### REPORT OF THE

### OFFICE OF THE AUDITOR GENERAL

TO THE

JOINT LEGISLATIVE AUDIT COMMITTEE

839

A PROGRAM REVIEW
OF THE
DEPARTMENT OF REHABILITATION

JUNE 1979



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# California Legislature

## Joint Legislative Audit Committee

GOVERNMENT CODE SECTION 10500 et al

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June 27, 1979

839

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The Honorable Speaker of the Assembly
The Honorable President pro Tempore of the Senate
The Honorable Members of the Senate and the
Assembly of the Legislature of California

Members of the Legislature:

Your Joint Legislative Audit Committee respectfully submits the Auditor General's report entitled "A Program Review of the Department of Rehabilitation."

The report criticizes the department's method of measuring the effectiveness of rehabilitation programs. Inadequate follow-up has led to overstating the number of individuals actually rehabilitated.

Additionally, the report discusses the need for the department to establish guidelines and improve procedures for designing client rehabilitation plans and awarding some services. Finally, the report concludes that the department has not complied with certain contract management provisions of the State Administrative Manual regarding the award of contracts based on a competitive process.

The auditors are Richard C. Mahan, Supervising Auditor; Douglas L. Williams; Enrique E. Farias; and Peter A. Wolfe.

Respectfully submitted,

CHARD ROBINSON

Assemblyman, 72nd District Chairman, Joint Legislative

Audit Committee

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#### SUMMARY

Since 1970, the Department of Rehabilitation has been designated as the sole state agency responsible for administering and providing vocational services to the disabled. The department's primary responsibility is to assist and encourage physically or mentally disabled individuals to prepare for and engage in gainful employment to the extent of their capabilities.

The department receives funding from both federal and state sources. For fiscal year 1977-78, the department's federal apportionment totaled \$81,002,836 while the state apportionment totaled \$11,621,666. During that same year, the department closed over 14,000 client cases as successfully rehabilitated.

Although the department provides worthwhile programs and successfully rehabilitates many disabled individuals each year, we found these areas which need improvement:

- The department's system for measuring program effectiveness does not accurately report the percentage of former clients employed one year after program completion;
- The department needs to establish guidelines and improve procedures for designing rehabilitation plans and providing some services;

- The department has not complied with certain contract management provisions of the State Administrative Manual regarding the award of contracts based on a competitive process.

To alleviate these weaknessess, we recommend the department modify its follow-up survey questionnaire and sampling process to accurately determine whether former clients have secured appropriate jobs and to account for those clients who fail to respond to the survey. We also suggest that the department review procedures for awarding services and provide more specific criteria to assist counselors in determining which clients should receive special services. Finally, we recommend that the department adopt methods based upon a competitive process for ensuring an equitable selection of contractors.

### INTRODUCTION

In response to a resolution of the Joint Legislative Audit Committee, we have conducted an audit of selected areas of the Department of Rehabilitation (department). The review was conducted under the authority vested in the Auditor General under Section 10527 of the Government Code.

#### BACKGROUND

The Department of Rehabilitation has been designated as the sole state agency responsible for administering and providing vocational rehabilitation services to the disabled. The department operates under the authority of the Federal Rehabilitation Act of 1973, as amended in 1974, and Division 10 of the Welfare and Institutions Code of the State of California.

The department's primary responsibility is to assist and encourage physically or mentally disabled individuals to prepare for and engage in gainful employment to the extent of their abilities. Additional responsibilities include (1) preparing the disabled to live independently; (2) promoting and expanding employment opportunities for the disabled; (3) removing architectural and transportation barriers; and (4) developing new and innovative ways of serving the disabled through workshop services, special projects and demonstrations.

The department administers its services through 26 district offices and with the assistance of approximately 850 counselors who are generally responsible for initiating, providing and monitoring general and specialized counseling services. To further provide services for the disabled, the department contracts with a variety of consultants, sheltered workshops and independent living centers.

The department receives funding from both federal and state sources. For fiscal year 1977-78, the department's federal funds totaled \$81,002,836. State general funds totaled \$11,621,666. Added to this amount is \$7,692,798 in other state funds for a total of \$100,317,300. Within this same fiscal year, the department spent \$81,697,374. The following table summarizes program costs, number of successful rehabilitations and average program funds per individual rehabilitated over the last five years. 1/

TABLE 1

DEPARTMENT OF REHABILITATION PROGRAM COSTS
AND NUMBER OF PERSONS SUCCESSFULLY REHABILITATED

Fiscal <u>Year</u>	Persons Successfully Rehabilitated*	Total Program Costs	Average Program Funds Per Person Successfully Rehabilitated
1973-74	15,505	\$55,104,829	\$3,554
1974-75	15,537	\$72,277,915	\$4,652
1975-76	14,522	\$77,824,637	\$5,359
1976-77	12,278	\$64,423,264	\$5,247
1977-78	14,028	\$81,697,374	\$5,824

<sup>\*</sup>As reported by the Department of Rehabilitation.

### SCOPE OF AUDIT

This audit focused on evaluating the department's (1) system for measuring program effectiveness, (2) criteria and procedures for awarding services and (3) management of contracts awarded to private firms and other government agencies.

We reviewed the department's system for measuring effectiveness (including its survey instrument) to evaluate the validity of the department's sampling techniques and assess the accuracy of the results. Additionally, we conducted an independent survey of former clients to check those statistics the department reported.

We selected approximately 70 rehabilitation counselors and 10 district administrators at random and interviewed them; we examined case files and reports at district offices. Additionally, we reviewed the department's administrative and services manuals to identify criteria and procedures for client eligibility and services.

Audit field work was partially limited by the lack of documentation. Specifically, the Contracts' Management Section does not maintain adequate records of outside private contracts. Also, information about special services to the disabled was limited in that district offices do not keep records of vehicles purchased and issued.

### AUDIT RESULTS

### PROGRAM EFFECTIVENESS MEASUREMENT NEEDS IMPROVEMENT

The Department of Rehabilitation lacks a sufficient system for measuring program effectiveness. Although the department gathers comprehensive clients, data on information is insufficient for accurately evaluating effectiveness. Because of this insufficient data base, the department cannot verify the actual performance of its programs. The department reports that in fiscal year 1976-77, 65 percent of its former clients were still employed in California one year after completing their program. However, a survey conducted by the Auditor General in the fall of 1978 concluded that no more than 46 percent of the department's former clients are employed in California after two years. 2/\*

The current system for measuring the effectiveness of the program, including the accompanying data base needs improvement for these reasons:

- The department's survey questionnaire gathers information insufficient to fully evaluate program effectiveness;

<sup>\*</sup>Different statistical conclusions may be partially due to the testing of two different time periods. We surveyed former clients two years after program completion to assess job stability.

- The department does not account for the excessive number of former clients who do not respond to the survey questionnaire;
- The department does not outline sufficient criteria to guide counselors in successfully placing clients into some jobs. Additionally, the department requires counselors to monitor job placement stability for only a minimum of 60 days.

The Rehabilitation Act of 1973 requires that the U.S. Department of Health, Education and Welfare (HEW) evaluate the effectiveness of all programs the act authorizes. Furthermore, this act requires HEW to develop and publish General Standards for the Evaluation of Vocational Rehabilitation Programs and Projects. The standards are designed to establish criteria for evaluating program effectiveness, increase program accountability and require state agencies to determine if they are achieving program goals within their resource capabilities. Annually, state vocational rehabilitation programs submit reports to HEW in response to the federal standards for program evaluation.

To evaluate the effectiveness of vocational rehabilitation, the standards require the department to measure:

- The percentage of rehabilitated clients still employed one, two or three years after they have completed the program

- Various specified earning levels of former clients
- The percentage of rehabilitated clients unemployed for specified time periods after program completion.

The Program Evaluation and Statistics section of the Department of Rehabilitation assumes the responsibility for conducting evaluations under the Rehabilitation Act of 1973 and the General Standards. In addition to gathering and maintaining statistical information about the number of clients served, average cost of services and number of clients placed in jobs, this section gauges overall program effectiveness and client satisfaction by reviewing the results of a survey questionnaire annually distributed to a sample of former clients. Department staff draws a sample of approximately 25 closed client cases from each district office and mails out a standard questionnaire to these former clients. After collecting and analyzing client responses, the department reports its conclusions to HEW.

### Survey Questionnaire Needs Improvement

As previously stated, the department measures program effectiveness with a questionnaire. This instrument, however, gathers insufficient data. Specifically, it fails to adequately correlate the client's vocational training with actual employment

and also fails to gather certain types of information necessary to fully evaluate program effectiveness. (This questionnaire is reprinted in Appendix A.)

HEW's General Standards require the department to ensure that rehabilitated clients are placed in gainful employment suitable to their capabilities. In fact, each client's training and subsequent job should be numbered with the first digit of the corresponding job code in the Dictionary of Occupational Titles. Even though the guidelines do not prescribe that the department indicate a correlation between training and occupation, these standards do require statistics on the relationship between the client's training and job.

In July 1978, the department reported to HEW that 56 percent of the 8,775 clients who received training were placed in a job related to the training they had received. However, the department calculated these statistics by comparing occupational code titles of training plans to code titles of jobs. The questionnaire distributed to former clients includes only one question which relates to training. That question attempts to determine whether the training received was useful in obtaining a job. None of the questions directly pertains to the relationship between the individual's current job and the training provided by the department. As a result, statistics reported by the department may not accurately reflect whether each client's job is related to training received.

The department's follow-up questionnaire also fails to gather information necessary to fully evaluate program effectiveness. Specifically, the questionnaire does not gather this information:

- Whether the individual, if unemployed, is seeking a job
- How long it took a client to find a job
- Whether the client was placed into his job by the department or obtained the position on his own initiative
- Whether a client's job is part-time or full time
- The length of time a former client has been employed
- How soon after program completion the client began his first job
- How many times the client has been through a rehabilitation program.

This information would assist the department in more accurately measuring program effectiveness. Detailed information on a former client's type of employment, length of time employed and number of jobs since program completion would provide the

department with a more complete profile of each client's employment status and with a sounder basis for evaluating program effectiveness.

In March 1979, the department conducted an evaluation of its Client Tracking System pilot project, a program for maintaining and retrieving information about clients. Management decided to fully implement this tracking system by June 1980. The system, once fully operational, will give district offices direct access to some of the data discussed thus far.

### Imprecise Survey Sampling Methodology Produces Misleading Data

Employment statistics reported to HEW each year are not statistically valid because the department receives an inadequate response to its survey questionnaire and does not estimate the effect of those former clients who do not respond to the questionnaire.

Although the department analyzes client responses to the questionnaire, it does not calculate the effect of nonresponses. As a result, the department lacks the data necessary to statistically project accurate conclusions. For example, the department reported in May of 1978 that 65 percent of its former clients in fiscal year 1976-77 were still employed one year after leaving the program. But from fiscal year 1974-75 through 1976-77, the department never received more than a 38

percent response to its questionnaire. Thus, the department could only report that 65 percent of the former clients who responded in the 1976-77 study were employed. It could not accurately project conclusions about all former clients.

The following table details the number of former clients, both rehabilitated and not rehabilitated, responding to the department's questionnaire from fiscal year 1974-75 to 1976-77.

TABLE 2

CLIENT RESPONSE RATE FOR FOLLOW-UP SURVEY\*
FISCAL YEARS 1976-77, 1975-76 AND 1974-75

Fiscal Year Client's Cases Closed

Item of Information	1976-77	1975-76	1974-75
Total number of questionnaires mailed	637	541	800
Clients rehabilitated Clients not rehabilitated	312 32 <u>6</u> 4/	271 270 <u>a</u> /	500 300 <u>b</u> /
Number of mailings	2	2	3
Total number of questionnaires returned	<u>186</u>	112	300
Clients rehabilitated Clients not rehabilitated	109 77	80 32	175 125
Response Rate	<u>29</u> %	21%	38%
Clients rehabilitated Clients not rehabilitated	35% 24%	30% 12%	35% 42%

<sup>\*</sup>The HEW General Standards require the department to evaluate the status of closed cases using these codes:

- 08 -- Closed from referral, applicant or extended evaluation statuses
- 26 -- Closed rehabilitated
- 28 -- Closed not rehabilitated after initiation of rehabilitation services
- 30 -- Closed not rehabilitated before initiation of rehabilitation services

a/ Includes status 30 and 28 closures; excludes 08 closures.

b/ Includes status 08, 30 and 28 closures.

The department selects its sample based upon a request from the Field Operations Division to limit the sample to 25 clients per district office. The division suggested this sample size not because it would yield data representative of the population of former clients, but because of concerns over staff workload.

According to the section chief, the department realizes a low response rate to its questionnaire because address information is inaccurate. During fiscal year 1977-78, the department sent questionnaires to 637 clients whose cases closed during the previous fiscal year. The Post Office returned 220 of the questionnaires or 35 percent as undeliverable. The department received only 186 completed questionnaires out of the 417 questionnaires which were not returned and therefore probably delivered.

In analyzing the overall data, the department develops conclusions based only on the returned questionnaires and does not estimate the effect of nonresponses. The nature of the nonresponses may alter the survey's conclusions. For example, clients may not respond because they were dissatisfied with the program were unable to find suitable employment. Consequently, the statistics from an insufficient sample of clients may not accurately reflect employment statistics on former clients.

### Auditor General Follow-up Survey

The conditions discussed in the preceding pages indicated that the department's follow-up survey may have been providing misleading information on the employment rate of rehabilitated clients. Therefore, we conducted an independent follow-up survey using a more comprehensive questionnaire distributed to a random sample of clients whose cases were closed as both rehabilitated and not rehabilitated during fiscal year 1975-76. The results of our survey reflect the effect of nonresponses. We calculated and adjusted for the effect of nonresponses to the questionnaire by reviewing Employment Development Department (EDD) records on sampled clients' state withholding tax. (See Appendix B for a detailed description of our survey methodology.)

As a result of our survey, we are 90 percent confident that between 39 and 46 percent of department clients completing the program two years prior to the survey were employed in California. These results are significantly lower than the department's conclusion that 65 percent of its former clients are employed one year after completing the program.

The department's insufficient measurement system prevents it from developing accurate information on the effectiveness of rehabilitating clients and placing them into gainful employment. As a result, it may be more difficult for

the department to evaluate the effectiveness of individual rehabilitation programs and allocate resources in the areas which will maximize benefits.

### Criteria for CETA Program Job Placements and Follow-up Needs Improvement

The department has not provided counselors clearly defined criteria for crediting certain job placements. The department monitors job placements for only 60 days before closing a client's case as a successful rehabilitation. Because of this limited monitoring, the department may be closing some cases and recording a successful rehabilitation when a client remains employed for only a limited period of time.

Neither the Rehabilitation Act of 1973 nor the department's Rehabilitation Services Manual provides sufficient criteria for determining when a successful job placement occurs. Although the federal act does not discuss specific criteria for successful rehabilitations, the department's manual provides basic criteria for terminating services and reporting the client as rehabilitated. Basically, these are the criteria:

- Appropriate services have been provided the client in accordance with the individual written rehabilitation plan
- The program for rehabilitation services has been completed

- The client is engaged in a suitable occupation.

An occupation is considered suitable when counselors confirm that certain conditions have been met after the client has been employed no less than 60 days. Some of these conditions are that (1) the client must possess the technical skills as well as the physical and mental capacity to perform the work, (2) the client and the employer are satisfied and (3) the client enjoys regular or reasonably permanent employment with a wage commensurate with other workers.

In some cases, however, department counselors determine successful job placements using various criteria. For example, our survey of approximately 70 counselors revealed different practices on placing clients into jobs funded under the Comprehensive Employment and Training Act (CETA)--jobs which are generally for limited terms. Three counselors stated that placing a client into a CETA position for more than 60 days is denoted as a status 26 or a successful rehabilitation while 59 other counselors considered CETA positions for a status 26 rehabilitation in certain circumstances. Finally, only three counselors told us that placing a client in a CETA position does not constitute a successful rehabilitation. Department management agreed that client placement into CETA positions should not be labeled a status 26 rehabilitation. Inconsistent

interpretation of department criteria could allow for inaccurate counts of status 26 rehabilitations—a misrepresentation of program effectiveness.

Another hindrance in gauging program effectiveness is that counselors generally monitor a client's job stability for only 60 days. Since some CETA jobs last no more than one year while other jobs may have a probationary period of up to one year, the 60 days may be an insufficient amount of time to classify former clients as employed.

### CONCLUSION

The Department of Rehabilitation's survey questionnaire for measuring program effectiveness does not collect all information necessary for an evaluation. Moreover, the client sample which completes the survey is not representative of all former clients. As a result, the department does not gather accurate information on the employment status of former clients and reports statistics which are misleading.

While the department reports that 65 percent of its former clients are employed one year after program completion, an Auditor General survey projected that only 39 to 46 percent of these clients are employed two years after completing the program. As a result, the department may not be able to evaluate individual rehabilitation programs and allocate resources in areas which will maximize benefits.

### RECOMMENDATION

We recommend the department evaluate the usefulness and reliability of its current effectiveness measurement system. Although certain methodological improvements to the system will increase its accuracy and reliability, alternative evaluation systems—providing more in—depth information on former clients' employment status, reasons for unemployment and success at independent living—may be more appropriate for assessing program effectiveness. If the current follow—up survey system is retained, we recommend that the department:

Modify its current follow-up survey questionnaire to include questions which would gather more specific and useful information. At minimum, the department should include these questions:

- Whether the unemployed client is seeking employment
- How long a client may have been unemployed
- Whether employment is full-time or part-time
- Whether the client's job is related to training received.
- 2. Initiate the necessary actions to gain access to the Employment Development Department records on state withholding tax. These data would enable the department staff to adjust survey results for nonresponses to the questionnaire.
- 3. Increase the size of their random sample in order to obtain a larger response rate.
- 4. Evaluate the relationship between rehabilitation training and job placements for individual clients rather than for groups of clients.

# NEED FOR IMPROVED PROCEDURES AND CRITERIA FOR DESIGNING REHABILITATION PLANS AND AWARDING CERTAIN SERVICES

The Department of Rehabilitation's procedures need modification to provide more specific guidelines and criteria for designing client rehabilitation plans and awarding certain services. Currently, vocational rehabilitation counselors exercise considerable discretion in determining which services clients receive. As a result, the department inconsistently awards services to some clients. Specifically, we found these variations:

- Varying practices in issuing modified vans and other vehicles to clients
- Cases in which counselors approved excessive supplemental rehabilitation expenses
- Client cases, active for over 10 years, during which time clients received more than \$25,000 in training, equipment, vehicles and other services.

Eligibility for rehabilitation services is based on (1) the presence of a physical or mental disability which constitutes or results in a substantial handicap to employment and (2) a reasonable expectation that the individual will become employable after receiving rehabilitation services. To determine an individual's eligibility, the department conducts preliminary diagnostic studies of the applicant's medical, psychological and

vocational abilities. Once the department determines that a client is eligible for rehabilitation, it provides training, maintenance and placement services considered necessary to make the client employable. Training services include both vocational and college educational plans. Supplemental services include living expenses, supplies and other expenses essential to the rehabilitation program.

Before the client's program begins, the counselor and the disabled individual (or a parent or guardian in some cases) must jointly develop an Individualized Written Rehabilitation Plan (IWRP). Generally, the IWRP identifies a vocational goal for the client and outlines the steps for its accomplishment. Additionally, the IWRP serves to document the services the client will receive. For example, a typical IWRP may include this information:

- A summary of how eligibility was determined
- Long-range goals and objectives
- Projected dates for receiving services and completing plan objectives
- Special terms and conditions such as client participation in program costs
- Special services the client was granted such as automobiles

- Post-employment services
- Entries reflecting periodic reviews of the goals and services.

If the IWRP includes a college degree, department counselors negotiate agreements with the college and or university.

### Need for More Specific Procedures and Guidelines

Although the department has generally complied with the eligibility and services provisions of the Federal Rehabilitation Act of 1973, it has not provided sufficient guidelines and procedures to ensure that services are consistently awarded.

The State Rehabilitation Plan indicates the services and guidelines recommended by the federal government and does not include specific criteria and guidelines for awarding rehabilitation services. Furthermore, the department's Rehabilitation Services Manual does not provide specific criteria or parameters for consistent and equitable awarding of certain services.

Although department manuals and policies provide some criteria for awarding services, their general nature of these manuals allows for counselors to interject personal interpretations. This judgmental element could cause

inconsistent or excessive awarding of certain services to some clients. Two such problem areas are the issuance of vans and other vehicles to clients and client maintenance expenses.

### Issuance of Modified Vans and Other Vehicles to Clients

The department issues new custom modified vans and other vehicles to rehabilitation program clients. Additionally, the department may pay for related liability insurance and repairs in cases where it retains ownership of the vehicles.

The department's Rehabilitation Services Manual provides general guidelines for providing motor vehicles for rehabilitation clients. Sections 14.5300 and 14.5620 of the manual state:

In rare and unusual circumstances, a used motor vehicle may be purchased, subject to District Administrator approval if it is clearly needed for the client to succeed in the proposed vocational objective and the vocational objective is self-employment; or the client is severely disabled....

All alternative means of transportation must be... determined to be unavailable or impractical for the vocational objective. The feasibility of the training program or vocational objective must be determined before purchase of a van is requested....

However, criteria used for issuing vans and vehicles to clients vary among district offices and individual counselors.

After interviewing 70 counselors and reviewing various case file data for 360 vehicles issued to clients, we found disparities in

counselors' interpretations of guidelines. For example, 30 counselors generally do not issue vans or other vehicles. However, some counselors issue vans based on the client's individual needs, age, location of residence and accessibility to other available transportation. Also, internal memoranda revealed that some counselors require clients to secure employment before receiving a van and that others consider homemakers eligible for vehicles.

of insufficient official criteria Because procedures, counselors in district offices apply varying criteria when issuing vans and vehicles to clients and, as a result, issue vehicles to clients on inconsistent bases. While severely disabled clients--individuals suffering quadraplegia, paraplegia, muscular dystrophy, cerebral palsy-generally receive modified vans, clients with other disabilities also receive vehicles. In fact, the department has issued vehicles to clients suffering from obesity, dwarfism, emotional and behavioral disorders. appendage impairment, hearing impairment, alcoholism, drug abuse and skin conditions.

### Client Maintenance Expenses

According to the Rehabilitation Services Manual, counselors may authorize payments for supplemental expenses that clients incur during training and job placement. Section 14.4100 of the manual states that "supplemental expenses may be provided only to assist the client with expenses essential to the

rehabilitation program...to cover basic living expenses for items such as food, clothing and shelter..." Generally, counselors offer this assistance to clients during their participation in workshops, training, physical or mental restoration or during placement. The manual sets maximum dollar limits for most supplemental services, but that amount may be exceeded with approval of the program supervisor. The following table outlines examples of supplemental services, dollar limitations and levels of organizational approval for awarding services.

TABLE 3

REHABILITATION SUPPLEMENTAL SERVICES

Service	<u>Limit</u>	<u>Approval</u>
Supplemental Expenses	\$125 or less per month	Program Supervisor
	More than \$125 per month	District Administrator
Training	\$25 for registration fees	Program Supervisor/ District Administrator (Counselor)
Vehicle	\$1,000 or less	Program Supervisor (Counselor)
	More than \$1,000	District Administrator
Equipment and Supplies	\$2,000 or less	Program Supervisor
	More than \$2,000	District Administrator

Although the Rehabilitation Service Manual sets limits for various supplemental services and expenses, department procedures do not provide sufficient guidelines to assist counselors in determining (1) which expenses are essential to the client and which ones are not or (2) which conditions justify authorizing expenses above the stated limits. As a result, actual practices vary among district offices and services are not awarded consistently to some clients.

Supplemental maintenance expenses such as food, clothing and shelter are inconsistently awarded among districts. Some clients have had to file appeals to receive maintenance services that were provided to clients in other districts. A review of Appeals Board cases identified instances in which district decisions for not approving maintenance services were overruled. In three different cases, the Appeals Board authorized child care, equipment and supplies and interpreter services after district offices had denied these services to clients.

Insufficient guidelines exist for authorizing and monitoring the awarding of expenses above the stated limits. Although the manual indicates who should approve services above the stated limits, there are no procedures for monitoring and controlling such cases. As a result, some clients receive extensive services and expenses during their rehabilitation period while others do not.

For example, between fiscal year 1975-76 and 1977-78, services to 84 percent of the clients cost less than \$2,000 and averaged 18 months. However, some cases have exceeded \$25,000 in costs (ranging from \$25,032 to \$66,253) and have been or are still open after ten years. We reviewed four such cases and have summarized them within Table 4.

TABLE 4

EXAMPLE CLIENT CASES EXCEEDING \$25,000 IN COST

Case	<u>Disability</u>	Cost	IWRP Began	Services Provided
A	Quadraplegia	\$28,232	1968	School, supplies, maintenance, prosthesis
В	Blindness	\$25 <b>,</b> 432	1969	School, supplies, maintenance
С	Cerebral Palsy	\$36,364	1965	School, supplies, OJT contract, maintenance, prosthesis
D	Arthritis	\$37,206	1964	School, supplies, physical restoration, vans, maintenance, prosthesis

Generally, these cases involve severely disabled clients receiving undergraduate and graduate college degrees. However, client maintenance expenses account for up to 30 percent of the total costs.

For example, one client has received over \$42,000 in services since beginning the program in 1965. As part of the total services, the department provided the client a used car,

electric cart, bicycles, school tuition, books, equipment and reader services. This client also received about \$2,700 in supplemental cash allowances, \$1,700 in repairs to the electric cart and vehicle and \$520 in equipment repairs.

### CONCLUSION

Rehabilitation counselors in district offices have applied varying criteria and have adopted divergent interpretations in issuing vehicles and authorizing certain maintenance expenses to clients. In our view, more specific guidelines would reduce inconsistent awarding of services.

#### RECOMMENDATION

Throughout the course of the audit, we briefed department management on our tentative findings. Management has already identified and studied some issues. For example, the department is in the process of revising its Rehabilitation Services Manual. But we further recommend these actions:

 Review procedures for awarding services and provide more specific guidelines to assist counselors in consistently awarding services to clients 2. Establish a system to monitor rehabilitation plans that exceed normal expenditures and services. Services and costs beyond an established reasonable level should be reviewed and approved by the headquarter office.

### CORRECTIVE ACTION BY DEPARTMENT

On January 1, 1979 and March 6, 1979, the department issued administrative directives temporarily implementing a new vehicle purchase policy providing more specific guidelines for awarding vehicles to clients. The directive will be in effect until the necessary hearings are held to incorporate the policy into department regulations.

## THE DEPARTMENT HAS NOT FOLLOWED CERTAIN CONTRACT MANAGEMENT POLICIES OF THE STATE ADMINISTRATIVE MANUAL

The Department of Rehabilitation has not followed certain State Administrative Manual (SAM) policies regarding contracting with private organizations and other government agencies. 3/ Specifically, the department has not fully developed cost comparisons among competitive contractors and has awarded contracts without developing adequate performance specifications.

The Rehabilitation Act of 1973 authorizes the department to enter into contracts. Each contractor must keep such records as the Secretary of Health, Education and Welfare prescribes. Under the Welfare and Institutions Code, Division 10, Chapter 1, Section 19005, the Legislature has vested the department with all necessary powers to comply with federal law.

The department frequently uses contractual services. During fiscal years 1976-77 and 1977-78, it negotiated over 900 contracts at a total cost exceeding \$14 million. The number of contracts and expenditures for each fiscal year are categorized below:

TABLE 5

### DEPARTMENT OF REHABILITATION CONTRACTUAL SERVICES BY CATEGORIES FISCAL YEARS 1976-77 AND 1977-78

### 1976-77

Number of Contracts	Category of Services Received	Amount
562	Contractual Services Consultant Services Services of Other Agencies Medical Services	\$3,004,581.08 726,896.72 2,295,013.38 756.55
	Total	\$6,027,247.73
	1977-78	
561	Contractual Services Consultant Services Services of Other Agencies Medical Services	\$4,577,038.82 933,862.52 2,478,248.77 611.14
	Total	\$7,989,761.25

Section 13070 and 14615 of the Government Code gives the Department of General Services general powers of supervision over matters concerning the financial and business policies of the State. Section 14780, et seq., states that all contracts should be transmitted to the Department of General Services for approval, although certain transactions may be exempted from review. To meet its responsibilities in reviewing contracts, the Department of General Services developed general policies that are outlined within the State Administrative Manual.

In some cases, the department has not complied with sections 1213 and 1242 of SAM which require that at least three competitive bids or qualifying contractor proposals be secured on all contracts for professional services that could not be performed within the civil service system. SAM identifies methods to ensure competition. One method state agencies generally use is to send prospective bidders a request for proposal (RFP), a public request for proposals to provide a product.

To evaluate the department's compliance with these sections of the SAM, we reviewed a random sample of contracts representative of those awarded during fiscal years 1976-77 and 1977-78. The sample revealed that ten percent of the contracts awarded during those years were sole source contracts.

We also conducted a case study analysis of a sample of 25 contracts. The following three contracts illustrate that often the department has not developed cost comparisons among competitive contractors and has improperly awarded sole source contracts. These examples also document that the department has awarded contracts without properly developing performance specifications.

Contract Case A: In fiscal year 1976-77, the department awarded a \$200 per day contract to a private organization to independently evaluate the department's organizational structure

and examine the relationship between prescribed staff duties and job titles. The consultant was to work 40 full-time days and receive \$4,032 in expenses for a total cost of \$12,032. The contract period extended from December 1, 1976 through June 30, 1977.

However, in April of 1977, the department attempted to amend the contract by increasing costs to \$24,064 to reimburse the contractor for 40 additional work days. The Department of Finance, which must approve such amendments, initially disapproved this increase stating that the department had an in-house capacity to perform the contractual duties. The department argued that it was unrealistic to expect its executive staff to conduct an objective and critical self-evaluation and that a comprehensive organizational evaluation was necessary for a public rehabilitation agency.

Throughout this process, the provisions of SAM requiring at least three qualifying proposals for consultant contracts were ignored. Additionally, the contract file reflects that the contractor was pre-selected during the contract development period and that the department failed to develop specific performance guidelines.

After 80 work days, the contractor produced a 30-page study which included organizational data from rehabilitation offices in six other states, quotations from Peter F. Drucker's book, Management Tasks and Responsibilities and recommendations accompanied by a series of organizational charts.

Contract Case B: During fiscal year 1977-78, the department awarded a \$965,101 continuing interagency agreement with the Regents of the University of California. The contract requires the University of California to conduct a comprehensive statewide demographic telephone survey which would project the number of disabled Californians in each of the department's 26 districts. Even though interagency agreements are exempt from competitive bid procedures under SAM, the department made little attempt to determine if private contractors would have been more qualified to perform the study and performed at a lower cost.

The U.C. Berkeley Survey Research Center, chosen to conduct the primary survey work, had never conducted a study of this size. The contract required a survey of 30,000 households; the center's largest prior study had involved only 3,000 households. Additionally, the center had never used a computer-assisted telephone interview (CATI) process until this study. Organizations such as the National Opinion Research Center at the University of Chicago, West Stat and Chilton have experience in survey techniques, yet they were not considered for this project.

Although the department has received the raw data from the study, the final report, scheduled for completion in June 1978, has not yet been submitted.

Contract Case C: On January 13, 1978, the department requested contract proposals to provide technical and management assistance in clarifying and developing the new consumer advocacy and service responsibilities mandated by the Rehabilitation Act of 1973. Three contractors submitted proposals. The director rejected all bids; requests for proposals were rewritten and submitted by the same three contractors. The second evaluation, conducted by a different staff member, ranked as first the organization that was originally listed as third choice and awarded it the contract. The contract called for 50 full-time consultant days at \$200 per day plus regular expenses received by state employees not to exceed \$3,000. At the close of the contract, costs totaled \$13,250.

#### CONCLUSION

The Department of Rehabilitation has not followed certain State Administrative Manual policies regarding contracting with private organizations and other government agencies.

#### RECOMMENDATION

During the course of our audit, we briefed department management on our findings. At that time we recommended these improvements:

- 1. Revise Chapter 7, Rehabilitation Administrative Manual and make the Contracts and Regulations Section responsible for contract management.
- 2. Limit the responsibility of contract administrators to making contract requests, monitoring contract progress and writing contractor performance evaluations.
- 3. Retain a complete file of each contract, including, progress and contractor evaluation reports, within the Contracts and Regulations Section.
- 4. Develop a list of potential contractors so that all interested contractors in the State receive announcements of department requests for proposals.
- 5. Increase the Contracts and Regulations Section staffing to absorb and perform additional workload associated with a full service operation.

#### CORRECTIVE ACTION BY THE DEPARTMENT

In response to our recommendations, the department revised Chapter 7 of the Rehabilitation Administrative Manual to reduce the responsibilities of contract administrators and make the Contracts and Regulations Section responsible for contract management. Additionally, on June 8, 1979 the department issued an administrative directive implementing new policies regarding the management of contracts.

#### OTHER PERTINENT INFORMATION

## CLIENT PARTICIPATION IN COST OF REHABILITATION VOCATIONAL PLANS

There is no federal requirement that the financial need of a handicapped individual be considered in providing any vocational rehabilitation service. If the State elects to consider the financial need of handicapped individuals to determine the extent of their participation in the costs of vocational rehabilitation services, the state agency shall establish in writing and maintain policies to determine financial need, and the state plan shall specify the types of vocational rehabilitation services for which the agency has established an economic needs test. The policies so established shall be reasonable and shall be applied uniformly so that equitable treatment is accorded all handicapped individuals in similar circumstances.

The California Department of Rehabilitation developed its economic needs test in 1960. Since then, the department has revised its income formula on an irregular basis. In April 1967, the department changed to a system of monthly income limitations based on the number of dependents. For example, a client with one dependent was exempt from participating in costs if his monthly income did not exceed \$225 plus \$55 allowance for prior debts, or a total of \$280 monthly. However, the May 1968 revision only altered the method determining monthly allowances

for clients with six or more dependents. When the department last revised the monthly income limitations in April 1975, it also changed the economic needs test to include client participation in costs only for transportation, clothing, equipment and maintenance services. The following tables show the changes in monthly income and allowances resulting from the 1968-1975 revisions.

TABLE 6

DEPARTMENT OF REHABILITATION EXEMPTION OF RESOURCES REVISED MAY 1968

Number of Dependents	Amount for Normal Living Requirements	Standard Allowance for Debts	Total Monthly <u>Allowable</u>
0	\$125	\$ 30	\$155
1	\$225	\$ 55	\$280
2	\$275	\$ 70	\$345
3	\$325	\$ 80	\$405
4	\$375	\$ 90	\$460
5	\$410	\$100	\$510

6 or more (Add \$50 for each additional dependent) (Add \$10 for each additional dependent)

TABLE 7

DEPARTMENT OF REHABILITATION
EXEMPTION OF RESOURCES
REVISED APRIL 1975

Number of Dependents	Amount for Normal Living Requirements	Standard Allowance for Debts	Total Monthly <u>Allowable</u>
0	\$150	\$ 35	\$185
1	\$250	\$ 60	\$310
2	\$310	\$ 80	\$390
3	\$375	\$ 85	\$460
4	\$425	\$ 95	\$520
5	\$475	\$110	\$585

6 or more (Add \$50 for each additional dependent)

(Add \$10 for each additional dependent)

The department has not included in its formulas a method of raising monthly income limitations to meet rising costs of living. Consequently, some clients could receive inequitable treatment when participating in client vocational plans. Statistics from the Department of Labor's consumer price index (CPI) based upon a 1967 base reveal a 5.2 percent unadjusted inflationary rate in January 1976 and a 7.4 percent rate in June 1978.

The department is currently considering a revised client participation policy to correct this problem. We recommend the department expedite its approval to assure equitable treatment of all disabled clients.

Respectfully submitted,

THOMAS W. HAYES

Acting Auditor General

June 21, 1979

Staff: Richard C. Mahan, Supervising Auditor

Douglas L. Williams Enrique G. Farias Peter A. Wolfe

#### FOOTNOTES

- 1 A client who completes his or her Individualized Written Rehabilitation Plan and is placed into an appropriate job is considered to be successfully rehabilitated.
- 2 Both Department and Auditor General statistics do not include former clients who may be employed out of state.
- 3 There are no legal penalties for noncompliance with the State Administrative Manual.

## Memorandum

To : Thomas W. Hayes

Acting Auditor General

Date : June 20, 1979

File No.:

Telephone: ATSS (

From : **Department of Rehabilitation** 

OFFICE OF THE DIRECTOR

Subject: DEPARTMENT OF REHABILITATION - PROGRAM REVIEW

Attached is our response to the program review of our department conducted by your staff.

Our response contains minor disagreements with some of the recommendations made by your staff. However, for the most part, we concur with your findings. This can mainly be attributed to the professional manner displayed by your staff, particularly Rick Mahan the audit leader. From the very beginning they kept us informed of their findings and thoughts concerning our program and administration of our program. As a result, most of the misunderstandings concerning facts were eliminated.

As you know, we are in the process of implementing many of your recommendations. I can assure you that where appropriate I will continue to take immediate action to implement the recommendations contained in your report.

Again, thank you for assisting us in our endeavors to provide efficient and effective service to the disabled populations in California.

EDWARD V. ROBERTS

ward V. Laherti

Director

Attachment

#### DEPARTMENT OF REHABILITATION

#### RESPONSE TO AUDITOR GENERAL

#### PROGRAM REVIEW

#### I. SYSTEM FOR MEASURING PROGRAM EFFECTIVENESS

#### Auditor General Recommendation #1

"We recommend the department evaluate the usefulness and reliability of its current effectiveness measurement system."

### Department Response

We concur with this recommendation and consideration will be given at the time of the next annual client follow-up to incorporate as many of the Auditor General's suggestions as are feasible and cost-effective.

We are interested in improving all aspects of our program. However, to put our concurrence in proper perspective, it must be recognized that the client follow-up system utilized by our department has complied with HEW-RSA standards for the last five years.

#### Comments

One of the primary methods employed by the Department of Rehabilitation to measure program effectiveness is to review the results of a survey questionnaire annually distributed to a sample of former clients.

The Auditor General has reviewed this survey questionnaire and recommends that it be improved along with the sampling methodology. As stated above in our response we will re-evaluate the survey questionnaire and make changes as appropriate.

In addition, the Auditor General recommends that the criteria for CETA program job placement and follow-up needs improvement. A uniform criteria for closure of cases with CETA program job placement has been developed. A small working group from the department will refine these criteria and a statewide policy will be implemented by September 1, 1979.

In order to evaluate the accuracy of our follow-up survey the Auditor General developed their own survey.

The Auditor General noted that:

"As a result of our survey, we are 90 percent confident that between 39 and 46 percent of department clients completing the program two years prior to the survey were employed in California. These results are significantly lower than the department's conclusion that 65 percent of its former clients are employed one year after completing the program."

The Department of Rehabilitation's follow-up studies include all closures after acceptance, but limit the employment retention rates to former rehabilitated clients only. The Auditor General appears to have calculated retention rates on all former closures from plan, whether rehabilitated or not. Therefore, it is understandable why the Auditor General's employment rate is lower.

The latest Departmental follow-up study for clients rehabilitated in Fiscal Year 1977/78, reveals that 77% of the formerly rehabilitated respondents are employed with earnings one year after closure.

# II. NEED FOR IMPROVED PROCEDURES AND CRITERIA FOR DESIGNING REHABILITATION PLANS AND AWARDING CERTAIN SERVICES

#### Auditor General Recommendation #2

"We also suggest that the department review procedures for awarding services and provide more specific criteria to assist counselors in determining which clients should receive service."

#### Departmental Response

We concur with this recommendation and are taking positive steps to eliminate the problems cited in the report.

#### Comments

The Department acknowledges that varying criteria and divergent interpretations of policy do exist in the district offices. In addition to the new vehicle policy cited on Page 30 of the Auditor General Report, in May 1979 an Administrative Directive reviewing all purchasing, maintenance, and transportation policies was sent to all employees in the field which required the employee's signature to acknowledge that the directive had been read.

Moreover, all new case carriers are required to attend the Department's Counselor Academy that was started in January of 1979. At this Academy uniform casework practice is emphasized. Beginning in July 1979 each participant will be instructed that if their district's practices are at variance with the procedures taught at the Academy, the participant should ask his supervisor to call one of the Academy staff to achieve resolution.

Also, beginning in July 1979 the Field Operations Division of the Department is exploring the possibility of designating a Quality Assurance team from headquarters to monitor casework practices in all 26 districts. This team would review cases to determine the range of casework practices, provide feedback on training needs, and identify the need for policy clarification. The team would also provide immediate feedback to the District Administrator on casework areas that need corrective action.

The Department is confident that the aforementioned systems and procedures along with regulation and manual changes will provide more specificity and uniformity in the provision of services to clients.

It should be pointed out however, that we are faced with the problem of attempting to develop policies and procedures which can be applied unifromly throughout the State while at the same time recognizing that each disabled individiual has different needs.

#### Auditor General Recommendation #3

"Establish a system to monitor rehabilitation plans that exceed normal expenditures and services. Services and costs beyond an established reasonable level should be reviewed and approved by the headquarter office."

#### Department Response

We concur with this recommendation to the extent that "service and costs beyond and established reasonable level" should receive more critical review. However, it is premature to assume that headquarters staff need to review and approve these cases.

# III. NEED FOR FOLLOWING CERTAIN CONTRACT MANAGEMENT POLICIES OF THE STATE ADMINISTRATIVE MANUAL

#### Auditor General Recommendation #4

"We recommend that the department adopt methods based upon a competitive process for ensuring an equitable selection of contractors."

#### Departmental Response

We concur with and have implemented this recommendation.

#### Comments

In addition to the above recommendation, the Auditor General report includes five further recommendations on page 37 pertaining to our contract management system. We have implemented all of these recommendations. Even though we were in the process of making most of these changes prior to the review by the Auditor General's staff, we are most appreciative of the advice and guidance given by them.

#### IV. CLIENT PARTICIPATION IN COST OF REHABILITATION VOCATIONAL PLANS

### Auditor General Recommendation #5

The Auditor General recommends that the department update its policy concerning client participation in cost of rehabilitation vocational plans.

#### Department Response

The Department concurs with the recommendation to expedite approval of the new economic needs test. It is anticipated that the new policy will be approved and implemented by September 1, 1979.

# DEPARTMENT OF REHABILITATION 1977 CLIENT FOLLOW-UP QUESTIONNAIRE

Α.	Are you	now employed?
	<u> </u>	Yes 2. No (If no, skip to part D)
В.	If empl	oyed, indicate type of employment.
	□ 1.	Self-employed
	<u> </u>	Working in a sheltered workshop
		Private industry or business
	<u> </u>	Government Civil Service
		Other (please describe)
С.	If empl	oyed, what is your average weekly pay before ons?
	<u> </u>	\$0
	<u> </u>	\$1 - 25
	∃     3.	\$26 - 50
	<u> </u>	\$51 - 75
		\$76 - 100 \[ \bigcup 10. \\$201 - 225 \\$
D.	If unem	nployed, how long have you been out of work?
	<u> </u>	Less than one month
	<u> </u>	1 to 3 months
		4 to 6 months
	<u> </u>	7 to 12 months
	□ 5.	More than 12 months

Ε.	How satisfied were you with the fol	lowing?	•	
	Satis (1	fied )	Not Satisfied (2)	Not Apply (3)
	My counselor's willingness to listen to ideas and suggestions in developing my program	]		
	My counselor provided adequate information to help me under-stand my disability			
	The promptness of services provided to me			
	My counselor's help in my search for work and my first weeks on the job			
	The kind of training I received.	J		
	The benefits I received from training	]		
	The results of medical treatment	J		
	The job I have now	J		
F.	Did your counselor provide you with rehabilitation plan?	а сору	of your	
	☐ 1. Yes ☐ 2. No			
G•	How useful was your training for the job held if not employed now?	e job h	eld now or	the last
	1. Useful			
	2. Not useful			
	3. Did not receive training from Rehabilitation	m the D	epartment o	f
Н•	Would you recommend the Department disabled friend?	of Reha	bilitation	to a
	☐ 1. Yes ☐ 2. No			

I.	Do you have any other comments or suggestions for improving our services?
	1. Yes 2. No
	(If the answer above is "Yes", please comment)

Source: Paul Meuller, Chief, PEAS.

## AUDITOR GENERAL EMPLOYMENT VERIFICATION SURVEY

The Auditor General's staff conducted a questionnaire survey to determine the percentage of former Department of Rehabilitation clients that are employed two years after program completion. The staff developed a comprehensive questionnaire based upon the department's questionnaire and a vocational education survey questionnaire developed by another organization.

The questionnaire was administered through a three-step process:

- Step #1--Contact through mail
- Step #2--Telephone contact at home
- Step #3--Telephone contact at work.

Step 1 included an initial mailout and a subsequent follow-up to those not initially responding. Step 2 followed the mailout. The telephone information service provided telephone numbers; we attempted to contact former rehabilitation clients at their homes.

Step 3 used Employment Development Department information which provided employer names and addresses for 176 of the 550 former department clients. We used this information to contact former clients through their employers. Of the 176 persons EDD identified on the tax role (assumed employed), 54 had already been contacted through earlier efforts. These efforts showed that of the 54 contacted, 45 were presently working, 8 were not working and 1 would not respond to the question. Using EDD data to statistically project the rate of employment of the 550 former clients, we are 90 percent confident that the percentage of former Department of Rehabilitation clients now employed in California is between 39 percent and 46 percent.



# Joint Legislative Audit Committee

OFFICE OF THE AUDITOR GENERAL

# California Legislature

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NATE HOLDEN LOS ANGELES

September 18, 1978

839

Dear Former Department of Rehabilitation Client:

The California Legislature has asked the Office of the Auditor General to evaluate the effectiveness of the Department of Rehabilitation's programs. The Legislature wants an independent and objective assessment of the Department's operation along with recommendations for improvements. To assist us in the evaluation, we need your help.

Please take a few minutes to complete the attached questionnaire. We have included a self-addressed postage-paid envelope for your convenience. The success of our work is highly dependent on a total return of questionnaires. All responses will be held in confidence.

Thank you for your help.

homa w. Hazer

Sincerely,

JOHN H. WILLIAMS Auditor General

JHW:RCM/arm Attachment

### AUDITOR GENERAL QUESTIONNAIRE

	ase answer the following questions in the spaces provided. Individual responses I be held in confidence.
1.	Are you now employed?
	If employed, do you workFull-timePart-timeHrs/WkIf not employed, are you seeking work?YesNo
2.	If employed, indicate the type of employment (mark one)
	a Self-employed b Working in a sheltered workshop c Private industry or business d Government Civil Service e Other (please describe)
3.	Which of the following <u>best</u> describes the first job you got after completing your rehabilitation plan/vocational training program? (mark one)  a I have not gotten a job since completing my training program  b A full-time job <u>related</u> to my training  c A part-time job <u>related</u> to my training  d A job (part-time or full-time) <u>unrelated</u> to my training
	e Homemaker
4.	How long after completing your rehabilitation plan/vocational training did it take you to find a job? (mark one)
	a I was placed into a job at completion of my program b Less than I month c 1-3 months d 4-6 months e 7-12 months f More than 12 months g I have not been employed since completing the program
5.	If employed, what is your average weekly pay before deductions?
	a \$0

6.	<u>If unemployed</u> , how long have you been out of work?
	a Since completing the rehabilitation program Number of Months
	b 1 - 4 months
	c 5 - 8 months
	d 9 - 12 months
	e 13 - 16 months
	f 17 - 20 months
	g More than 20 months
7.	Which of the following best describes your present job? (mark one)
	a Same job as after I completed training
	b A full-time job <u>related</u> to my training
	c A part-time job <u>related</u> to my training
	d A job (part-time or full-time) <u>unrelated</u> to my training
	e Homemaker (Do not mark if you were employed as a Homemaker prior to being a Department of Rehabilitation client)
	f I do not now have a job
8.	If you are <u>unemployed</u> , are you available for employment? Yes No
	If no, please explain why
9.	Have you participated in more than one rehabilitation plan that led to gainful
۶.	
	employment? Yes No
	If yes, please explain why.

cc: Members of the Legislature
Office of the Governor
Office of the Lieutenant Governor
Secretary of State
State Controller
State Treasurer
Legislative Analyst
Director of Finance
Assembly Office of Research
Senate Office of Research
Assembly Majority/Minority Consultants
Senate Majority/Minority Consultants
California State Department Heads
Capitol Press Corps