

Massachusetts Office on Disability

The Executive Office for Administration and Finance
Commonwealth of Massachusetts



STRATEGIC PLAN-IN-BRIEF
2013-2015

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MESSAGE FROM THE DIRECTOR

It is with great pleasure that I share with you the goals and objectives of the Massachusetts Office on Disability (MOD). MOD is a very small state agency that has far reaching impact on the quality of life of people with disabilities. As part of the fabric of state government, and with the support of the Executive Office for Administration and Finance (A&F), MOD is able to reach across the Executive Branch and across the Commonwealth with a single purpose of protecting the civil rights of people with disabilities.

The Massachusetts Office on Disability was created in 1981 under M.G.L. Chapter 6 section 185. It came about during a time when people with disabilities were finding a voice. It was a period of awakening as people fought to be recognized and included in all the various aspects of life we enjoy as citizens. The agency stands shoulder to shoulder with advocates and the Administration as the struggle for full inclusion of people with disabilities continues to move forward.

The following document highlights some of MOD's recent initiatives. I hope that by sharing the agency's performance goals, there will be a better understanding of the

work we do, how MOD has influenced the operation of state government and how we have improved the lives of individuals with disabilities.

We strive to ensure the Executive Branch is a place where our employees with disabilities are valued and supported, that the programs, services and activities of our sister agencies fully consider inclusion of people with disabilities, and that the Commonwealth is a place where people with disabilities are able to spend time with family and friends and enjoy all this opportunities this wonderful state offer.

-Myra Berloff

This document was developed pursuant to Executive Order 540 which calls on state government to develop and publish strategic plans and institute performance management. As an agency affiliated with the Executive Office for Administration and Finance (A&F), the Massachusetts Office on Disability's 2013-2015 Strategic Plan aligns and supports the overarching goals set forth in the A&F Strategic Plan.

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MISSION, VISION & POICY CONTEXT

OVERVIEW

The Massachusetts Office on Disability (MOD) was created in 1981, by [MGL Chapter 6, Section 185](#), as the state advocacy agency that serves people with disabilities of all ages. MOD's primary mission is to ensure access to state and local government services, programs and activities, while also promoting full and equal participation of people with disabilities in all other aspects of life.

MOD is a small agency with very limited resources, but its output is significant. It is the designated agency to oversee and administer the Commonwealth's compliance with the Americans with Disabilities Act (ADA). It is the touchstone within government for technical assistance, trouble-shooting, and advice on all disability related issues.

MOD has three main components that function to fulfill its priorities:

The Government Services Program offers guidance, training, and technical assistance to Executive Branch agencies to ensure that Massachusetts' policies and

practices are consistent with state and federal laws.

The Community Services Program provides outreach to the disability community and technical assistance and training to municipal officials and businesses to ensure that they know how to comply with their non-discrimination responsibilities.

The Client Services Program has three core areas of focus: an information and referral hotline that connects individual callers with services, programs, resources, and explains rights and obligations under the various state and federal disability laws; the federally-mandated and funded Client Assistance Program, which specifically addresses information and advocacy concerns for clients of the Commonwealth's Vocational Rehabilitation (VR) and Independent Living Programs (IL); and advocacy for individuals who have been denied service, face barriers in their attempt to obtain service, or have been discriminated against on the basis of their disability. While each program is uniquely distinct, they intersect and interact with each other in order to effectively ensure that people

MISSION

The purpose of the Massachusetts Office on Disability (MOD) is to bring about full and equal participation of people with disabilities in all aspects of life. It works to assure the advancement of legal rights and for the promotion of maximum opportunities, supportive services, accommodations and accessibility in a manner which fosters dignity and self-determination. MOD is the Commonwealth's Americans with Disabilities Act Coordinating Agency.

VISION

We strive to create a more equitable Commonwealth, one in which persons with disabilities face neither architectural nor programmatic accessibility barriers in daily living or discrimination due to their disability.

with disabilities are treated fairly in the Commonwealth.

ACHIEVEMENTS

Over the last year, MOD has seen a particularly gratifying paradigm shift within state government. While we have always approached our work with a cooperative spirit, our focus on accessibility for persons with disabilities has historically put us in the position of having to serve as a slightly nagging conscience on Executive Branch activities. Over the last year, however, we have been met by colleagues with more willingness to collaborate and a greater understanding of the need to consider accessibility at the start of a project as opposed to the end. While there is still much work to be done, it is clear that MOD has raised the consciousness of our sister agencies about the importance of architectural, communication, and programmatic accessibility for persons with disabilities.

At the same time, our efforts to aid the public and municipalities with disability-related concerns has been ongoing and has once again produced substantial improvements to the quality of life for individuals with disabilities in Massachusetts.

MOD is pleased to share the following *sampling* of our achievements from the past year:

Intra- Governmental Achievements

- MOD sits as an active member of the Universal Access Committee (UAC), established under A&F Bulletin #19. This provides an opportunity to interact across Secretariats to provide technical assistance and to promote the full inclusion of persons with disabilities in all activities of state government.
- MOD is a Co-Chair with the Human Resources Division of the Governor's Model Employer Initiative. This cross-Secretariat initiative has dramatically raised the consciousness enterprise-wide of the value of our employees with disabilities.
- MOD has partnered with the Division of Capital Asset Management and Maintenance (DCAMM) to ensure that accessibility is included in Integrated Facilities Management, the LEED building certification efforts and in the efforts to include updated ADA self-evaluations and transition plans as agencies put together their 5-year capital plans. The recognition that disability access must be considered

Model Employer Initiative

In June 2009, Governor Patrick announced a strategic plan to make the Commonwealth a "Model Employer" for people with disabilities. The goal of the Model Employer Initiative is to promote the hiring and retention of people with disabilities in the Executive Branch of state government.

As part of that effort, MOD administers the application process for a capital fund designed to supplement agency efforts to pay for the reasonable accommodation needs of Executive Branch employees with disabilities. The Reasonable Accommodation Capital Reserve Account (RACRA) makes funds available to agencies faced with requests of over \$2,500 for a single individual or cumulative expenses totaling more than 0.5% of the agency's annual budget.

In FY12, the RACRA distributed \$90,000 to agencies, benefitting over 6,000 employees.

and the allocation of funds to support this effort is an important step toward ensuring state services are more accessible to persons with disabilities.

- MOD serves as an invited member of the Department of Correction's (DOC) ADA Task Force, which was formed to spearhead DOC's compliance with A&F Bulletin #19. As a member of this task force, MOD has provided extensive technical assistance to DOC as they have overhauled their reasonable accommodation policies for inmates, employees, and visitors.
- In an effort to ensure that the Self-Service Time and Attendance (SSTA) program for Executive Branch employees was accessible to employees using assistive technology, the Self-Service Time and Attendance Task Force was created, which brought together staff from MOD, the Commonwealth's Human Resources and Information Technology Divisions, the Comptroller's Office, and Health & Human Services agencies. Under a tight timeline for roll-out of the new program, MOD advocated for programming changes that facilitated compatibility with assistive technology, performed user-testing on the modified product, provided

technical assistance regarding the training offered to assistive technology users, and fielded questions from colleagues after the successful roll-out of the program.

- The Massachusetts Emergency Management Agency (MEMA) asked MOD to serve as a technical advisor on its Mass Cares Shelter project that acknowledges accessibility for persons with disabilities is a priority in the sheltering process.
- MOD ardently supported the passage of legislation which adds the Massachusetts Identification Card as an acceptable form of identification to purchase alcohol. The bill, which was signed into law by Governor Patrick in July 2012, ensures that individuals with disabilities who carry a valid Massachusetts Identification Card will no longer be refused access to alcohol and in some cases over the counter cold medicine because of the type of state-issued identification they carry.
- Together with the Executive Office of Elder Affairs (EOEA), MOD responded to a legislative request for information regarding the impact of recent MBTA fare hikes on persons with disabilities and the elderly. MOD and EOEA

formally surveyed these constituencies in December 2012, and will release the findings in early 2013.

- MOD provided technical assistance to the Department of Transportation (MassDOT) as they devised a tool to survey the design and regulatory compliance of curb cuts. With MOD's assistance, MassDOT was able to reduce time spent surveying curb cuts from approximately 2 hours per curb cut to approximately 20 minutes per curb cut. Given that MassDOT needs to survey each of the over 100,000 curb cuts under its jurisdiction, MOD's assistance has proven to be a substantial resource for MassDOT.
- MOD has been increasingly called upon by other agencies to test and offer feedback on the compatibility of new online initiatives with assistive technology. Most notably, MOD has worked with HRD on its SSTA website and with A&F on the launch of the Open Checkbook website.

Client & Community-Based Achievements

- MOD advocated on behalf of an individual who was denied access to visit a friend in the hospital because she used a guide dog. Because of MOD's intervention, the hospital

implemented new policies regarding service animals. This hospital is part of a national chain, and the policy changes implemented in Massachusetts have enhanced access for service animal users nationally.

- MOD partnered with a local Commission on Disability and municipal officials in a metro-west suburb to ensure that a \$20 million renovation of an elementary school provided compliant accessibility.
- MOD advocated that accessibility be incorporated in the renovations of a private function hall; prior to MOD's involvement, access for persons with disabilities was not being considered. In the end, this benefitted the business owner as the renovation was compliant with state and federal access codes and ensured that persons with disabilities could be fully included in functions held at this location.
- MOD advocated on behalf of a wheelchair user who was summonsed to an inaccessible courthouse and forced to receive court services on the sidewalk. This intervention resulted in a state-wide policy change whereby notices from the court now include

specific information explaining how to contact the court in advance regarding accessibility concerns.

- MOD intervened after a series of vocational rehabilitation clients indicated that the Massachusetts Rehabilitation Commission (MRC) had stopped funding job skills training which was essential to their employment goals. Through consultation with MRC's regional and central offices, MOD was able to: ascertain that the funding revocation was an error, ensure that the funding was restored, and ensure that future clients would not have planned services suddenly removed in the same way.
- MOD assisted a popular nature preserve with developing a service animal policy that articulates clear guidance on the admittance of miniature horse service animals. After working with the Commonwealth's Veterinarian, MOD determined that the unique features of this facility, including the presence of other horses, provided venue-specific grounds for excluding miniature horses and the need existed for a policy addressing visitors who might

arrive with a miniature horse service animal.

- MOD reached out to a local real estate management company on behalf of an individual with mobility impairments, who had difficulty navigating the stairs of her building while the elevator underwent service. The management company agreed to replace the ungraspable, unsafe hand-rail with a code-compliant hand-rail that the resident could use until the elevator was repaired.
- MOD advocated on behalf of an individual who is legally blind and needed to take a professional credentialing exam using a software program that enlarges computer text. When its discussions with both the testing service and the national accreditation association proved unsuccessful, MOD filed a disability-discrimination complaint on the individual's behalf at the Massachusetts Commission Against Discrimination (MCAD). In its capacity as the individual's non-attorney advocate, MOD obtained a "probable cause" finding for the complaint at MCAD. The applicant was given the exam with accommodation and is now in school.

Training-Related Achievements

- MOD conducted 23 Emergency Preparedness Meetings across the Commonwealth, bringing together over 900 people with disabilities and their emergency response providers to discuss the needs of the local disability community in the event of an emergency. Since the program's inception in 2007, MOD has interacted with almost 5,600 people, handed out over 4,600 personal preparedness go packs, 950 "Tips for First Responders on How to Interact with People with Disabilities in Times of Emergency", and more than 5,000 personal preparedness planning guides.
- MOD trained over 100 people through the Community Access Monitor (CAM) Project. The CAM Project brings together persons with disabilities and municipal officials for training on the rights and responsibilities afforded to people under the various state and federal disability laws, focusing particularly on architectural accessibility.
- MOD conducted 132 other trainings for over 2,200 people on disability-related rights and responsibilities.

These trainings include those offered to state government employees and external entities.

CHALLENGES

Equal opportunity for persons with disabilities is at the core of MOD's work, and remains the agency's biggest challenge. Of particular concern is that a general lack of understanding exists regarding the obligation to provide reasonable accommodations and modifications to ensure equal opportunity for persons with disabilities.

With responsibilities to state government and the public, MOD's twelve staff members are regularly asked to provide more technical assistance, training, and advocacy than it has the capacity to handle. As a result, the agency is unable to be more proactive in working toward full inclusion of persons with disabilities in all aspects of life. With greater capacity, MOD would seek to offer even more training and technical assistance; these are essential tools to ensuring persons with disabilities are afforded equal opportunity and to reducing the quantity and severity of mistakes made by internal and external

entities when working with persons with disabilities.

Additionally, while MOD recognizes that the nature of disability rights is complaint driven, it strives to address potential pitfalls inside state government prior to them becoming problems; however, the agency's ability to be proactive is regularly challenged by the fact that it is frequently brought into situations too late in a process or after the complaint process has commenced. MOD has a tremendous track record of finding solutions that meet the needs of all involved when included before a problem becomes a crisis.

Finally, because the agency's work is largely dictated by the needs of the disability community and the activities of state government, much of it cannot be predicted in advance. For example, MOD did not know in late 2011 or early 2012 that it would be working on HRD's SSTA Program, DOC's reasonable accommodation regulations, or DCAMM's self-evaluation plan and transition process. In some respects, this is a positive challenge – each day brings new and interesting work – but it also means that accurately planning for 2015 is extraordinarily difficult.

SUPPORTING THE SECRETARIAT

A&F has four strategic goals: Better Finance, Better Health Care, Better Performance and Better Government. To advance the work of A&F, MOD's efforts focus primarily on achieving Better Performance and Better Government.

MOD has a unique relationship to its Secretariat. It is a statutorily independent agency that sits in A&F. This is an intentional distinction designed to enable MOD to be independent of other executive departments; it is the agency's independence that allows MOD to be the leading voice for the disability community within the halls of government.

Despite their unique relationship, MOD and A&F share a common purpose. Both care deeply about the engagement and responsiveness of government. While A&F focuses broadly on making government services more accountable, efficient, and transparent, MOD works to ensure that change does not get implemented at the expense of access and opportunity for individuals with disabilities to interact with government.

MOD STRATEGIC GOALS

MOD has four agency-wide goals that drive its activities and support A&F:

- **Better state and local government compliance with disability policy** – MOD supports every agency in the Executive branch and informally works with the legislative and judicial branches to provide technical assistance and training on compliance with disability laws and policies. This work will continue in the years ahead. More broadly, MOD will also continue to advocate that its colleagues consider the needs of individuals with disabilities at the forefront of service-delivery, which is essential to compliance with both the spirit and technical aspects of disability law.
- **Better engagement with the disability community** – MOD understands that its outward-facing advocacy and training is largely driven by the needs of the disability community. Similarly, MOD cannot ensure that government is meeting its obligations to individuals with disabilities unless it is attuned to the needs of those it serves. In the

next two years, MOD seeks to strengthen and expand its relationships within the disability community while providing ample opportunity for the community to share its concerns.

- **Better support and advocacy for people with disabilities** – By increasing engagement with citizens with disabilities, MOD will be more in tune with the needs of the community as it relates to the programs, services, and activities of state government. The agency also believes that as it becomes more engaged, more persons with disabilities will reach out to MOD for assistance.
- **Better customer service** – MOD adamantly believes that every individual who contacts the agency deserves to be treated with empathy and respect. It strives to provide an exceptional level of service to all; this means that while it may not be able to resolve every concern, it will always provide information and/or advocacy that is relevant, thorough and thoughtful.

ACTIONS

The Massachusetts Office on Disability will take the following actions to achieve its strategic goals:

GOAL	ACTION
A&F Better Performance: Build trust in government by improving accountability, transparency and responsiveness	
Better state and local government compliance with disability policy	<ul style="list-style-type: none"> • Action 1: Provide technical assistance to ADA coordinators, executive branch managers, and/or legislative staff regarding disability-related responsibilities • Action 2: Monitor the work of state agencies and its impact on persons with disabilities • Action 3: Serve on boards and task forces throughout state government to provide technical assistance and ensure that the rights of persons with disabilities are included in the decision making processes of government • Action 4: Serve on the Architectural Access Board (AAB) which enforces 521 C.M.R. • Action 5: Serve on the AAB sub-committee tasked with updating 521 C.M.R. • Action 6: Responsibly administer the Reasonable Accommodation Capital Reserve Account (RACRA) • Action 7: Work with the Information Technology Division (ITD), Office of Access and Opportunity, and other key stakeholders in state government to establish a “Roadmap to Achieve Accessibility in Information Technology Acquisition, Deployment, and Utilization” • Action 8: Work with DCAMM to design and pilot the template to be used by state agencies for conducting their ADA-mandated Self-Evaluation and Transition Plan • Action 9: Serve on the DCAMM project management team charged with hiring and monitoring the performance of the consultants who will conduct the self-evaluations across state government • Action 10: Serve as an appointed technical advisor to Executive Branch agencies as these organizations conceive and implement their transition plan - in FY13, MOD expects to support at least: DOC, DCAMM, MassDOT and the Higher Education institutions • Action 11: Serve as a member of the MEMA project management team as a technical resource in developing the Mass Care Shelter State Coordination Plan and a regional shelter coordination plan template • Action 12: Revise and re-publish <i>The Disability Handbook for the Executive Branch</i>, a guide designed to aide Executive Branch personnel in their efforts to ensure that all government services, programs, and activities are accessible to all citizens • Action 13: Continue to spearhead the implementation of the Model Employer Initiative • Action 14: Conduct at least two trainings in FY13 for newly-designated or otherwise qualified ADA Coordinators • Action 15: Conduct an annual information session for members of the General Court, discussing MOD services and opportunities for collaboration

GOAL	ACTION
	<ul style="list-style-type: none"> Action 16: The revision and republication of <i>The Disability Handbook for the Executive Branch</i>
A&F Better Government: Build trust in government by improving accountability, transparency and responsiveness	
Better engagement with the disability community	<ul style="list-style-type: none"> Action 1: Perform Community Access Monitor Trainings Action 2: Coordinate and conduct Emergency Preparedness Meetings Action 3: Perform site visits to assess architectural accessibility and complete a report following each visit that explains the necessary steps to remediate the accessibility barrier(s) found Action 4: Provide in-person technical assistance at municipal Commission on Disability meetings across the Commonwealth Action 5: Revise and re-publish Disability Rights Laws in Massachusetts, an annotated compendium of frequently-used disability rights laws Action 6: Serve as the Commonwealth’s representative to the ADA National Network, the technical assistance arm of the Federal Department of Education Action 7: The revision and republication of “Disability Rights Laws in Massachusetts”, an annotated compendium of frequently-used disability rights laws
Better support and advocacy for people with disabilities	<ul style="list-style-type: none"> Action 1: Provide information & referral services that facilitates access to resources and enhances the quality of life of persons with disabilities Action: 2: Perform advocacy to resolve disability-related denial of service issues and/or disability discrimination Action 3: Provide information & referral services and perform advocacy to assist clients of the Commonwealth’s vocational rehabilitation agencies through the federally-mandated Client Assistance Program Action 4: Provide client assistance that results in the resolution of systemic accessibility barriers external to state government Action 5: Conduct outreach sessions at various entities that work with Vocational Rehabilitation (VR) consumers Action 6: By reporting to the U. S. Rehabilitation Services Administration (RSA) by December 31st on the activities of the Client Assistance Program, ensure the uninterrupted flow of approximately \$48 million of federal vocational rehabilitation funds into the Commonwealth
Better customer service	<ul style="list-style-type: none"> Action 1: Conduct performance evaluations for all trainings conducted Action 2: Send performance evaluations to all clients for whom advocacy is performed.

OUTCOME MEASURES

The Massachusetts Office on Disability will utilize the performance measures below to assess success in achieving its strategic goals:

GOAL	MEASURE	DEFINITION / NOTE	DATA SOURCE	FREQ
Better state and local government compliance with disability policy	# of instances (and nature) of technical assistance provided to the ADA Coordinators, Executive Branch managers, and/or legislative staff regarding their disability-related responsibilities	As the Commonwealth's ADA coordinating agency, MOD offers technical assistance and ongoing support to the ADA Coordinators and senior managers across state government. Historically, the two most frequent areas of technical assistance are employment and programmatic access to services and programs.	Government Services' records	Annually
	# of systemic and/or critical issues addressed that result in enhanced compliance with disability policy	Critical issues are defined as those issues arising from government operations that would disenfranchise persons with disabilities and/or be likely to spur litigation against the Commonwealth	Agency records	Annually
	# of trainings conducted in FY13 for newly-designated or otherwise qualified ADA Coordinators	MOD will conduct at least two trainings in FY13 for newly-designated or otherwise qualified ADA Coordinators	Government Services' records	Annually
	# of trainings facilitated per year for ADA Coordinators and other senior managers within state government regarding changes in disability law	MOD offers ADA Coordinators access to local and national webinars pertaining to developments in disability law and assistive technology	Government Services' records	Annually
	# of requests received for the Reasonable Accommodation Capital Reserve Account	Commonly referred to as RACRA, this capital account is available to Executive Branch agencies as a resource to fund reasonable accommodations for employees with disabilities. To be eligible for funds from the RACRA an agency must establish either that the cost of the specific reasonable accommodation exceeds \$2,500 or that the agency has already spent more than 0.5% of their annual budget on reasonable accommodations for the fiscal year.	Agency records	Annually

GOAL	MEASURE	DEFINITION / NOTE	DATA SOURCE	FREQ
Better state and local government compliance with disability policy (continued)	# of board and task forces meetings attended by MOD	MOD sits on over 25 Boards and Commissions to ensure the rights of persons with disabilities are included in the decision making processes inside and outside of state government.	Agency records	Annually
	# of not budget-dependent initiatives in the IT Accessibility Roadmap that are rolled-out on schedule	MOD worked with ITD, Office of Access and Opportunity, and other key stakeholders in state government to establish a “Roadmap to Achieve Accessibility in Information Technology Acquisition, Deployment and Utilization.” This document provides the framework and force of policy to ensure that the Commonwealth’s information technology is accessible to those with disabilities. The IT Accessibility Roadmap contains numerous action items that are not budget-dependent.	“Roadmap” document	Annually
	# of “disability awareness training for managers” sessions co-facilitated as needed to assist the Office of Diversity and Equal Opportunity’s efforts to implement the Model Employer Initiative	The Commonwealth endeavors to train all of its employees, including an intensive training for managers, in the curriculum that MOD co-created to implement the Model Employer Initiative.	Government Services’ records	Annually
	# of information sessions conducted for members of the General Court	Session will cover MOD services and opportunities for collaboration	Government Services’ Records	Annually
	# of instances where MOD is a resource to the Executive Branch to test and evaluate the accessibility of enterprise-wide or agency-specific software programs	The Commonwealth regularly implements upgrades to technology or new programs that are intended to be used by all citizens. It is the goal that these programs can be independently accessed by all intended users.	Agency Records	Annually

GOAL	MEASURE	DEFINITION / NOTE	DATA SOURCE	FREQ
Better engagement with the disability community	# of Community Access Monitor Trainings held	This nationally-recognized program trains individuals on rights and responsibilities afforded people under state and federal disability laws. Trained volunteers have proven to be highly effective in coordinating advocacy efforts within their local communities.	Community Services' records	Annually
	# of people trained at Community Access Monitor Trainings	This measure tracks the cumulative number of people trained at Community Access Monitor sessions.	Community Services' records	Annually
	# of Emergency Preparedness meetings held	As a Co-Chair of the Commonwealth's task force to evaluate the state of emergency preparedness for people requiring additional assistance, MOD learned that people with disabilities did not fully appreciate their role in being personally prepared and that local emergency planners were not including people with disabilities in the design and review of emergency plans. In response, MOD developed outreach to bring these groups together to improve relationships and enhance communication.	Community Services' records	Annually
	# of people included in Emergency Preparedness meetings	This measure tracks the cumulative number of people who attended a personal preparedness meeting.	Community Services' records	Annually
	# of site visits with accompanying reports produced	At the request of community members, municipal representatives, or business owners, MOD conducts architectural assessments of buildings and facilities based on both state and federal laws to ensure that they are accessible to and usable by persons with disabilities.	Community Services' records	Annually
	# of Commission on Disability Meetings attended to provide in-person technical assistance	M.G.L. Chap. 40, Sec. 8J authorizes municipalities to establish Commissions on Disability by a vote of Town Meeting (in towns) or City Council (in cities)	Community Services' records	Annually

GOAL	MEASURE	DEFINITION / NOTE	DATA SOURCE	FREQ
		to promote the inclusion and integration of persons with disabilities in the activities, services and employment opportunities in the community. MOD is the primary technical advisor to these commissions.		
Better support and advocacy for people with disabilities	# (and nature) of information and referral services provided.	MOD's information & referral services facilitates access to resources and enhances the quality of life of persons with disabilities	Client Services' records	Annually
	# of instances in which advocacy is performed to resolve disability-related denial of service issues and/or disability discrimination	Some of the requests MOD receives pertain to disability-related denial of service issues and/or allegations of disability discrimination that cannot be resolved easily. Advocates first attempt to resolve the reported problems through informal advocacy. If an issue cannot be resolved informally, an advocate may represent an individual at an administrative hearing and/or represent them through an administrative discrimination complaint process.	Client Services' records	Annually
	# of client interactions that resulted in resolution of a systemic accessibility barrier external to state government	Periodically, the advocacy efforts surrounding disability-related denial of service issues and/or disability discrimination outside of state government results not only in resolving the Client's instant issue, but also a broader, systemic issue that will impact other persons with disabilities.	Agency records	Annually
	# (and nature) of referral services and advocacy performed to assist clients of the Commonwealth's vocational rehabilitation agencies through the federally-mandated Client Assistance Program.	MOD houses the federally mandated and funded Client Assistance Program, which specifically addresses information and advocacy concerns about the functioning of federally funded. Vocational Rehabilitation (VR) and Independent Living Programs (IL). This program facilitates enhanced vocational rehabilitation services for	Client Services' records	Annually

GOAL	MEASURE	DEFINITION / NOTE	DATA SOURCE	FREQ
		individuals with disabilities, which enables many to find and maintain employment.		
	# of outreach sessions for Client Assistance Program at various entities that work with Vocational Rehabilitation (VR) consumers	MOD will meet with VR agency and Independent Living Center staff, community college staff, 4-year college staff, and other stakeholders to provide information about the Client Assistance Program. The goal of these outreach efforts is to establish relationships that will enable the Client Assistance Program to be even more proactive in assisting clients to further achieve their goal of becoming employed.	Client Services' records	Annually
Better customer service	% of performance evaluations that are positive from all trainings conducted.	MOD distributes a multi-question, evaluative survey at each training it conducts and expects that each question will garner positive responses at least 90% of the time.	Agency records	Annually
	% of performance evaluations that are positive from all clients for whom advocacy is performed	At the close of each advocacy case, the client is sent a multi-question survey soliciting their feedback on their experience with our agency. MOD expects each question related to its efforts (as opposed to the client's outcome) to garner positive responses at least 90% of the time.	Client Services' records	Annually