



Department of Rehabilitation

Its Inadequate Guidance and Oversight of the Grant Process Led to Inconsistencies and Perceived Bias in Its Evaluations and Awards of Some Grants

Background

Working in partnership with the disability community to provide services and advocacy to individuals with disabilities, the Department of Rehabilitation (Rehabilitation) offers the majority of its services through its vocational rehabilitation program—such as career counseling, career education, and independent living skills training—directly to individuals with disabilities. It also works with other nonresidential, nonprofit community-based agencies—known as independent living centers—which are operated by individuals with disabilities and located throughout California to provide such services. These independent living centers receive federal and state funding through grants that are administered and awarded by Rehabilitation. We evaluated Rehabilitation’s process to solicit, evaluate, and award grants.

Our Key Recommendations

Rehabilitation should do the following:

- To ensure fairness, issue regulations for the grant process and formalize its policies and procedures.
- Clarify roles and responsibilities for those involved with the grant process, and ensure that staff are free from conflicts of interest and receive proper training.
- Issue public solicitations for evaluators for each grant, and ensure that each evaluator receives proper training.
- Resolve issues before it rescores applications when it identifies procedural errors, and ensure appropriate oversight of the entire process.

Key Findings

- Although required to, Rehabilitation had not formalized procedures for soliciting and awarding grants, which contributed to many inconsistencies and shortcomings in its grant process.
 - » For the grants we reviewed, Rehabilitation did not adequately plan the grant process, clearly define roles and responsibilities, and ensure key staff were free from conflicts of interest or received the required training on ethics or confidentiality procedures.
 - » It did not clearly disclose the scoring criteria in its requests for applications (RFAs), the RFAs sometimes contained inaccurate information, and Rehabilitation sometimes disregarded filing deadlines.
- Rehabilitation had significant gaps in the evaluation of the grant applications that raised questions about the fairness of the process.
 - » It did not publish solicitations for individuals evaluating the grant applications (evaluators) nor did it ensure the evaluators it selected were free from bias.
 - » It could not demonstrate that it trained evaluators or provided them with written instructions to ensure they understood the evaluation process, including the scoring criteria.
- Rehabilitation did not always follow the appeals process contemplated in its grant manual.
 - » It did not fully inform appellants about those who would conduct a review of their appeal—it did not provide appellants with the grant review committee members’ qualifications.
 - » The grant review committee did not always conduct comprehensive reviews to determine whether errors or omissions occurred, evaluator prejudice affected the scores, or evaluators adequately supported their scores.