

Department of Education
Office of Inspector General – Internal Audit
18 Month Status Report on: DBS District Allocations
Report # A-1516-020 Issued: October 25, 2016
Status as of April 25, 2018

Finding	Recommendation(s)	Previous Management Response	Management Response as of April 25, 2018	Anticipated Completion Date & Contact
<p>DBS provided services prior to the completion of IPEs and services did not match the IPE in effect.</p>	<p>We recommend that DBS monitor the districts to ensure IPEs are properly completed prior to providing services to clients and ensure the services provided match the current IPE on file. We also recommend DBS identify the correct provider when providing services to the clients and amend the IPEs accordingly.</p>	<p>DBS will continue to conduct random desk reviews. Targeted desk and onsite reviews will be made to districts with higher incidences of non-compliance. DBS will ensure that the Quality Assurance Case Review Form addresses the IPE, the specific provider and provided services. DBS will address the IPE process in ongoing staff trainings.</p> <p>Response as of April 25, 2017:</p> <ul style="list-style-type: none"> • A schedule for targeted desk and onsite reviews is being developed. • DBS revised the Case Review Form to address the IPE, the specific provider and provided services addresses. • DBS is exploring the ability to add an internal control via the AWARE case 	<p>Initial trainings have been conducted. Additional trainings will be provided on an ongoing basis as needed. Policy 2.14, IPE Development has been updated and approved.</p>	<p>Complete</p>

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		<p>management system to restrict the ability to generate authorizations on expired plans, etc.</p> <ul style="list-style-type: none"> • DBS will address the IPE process in ongoing staff trainings. Staff is informed via emails, intranet updates, webinars and/or phone conference calls. <p>Anticipated completion 10/31/2017: Robert Doyle</p> <p>Response as of October 25, 2017:</p> <ul style="list-style-type: none"> • Implementation of the revised QA Case Review Form #253 occurred July 1, 2017. • DBS supervisors and district administrators continue to conduct random desk reviews, and the program 		

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		<p>administrator collects and analyzes the data. Counselors are provided with feedback and may receive individual training as needed.</p> <ul style="list-style-type: none"> • The IPE process was addressed via email and during the Annual VR training held October 9-13, 2017. • Affected policies and the VR program manual have been revised and are awaiting final review and approval. <p>Anticipated completion 11/30/2017: Robert Doyle</p>		
Invoices and authorizations were not appropriately signed	We recommend DBS ensure all invoices and authorizations are properly signed in accordance with the VR and CP manual. We also recommend DBS ensure	DBS will continue to conduct random desk reviews. Targeted desk and onsite reviews will be made to districts with higher incidences of non-compliance. DBS will ensure that the Quality	DBS identified the need for a full-time position to address quality assurance and quality control during a reorganization process. Case reviews revealed	Complete

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	<p>all districts are trained and aware of the approval requirements.</p>	<p>Assurance Case Review Form addresses the invoice and authorization approval process (required signature in designated area on the invoice and authorization). DBS will address the invoice and authorization process in ongoing staff training.</p> <p>Response as of April 25, 2017:</p> <ul style="list-style-type: none"> • A schedule for targeted desk and onsite reviews is being developed. • DBS revised the Case Review Form to address the invoice and approval process. • DBS will revise the VR and CP manuals to include an internal control for delegations of authority in order to ensure services are provided timely. • DBS will address the invoice and authorization process in 	<p>several districts in need of an onsite review and technical assistance. Of these, the QA/QC staff will visit three districts in round one (Districts 2, 9, and 10). Round two of onsite reviews will include Districts 3, 6, and 11. Round three will include Districts 1, 5, 7, and 12.</p>	

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		<p>ongoing staff trainings. Staff is informed via emails, intranet updates, webinars and/or phone conference calls.</p> <p>Response as of October 25, 2017:</p> <ul style="list-style-type: none"> • Implementation of the revised QA Case Review Form #253 occurred July 1, 2017. • The Program Administrator collects and analyzes data on a quarterly basis. • Data collected is used to prioritize onsite training and monitoring. • Affected policies, the VR program manual and the Children’s program manual have been revised and are awaiting final approval. • The invoice process was addressed during the Annual 		

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		VR training held October 9-13, 2017. Anticipated completion 11/30/2017: Robert Doyle		
Maintenance requests did not include the required needs assessments and request forms.	We recommend DBS ensure all required maintenance forms and needs assessments are completed in accordance with the CFR and VR manual. We also recommend DBS reiterate the needs assessment requirements to the districts.	DBS will continue to conduct random desk reviews. Targeted desk and onsite reviews will be made to districts with higher incidences of non-compliance. DBS will revise the Case Review Form to reflect monitoring as it applies to maintenance requests. DBS will ensure that the needs assessments are applied to the appropriate maintenance services. In addition, DBS Client Services will work to clarify related policies and procedures. DBS will address the maintenance request/needs	DBS uses the Maintenance Authorization Procedure Checklist (Form #264) to ensure maintenance requests include needs assessments and request forms. Case Reviews are conducted to ensure needs assessments are applied to the maintenance services and documentation is scanned in AWARE. Staff received training on this process during the Annual VR Training held on October 9-13, 2017.	Complete

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		<p>assessment process in ongoing staff training.</p> <p>Response as of April 25, 2017:</p> <ul style="list-style-type: none"> • A schedule for targeted desk and onsite reviews is being developed. • DBS revised the Case Review Form to reflect monitoring as it applies to maintenance requests. • DBS will ensure that the needs assessments are applied to the appropriate maintenance services, and documentation is scanned into AWARE. In addition, DBS Client Services will work to clarify related policies and procedures. • DBS will address the maintenance request/needs 	<p>Note: Copies of the agenda and training materials were provided to the OIG with DBS' October 2017 update.</p>	

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		<p>assessment process in ongoing staff trainings. Staff is informed via emails, intranet updates, webinars and/or phone conference calls.</p> <p>Anticipated completion 11/30/2017: Robert Doyle</p> <p>Response as of October 25, 2017:</p> <ul style="list-style-type: none"> • The #264 Maintenance Authorization Procedure Checklist and review process, which includes a section on maintenance requests, was created and was implemented July 1, 2017. • Data collected from case reviews and authorization reviews will be used to prioritize onsite reviews for districts. 		

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		<p>This data will also be used to focus training on specific areas included under “Fiscal Management and Authorizations” during the Annual VR training October 9-13, 2017. Staff was also informed on the maintenance process via email.</p> <p>Anticipated completion 11/30/2017: Robert Doyle</p>		
<p>Maintenance payments were used for unallowable services and were paid to clients instead of vendors.</p>	<p>We recommend that the department strengthen their controls and monitoring of maintenance payments to ensure payments are only made for allowable services and paid directly to vendors when possible.</p>	<p>DBS will reinforce the need to directly pay vendors for client maintenance payments when possible. DBS will develop a form to ensure supervisory review and approval of maintenance paid to clients, and will develop a quarterly summary report for management review of such payments. DBS</p>	<p>DBS revised the Form 264, Maintenance Authorization Procedure Checklist to ensure supervisory review and approval of maintenance services. Staff are instructed to pay vendors directly for maintenance and this procedure is reinforced by</p>	<p>Complete</p>

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		<p>Client Services will require staff to submit justification in AWARE when directly paying clients for purchases outside of MyFloridaMarketPlace. DBS will ensure that the Quality Assurance Case Review form addresses allowable services paid directly to vendors. DBS will address the maintenance request/allowable services process in ongoing staff training.</p> <p>Response as of April 25, 2017:</p> <ul style="list-style-type: none"> • DBS will reinforce the need to directly pay vendors for client maintenance payments when possible • DBS revised the “Maintenance Authorization Procedure Checklist” to ensure supervisory review and approval of client maintenance payments. 	<p>the state office. Case Reviews are conducted to ensure maintenance payments are used for allowable services and documentation is scanned in AWARE. Staff received training on this process during the Annual VR Training held on October 9-13, 2017.</p> <p>Note: Copies of the agenda and training materials were provided to the OIG with DBS’ October 2017 update.</p>	

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		<ul style="list-style-type: none"> • DBS staff will be required to submit justification in AWARE (case note) when paying clients for purchases outside of MyFloridaMarketPlace. • The Case Review Form addresses allowable services paid directly to vendors. • DBS will address the maintenance request/allowable services process in ongoing staff training. Staff is informed via emails, intranet updates, webinars and/or phone conference calls. <p>Anticipated completion 10/31/2017 Robert Doyle</p> <p>Response as of October 25, 2017:</p>		

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		<ul style="list-style-type: none"> • The #264 Maintenance Authorization Procedure Checklist and review process, which includes a section on maintenance requests, was created and was implemented July 1, 2017. • Data collected from Case Reviews and Authorization Reviews will be used to prioritize onsite reviews for districts. • This data will also be used to focus training on specific areas included under “Fiscal Management and Authorizations” during the Annual VR training October 9-13, 2017. Staff was also informed on the maintenance process via email. 		

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		Anticipated completion 11/30/2017 Robert Doyle		
<p>Equipment forms were not completed and signed when the client received assistive technology.</p>	<p>We recommend DBS ensure the Client Equipment Inventory and Receipt Form #108 is completed and signed by all parties when the client receives assistive technology or when DBS reclaims possession in accordance with the manual. We also recommend that DBS include the equipment threshold amount in the policies and procedures for equipment form 108.</p>	<p>DBS will continue to conduct random desk reviews. Targeted desk and onsite reviews will be made to districts with higher incidences of non-compliance. DBS will ensure that the Quality Assurance Case Review Form addresses the Client Equipment Inventory and Receipt Form #108. DBS will address the equipment inventory and documentation process (AWARE) in ongoing staff training by emphasizing DBS Policy 6.07 which addresses the procedures for equipment</p>	<p>DBS updated Form 108, Client Equipment Inventory in June 2017. Case reviews identified the first three districts (Districts 2, 9, and 10) in need of an onsite visit and technical assistance. DBS revised Policy 6.07 to include the equipment threshold amount. The policy was approved and implemented on 10/18/17. DBS conducted training on this policy and process during</p>	<p>Complete</p>

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		<p>purchases and threshold amounts.</p> <p>Response as of April 25, 2017:</p> <ul style="list-style-type: none"> • A schedule for targeted desk and onsite reviews is being developed. • DBS updated the Case Review Form. DBS will update the Client Equipment Inventory and Receipt Form #108. • DBS will update Policy 6.07 to include the equipment threshold amount. • DBS will address the equipment inventory and documentation process (AWARE) in ongoing staff training. Staff is informed via emails, intranet updates, webinars and/or phone conference calls. 	<p>the annual VR training in October 2017.</p> <p>Note: Copies of the agenda and training materials were provided to the OIG with DBS' October 2017 update.</p>	

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		<p>Anticipated completion 10/31/2017: Robert Doyle</p> <p>Response as of October 25, 2017:</p> <ul style="list-style-type: none"> • The #264 Authorization Procedure Checklist and review process, which includes a section on equipment (refers to Form #108), has been created and was implemented July 1, 2017. • Data collected from these forms will be used to prioritize onsite reviews for districts. • Provided overview to staff on statewide call 4/13/2017. Emailed memos to staff 4/17/2017; • This data will also be used to focus training on specific areas included under “Fiscal 		

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		<p>Management and Authorizations” during the Annual VR training held October 9-13, 2017.</p> <ul style="list-style-type: none"> Affected policy #6.07 and the VR program manual have been revised are pending final review and approval. <p>Anticipated completion 11/30/2017 Robert Doyle</p>		
<p>Payments did not include sufficient documentation to support the authorizations and payment requests</p>	<p>We recommend DBS strengthen their policies and procedures to include requirements for supporting documentation in the form of invoices and/or receipts for maintenance payments. In addition, we recommend DBS rehabilitation specialists document their</p>	<p>DBS will continue to conduct random desk reviews. Targeted desk and onsite reviews will be made to districts with higher incidences of non-compliance. DBS revised its VR manual in May 2016 as it applies to Client Services, Policy #9.1 “Fiscal Process and Procedure” to include “will collect receipts</p>	<p>DBS revised the Form 264, Maintenance Authorization Procedure Checklist to ensure supervisory review and approval of maintenance services. Staff are instructed to pay vendors directly for maintenance and this procedure is reinforced by</p>	<p>5/1/2018</p>

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	<p>verification of client receipt of services in AWARE. We further recommend DBS perform periodic reviews to ensure payments are made for allowable and necessary services and contain the appropriate documentation.</p>	<p>from clients when direct maintenance is provided.” DBS will work to revise the current maintenance policy to address efficiency and accountability. DBS will address the roles of the Rehab Specialists and the DBS Fiscal Office in documenting and verifying allowable payments by providing ongoing staff training.</p> <p>Response as of April 25, 2017:</p> <ul style="list-style-type: none"> • A schedule for targeted desk and onsite reviews is being developed. • DBS will work to revise the VR manual (directing staff to add supplemental documentation and receipts) and is revising the Maintenance Policy. 	<p>the state office. Case reviews are conducted to ensure maintenance payments are used for allowable services and documentation is scanned in AWARE. The revisions to revised Policy 6.12, Maintenance are under review.</p>	

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		<ul style="list-style-type: none"> • DBS will address the roles of the Rehab Specialists and the DBS Fiscal Office in documenting and verifying allowable payments by providing ongoing staff training. Staff is informed via emails, intranet updates, webinars and/or phone conference calls. <p>Anticipated completion 10/31/2017 Robert Doyle</p> <p>Response as of October 25, 2017:</p> <ul style="list-style-type: none"> • The #264 Authorization Procedure Checklist and review process was created and was implemented July 1, 2017. • Reviews are conducted for each district, each month. 		

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		<p>The data collected via these forms will be used to focus training on specific areas included under “Fiscal Management and Authorizations” during the Annual VR training held October 9-13, 2017.</p> <ul style="list-style-type: none"> • Provided overview to staff on statewide call 4/13/2017. Emailed memos to staff 4/17/2017. • Affected policies and the VR program manual have been revised and are awaiting final review and approval. <p>Anticipated completion 11/3/2017 Robert Doyle</p>		