

CENTRAL POLICY ISSUES
FOR THE EVALUATION OF
SHELTERED WORKSHOPS

by

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FOREWORD

In this paper, Mr. Markowitz explores a number of important policy issues relating to the role of workshops and facilities in vocational rehabilitation programs. We believe that the paper, which concludes a series of three papers by Mr. Markowitz evaluating the activities of workshops, provides an important kind of policy analysis which has previously been missing in the discussion of rehabilitation programs. We hope that his paper will spark debate and that his call for governmental investment in the provision of better data and of more sophisticated evaluations of the rehabilitation performance of workshops will be heeded. Mr. Markowitz recently received a Masters degree from the Department of City and Regional Planning at the University of California, Berkeley.

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PREFACE

This paper is the result of a three-month effort to follow up some of the issues raised in our initial investigation of sheltered workshops (Sheltered Workshops in Vocational Rehabilitation: A Background Paper, Working Paper No. 166, Institute of Urban and Regional Development, December 1971). Where our previous paper was a learning exercise for our research project, our present concern will be to suggest the most significant decision areas relevant to formulating a national policy on the future direction of sheltered workshops in rehabilitation. We will attempt to consider the range of possible policy choices as well as the probable consequences of those choices.

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INTRODUCTION

We have already learned the hazard of speaking of "sheltered workshops" as though they were a well-defined, homogeneous class of rehabilitation facilities. Suffice to say that when we speak of workshops here, we will be referring to those public and private facilities which provide rehabilitative services in the form of work evaluation, work adjustment, work training, work experience or long-term employment for persons handicapped by physical and mental disabilities. A given workshop might offer any combination of these services, but rarely all of them.

Facilities classified as "work activity centers" are often included in the workshop group, even though their focus is more often maintenance than rehabilitation. Work activity centers, the fastest growing type of workshop activity, tend to serve persons with more severe handicaps than either "regular" workshops or the Federal-State vocational rehabilitation system. Consequently, they cannot set meaningful goals of eventual employability and self-sufficiency for those they serve.

Since available data often does not make the distinction between workshops and work activity centers, we will have to specify throughout which meaning we intend. The remainder of this section will treat the two together.

Program evaluation is by now a familiar term, and should require little explanation. Given that workshops represent one broad strategy (program) for rehabilitation, and that available financial and professional

resources will usually be less than desired by all programs, decision-makers at the Federal level will require program evaluations of individual strategies to determine if they should be maintained, terminated, expanded, contracted, or diverted to other activities. A program evaluation, of course, is not yet, nor perhaps ever should be, the central consideration in policy decisions. Yet evaluations should always be available to decision-makers, the public, and the persons and agencies directly concerned in the program, to objectively ascertain the actual accomplishments, beyond the rhetoric and number-shuffling of supporters and detractors.

Management evaluations are commonly employed in business and government to assess progress in an already well-defined program; this is the supervisory role. Program evaluation, on the other hand, does not take the program as given, but seeks to evaluate it in terms of its purpose rather than its functions. Thus we will not be explicitly concerned with the internal operations of workshops, but with the role of workshops in rehabilitation.

We will have to ignore the interesting philosophical questions, such as the suitability of the "work ethic" to modern American society. We will try to remain relevant to the current and anticipated needs of Federal policy-makers, and to date, philosophy has not ranked high in their information needs.

We may at times refer to the "workshop system," and this should be understood as the same sort of fragmented "non-system" described by Donald Schon in "The Blindness System."¹ The system includes 1) all

¹ Donald Schon, "The Blindness System," The Public Interest, 18 (Winter, 1970), p. 25-38.

persons with disabilities qualifying them for workshop services; 2) all workshops that serve such persons, plus all other public and private agencies providing additional services; 3) training and research affecting the provision of services; 4) laws and governmental policies influencing services; 5) charitable, labor, and business elements in the communities that form the operating environment of workshops; 6) the individuals on the boards of directors of workshops; and 7) the personal contacts between workshop staff and individuals in other public agencies and in the business sector. The first four elements of the system are the direct, formal ones; the latter three the informal, less direct influences on the extent and quality of workshop services.

We will treat three broad policy areas, as suggested in our previous paper: 1) the goals of workshop services; 2) the target population to be served by workshops; and 3) the delivery of workshop services. Several specific policy questions will be pursued within each of these areas. A final section will pull together whatever conclusions might be drawn from the discussion relevant to policy formulation.

GOALS OF SERVICE

A sore point of many evaluation efforts is the attempt to define the program's goals. Workshops, like many other social service programs, have developed over a long time span, and therefore the goals often stated are the "motherhood" variety that serve merely to summarize the accumulated traditions. "Serving those in need" is a typical example of this variety. While undeniably accurate, "serving" as a goal of service doesn't tell us much. Though definition of target populations and methods of delivering services to them should be recognized, goal definition must concentrate on the narrower questions of "What do we want to do and why do we want to do it?" Neither question can be treated as trivial when workshops are viewed in the context of one program among many competing for public attention and funds. The questions of how to reach a target population and what kind of services to provide to those reached then become merely technical problems to be handed over to the professionals. The political questions remain "what" and "why."

Goals can be placed along a continuum from broadest policy to narrowest operational concerns. Toward the policy end are the twin goals of altruism and productivity. As long as "vocational" is joined to "rehabilitation," a primary concern will be to attempt to aid those with vocationally handicapping disabilities to re-enter employment at some level consonant with their changed skill levels. The goal is thus just to compensate the disabled for the loss of their physical or

mental capacity (a welfare goal), but attempt to re-establish their economic productivity. As one writer says:²

Vocational Rehabilitation expenditures are never spoken of as costs but as high return investments. Traditionally the argument has not been that rehabilitation makes people happier but that it makes them self-supporting.

It is little surprise that one finds vocational rehabilitation listed among the "manpower programs" in the most recent "Special Analysis" of the U.S. Budget, following the introduction that:³

Federal manpower programs generally serve persons who would otherwise be unable to obtain self-sustaining employment.

At the operational end of the scale of goals are all the individual reasons workshops gain support in their own communities: philanthropic concern of citizens for their less fortunate fellows, personal interest of friends and families of the disabled, and the interests of those who staff workshops in the maintenance and improvement of their operations.

Between these points, we can locate the goals of workshop services. The "what do we want to do?" question then suggests workshops want to:

- 1) reduce the stress on individuals and their families due to the individuals' severe mental or physical disabilities by providing work-oriented services that can:
 - a) lead to self-sustaining employment, or
 - b) improve individuals' income, or
 - c) improve individuals' job-seeking and job-holding capacities or

²Sar Levitan and Garth Mangum, Federal Training and Work Programs in the Sixties (Ann Arbor, Institute of Labor and Industrial Relations, 1969), p. 281.

³U.S. Office of Management and Budget (US/OMB), Special Analyses of the U.S. Government, Fiscal Year 1973 (Washington, GPO, 1972), p. 136.

- d) provide productive employment on an extended basis, or
 - e) provide work or handicraft-type activities not tied to productive employment. (work activity centers)
- 2) provide services similar to (1) to persons less severely disabled who are primarily the responsibility of other public or private agencies e.g., public assistance, formal vocational rehabilitation, manpower development, correctional institutions, etc.

The "Why do we want to do it?" is closely related, of course. Basic is the presumption that productive employment is the basis for an individual's self-esteem in American society. Not only do we accept that "everyone who wants a job should have the opportunity for it," but we believe that everyone should want a job. The social pressure for employment is closely tied to the economic consequences of unemployment and the strongly materialistic measures of "success" we have adopted. We have promised not to indulge in philosophy, but we will suggest that if "maximizing human worth" could ever be separated from "maximizing productive capacity," the consequences for the goals and methods of workshops and rehabilitation in general would be immense. Since this is not a short-run possibility, we will drop the subject here.

Since workshops are usually self-contained, relatively small-scale operations, they can be greatly influenced by Federal government policy decisions, not just concerning goals, but in all areas. If Federal policy were to pursue the guaranteed minimum income path, for example, the push for employability might be reduced as a workshop goal. Proposed Vocational Rehabilitation Act amendments

include provisions for allowing more severely disabled persons to qualify for assistance. If this should be adopted, workshops could broaden their scope of operations, again away from strict goals of employability toward the more individualized goals of maximizing an individual's potential, regardless of productivity.

It is a maxim of many governmentally-supported programs that those programs with the most funds available to them tend to attract the most fervent followers, who tend to adapt their goals to those of the higher level of government. Since workshops are generally highly susceptible to fluctuations in their financial stability, they would be likely to respond to any "carrot" that bore any resemblance to their traditional roles. For example, a sudden Federal interest in pursuing the neglected Section Fifteen authorizations for rehabilitation services for the non-disabled disadvantaged would quite probably herald a shift in workshop goals to include provision of services for that group. This is not opportunism, but merely the realistic acknowledgement that operational goals must respond to the limits of available resources. No matter what directions Federal policy might push workshops, workshops will still maintain their focus of using work as a medium to effect rehabilitation's goals.

Where discussions of goals at any level tend to be vague, cautious, and often (possibly here) inconclusive, we find the consideration of whom to serve, how, and how well focuses more easily on specific policy issues.

TARGET POPULATIONS

The distinction must be drawn between the "target population" -- the description of the class of persons to whom workshop services are to be available -- and the "coverage" of the workshop program -- that fraction of the target population actually reached. While the target population's definition is a matter for policy definition, an even more influential use of policy is to manipulate coverage by: 1) changing eligibility criteria or screening procedures, or 2) enlarging or restricting "outreach" efforts to advise potential recipients of the availability of services. Beyond the realm of these policy choices, coverage is clearly limited by the workshop resources available, which in turn depend on localized business and economic conditions. This effect on the physical location of workshops has been noted elsewhere:

...precarious financing, especially in areas of low population density where clientele is small and transportation is a major problem, has influenced the geographic distribution of workshops.⁴

Workshops are generally found in large urban areas where professional and financial assistance are more easily accessible.⁵

In other words, regardless of the prevalence rates of disabling conditions that might create a demand for workshop services in non-urban areas, coverage has had to be restricted to where the supply of workshop services could be maintained.

⁴New Jersey Comprehensive Statewide Planning Project for Vocational Rehabilitation Services, The Second Half Century (Trenton, 1968), p.111

⁵U.S. Department of Labor, Wage & Hour & Public Contracts Division (US/DoL), Sheltered Workshops (Washington, GPO, 1969), p. 8.

We will be concerned primarily with coverage here, but we note from the previous section that the target population (often stated in terms of a goal) can be shifted by policy decisions with no corresponding effect on who is served. The case in point here is that the non-disabled disadvantaged are included in the target population by the Vocational Rehabilitation Act Amendments, but lack of appropriations under that section of the Act precludes them from actually being served. A similar fate may befall amendments currently under consideration which seek to broaden the definition of eligibility for Federal-State vocational rehabilitation services to include the more severely handicapped. Realistically, we want to be concerned only with policy decisions that actually result in delivery of services.

Workshops have come to serve the more severely handicapped segment of the disabled population. This is almost tautological. Basic work skills and personal adjustments to work routines are most lacking in those persons with little or no previous work experience, hence those with congenital or long-standing disabilities. Several surveys have confirmed that workshops serve a different group of the disabled than the formal Federal-State rehabilitation programs:⁶

...population of clients served by sheltered workshops is drawn from the segment of the state agency caseload with greater vocational and educational deficits than those confronted by the average rehabilitant, more severe impairments, and greater economic deprivation.

The mentally ill and mentally retarded form the largest single group served by workshops (often activity centers, testifying to the severity

⁶William Button, "Sheltered Workshops in the United States," in Button (ed.), Rehabilitation, Sheltered Workshops and the Disadvantaged (Ithaca: Cornell Univ., 1970), p. 20.

of the disabilities). Figures for the years 1966-1969 place the proportion of persons with mental disabilities at from 37% to 47% of all persons in workshops nationally.⁷ The same sources noted that in the same period, the mental disability proportion of clients served in the state agency caseload was 20-25%.

Staff in both workshops and state rehabilitation agencies have been known to admit that workshops are often used as "dumping grounds" for those too severely disabled to benefit from state agency services. This has served to reinforce a negative image of workshops that deters the less severely disabled from seeking workshop services.

All this described who has been reached by workshops, but not who could or should be reached. We turn now to the assessment of present utilization, present capacity, and anticipated needs for workshops.

Surveys of workshops have tried to establish what the maximum number of available places sometimes ("work stations") is in relation to average daily attendance ("caseload") in the workshop. Surveys have relied on the workshops' own estimates of capacity, which may have been under- or over-stated. There is no reason to assume that quality of service is either positively or negatively related to rate of utilization, for there is yet no sure way of establishing the direction of causality: is the workshop used because it is good, or good because it is used? The utilization studies cannot answer this question. There is a consistency in results, however. A 1966-67 nationwide survey found a 70% utilization rate;⁸ another national survey of 1968-69 found a 71% rate;⁹ a state

⁷ Ibid., p. 22. US/DoL (1969), p. 15. California State Department of Rehabilitation (CalDR), California State Plan for Workshops and Rehabilitation Facilities (Sacramento, Human Relations Agency, 1971), p. 138.

⁸ Button, p. 19.

⁹ Region II Rehabilitation Research Institute (RRI), "Summary Statistics and Profile Characteristics for Rehabilitation Centers and Workshops" (Ithaca, Cornell Univ., 1970), Table B-III.

inventory found a 76% rate.¹⁰ Thus one study concluded that while workshops served an estimated 86,000 persons daily (1968), they could have served 123,000,¹¹ and roughly double that annually. Though this estimate does not include a correction for the number of workshop places held by long-term client workers, thus over-stating the available capacity, it is the best existing judgment, and is probably in the right ball-park.

Estimated needs, on the other hand, tend to rely on "magic numbers," usually multiples of ten. A 1968 report mentioned guides of one workshop (capacity and services not stated) per 100,000 population, and an estimated 0.6% of the population as potential workshop clients.¹² Another widely used standard is one work station per thousand population.¹³ Another "rule of thumb" says 10% of the physically handicapped and chronically ill population will need workshop services.¹⁴

These factors yield, in the order listed above: 2000 workshops, 1.2 million potential workshop clients (1970), 200,000 work stations, and 1.9 million potential clients.¹⁵ Since the average (not median) workshop capacity is around 100,¹⁶ the standards for number of workshops and work stations are identical, and lead to a yearly capacity of 200,000 in

¹⁰ Cal DR (1971), p. 21.

¹¹ Button, p. 19.

¹² New Jersey, p. 112.

¹³ California State Department of Rehabilitation, The Hidden Minority - Part 2 - Findings and Recommendations (Sacramento, Human Relations Agency, 1969, p. 53.

¹⁴ Nathan Nelson, Workshops for the Handicapped in the United States (Springfield, Ill., Charles C. Thomas, 1971), p. 397.

¹⁵ Susan Shea Ridge, Geographic Resource Allocation in Social Planning: Measuring Need and Allocating Resources for Rehabilitation Services, Thesis for Master of City Planning (Berkeley Univ., of California, 1972), p. 15. (Estimate based on the Social Security Survey of the Disabled: 1966 for rates and 1970 Census figures for adult population)

¹⁶ Button, pp. 16-19. Cal DR (1971), p. 136. RRI, Table B-III.

daily attendance, or (liberally) 400,000 annually. While this represents a full 1/3 to 1/5 coverage of the potential (target) population of 1.2-1.9 million, it certainly does not create confidence that ostensible standards are meaningfully related to needs, nor the needs are well determined. If the figures for need are anywhere near the right magnitude, then at best the present workshop system is reaching 10% of its target.

If one were to accept the needs figures unquestioningly, one might conclude that the case is proven for rapid expansion of workshops, whether by increased capacity of existing facilities or introduction of new workshops. If, however, one believes that the services workshops offer are not unique to workshops, then one would attempt to locate all alternative sources of services, aggregate them, and only then determine if a gap existed between capacity and need. The definition of need, as mentioned, can be manipulated by changes in intake procedures like eligibility determination and outreach. And if goals like employability are shifted by wage or income subsidies, then "need" soon becomes a very elusive, relative concept.

We have reached the question of service delivery in workshops, but there are several questions within this: what services do workshops try to provide? How successful are they? Where else are such services available? Are there other services a workshop should provide?

WORKSHOP SERVICE DELIVERY

Workshops can be found that provide only custodial care for the severely disabled, or that seek to span the range of all rehabilitative services. We can only speak here of the "average" workshop, and we will usually be excluding strictly work activity centers.

In a national survey of workshops, over 70% of the shops in the sample provided services classified as work evaluation, personal adjustment training, vocational training, and transitional or long-term employment.¹⁷ Again, each responding workshop used its own interpretation of these terms, and there is no implication that all the shops provided the same level of these services. Whatever the quality and quantity of services offered, all workshops rely on the use of real or simulated work as the medium for rehabilitation. Supporters stress this:¹⁸

The critical advantage which the sheltered workshop offers is that it provides a realistic context for evaluating and observing work behavior in an environment where the social and technological dimensions of employment are also present.

Workshop services are directed toward supplying persons who have never been capable of gaining experience in work with the basic personal habits ("work personality") necessary to maintain employment. This is a prerequisite to actual skill training and placement. Services in this category are referred to as personal or work adjustment:¹⁹

¹⁷Button, p. 29.

¹⁸Gail Hogan and William Button, "An Empirical Perspective," Journal of Rehabilitation, 37 (July-August, 1971), p. 19.

¹⁹Gordon Kratz, "Critical Vocational Behaviors," Journal of Rehabilitation 37 (July-August, 1971), p. 15.

The rehabilitation client who suffers from a circumscribed disability but is an otherwise employable person does not present a work adjustment problem.

The technology of work adjustment is most needed when the issue is the general employability, the ability to be employed at all, of the client. A simplistic comparison is that job skill training is useful when the client needs to become a square peg for a square hole; work adjustment is most useful when he needs to become a peg at all.

Work adjustment is also used, of course, for those persons who become disabled after a considerable amount of work experience, and must be psychologically and physically adapted to their new capacities.

Data are not readily available (often not available at all) concerning what kinds of clients receive which types of workshop services. One estimate places the proportion of long-term workshop clients at 34.8% of the average daily attendance,²⁰ but there is no way to determine, for example, how many of those were state agency referrals. State agency referrals (those who had been referred at some time) were placed at 59.8% of average daily attendance by that same study.²¹ A state agency's workshop utilization study showed that 28.7% of workshop clients served annually were at one time referred by the state agency, yet other figures from that state show that in a recent year state agency referrals for that year were only 11% of all those served by workshops.²²

A national survey of vocational rehabilitation counselors, state agency directors, and local public and private officials produced results that: 1) counselors send less than 15% of their clients to workshops; 2) these are split about 50-50 into transitional and long-term;

²⁰Button, p. 16.

²¹Loc. cit,

²²Cal DR (1971), p. 21, p. 136.

and 3) the most frequently used criteria for sending clients to workshops is the clients' abilities.²³ Though there are differences between states in the state agency's use of workshops, it is still significant to note that one state survey showed that most counselors use workshops for evaluation and adjustment services, and few use them for training and experience.²⁴

No general conclusion is apparent from this batch of numbers, except that the fact that workshops seem to vary among and within states is again reinforced. Since the methods and practices of vocational rehabilitation counselors are uniform in many ways nationally, we must assume that differences in workshops' services offered and quality of services must be responsible for the variations in referral rates.

The success measures for workshops are identical to those for state rehabilitation agencies as long as the goal of employability is maintained. Placement in competitive employment is the avowed goal for those persons for whom that is possible, but for those persons too severely disabled to make that a reality, placement in the sheltered environment of the workshop is another success measure. For both kinds of placement, relative or absolute increases in client earnings are often used as measures. Again, there are large differences between the report of a national survey and that of one state. In the former, of those entering employment after workshop services, 16% continue as workshop employees,²⁵ while the latter claims 41% stay on in the workshops.²⁶ This last figure is confounded by the fact that it refers only

²³ABT Associates, unpublished data from survey of ten states, summer 1971, under Rehabilitation Services Administration Contract No. OMB-83S-71010.

²⁴Cal DR (1971), p. 144.

²⁵Button, p. 17.

²⁶Cal DR (1971), p. 141.

to state agency referrals who are "closed" as rehabilitated from workshops. A possible explanation of this discrepancy is the repeated claim by many in both workshops and State agencies that counselors refer only their most seriously disabled clients to workshops. (Recall the quote on page 9, above.) This could account for a high proportion having to remain in sheltered employment.

There are difficulties in delivery of workshop services that are almost inherent structural problems. One is the dual business/rehabilitation role the workshops have come to take on. This has proven to be the foundation for the constant financial headaches that plague all workshops. In order to provide disabled persons with a meaningful work experience in the workshops, it is necessary to maintain an adequate flow of work; in order to maintain an adequate work flow, it is necessary to provide marketable goods or services to the local economy; in order to achieve that, it is necessary to compete favorably with firms who don't have the constraint of using marginally productive workers. Furthermore, by having a purposefully transient work force, the workshops constantly jeopardize their ability to undertake moderate or long-term contracts. Alternately, if the workshops want to stabilize their productive capabilities, they can control the kinds of clients they accept to insure that certain types of skills will always be available in the shop. While perhaps counter to the highest rehabilitation goals, this sort of dilemma may be typical.

Another problem is the small operating scale of workshops. There has been much comment on this difficulty:

Underutilization may reflect the generally uneconomic consequences of small scale operation.²⁷

²⁷Button, p. 19.

The principal problem evidenced throughout the State of California in rehabilitation workshops is gross undercapitalization. Lack of sufficient money critically limits adequate rehabilitation and habilitation services to the handicapped.²⁸

The small size of many workshops has limited their usefulness as meaningful training and work experience environments. Larger workshops are able to provide a greater variety of opportunities with equipment and procedures more closely representing competitive employment.²⁹

It appears that all shops under 150 ADA (Average daily attendance) are operating at a level which is highly inefficient. If this criterion is accepted, then 86% of workshops in the sample are operating at highly inefficient levels. Turning to clients served, the conclusion is that over 50 percent of the clients are located in highly inefficient shops.³⁰

...it is the small workshops which are least likely to be adequately capitalized, most likely to be single-disability, and least likely to have business-oriented management.³¹

Despite the weight of this testimony, there has been no concerted effort by either government or within the workshop movement to remedy the problems caused by small scale operations. Even the recently promulgated standards for accreditation of workshops ignore this critical influence on performance.

Related in some ways to the question of size and quality of service is that the range of available work determines the ability of the workshop clients to develop relevant skills:³²

²⁸Cal DR (1969), p. 534.

²⁹Levitan and Mangum, p. 310.

³⁰Vladimir Stoikov, "Economics of Scale in Sheltered Workshop Operations," in Button (ed.), Rehabilitation, Sheltered Workshops and the Disadvantaged, (Ithaca, Cornell Univ., 1970), p. 66.

³¹Ronald W. Conley, Economics of Mental Retardation (Baltimore, Johns Hopkins Press, (1972)(forthcoming), P. VII-31.

³²Robert Walker, "The Accountability Game," Journal of Rehabilitation, 37 (July-August, 1971), p. 35.

A common abuse found in many work adjustment programs is the small number of work activities or tasks. This constraint ultimately results in clients obtaining limited types of jobs..... clients enter the facility with widely differing capacities, skills and interests, but because the tasks that they can perform are so limited the facility spout tends to produce endless numbers of punch press operators, assemblers, and messengers. There are some who have been so unkind to say that electronic air filters will probably destroy rehabilitation because it will lessen the demand for janitors.

This idea of workshops as either dead-ends in themselves or the step just before entering a dead-end job is a stigma that can be difficult to surmount:³³

The identification of the workshop as a charitable organization fixes it in an aura of impotence in the public mind. The individual who attends a sheltered workshop has failed in life. Indeed the sheltered workshop is a substitute when the real thing is not available.

Adding to the stigma is the low wage scale in workshops, based on Federal exemptions from minimum wage laws. The low wages represent a significant reason why state agency clients do not like to be sent to workshops.³⁴ The average hourly wage of all workshop clients in 1968 was 76¢, with a range from 35¢ to \$1.35; this when the minimum wage was \$1.60.³⁵

Federal policy decisions could change the delivery of workshop services in several ways: 1) it can change the costs of providing those services; 2) it can change the availability of those services; 3) it can re-define the role of workshop services in rehabilitation such that the actual mix of workshop services is altered. We will treat each of these in turn.

The costs of workshop services could be reduced by either out-right subsidies, grants or donations, or by reducing the uncertainty of workshop operations. For example, the uncertainty caused by variations in work flow would be reduced by guaranteed long-term contracts with the

³³Nelson, p. 407.

³⁴Cal DR (1971), p. 145.

³⁵US/DoL (1969), p. 18.

government for specified goods and services, or guaranteed markets. Similarly, the uncertainty due to the variability of the numbers (not skills) of workshop client-employees might be reduced by a guaranteed flow of clients from referring agencies.

If there were alternative sources of the services which workshops provide in an inefficient manner, then governmental policies that encouraged a switch from workshop programs to the alternative would reduce the workshops to providing only the services they can do "best" (by efficiency criteria). On the other hand, if alternative sources were competitive with workshops for funds, clients, markets, etc., the effect of switching to them would be to further deteriorate the workshops' poor financial positions.

Just what are alternative sources of workshop services? It has been noted that vocational rehabilitation has sometimes been included as manpower program, so it has been suggested before that some manpower programs could absorb the responsibility for providing certain types of workshop services. While both rehabilitation and manpower programs seek to develop human resources, there are significant differences:³⁶

It is interesting, but not particularly enlightening, to compare the costs and results of various manpower programs. Though all have the objective of employment, the clientele and methods differ widely. Vocational Rehabilitation services are primarily evaluation, medical restoration, and counseling with only limited skill training. Manpower Development and Training is almost totally a skill training program.

Nonetheless, some scattered data does exist on comparative costs of programs. For instance, it is noted in the analysis of Federal manpower programs quoted above that in fiscal year 1967, the cost per enrollee for all Manpower Development and Training (MDT) programs

³⁶ Levitan and Mangum, p. 320.

was \$1230, compared to \$510 for Vocational Rehabilitation (VR) enrollees.³⁷ These costs do not reflect actual per unit cost of successfully placing a program participant in employment. Only about 75% in both cases actually complete the programs,³⁸ and the lack of follow-up studies precludes a reliable estimate of the number of completers who find employment.

Within the MDT program, the two main sub-programs are the Institutional and the On-the-Job-Training (OJT). The institutional, or formal school, program generally is more costly per enrollee, since the program must assume support of the persons while in training. The OJT program usually appears more efficient, since the enrollee is being paid a normal wage by his trainer-employer. Comparative costs, again in fiscal year 1967, were \$1900/enrollee and \$2040/completer for the Institutional program, and \$380/enrollee and \$490/completer for the OJT program.³⁹

A more recent analysis of manpower programs changes this interpretation somewhat. Though the yearly unit cost for OJT (\$2000) is less than Institutional MDT programs, (\$2600) the average duration of enrollment is longer for OJT.⁴⁰ The adjusted "participant unit cost" is then estimated at \$1000 for OJT and \$900 for Institutional, for 1971.⁴¹ Rehabilitation programs are again less costly annually (\$1150), but their longer duration of enrollment increases their "participant unit cost" to \$1450.⁴²

³⁷ Ibid, p. 321.

³⁸ Loc. cit.

³⁹ Ibid., p. 78

⁴⁰ US/OMB, p. 149

⁴¹ Loc. cit.

⁴² Loc, cit.

The only study specifically focusing on workshop costs is again that for the State of California. For fiscal year 1969, the overall case service cost of delivering services to State agency clients is higher for those requiring workshop services than for those not receiving workshop services. The data are reproduced below:⁴³

<u>Type of Closure</u>	<u>With Workshop Services (Average Cost)</u>	<u>Without Workshop Services (Average Cost)</u>	<u>All Types of Services (Average Cost)</u>
All Closures	\$764	\$162	\$179
Closed Rehabilitated	\$895	\$565	\$590
Closed Not Rehabilitated (after plan)	\$869	\$418	\$452

No data can be found on the unit cost of delivering workshop services in general. Moreover, the above figures on State agency case service expenditures for clients placed in workshops may not reflect the full costs borne by the workshops in delivering those services. Case service fees are set up on a strict schedule by duration of service delivered, e.g., days, weeks, or months, and are not related to the quality of service in any way. Again, the services purchased by State VR agencies from workshops are generally only diagnostic and evaluative, not training. Thus comparisons with manpower programs should be made cautiously.

In California, although over 70% of the state rehabilitation agency's clients receive some form of vocational training, over 40% of them are trained in junior or business colleges, 7% in four-year colleges, about 25% in on-the-job training (OJT) positions in business, 20% in

⁴³Cal DR (1971), p. 135.

vocational schools, and the remaining (less than 8%) in workshops, rehabilitation centers, special schools, etc.⁴⁴ A recent analysis of Federal manpower programs showed that in 1971, none of the major manpower programs (on-the-job training, institutional training, post-school and in-school work support) had more than 7% disabled enrollees.⁴⁵ These statistics seem to say that, at least for the training function, workshops serve those who, by nature of their disabilities, cannot qualify for any of the alternatives listed above. This is not to say that the eligibility and success criteria of the alternate programs could not be adapted to accept disabled enrollees, only that this is not now the case. We can then say that manpower programs and workshops do not compete or overlap in the training of disabled persons. There have been some joint programs between workshops and manpower projects, but little data is available on the outcomes.⁴⁶

In the diagnostic and evaluative functions, workshops currently "corner the market," sharing those tasks only with other types of rehabilitation facilities. Again, this does not say that workshops should have this role, or that they currently do a good job of it. In fact, one authority in rehabilitation casts doubt on the predictive ability of workshop evaluations:⁴⁷

...it is something of a tribute to our collective ingenuity that the predictive efficiency of some of our assessment techniques are significantly better than zero.

...even the most ingeniously devised workshop has its limits. Not only are most rehabilitative workshops sharply limited in the kinds of work made available, but they are still basically protected situations... By and large, the bulk of the clients of these facilities are aware... that they are there to be helped and trained, that the workshop is transitional to genuine employment, but is not the "real thing," that the workshop foreman is not exclusively interested in output.

⁴⁴ Levitan and Mangum, p. 307.

⁴⁵ US/OMB, p. 149.

⁴⁶ US/DoL (1969), p. 11.

⁴⁷ Walter Neff, "Vocational Assessment - Theory and Models," Journal of Rehabilitation, 36 (January-February, 1970), p. 29.

I am afraid that there is no substitute for extension of the assessment process into the actual industrial situation.

One of the more highly regarded workshop operations in California has used this approach of evaluating the individuals who complete the workshop training programs by placing them for four to six weeks with an employer in the community. These "Job Site Evaluations" place no burden on the employer other than supervisory time and space, since the Training Services Grant under which this program operates continues to supply the trainee with a training allowance throughout the evaluation period. A recent semi-annual report from that workshop concludes: "It (Job Site Evaluations) has been an extremely successful aspect of our program. It has helped us better prepare our trainees for a more successful job placement as well as increase the likelihood of greater job retention."⁴⁸

Aside from the training and evaluative functions, there is the remaining role of workshops as employers of disabled clients. One author claims that many low-skill jobs suitable for the disabled could be easily found in regular industry:⁴⁹

The crucial question is not whether sheltered work is needed, but where it should be provided. Although usually sheltered work is associated with sheltered workshops, it would be possible to locate many sheltered jobs within regular employment channels.... Most of the additional 400,000 jobs needed for retardates should be sought in regular employment channels. Sheltered workshops have a crucial rehabilitation role and are the employer of last resort for disabled persons with unacceptable behavior problems and the very seriously disabled.

The author, however, makes a weak case that such numbers of low-skill jobs are actually available, basing his judgment primarily on a handful of episodes where an employer who had hired X number of retardates was

⁴⁸ Goodwill Industries of Santa Clara County (California), Semi-Annual Report RSA Training Services Project Grant, January 10, 1972, p. 5.

⁴⁹ Conley, p. VII-40,42.

satisfied with their performance and testified he could use more workers like them. While interesting, the sum total of the examples cited was less than 7000 jobs⁵⁰ -- hardly a dent in the proposed 400,000. Simply "assuming," as the author does, that the supply of low-skill positions will be sufficient may not be justified. We can, however, draw together some figures to hazard a guess of the growth potential of the kind of jobs the disabled may pursue. Ideally, we would like to know the types of jobs that have been filled by the disabled, before and after receiving rehabilitation services (including workshops), broken down by disability categories. By the nature of ideals, of course, such data does not exist. The computations to follow, though rough, should still be able to tell us if 400,000 jobs can really be found for the retarded. We dwell on this question for two reasons: 1) workshops for the retarded have been both the fastest growing and the largest single disability type of workshop in recent years, and 2) if jobs can be readily found for the retarded, who are admittedly among the most difficult of the disabled to train, then prospects are brighter for finding sheltered employment outside of workshops for most of the other disabled.

Four sources seem to indicate that those closed from State agency caseloads as rehabilitated find employment in clerical, sales, service, and lower-level blue collar categories. Keep in mind these figures all refer to clients of many disability types rehabilitated through State agencies which may make varying use of workshops. If we agree that the retarded, and the more seriously disabled who make up much of the workshops' clientele, probably will not do as well in obtaining work as the more "typical" recipient of rehabilitation services, then we can consider all of the figures as conservative for our purposes.

⁵⁰ Ibid., pp. 36-37 cite five examples from various sources, totaling 6879 jobs.

Percent Employed Rehabilitated (Source/Date)

<u>Occupation Group</u>	<u>U.S. 1966</u> ⁵¹	<u>Minn. 1967</u> ⁵²	<u>W. Va. 1968</u> ⁵³	<u>Calif. 1971</u> ⁵⁴
Clerical & Sales	19%	16.9%	(NA)*	19%
Service	25%	26.1%	29.9%	19%
Semi-skilled (operative, machine work)	15%	35.2%	(NA)*	17%
Unskilled (non-farm labor)	9%	(NA)*	14.9%	5%
TOTAL	68%	78.2%	44.8%	60%

*NA= Not available in this study.

We conclude that these categories are likely to include all possible jobs for the seriously disabled, especially the retarded.

Turning to the most recent projection of the U.S. Department of Labor for jobs by industry and occupation, we find the following:⁵⁵

	(Thousands)	
	<u>1970</u>	<u>1980 (estimate)</u>
Total National Civilian Employment	78,627	95,085
Occupation Group		
Clerical	13,715	17,285
Sales	4,854	5,760
Operatives	13,909	15,440
Service	9,712	13,060
Non-farm laborers	3,724	3,700
Sub-total - Occupations for Seriously Disabled (Potential)	45,914	55,245
Increase, 1970-80		9,331

⁵¹Levitan and Mangum, p. 306.

⁵²Minnesota Studies in Vocational Rehabilitation, A Follow-Up Survey of Former Clients of the Minnesota Division of Vocational Rehabilitation, Bulletin 50 (Univ. of Minnesota, 1969), p. 8.

⁵³Ranjit Majumder, Study of Trends and Characteristics of West Virginia Dept. of Vocational Rehabilitation Programs (West Virginia Dept. of Voc. Rehab., nd.), p. 16.

⁵⁴Telephone conversation with staff member of California Department of Rehabilitation, figures from 1971 Annual Report of the Department.

⁵⁵U.S. Department of Labor, Bureau of Labor Statistics, Tomorrow's Manpower Needs, Volume IV (Washington, GPO, 1971), pp. 14-16.

If we make the simplifying assumption that the new jobs are spread evenly across the decade, then we could expect 933,100 jobs per year to be created which could conceivably be held by the retarded. This itself is a gross assumption, given the wide range in skill and experience levels hidden within the broad occupational categories. We believe we have reason to doubt that 400,000 jobs, or 43% of the estimated annual increase, could now be found for the retarded, as readily as Conley implies, under the present structure of employment. Indeed, even securing 5% each year of the annual job increase and thus achieving full employment objectives for the retarded over a ten-year period would be very difficult given the number of other disadvantaged populations competing for those jobs. Also, the 1980 projections assumed a 3% unemployment rate, which again would make our conclusion conservative under prevailing economic conditions. The only reasonable source of jobs for such a large number of the retarded, or other disabled, would be subsidized, sheltered work of a "make-work" variety. Neither the rehabilitation system nor the political and industrial institutions are to that point yet.

Even if all the hoped for jobs were to materialize, we still might question the consequences of relegating workshops to "employer of last resort for disabled persons with unacceptable behavior problems." This comes again to the workshop's rehabilitation/production dilemma, where the reward for successfully rehabilitating a client-worker is to discharge him from the workshop, guaranteeing a constant exodus of the most productive workers. If all or most of the productive workers were to leave the workshops for sheltered positions in industry, the workshops' financial situation would move from critical to impossible.

If workshops are still to pursue that "crucial role" of employer of last resort, then a heavy subsidy to keep them going is a corollary of withdrawing their productive workers. This alternative to workshop services must be considered with this added cost in mind.

The final potential effect of policy on workshop services, actually changing the nature of workshop services, may pursue two directions. First, governmental policy can define the attributes of an "efficient" or "effective" workshop, hopefully with respect to some criteria backed up by factual evidence, and apply the definitions as standards. The standards might become prerequisites for any workshop seeking to qualify for federal grants, tax exemptions, or minimum wage exemption certificates. This kind of accreditation, if mandatory and strictly applied, could have profound effects on the production procedures followed, the client disability mix accepted, the scale of operation in daily attendance, capitalization, and staffing, etc. The present moves toward accreditation are not so extreme, however.⁵⁶ Such standards would certify that the workshops meet minimum acceptable levels of service delivery, but would still be a questionable measure of quality.

Another way services could be re-directed is if a policy decision defines a new role for workshops and provides some means of accomplishing that role. The interest in enlarging the evaluative and diagnostic operations of workshops to accommodate the needs of public assistance and manpower programs, for example, could result in workshops giving those functions more weight in terms of staff, space, materials, etc, if funds

⁵⁶Joel Markowitz and Frederick Collignon, A Second Look at Accreditation of Rehabilitation Facilities: Some Questions and Cautions, Working Paper No. 175/RS005 (Berkeley, Institute of Urban and Regional Development, 1972), p. 12.

were available for such purposes. It is interesting to develop a few "magic numbers" of our own here, to see if workshops could be able to expand to meet this kind of need. Recall the number of desired work stations -- 200,000, for a population nationally of 200,000,000. Suppose half of them could be set aside for evaluation use full-time (this is obviously an over-estimate). Suppose an evaluation could be completed in three weeks (Goodwill of Santa Clara County allowed four to six weeks for its job site evaluations, and the U.S. Department of Labor allows six months for certification of evaluation programs -- again in over-statement of capacity). Thus there could be, with these harsh assumptions:

for one work-station:

$$\begin{aligned} 52 \text{ weeks/year} \div 3 \text{ evaluations/week} &= 14 \text{ evaluations/year} \\ 100,000 \text{ work stations} \times 14 \text{ evaluations/year/work station} &= \\ &1.4 \text{ million evaluations possible} \end{aligned}$$

In 1970, there were about 1.2 million new enrollees in all manpower programs,⁵⁷ and about 7.4 million public assistance recipients (Aid to Families with Dependent Children).⁵⁸ Even if only 1/6 of these manpower-welfare enrollees (and we admit some double-counting here), were to seek evaluation services from workshops, all the 1.4 million spaces would be filled, leaving no room for the strictly rehabilitation evaluations which now use available work stations. If we recall that 1) workshops have been characterized as under-capitalized, 2) workshop evaluations may be poor predictors of actual employment behavior, and 3) not all workshops offer evaluative services, and the not of uniform quality, then one begins to doubt the ability of the current workshop system to take on the proposed job.

⁵⁷US/OMB, p. 140.

⁵⁸U.S. Bureau of the Census, Statistical Abstract of the United States, 1971 (Washington, GPO, 1971), p. 845.

It might be able to perform if funds were readily available for expansion and modernization for equipment and training of personnel, and if the number of evaluations were less than that figured above, but then there would still be the question of whether evaluations might not be better accomplished on-site in industry. The cost of locating a large number of such positions and maintaining a field staff to monitor them could be high. Once again because of the absence of basic data, we cannot say for certain what the capacity of workshops is at present for conducting evaluations, but we have reason to believe now that the capacity is not as great as some assume, and even if capacity were assured, the quality and reliability of the results could still be suspect.

We have treated in cursory fashion some of the most interesting and difficult policy areas concerning workshops, and we have seen that our neat three-way framework (goals-targets-services) breaks down often in the grey areas. We will now turn in the final section to an even more brief look at some of the questions implied in the foregoing discussion, or questions that we could not conveniently cut to fit our outline.

CONCLUDING POLICY QUESTIONS

Workshops appear to fill a gap in the rehabilitation services offered by the Federal-State agency system, serving those with more severe handicaps. Though other sources exist for some of these services (training and employment), present limitations of both public attitude toward the severely disabled and institutional restrictions of program criteria tend to prevent these alternatives from being actively explored.

We have had reason to doubt the continued availability of jobs for workshop "graduates" and the supply of work to keep the shops going. Furthermore, the problem of the workshops' "dead-end" stigma is more often a confirmed reality rather than a simple stereotype. The individual variability among workshops is so great, however, that any national policy that assumes an "average" workshop is sure to be misled.

Since the universal complaint both of and by workshops is their lack of adequate financial resources, it would appear that only the addition of money would reap a windfall of good works. Yet the basic choice of how much to support workshops cannot be honestly reached without considering the alternatives. There seems to have been no systematic attempt to evaluate these alternatives, and perhaps this is due to the paucity of program data about workshops. A policy decision that could be rather easily made at the federal level and would have immediate impact would be a required, standardized data sheet that all workshops must submit for less-than-minimum wage certification or grant programs, with comparable definitions of services and measures of output. Even this may be asking too much.

The entire argument could be changed if this country were to adopt a European version of sheltered employment, where the

...primary purpose is not to produce goods and services or to seek profitable operations, but to provide a steady flow of work with a suitable variety of jobs at a good pay for the maximum number of handicapped workers at the minimum annual subsidy per worker.⁵⁹

The prospects for such a philosophical shift are not very great, but it is instructive to note that the European model seems to function fairly well. Aside from the philosophical differences between the European and American approaches to and feelings toward workshops is the great difference in relative magnitudes of use. One source claims that 0.5% of the total European population received workshop services in one form or another.⁶⁰ An equivalent percentage in this country would mean one million persons receiving workshop services. Compare this to the present utilization of workshops in America of less than 200,000 annually, 100,000 in average daily attendance, cited earlier.

The idea of using workshops to create jobs in times of unemployment has not been considered here, but is a general question of manpower policy. The rationale for this use of workshops would be that they could be the temporary employers of the structurally unemployed in times of high unemployment. The workshops could thus be built up to a high level of operation with considerable public investment. Then, when unemployment drops back to the "full employment" level, the workshop would be in a position to reach deeper into the population of unemployed and handicapped. The workshop would then be a manpower tool to use as economic fluctuations dictated. Neither the present operating scale of workshops, nor the

⁵⁹ Beatrice Reubens, The Hard-to-Employ: European Programs (N.Y., Columbia Univ. Press, 1970), p. 250.

⁶⁰ Nelson, p. 397.

de-centralized "non-system" of workshops give much hope that such a unified, rational economic mechanism can soon be realized. Nonetheless, it is a significant function to keep in mind for future policy directions. We note that the European workshops do use job creation as the bridge to competitive employment, though not as part of national macro-economic policy.⁶¹

Can the "dead-end" stigma of workshops be overcome? Only if the reasons for the image are treated: low wages, drab surroundings, training in skills only good for the bottom of the occupational ladder. This, in turn, requires a considerable investment to produce a full up-grading of facilities. Any programs designed to support workshops (subsidies, contracts, block funding), of course, must be weighed against alternatives, and this quickly brings us back to that same point again -- we have little ground on which to compare alternatives.

Because of this, the best policy choice concerning workshops would be to approach the question of alternatives experimentally. By funding innovative projects designed to control for critical workshops variables (location, size, client disabilities), some comparisons might be drawn that would hold up to a statistical analysis. Guaranteed contracts, work flows, clients, sheltered positions in industry, all these suggested alternatives must be examined, and there is no evidence that they ever have been in a thorough manner. It may be trite to cry over lack of data as an excuse from taking a firm stand, but the data (where available at all) are of such erratic quality that we must resort to this plea.

⁶¹Reubens, Chapters 8 & 9, pp. 179-269, concern job creation programs in European countries.

So why use workshops? Simply because there are no proven alternatives for the particular mix of rehabilitation and vocational services for those too severely handicapped to be served by other methods. The future of workshops will be a function of how quickly efforts are undertaken to probe the causitive factors underlying the great variations in the effectiveness of individual workshops. If, for instance, the question of size is found to be as critical as suggested previously, a national policy to consolidate small workshops where they cannot be expanded, or to aggregate certain functions to achieve economies of scale (e.g., marketing, contract procurement, placement) would be a great step forward. Prior to adoption as policy, this could be pursued as an experiment. Similarly, evaluations of non-disabled disadvantaged could be accomplished in various types of workshop environments and in job-site situations, and the predictive accuracy assessed by detailed follow-up.

The general dearth of data on which to base an evaluation of workshops may be dealt with by one means mentioned above: coercion. Workshops must fill out typically lengthy forms to obtain Department of Labor certification. Full financial details of their operations are required. It would occupy little additional space on the forms (though probably more effort from the workshops) to specify the results of their efforts: how many workshop clients were placed and in what jobs? How many clients remain in the workshop? Have they made any progress toward employability? What happened to those who leave the workshop, before or after services are completed? Aside from this mandatory reporting, we find that the only national, voluntary reporting system has also failed to produce data useful for program evaluation, and, therefore, also could

be modified. That effort, the "Reciprocal Rehabilitation Reporting System,"⁶² concentrated on structural data describing how the workshops are set up, not how well they work; the data show "how much" but never "how good."

Dwelling on the need for data and evaluative research on workshops would be academic, were it not for some of the facts we have tried to bring out here. To reiterate, the conventional wisdom places both workshop capacity and potential clientele far in excess of present abilities and coverage. The proposed 200,000 daily attendance figure (see page 11 above) is roughly double present utilization, and the "target population" of 1-2 million is poorly defined, but certainly much greater than that presently served. Added to this is the reality of the projected growth rates for those occupations likely to be filled by the disabled. Less than one million jobs are expected to be created in each year in the next ten in the semi-skilled and un-skilled categories, to be filled by the disabled and fully able alike. In times of moderate or high unemployment, the competition for these jobs may be severe, and the disabled could be expected to capture only a small portion of available places. The implication is that workshops would have to perform particularly well to provide services that lead to competitive employment, and the questions concerning under-capitalization and small scale raise doubts that workshops can do the job. And this brings us full circle back to the data problem. We cannot now, though we must soon be able to, say with confidence precisely how well workshops are doing their job, and how well they could do.

⁶²Conducted by Region II Rehabilitation Research Institute.

We recommend, therefore, that the following steps be considered:

- 1 - An experimental or demonstration approach be taken to answer questions of:
 - a - proper scale or workshop operations
 - b - comparative success of sheltered workshops versus sheltered work places in industry
 - c - effects on workshop operations of guaranteed work flow, and guaranteed clients by referring agencies
 - d - predictive accuracy of workshop evaluations
- 2 - New (or expanded use of existing) data sources on workshop outputs:
 - a - through mandatory reporting for minimum wage certification
 - b - through voluntary research efforts
- 3 - Once data on output exists, standards relating to quality of service may be applied to applications for certification from the Department of Labor, aside from any accreditation requirements from the Rehabilitation Services Administration.
- 4 - The question of workshops as a manpower tool, and the expansion of the workshop role along European lines must be kept in mind for long-range decisions.

Without some answers to such questions as these, we are in a shaky position when asked the superficially simple question "should we expand or contract the use of workshops?" We have some reasons to doubt the ability of workshops to deliver uniformly high quality services to the disabled and disadvantaged. We have little grounds to accept the presumption by some that workshops are not only doing well, but that their role should be enlarged to include new responsibilities.

A call for new data and new research is certainly not what the rehabilitation or workshop movements want to hear. There are surely enough questions to go around; the real need is for answers. Yet our search for those answers has led us ever more strongly toward the conclusion that only poor, partial, or irrelevant data exists. An "information gap" spreads wide before us. The effort to bridge the gap effectively must begin.

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APPENDIX - DATA SOURCES

The best, and virtually only, data available on workshops nationally comes from these sources:

1. Cornell Univ., Region II Rehabilitation Research Institute: Rehabilitation, Sheltered Workshops and the Disadvantaged (1970), and statistics from the "Reciprocal Rehabilitation Reporting System," most recently fiscal year 1969.
2. Michael Dolnick, Contract Procurement Practices of Sheltered Workshops, National Society of Crippled Children and Adults, 1963, reprinted by RSA. Though dated, still seems to describe the situation.
3. U.S. Department of Labor, Wage & Hour & Public Contracts Division, keeps tabulations of certificates granted to sheltered workshops to permit payment of wages below the legal minimum. There is unpublished data available on the results of DoL investigations of workshop practices for compliance with certification. Over-all workshop statistics may be obtained from:

Artuhr Korn, Chief
Handicapped Workers Section,
Employment Standards Administration
U.S. Department of Labor
711 - 14th St. N.W.
Washington, D.C. 20005

 Also, refer to DoL 1967 and 1969 studies of workshop wage payments.
4. "Workshops for the Handicapped -- An Annotated Bibliography," Numbers 1-6, compiled by D. Perkins, M. Brodwin, A. Oberstone, for the Rehabilitation Counseling Program, California State College, Los Angeles. The bibliography looks comprehensive, but it is alphabetical by author, with no index by subject, or even sub-headings of any form. Thus these are possibly rich sources of information, but the format makes them unmanageable.

And that's it in the way of publications. No one interviewed in the course of either this or the preceding paper on workshops could mention any other source of national data on workshops. The State of California's Department of Rehabilitation included a "Workshop Utilization Study" in its 1971 State Facilities Plan. Each state must submit some manner of

facilities plan annually to RSA. A fruitful effort might be to collect as many of these plans and inventories as possible, especially for those states mentioned by Button (p. 11-13) which seem to have most of the nation's workshops. This could be a source of aggregation for a better approximation of the national total of workshops.