

Department of Education
Office of Inspector General – Internal Audit
Six-Month Status Report on: Space Coast Center for Independent Living
Report #A-1516-009 Issued: August 8, 2016
Status as of February 8, 2017

Finding	Recommendation(s)	Management Response as of August 8, 2016	Management Response as of February 8, 2017	Anticipated Completion Date & Contact
<p>The CIL continued to charge consumers a fee for transportation services despite DVR’s failure to develop guidelines.</p>	<p>We recommend DVR develop guidelines for charging consumers for the cost of IL services or disallow the practice.</p>	<p>WIOA changed the definition of “Center for Independent Living” by adding the words “regardless of age or income”. The addition of this language brings the legality of financial testing/participation into question. We have sought clarification from our federal partner, the Administration on Community Living, but until final regulations are published we won’t know the answer. In the meantime, CILs are forbidden from charging consumers with disabilities for services provided with VR funds. All CILs have been notified of this prohibition, including via a “Technical Assistance Reminder – Charging Consumers for Services” email on March 14, 2011. Space Coast CIL was also specifically</p>	<p>As a result of WIOA on November 28, 2016 the final rule outlining the amendments to the Rehabilitation Act of 1973, which transferred the administrative duties for Centers for Independent Living from the Federal Department of Education Rehabilitation Services Administration to Health and Human Services’ Administration on Community Living, went into to effect. The amendments provided limited direction to CILs on the development of fee for service policies. The language stated, “The final rule does not address the use of fee-for-service models, though we encourage CILs</p>	<p>July 1, 2017 Jennifer Powell 245-3352</p>

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		<p>reminded of this prohibition in the findings of the Rehabilitation Services Administration Compliance Review Report dated October 14, 2014, which were reinforced by VR during the site visit. Space Coast CIL was most recently reminded of the prohibition via email on July 6, 2016.</p> <p>VR will continue to provide technical assistance to all CILs on this topic as the WIOA regulations are promulgated.</p>	<p>to consider how to ensure that any application of such a model is accomplished in a way that is consistent with IL values.” VR will continue to restrict CILs to charge for services with funding from VR and will insert language into the new contract that addresses fee for service limitations based on funding provided by VR.</p>	
<p>The CIL did not meet employment requirements.</p>	<p>We recommend DVR provide technical assistance as needed to ensure the CIL remains eligible for state and federal assistance.</p>	<p>In March, the independent living director and two performance improvement consultants visited the center and provided extensive technical assistance, including reviewing current policies and process mapping.</p>	<p>VR will continue to provide technical assistance regarding the qualifications of staff and will include a review of staff qualifications based on accepted levels of expertise</p>	<p>September 2017 Jennifer Powell 245-3352</p>

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			<p>established by the field as part of periodic monitoring. VR will also, as a part of future monitoring, review CILs for polices regarding the onboarding and on-going training of CIL staff as it pertains to IL best practices and job-specific content. In 2017, VR in conjunction with CILs and the Florida Independent Living Council, will provide a statewide conference on independent living. Mandatory training will be provided to all attending CIL staff with subject matter based on IG findings and repeated technical assistance provided by the program and contract manager.</p>	

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<p>The CIL did not provide the four independent living core services to one of the two counties.</p>	<p>We recommend DVR add language in its contracts with the CILs to specify service delivery areas.</p>	<p>This language will be added when new contracts are developed in 2017.</p>	<p>VR has included language in the new contract that directs CILs to provide the 5 core services to the CIL’s federally established service area.</p>	<p>July 1, 2017 Jennifer Powell 245-3352</p>
<p>The CIL did not maintain appropriate fiscal oversight.</p>	<p>We recommend DVR perform periodic reviews to ensure expenditures are allowable, allocable, reasonable, and necessary to the performance of the contract.</p>	<p>The method of payment for this contract has been changed to cost reimbursement. Expenditures are now reviewed every month to ensure they are allowable, allocable, reasonable, and necessary to the performance of the contract.</p>	<p>The method of payment remains cost reimbursement. A more in depth monitoring occurs quarterly to follow-up on the findings listed in the report.</p>	<p>On-going</p>

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<p>The CIL continued to charge consumers a fee for transportation services despite DVR's failure to develop guidelines.</p>	<p>We recommend the CIL discontinue charging consumers for services until DVR establishes guidelines and the CIL develops policies and procedures in accordance with that guidance.</p>	<p>Space Coast CIL consulted with DVR to establish guidelines and update the CIL's internal policies and procedures. It was concluded that the timeframe needed to develop and implement this update for the new grant period was not sufficient. Space Coast CIL currently does not collect on transportation fare.</p>	<p>Space Coast CIL has updated and established new guidelines addressing the transportation program. The program is not collecting fees for the service. This was completed 06/30/2106.</p> <p>Signs are displayed inside the transportation vans stating the free service.</p>	<p>Completed 06/30/2016 Rose Miles</p>
<p>The CIL did not meet employment requirements.</p>	<p>We recommend the CIL develop an improvement plan to bring them into compliance with the Code of</p>	<p>As of January 2, 2016 the IL staff either transitioned to other jobs or found employment outside the CIL. The new IL</p>	<p>Staff training took part in new and old staff taking 4 part course through the ILRU website. Additionally</p>	<p>Completed Staff training 2/2/2016 & 4/7/2016</p>

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	Federal Regulations. We recommend the CIL develop and implement employee and board training and development programs to ensure employees providing IL services and those administering the IL program have the skills and knowledge necessary to perform their duties.	staff was selected from a pool of candidates with prior social service experience. All staff is now required to go through the Independent Living Research Utilization’s (ILRU) training in ‘Foundation for Independent Living’ course within their first 90 days of employment. Board members also have access to ILRU’s training as well. A self-paced workbook with tools for improving the governance practices of non-profit organizations is in the process of development.	VocRehab training for both staff and Board held on 2/2/2016. Process Mapping held on 4/7-4/8/2016; The staff participates in continuous training. The Board also attended a training on Board Governance January 27, 2017, they are now working on creating material to train new Board members.	Completed Board training 2/2/2016 & 01/27/2017 Board manual development is in progress. Expected completion 06/30/2017
The CIL did not provide the four independent living core services to one of the two counties.	We recommend the CIL serve eligible individuals with the four independent living core services in Brevard and Indian River County as stated in the SPIL for Florida for 2014-2016	Space Coast CIL’s new IL team is now part of the Interagency Council serving Indian River County. This Council is made up of various non-profit and government organizations whose focus is persons with disabilities.	Staff continues to foster interagency relationships in Indian River County and deliver IL 5 core services. Agency currently addressing office space	Initiated 03/08/2016 Indian River development is in progress.

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	and the CIL’s Program Services Policies and Procedures.	This partnership has opened the opportunity to reach the Indian River community and it is ongoing.	needs in Indian River.	Rose Miles Expected Completion Date 06/30/2017
The CIL did not maintain appropriate fiscal oversight.	We recommend the CIL enhance its procedures to ensure expenses funded through DVR’s contract are allowable, accurately allocated, and appropriately reflected in budget reconciliations. We recommend the CIL develop a timesheet that uses activity-based reporting and ensure employees accurately complete timesheets and allocate work hours across funding sources.	The finance office implemented a timesheet on payroll week starting 01/17/2016 that uses activity based reporting and ensures employees record actual time worked by contract (grant). Coding sheets are used to ensure expenses are applied to the correct grants.	Completed 01/17/2016	Completed Rose Miles

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<p>The CIL did not ensure consumer service records contained all required documentation.</p>	<p>We recommend the CIL establish and implement a written policy and procedure requiring the CIL staff to conduct eligibility determinations; establish IL plans with consumers or maintain waiver documentation; conduct timely annual reviews; and document the reason for case closure after the consumers have been notified of such case closure.</p>	<p>New IL team was trained and processes implemented which requires every consumer to go through an intake process to establish services. This includes accessing needs according to their disabilities, which may or may not include a consumer driven IL plan. In addition to updating IL processes, the CIL participated in a process mapping workshop conducted by process improvement consultants for VR. The purpose of this mapping was to give the CIL an overview of how our consumers are served from initial point of contact, through the intake process and delivery of services.</p>	<p>Since the last update, Space Coast CIL implemented procedures to ensure record files are checked for documentation on a weekly basis.</p> <p>New Policies and Procedures will be reviewed by Board this quarter.</p>	<p>Completed Rose Miles</p>
<p>The CIL did not accurately record</p>	<p>We recommend the CIL</p>	<p>Training was provided to staff</p>	<p>This item was completed</p>	

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service hours.	develop policies and procedures to ensure they accurately record service hours and maintain the service hours by funding sources.	regarding the input of consumer service records. Training took place at staff meetings held between February and April. In addition to in-house training, other changes were implemented after going through the process mapping workshop conducted by process improvement consultants from VR.	04/30/2016	Completed 04/30/2016 Rose Miles
The CIL needs to implement an effective satisfaction survey process.	We recommend the CIL improve its satisfaction survey process to allow for appropriate feedback, and timely submit the survey results to DVR.	The CIL will look back period of 6 months then contact persons served during the first 90 days of the 6 month period to issue satisfaction survey via in-person, mail or electronically.	As of August 8, 2016 report, Space Coast CIL implemented the 6 month period look back process to gather satisfaction survey data. Procedure is in place.	Completed 01/03/2017 Rose Miles

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<p>The CIL policies and procedures need improvements.</p>	<p>We recommend the CIL update its financial policies and procedures so they do not conflict with contract terms and consistently follow its established policies and procedures.</p>	<p>Space Coast CIL board policy committee is reviewing the financial policies and procedures to ensure the policies accurately reflect the needs of the contractual terms.</p>	<p>Board and Staff are working together in finalizing the review and updating of agency's Policies and Procedures</p>	<p>Expected completion: June 30, 2017 Rose Miles</p>