,188 (0%)	95,886 (0%)	95,886 (0%)	(1%)
8	70,013 (0.4%)	84,015 (0%)	98,018 (0%)	98,018 (0%)	(0.4%)
9	71,535 (0.4%)	85,842 (0%)	100,149 (0%)	100,149 (0%)	(0.4%)
10	73,056 (0.4%)	87,668 (0%)	102,279 (0%)	102,279 (0%)	(0.4%)

The table below contains information as it relates to those consumers who would be required to financially participate in the cost of RT services should a seventy-five (75%) sliding scale be applied. For each type of service the average cost per expenditure was multiplied by twenty-five percent (25%) to figure the average cost for the consumer, which is listed in the last column.

### Service Type and Expenditures Per Consumer

Type of Service	Average Cost Per Expenditure	Minimum Average Consumer Participation (25%)
Sensory	\$498.17	\$124.54
Computer	\$1,469.41	\$367.35
Vehicle Modification	\$9,805.61	\$2,451.40
Rehabilitation Technology	\$778.46	\$194.62
Home Modifications	\$6,383.81	\$1,595.95
Driver Evaluation and Training	\$1,412.63	\$353.16
Other	\$180.40	\$45.10

The following chart demonstrates the portion of the cost of RT services the Department would pay if a seventy-five percent (75%) sliding scale were applied.

### Financial Needs Testing Applying a 75% Sliding Scale

	75%	50%	15%	0%
<b>Consumers</b>	199	10	11	18
<b>Percentage</b>	84%	4%	5%	7%

Since the highest amount that the Department would pay is seventy-five percent (75%), all consumers of RT would be required to participate financially with the exception of those who receive SSI or SSDI. Applying this scale would result in

approximately a thirty-four percent (34%) reduction in expenditures for RT services.

The study also considered the impact of applying a financial needs test with the maximum Department contribution being one hundred percent (100%). The following table illustrates this.

#### **Financial Needs Testing Applying a 100% Sliding Scale**

	<b>100%</b>	<b>75%</b>	<b>50%</b>	<b>25%</b>
<b>Consumers</b>	199	10	11	18
<b>Percentage</b>	84%	4%	5%	7%

In this scenario sixteen percent (16%) of individuals receiving RT services would be required to participate financially and the Department would gain approximately a nine percent (9%) savings in the cost of RT services.

Regardless of the method, if the Department decides to apply financial need testing to RT, there must be some mechanism for exceptions.

#### **Other issues related to implementation of financial needs testing for RT services**

The Department should consider if applying financial needs testing is appropriate since there is sufficient case service funds available to provide RT to eligible consumers in open priority categories without applying a financial needs test.

Federal regulations prohibit requiring financial participation at so high an amount that it effectively denies an eligible individual a needed service. This issue is extremely difficult to address. The minimum required financial participation for tuition is 25% of the highest state rate. Although this amount may rise over time, the minimum financial participation should consistently stay in the hundreds of dollars range. Whereas 25% of the cost of a single RT service could vary from as little as \$3 for a computer software item up to as much as \$14,250 for a van modification.

There are no set fees for specific rehabilitation services. Therefore, it would be difficult to predict consumer financial participation during plan development. Consumers may choose not to pursue needed services due to the uncertainty of the amount of financial commitment.

Requiring all consumers who are not SSI/SSDI recipients to participate financially in the cost of RT services may impact the informed choice of Individuals with no or very little income or comparable benefits. They would be restricted in their choices by the amount of financial participation required.



Those individuals who require RT may also have substantial expenses related to their disability for which they are responsible. Federal regulations require that such expenses be considered when calculating financial participation.

Under the Department's current administrative regulations, "other training" is excluded from financial needs testing. In FY 2002, \$257,873 or approximately 13% of the expenditures utilized from the RT budget was for driver rehabilitation training. Furthermore, drivers training for individuals with cognitive limitations who require specialized instruction are currently coded as rehabilitation technology although these individuals may not need any adaptations or specialized equipment. A decision as to whether this service would continue to be excluded from financial needs testing if RT services were to be subject to such testing would need to be made.

Several of the staff expressed that it did not seem fair that tuition would be singled out as requiring financial participation when other services which were also costly, such as RT, were not. Several asked for a single means of computing the amount of financial participation for all services. The Department will need to consider the implications of applying a financial needs test to other disability-related services such as those provided by community rehabilitation programs and supported employment providers.

There appears from comments made in the survey that there is some confusion about the application of financial needs testing to vehicle and property modifications. An economic need test is currently mandated for vehicle and property modifications in excess of \$10,000 (KAR 781 1:030). The Department may want to explore strategies for increasing staff knowledge in this area.

Rehabilitation Technology services are disproportionately provided to individuals with mobility, sensory, and learning disabilities. The Department should consider whether or not application of a separate financial need test for RT would adversely impact specific disability groups more than others.

Implementation of financial needs testing for RT services has several administrative implications, which could impact the workload of counselors and assistants.

Unlike post-secondary education where the school provides a Student Aid Report, the Department would need to develop a method of verifying income. Whatever method is selected, such as obtaining a tax return, would require additional time and effort by counselors and assistants.

Tracking and collecting payment of the consumer's share of RT services will also require the development of new procedures.

Federal Regulations prohibit the application of financial needs testing to auxillary aides or services, which are required for an individual to participate in their rehabilitation program as covered under Section 504 and ADA. This would require the counselor to determine on a case-by-case basis whether or not a RT service meets this definition.

The addition of these procedural steps in the administrative process could result in delay in the provision of needed services.

## **Conclusions**

This study found that the majority of staff and the SCVR were supportive of the implementation of a financial needs test for RT services. Collected comments indicated that many staff wanted financial needs testing to be applied consistently to all allowable services.

Gathered data indicated that RT services are highly effective in assisting eligible individuals, particularly those individuals with significant or most significant disabilities, achieve or maintain employment at higher wages and more benefits. Both consumers and staff expressed a very high satisfaction level with RT services.

If the Department chooses to pursue the application of financial needs testing to RT services, numerous administrative issues will need to be addressed including: consumer choice and access; legal mandates; quality of services; implications in terms of standards and indicators; and impact on staff workload.

The Division of Program Planning and Development would like to thank the Field Administrator Team for the recommendation to conduct the Rehabilitation Technology Comprehensive Study. As always, their valuable input will be considered as the Leadership Team makes policy decisions to more effectively serve Kentuckians with disabilities.

## Appendix

The Division of Program Planning and Development has been asked by the Leadership Team at the recommendation of Field Administrators to investigate the implications of applying a financial needs assessment to Rehabilitation Technology services. Currently these services are available at no cost to eligible consumers. The Department is assembling two pieces of information about this issue: A three-year statistical study of cases where RT was provided and professional opinion. As we are committed to seeking agency wide input as part of any decision making process, the survey below is especially valuable. Your opinion provides important information to make a decision that meets the needs of our consumers and makes the best use of the Department's fiscal resources.

**Rehabilitation Technology (RT) Services Survey:**  
**To be completed and returned by 12/20/02**

*This Survey consists of 6 questions and may be completed in under 5 minutes.*

1). Please check one of the following as it applies to you.

<input type="checkbox"/> Central Office Administrator <input type="checkbox"/> Central Office Assistant <input type="checkbox"/> Field Administrator <input type="checkbox"/> Counselor <input type="checkbox"/> Rehabilitation Counselor for the Deaf <input type="checkbox"/> Communication Specialist	<input type="checkbox"/> Field Assistant <input type="checkbox"/> Job Placement Professional <input type="checkbox"/> Rehabilitation Technology Staff  <input type="checkbox"/> <b>Other: please specify</b>
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2). What do you consider Rehabilitation Technology? Check all that apply.

<input type="checkbox"/> Computers <input type="checkbox"/> Assistive Software <input type="checkbox"/> Hearing Aids <input type="checkbox"/> Alerting Devices <input type="checkbox"/> Vehicle Modifications <input type="checkbox"/> Home Modifications <input type="checkbox"/> Adaptive Equipment	<input type="checkbox"/> Ramps/Structural Modifications <input type="checkbox"/> Work Station Accommodations <input type="checkbox"/> Prescription Glasses <input type="checkbox"/> Power Wheelchair <input type="checkbox"/> Specialized Keyboard <input type="checkbox"/> Communication Devices <input type="checkbox"/> Other (Please Specify)
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3). These services are currently **EXEMPTED** from financial needs assessment. Should they be subject to such an assessment? Check all that apply:

<input type="checkbox"/> Tutors, Note Takers, and Assistive Technology Educational Aids <input type="checkbox"/> Rehabilitation Technology <input type="checkbox"/> Carl Perkins Rehabilitation Center	<input type="checkbox"/> Books and Supplies, Tools, and Equipment (for training) <input type="checkbox"/> Vehicle Modifications <input type="checkbox"/> <b>Other (Please Specify)</b>
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- 4). These services are currently subject to a financial need assessment. **Should any of them be exempt?** Check all that apply:

<input type="checkbox"/> Physical & Mental Restoration <input type="checkbox"/> Tuition <input type="checkbox"/> Maintenance <input type="checkbox"/> Transportation	<input type="checkbox"/> Services to Family Members <input type="checkbox"/> Occupational Licenses, Tools and Equipment, Livestock & Supplies <input type="checkbox"/> Other Goods and Services (please specify)
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- 5). Should a financial needs assessment be applied to Rehabilitation Technology?

☐ Yes

☐ No

- 6). **If** a financial needs assessment for Rehabilitation Technology would be instituted, how should it be applied? *Keep in mind that we cannot set financial participation so high as to effectively deny the individual a necessary service.*

Choose only one of the three below:

☐ Apply the financial needs assessment completed during application.

☐ Apply a sliding scale with a maximum percentage point (i.e. like the 75% sliding scale for Training Services).

If so, what percentage do you feel is fair?

☐ Below 75%

☐ 75%

☐ 75 – 79%

☐ 80 – 84%

☐ 85 – 89%

☐ 90 – 94%

☐ 95 – 99%

☐ 100%

☐ Other (explain):

- 7). If you have any additional comments that pertain to this survey, please provide them here.

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**>>>ALL RESPONSES ARE CONFIDENTIAL<<<**

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**After completing the survey please choose one of the following options:**

To return your survey electronically:

- 1). Click on **File**,  
Scroll down to **Send to**,  
Then select **Mail Recipient (as Attachment)**.
- 2). Send to: **Leake, Joseph S**

Or

**FAX TO: 502-564-1268**

*Thank you for your hard work and continued commitment  
in providing the highest quality services to our consumers.  
We appreciate the time you took to provide your input on this issue.*

The Division of Program Planning and Development has been asked by the Leadership Team at the recommendation of Field Administrators to investigate the implications of applying a financial needs assessment to Rehabilitation Technology services. Currently these services are available at no cost to eligible consumers. The Department has collected information about this issue from a three-year statistical study of cases where RT was provided and survey responses from staff. Input from members of the Statewide Counsel for Vocational Rehabilitation has also been requested to be included in the final report. Please complete the survey below as your opinion will provide important information to guide the decisions that meet the needs of our consumers and makes the best use of the Department's fiscal resources.

**Rehabilitation Technology (RT) Services Survey:**

1). What do you consider Rehabilitation Technology? Check all that apply.

<input type="checkbox"/> Computers <input type="checkbox"/> Assistive Software <input type="checkbox"/> Hearing Aids <input type="checkbox"/> Alerting Devices <input type="checkbox"/> Vehicle Modifications <input type="checkbox"/> Home Modifications <input type="checkbox"/> Adaptive Equipment	<input type="checkbox"/> Ramps/Structural Modifications <input type="checkbox"/> Work Station Accommodations <input type="checkbox"/> Prescription Glasses <input type="checkbox"/> Power Wheelchair <input type="checkbox"/> Specialized Keyboard <input type="checkbox"/> Communication Devices
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☐ **Other (Please Specify)**

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2). These services are currently **EXEMPTED** from financial needs assessment. Should they be subject to such an assessment? Check all that apply:

<input type="checkbox"/> Tutors, Note Takers, and Assistive Technology Educational Aids <input type="checkbox"/> Rehabilitation Technology <input type="checkbox"/> Carl Perkins Rehabilitation Center	<input type="checkbox"/> Books and Supplies, Tools, and Equipment (for training) <input type="checkbox"/> Vehicle Modifications
--	--

☐ **Other (Please Specify)**

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- 3). These services are currently subject to a financial need assessment. **Should any of them be exempt?** Check all that apply:

<input type="checkbox"/> Physical & Mental Restoration <input type="checkbox"/> Tuition <input type="checkbox"/> Maintenance <input type="checkbox"/> Transportation	<input type="checkbox"/> Services to Family Members <input type="checkbox"/> Occupational Licenses, Tools and Equipment, Livestock & Supplies
---	--

☐ Other Goods and Services (please specify)

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- 4). Should a financial needs assessment be applied to Rehabilitation Technology?

☐ Yes

☐ No

- 5). **If** a financial needs assessment for Rehabilitation Technology would be instituted, how should it be applied? *Keep in mind that we cannot set financial participation so high as to effectively deny the individual a necessary service.*

Choose only one of the three below:

☐ Apply the financial needs assessment completed during application.

☐ Apply a sliding scale with a maximum percentage point (i.e. like the 75% sliding scale for Training Services).

If so, what percentage do you feel is fair?

- ☐ Below 75%  
☐ 75%  
☐ 75 – 79%  
☐ 80 – 84%  
☐ 85 – 89%  
☐ 90 – 94%  
☐ 95 – 99%  
☐ 100%



☐ Other (explain):

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6). If you have any additional comments that pertain to this survey, please provide them here.

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**>>>ALL RESPONSES ARE CONFIDENTIAL<<<**

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*Thank you for your hard work and continued commitment  
in helping to provide the highest quality services to our consumers.  
We appreciate the time you took to provide your input on this issue.*

**Question #1:**

Other Titles Identified from Survey Respondents
Teacher, Psychologist, Occupational Therapist, Interpreter, Instructor, Evaluator, Center Administrator, CDPCRC Assistant, and Accountant

**Question #2:**

Other Services Considered RT
To numerous to list
Surplus computers as support for persons in training
Scooters that are needed for an ambulatory person who cannot walk far, to move about at a job site.
Job Coach or other person to organize a workspace or do behavior modeling in organization for SD consumers who need this type of unique service.
Environmental control units, computer hardware
Environmental control units
Devices for LD students
Dependent upon client needs
Attendant Care
Attendant Care
Anything that modifies an individual's environment, so that they may work or attend school.
Any device that enables an individual to become employable when otherwise they wouldn't be
Almost anything could be, it depends on the application, not the item
[Faxed copy, question #2, the respondent checked computers and wrote beside it]: "only if specialized."
ADL devices, compensation strategies, job modifications

**Question #3:**

Other Services Identified to be <u>Subject</u> to Financial Needs Test
Treat all services the same as hard to weigh what is most important
Rehabilitation technology hardware
Personal Assistant (Attendant) Care
None should be subject to financial needs testing
If these are needed as a reasonable accommodation to attend training a consumer cannot be expected to pay for his own accommodation - right? ADA?

(Cont. on next page)

Other Services Identified to be <u>Subject</u> to Financial Needs Test
Home modifications, computers, ramps
Home modifications
Everything should have a financial need
Computers
Attendant Care
All VR services should have financial needs test applied over a certain income
All Technology
All DVR Services

#### Question #4:

Other Goods and Services Identified to be <u>Exempt</u> from Financial Needs Test
Occupational Licenses should be exempt, but not tools, equipment, livestock, etc.

#### Question #6

Other Suggestions on How to Apply a Financial Needs Test
The scale used for training would work well. Also, consideration for high medical bills, were a consumer has no insurance.
Tax Return
I am not sure how the current sliding scale or financial needs assessment is completed. I think RT might be underutilized if a client is asked to pay for it, resulting in fewer successful closures. Many people might forego RT if they are asked to pay for all of it or a significant percentage of it. So many of the people I work with need to worry about paying for food and shelter, and they obviously should not have to contribute at all. For people who have some discretionary income, I think that contributing a small amount towards RT would help them to consider cost-effectiveness of RT purchase and to take ownership in the selection of the items. I have also served clients who would be able to purchase some RT on their own.
Similar to the way DVR computes for tuition
I would prefer to use the assessment completed during application. However, I would like to see an exception placed into the regulations for those families that may appear to be over the limit but actually are not doing well do to all of the out of pocket medical expenses that they are incurring. I work with many families whose income is over our guidelines but if you look at their individual circumstances, they actually need the help more than some other families.

(Cont. on next page)

Other Suggestions on How to Apply a Financial Needs Test
I think that a program where the first \$1000 was exempt from a financial need test and then the remaining amount should be on a sliding scale like tuition where we pay up to 75% based on income. I highly recommend that we look at income tax returns, other resources as is done on financial aid applications. There would be less chance of penalizing someone who accurately reports income, but would also tend to cut down on the potential for "tweaking" the income.
None of the above
New financial need assessment using DVR-2 at time of plan
Need to have some flexibility for extenuating circumstances [use some type of sliding scale]
Limit the amount to be all purchases over \$500 and that would allow all consumers to have a small amount to use
Individual Review
Consider providing Rehab Tech services up to \$500 regardless of financial need, and any RT above that amount would be determined considering the Financial Need assessment at application.
Blanket 75%
Apply the financial needs assessment (with verification) completed during application on a 75% sliding scale.
Apply financial needs assessment on DVR-2 but require proof - i.e. Tax return, SAR, etc.
If you apply need, the DVR 2 at time of application is not appropriate as situations change over time. School transition cases may be in the system 4 to 10 years or more depending on age 14 application (as suggested in both the Rehabilitation Act and IDEA). The scale used for tuition is too punitive and in my opinion would be a mistake to apply to Rehabilitation Technology. However when you get into big ticket items such as car modifications the client may have some resources to participate (if costs are over \$5000).
All financial needs should be consistently implemented in all service areas. I do not think it's an issue of fair but of consistency.
(No explanation)

#### Survey Comments from Question #7:

General Comments about the RT Survey
Feel that we have many people with the means to pay but are being told by vendors that voc-rehab will pay for it.
The mission of our department is to serve individuals with disabilities. Our goal should be to "level the playing field" so that individuals with disabilities have the same opportunities as their peers without disabilities. By applying financial

(Cont. on next page)

General Comments about the RT Survey
needs testing to RT, we would be adding a cost of employment to the individual that his/her peers do not have. This is absolutely contrary to our mission. I am very much against applying financial needs testing to RT.
I truly hope that this doesn't happen. We already use comparable benefits to offset costs as much as possible. Our assistance (financially and experience) in this area is vital to helping consumers in both training and work settings.
There are many areas to look at in this agency to save money, such as the work group that researched in 1997 did (during the last big budget crunch). Look at all of the personal services contracts like the Morehead contract you will find things that are very hard to justify in today's market place!
Rehab tech cases are normally easy 26's. I think this will hurt the Counselor's ability to reach their quota and ultimately decrease the states numbers. More importantly, this is a core service that DVR provides which sets us apart from any other agency. This may weaken our need to exist in the first place. Most importantly, it will hurt our consumers who need the service and won't be able to get it by any other means.
In light of the budget crunch and rising cost of all service areas, I strongly support implementing a financial needs assessment to all areas that the Federal regulations allow.
Some consumers may elect not to purchase needed assistive technology and risk compromising the success of their DVR program. We may also alienate families of influence who advocate for DVR when asked.
I feel like it is wrong NOT to require a financial needs assessment to these items. I know of clients who have income (or they are students whose parents claim them on their taxes and the PARENTS have the income) who could afford a lot of these items we are paying for. With the budget crunch as such, this is a very logical and fair solution. You can't use a financial assessment scale on one item (schooling) and not use it on other items such as rehab tech.
When Rehabilitation Technology is provided, especially the high dollar ones, ideally there should be some guarantee that the outcome for (page cut off - fax)
I spend an extremely large amount each year on attendant care services. I think that particular service should have more restrictions and should be based on financial need.
I would like to see agency not provide tuition assistance, only do books no matter income but, the max for books be 500.00 per semester.
It seems to be to be fair to count prescription eyeglasses that help to compensate for a visual impairment the same as hearing aids that help to compensate for a hearing impairment. I think that the mix of a set aside amount and then applying the financial needs test is more equitable. The \$1000 limit would allow for many accommodations. Our Rehabilitation Technologist does a great job. I hope that any changes will not disturb the outstanding service delivery system already developed.

(Cont. on next page)

General Comments about the RT Survey
Many of our consumers need rehab technology advice but may be able to pay for equipment/modifications. It appears that we could use more rehab. tech. staff to provide those types of services.
Key is to treat all services the same, and then we don't have to choose what we apply financial needs to.
A maximum percentage point below 100% would effectively bar many clients from services. They simply cannot come up with 25% of anything. Remember, there are no federal training grants to fill this gap. We would essentially be denying services to eligible individuals because of their poverty. Wouldn't that leave egg on our collective faces!
I think the financial needs test is just as applicable for one service as another. I do not think rehab. Tech. Should be exempt.
If training and other services have a financial needs test, then I see no reason why rehab. technology, communication devices, hearing aids, etc should also.
I think that the definition of rehabilitation technology needs to be addressed. For example, computers are technology but not rehab./assistive technology. The software or equipment added to the computer is what constitutes the rehab./assistive technology. I feel that a sliding scale (such as 75%) should be applied to that technology which someone would require if they did not have a disability (i.e. computers, tape recorders, etc.). Another cost-saving measure would be to have training for the counselors and job placement staff to be educated on when the employer and schools should be responsible for the cost of the rehab. technology. I have tried to get employers and colleges to purchase the technology, which our RT prescribes but this does not work because another counselor has been willing to pay for it. This must be statewide consensus.
Many consumers are already contributing to their rehabilitation needs or are at poverty level. The greatest emphasis should be placed on "need" not "want" and that big and expensive is not always the best and most useful.
I think we should do Rehab tech for everyone up to \$1000 without any financial need requirement. Any expenditure over \$1000 could be done on a sliding scale of need. We just need to be able to do some assistive technology as a support service or even for just for evaluation of some individuals in order to get an appropriate vocational plan developed and going.
All other services have financial needs assessment and to treat all clients equal - F.A.N. should be applied.
I do not think hearing aids are Rehab. Tech. They should be subject to economic needs testing. Assistive listening devices are rehab tech.
The need for the purchase of equipment or services for one individual does not in itself justify a like need for technical services for another individual. A financial means test for all Rehabilitation Assistive Technology will do harm to the Customer and would extend the ability to provide services to many additional individuals in need.

(Cont. on next page)

General Comments about the RT Survey
As a disability-related service, rehabilitation technology services should be exempt from a financial needs test. In addition, any savings obtained by instituting a financial needs test in rehabilitation technology would be minimal.
If consumers pay for part of their rehab tech - it could be very confusing for our vendors - ex. - we have lower rates for hearing aids and vendors still have to accept our fees - so they get payment from VR and the consumer? We have tried that briefly in the past and vendors did not like it. Also, it seems like the rehab tech assessment and provision of rehab tech is one of the unique services we have, services currently subject to financial needs testing are not unique. Even though consumers may initially come to DVR for us to pay for technology they usually receive services they don't know they need - such as counseling to deal with the disabilities and info about job accommodations. If we institute a financial needs policy, we may lose these consumers who are often working when they come to us, but in danger of losing their jobs. Bottom line, fewer PEO's! Also, 20.7% VR consumers utilize asst. technology in helping to enter the workforce!
I strongly feel, in these times of limited financial resources, the agency should impose a financial needs test on rehab technology services. We presently apply financial needs testing on other services (outlined by you above) that are sometimes just as essential to an individual's rehab program as are services involving rehab technology. To be fiscally responsible and fair to all our consumers this needs to be done.
There would need to be a method devised to ensure that the income amount given is correct. With financial aid we have the FAFSA but could not require all needing Rehab Tech to apply for grants.
It is my opinion that in order for the program to be beneficial to all consumers of out Commonwealth, it is only equitable that consistency be shown through all the services we render to our consumers. Services should be based on need rather than whatever disability group has the larger, more influential lobbying power.
No Financial Needs Test should be applied.
I think it would be good to have a financial needs assessment for hearing aids.
RE: #3 assess via Tuition Worksheet - (similar benefits, possible loan reductions via FAO, etc.).
The more our agency slides into a fee for services, the closer we get to discrimination against individuals with disabilities that are economically poor.
By Rehab Tech do you mean the hardware or do you include the cost of evaluation for appropriate modifications, etc.
I think we need to have both 1) a minimum partial payment or percent (25%) so that all clients have something invested and it has value to them, and 2) a minimum we pay - around 50% so that a family is not penalized because they are working.

(Cont. on next page)



General Comments about the RT Survey
<p>I think that RT Consumers should be treated same as other consumers. Example is the most we can pay on tuition is 75% applying the sliding scale. We should not treat RT differently.</p>
<p>We need to develop a financial needs assessment that gives our program credibility. We rank 5th in the nation and doing a lot of good things with the limited funds we receive. Purchasing computers, hearing aids, etc for individuals with incomes of 100,000 or more just doesn't seem to do any thing for our credibility.</p>
<p>If the course of my work I have had little occasion to deal with needs assessment. In choosing which items should be exempt and which should be based on a needs assessment, I followed the guideline that it would be fair to use a needs assessment for those services all students/workers would have to provide such as tuition or transportation, but that all items and services arising out of the disability itself, such as vehicle modification or note takers, should be exempt.</p>
<p>If possible any individual should contribute something to their program. There should be consequences too. If there aren't any, then our consumers can choose any behavior without the consequences. I believe that DVR would have better outcomes if our consumers helped. I know when my consumers put forth an investment in their program; they always finished their program and got a job.</p>
<p>We need to continue to provide services to the middle class - when we effectively deny services to the middle class, we become just another "welfare program" and we know how they are viewed by congress!</p>
<p>I did not respond to many of the questions because I am not a counselor. I think the counselors have a better perspective on this topic.</p>
<p>I have a consumer whose family income is \$15,000 a month. The mother asked about van modifications. It was disconcerting to think that someone who makes that much money could possibly get this very expensive service, and not have to help out in the cost.</p>
<p>There is such variability in the cost of RT - from a few pennies to tens of thousands of dollars. I don't know how asking individuals to pay for a percentage of items could work effectively. Someone might be able to afford to purchase part of a specialized keyboard for a computer, but might have difficulty paying a percentage of a specialized wheelchair seating system. It seems that if there is a financial assessment, it should identify how much money is available to be spent for RT, rather than using a percentage.</p>
<p>Because Rehab tech is a service so important to people's disabilities, needs, and employment success, I hate to see us limit our Agency from providing such skilled services, and services that few other agencies provide. As we continue to set limitations on our services, I am afraid we also end up narrowing our clientele or potential consumers, as well as limiting the Rehab services we provide, eventually closing our doors, as other Agencies will pick up where we leave off.</p>



(08/01/2002)

Appendix (4)

**DVR APPLICATION WORKSHEET**  
**Cabinet for Workforce Development**  
**Department of Vocational Rehabilitation**

Caseload #: \_\_\_\_\_ Case # (S.S.) \_\_\_\_\_ Birth date: \_\_\_\_\_  
Month/Day/Year

Name: \_\_\_\_\_  
Last First MI Maiden

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_ County: \_\_\_\_\_

E-mail: \_\_\_\_\_ Telephone: \_\_\_\_\_ Referred date: \_\_\_\_\_  
Month Day Year

Living Arrangement: \_\_\_\_\_ Homeless/Shelter ☐

Grade Level Completed: \_\_\_\_\_ Type of Degree/Certificate \_\_\_\_\_ Service under IEP: Yes ☐ No ☐

Gender: Male ☐ Female ☐ Race: \_\_\_\_\_ Referral by: \_\_\_\_\_

Last School Attended: \_\_\_\_\_ Date: \_\_\_\_\_

Primary Impairment: \_\_\_\_\_ Cause: \_\_\_\_\_

Secondary Impairment: \_\_\_\_\_ Cause: \_\_\_\_\_

Source of Support: \_\_\_\_\_ SSI Status: \_\_\_\_\_ SSDI Status: \_\_\_\_\_

**Type of Public Support**

None	SSI-A	SSI-B	SSI-D	TANF	GA	SSDI	VET-D	W-COMP	Other	Public Support Total
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

**Financial Assessment:**

No. in Household & the Allowed Living Expense		
1.....1759	6.....4465	(A) Total Number in Household _____
2.....2300	7.....4566	(B) Total Monthly Income _____
3.....2909	8.....4668	(C) Monthly Allowable Living _____
4.....3382	9.....4769	Expense (from chart) _____
5.....3923	10.....4870	(D) Monthly Income Available _____
		for Rehab (B-C) _____

Work Status: \_\_\_\_\_

Hours Worked: \_\_\_\_\_ Hourly Earnings: \_\_\_\_\_ Weekly Earnings: \_\_\_\_\_

**Type of Medical Insurance and Comparable Benefits: (Check block if yes)**

Source	Y	Carrier ID #	Source	Y	Carrier ID #
Medicaid			Comm. Men. Health		
Medicare			PELL		
Health Insurance			Veteran's Admin.		
1. Private-Other			Workers Compensation		
2. Private Employer			Other		
3. Public-Other			Other		

Means of Transportation: \_\_\_\_\_ Driver's License ☐

Veteran: Yes ☐ No ☐

38. Applicant Vocational Preferences: \_\_\_\_\_

**39. Work History Section:**

Employer Name & Address: _____	Begin-End Dates: _____	Job Title: _____
Hourly Salary: _____	Hours Per Week: _____	Reason for Termination: _____
Job Functions: _____		

Employer Name & Address: _____	Begin-End Dates: _____	Job Title: _____
Hourly Salary: _____	Hours Per Week: _____	Reason for Termination: _____
Job Functions: _____		

Employer Name & Address: _____	Begin-End Dates: _____	Job Title: _____
Hourly Salary: _____	Hours Per Week: _____	Reason for Termination: _____
Job Functions: _____		

Employer Name & Address: _____	Begin-End Dates: _____	Job Title: _____
Hourly Salary: _____	Hours Per Week: _____	Reason for Termination: _____
Job Functions: _____		

40. Name, Address, Phone # of Contact Person: \_\_\_\_\_

41. Key Family Members (Name, Age, Relation, Occupation): \_\_\_\_\_

**FOR COUNSELOR USE ONLY:**

**APPLICANT STATEMENT:**

I understand that I will not be denied services on the basis of race, color, national origin, sex, age, religion, or type of disability. I understand the need for the Department of Vocational Rehabilitation to collect information about me and authorize release of any medical, psychological, educational or other information to the Department of Vocational Rehabilitation.			
I have been provided with a copy of the "Consumer Guide" which contains a written description of the program and my rights and responsibilities.			
The information I have given is true to the best of my knowledge and I hereby request Vocational Rehabilitation Services. I understand that my signature signifies my intent to work after completion of Vocational Rehabilitation Services.			
Signature: Counselor	Date	Signature: Individual	Date
Signature: Parent or Guardian	Date		

# DEPARTMENT OF VOCATIONAL REHABILITATION TRAINING EXPENDITURE WORKSHEET

CONSUMER NAME: \_\_\_\_\_ SS#: \_\_\_\_\_  
 SCHOOL YEAR: \_\_\_\_\_ ORIGINAL DATE: \_\_\_\_\_ AMENDED DATE: \_\_\_\_\_  
 SCHOOL NAME: \_\_\_\_\_  
 COUNSELOR: \_\_\_\_\_ TELEPHONE: \_\_\_\_\_  
 ADDRESS: \_\_\_\_\_ FAX: \_\_\_\_\_  
 \_\_\_\_\_ EMAIL: \_\_\_\_\_  
 \_\_\_\_\_

## PART A – TUITION/BOOK AWARD CALCULATION

ADJUSTED GROSS INCOME (From SAR #39 and #73) \$ \_\_\_\_\_

NUMBER IN HOUSEHOLD (From SAR # 64 or 84) \_\_\_\_\_

TUITION AMOUNT PER TERM (Not to Exceed Highest State Rate) \$ \_\_\_\_\_

SLIDING SCALE PERCENTAGE X \_\_\_\_\_ %

ESTIMATED TUITION AWARD PER TERM \$ \_\_\_\_\_

FAMILY OF	<u>Column A</u> Median Income Up to \$ amount, 75% Tuition	<u>Column B</u> Between Column A & B, 50% Tuition	<u>Column C</u> Between Column B & C, 15% Tuition	<u>Column D</u> This \$ amount and Above 0
1	26,381	31,658	36,934	36,934
2	34,499	41,399	48,298	48,298
3	42,616	51,140	59,663	59,663
4	50,734	60,881	71,028	71,028
5	58,851	70,622	82,392	82,392
6	66,969	80,363	93,756	93,756
7	68,490	82,188	95,886	95,886
8	70,013	84,015	98,018	98,018
9	71,535	85,842	100,149	100,149
10	73,056	87,668	102,279	102,279

## TUITION/BOOK AWARD PER TERM

	Term 1/FALL	Term 2/SPRING	Term 3	Term 4	Yearly Total
Tuition					
Books					
Total					

\*\*\*\*If only tuition and/or books are planned, STOP and submit estimated Tuition and/or Book Award to Student Financial Aid Office.\*\*\*\*

## TO BE COMPLETED BY THE STUDENT FINANCIAL AID REPRESENTATIVE

This is the **estimated Tuition and/or Book Award** that DVR plans to authorize for the consumer. Federal regulation **34 CFR 361.48** requires that this individual apply for and accept all available grants prior to utilization of Department funds. **PLEASE INDICATE BELOW IF THE PROJECTED CONTRIBUTION WOULD RESULT IN AN OVERAWARD OR WOULD DISQUALIFY THE INDIVIDUAL FROM RECEIVING GRANTS FOR WHICH THE INDIVIDUAL WOULD OTHERWISE BE ELIGIBLE.** Mail this form to the DVR counselor listed above within ten (10) working days **only** if adjustments are necessary.

The estimated contribution is not acceptable. Please make the following adjustments.

\_\_\_\_\_  
 \_\_\_\_\_

Financial Aid Representative

Date

## PART B – OTHER TRAINING COSTS

COLUMN A (RESOURCES)		COLUMN B	
ESTIMATED FAMILY CONTRIBUTION (From FAN or SAR)	\$ _____	COST OF ATTENDANCE	\$ _____
TOTAL OF ALL FINANCIAL AID AWARDS (From FAN)	+ \$ _____	TOTAL RESOURCES (From Column A)	- \$ _____
YEARLY TUITION FROM PART A	+ \$ _____	<u>REMAINING EXPENSES=</u>	\$ _____
YEARLY BOOKS FROM PART A	+ \$ _____		_____
<b>TOTAL RESOURCES</b>	\$ _____		

**DVR ASSISTANCE FOR OTHER TRAINING COSTS (TO EXCLUDE DISABILITY RELATED COSTS)**[illegible]

**Submit a copy of this page to the Financial Aid Office if expenditures other than tuition, books, and disability related costs are planned.**