



Office of Inspector General
Florida Alliance for Assistive Services and Technology, Inc.

Report # A-1819DOE-007

June 2019

Executive Summary

In accordance with the Department of Education’s fiscal year 2018-19 audit plan, the Office of Inspector General conducted an audit of the Division of Vocational Rehabilitation’s (DVR) Contract #18-126 with Florida Alliance for Assistive Services and Technology (FAAST). The purpose of this audit was to ensure FAAST has sufficient internal controls in place to provide assistive technology services and devices in compliance with contract terms and determine whether DVR is effectively monitoring the contract.

During this audit we noted that, in general, FAAST has sufficient internal controls in place to provide assistive technology services and devices, and DVR provided oversight of the contract. However, we noted instances where DVR and FAAST could strengthen their controls. For example, we cited instances where FAAST did not accurately report event data and failed to meet the Device Loans to Consumers deliverable for the two sampled quarters, and DVR did not conduct monitoring in accordance with the monitoring plan. The Audit Results section below provides details of the instances noted during our audit.

Scope, Objectives, and Methodology

The scope of this audit included an examination of Contract #18-126 from October 1, 2017, through September 30, 2018. We established the following objectives for our audit:

1. Determining if DVR effectively manages and monitors the contract for compliance;
2. Ensuring assistive technology services and devices are provided in accordance with contractual terms; and
3. Determining if payments and expenditures are made in accordance with contractual terms and applicable laws and rules.

To accomplish our objectives, we reviewed applicable laws, rules, and regulations; interviewed DVR and FAAST staff; reviewed Contract #18-126, amendments, and related documents; reviewed policies and procedures; reviewed invoices and supporting documentation; and reviewed a sample of expenditures and related documents.

Background

The Florida Alliance for Assistive Services and Technology (FAAST) program is administered through the Department of Education, Division of Vocational Rehabilitation (DVR). Since its inception in 1998, FAAST has been a resource to provide disabled Floridians free access to information, referral services, educational programs, and publications in an accessible format on extensive topics related to disability rights, laws and policies, and funding opportunities for assistive technology.

DVR entered into contracts with FAAST for the purpose of coordinating and delivering appropriate, cost effective, state-of-the-art assistive technology (AT) services and devices. Many high-tech and low-tech devices are available to assist people with disabilities in daily living tasks, communication, education, work, and recreation. Assistive technology services support people with disabilities or their caregivers to help them select, acquire, or use AT devices. Such services also include functional evaluations, training on or demonstration of devices, and purchasing or leasing such devices.

DVR provides general revenue funds to FAAST through Contract #18-126. Contract #18-126 was renewed effective August 30, 2017, and included a total contract payment not to exceed \$1,222,141.25 for three years. Amendment #1 effective April 8, 2018, added \$53,698.28 to year one of the contract increasing the maximum total contract payment to \$1,275,839.53. Amendment #2 effective June 14, 2018, additionally added \$7,931.02 to year one of the contract increasing the total contract payment maximum to \$1,283,770.55. Through Contract #18-126, FAAST entered into sub-recipient agreements with three existing regional demonstration centers (RDC): Central RDC, Gulf Coast RDC, and Northeast RDC.

Audit Results

Finding 1: FAAST did not accurately report event data and failed to meet the Device Loans to Consumers deliverable for the two sampled quarters.

Attachment A of Contract 18-126 lists deliverable requirements in the following fourteen categories: Device Loans, Device Purchases, Device Demonstrations, Trainings, Training Performance Measures, Information and Assistance, Public Awareness – Magazine, Public Awareness – FAAST Access, Public Awareness – Legislative Updates, Public Awareness – Website, Public Awareness – Exhibits, Media Activities, Subcontractor Agreements, and Monitoring. Within each of these categories, the contract lists the targets for each specific deliverable.

We judgmentally sampled six deliverables and reviewed supporting documentation to determine whether FAAST met the deliverables in accordance with the contract. The selected deliverables included:

- Device Loans – Consumers;
- Device Loans – Devices;
- Device Demonstrations – Individuals;
- Device Demonstrations – Devices;

- Trainings AT Products & Services; and
- Information and Assistance.

We reviewed the quarterly invoices, the National Assistive Technology Act Data System (NATADS) reports, monthly RDC reports, and supporting documentation for the six sampled deliverables during the periods of January 1, 2018, through March 31, 2018, and July 1, 2018, through September 30, 2018. Our review revealed discrepancies between the deliverable data from the invoices and NATADS reports; the monthly numbers reported by the RDCs; and the supporting documentation retained by FFAST. For the two sampled quarters, we confirmed the invoices reflected the numbers in the NATADS reports.

During the period of January 1, 2018, through March 31, 2018, we identified the following discrepancies:

- In two of the six sampled deliverables, we identified discrepancies between the NATADS reports submitted to DVR and the supporting documentation for the numbers reflected in the NATADS reports (Device Loans to Consumers and Device Loans – Devices). See Table 1.
- In three of the six sampled deliverables, we identified discrepancies between the monthly RDC reports submitted to FFAST and the NATADS reports submitted by FFAST to DVR (Device Loans to Consumers; Device Loans – Devices; and Trainings – AT Products & Services). In these three cases, the discrepancies were limited to the Northeast RDC. See Table 1.

For example, during the period of January 1, 2018, through March 31, 2018, Northeast RDC reported that device loans were provided to 118 consumers. Per the NATADS report, FFAST reported that only 47 consumers received device loans. We requested the supporting documentation for the device loans to consumers and received documentation supporting loans made to nine consumers. See Table 1.

Table 1: January 2018-March 2018 Data

	Jan-March 2018 RDC Reports	NATADS - Jan-Mar 2018	Supporting Data Supplied By FFAST- Jan-Mar 2018
2018 - Device Loans Consumers (Quarterly Goal: 165)	Loans	Loans	Consumers
Central RDC	44	44	25
Gulf Coast RDC	110	110	85
Northeast RDC	118	47	9
FFAST-State HQ	64	64	38
Total	336	265	157

	Jan-March 2018 RDC Reports	NATADS - Jan-Mar 2018	Supporting Data Supplied By FFAST- Jan-Mar 2018
2018 - Device Loans Devices (Quarterly Goal: 270)	Devices	Devices	Devices
Central RDC	105	105	79
Gulf Coast RDC	148	148	148
Northeast RDC**	185	76	15
FAAST-State HQ	134	134	134
Total	572	463	376
	Jan-March 2018 RDC Reports	NATADS - Jan-Mar 2018	Supporting Data Supplied By FFAST- Jan-Mar 2018
2018 - Trainings-AT Products & Services (Quarterly Goal: 975)	Trainings	Trainings	Trainings
Central RDC	222	222	Not Sampled
Gulf Coast RDC	367	367	Not Sampled
Northeast RDC	335	361	361
FAAST-State HQ	38	38	Not Sampled
Total	962	988	N/A

During the period of July 1, 2018, through September 31, 2018, we identified the following discrepancies:

- In two of the six sampled deliverables, we identified discrepancies between the NATADS reports submitted to DVR and the supporting documentation for the numbers reflected in the NATADS reports (Device Loans to Consumers and Device Loans – Devices). See Table 2.
- In two of the six sampled deliverables, we identified discrepancies between the monthly RDC reports submitted to FFAST and the NATADS reports submitted to DVR (Device Loans to Consumers and Device Loans – Devices). See Table 2.

For example, during the period of July 1, 2018, through September 30, 2018, Northeast RDC reported device loans were provided to 71 consumers. Per the NATADS report, FFAST reported that only 38 consumers received device loans. We requested the supporting documentation for the device loans to consumers and received documentation supporting loans made to 15 consumers. See Table 2.

Table 2: July 2018-September 2018 Data

	Jul-Sept 2018 RDC Reports	NATADS - Jul- Sept 2018	Supporting Data Supplied By FFAST- Jul-Sept 2018
2018 - Device Loans Consumers (Quarterly Goal: 165)	Loans	Loans	Consumers
Central RDC	40	44	24
Gulf Coast RDC	62	63	43
Northeast RDC	71	38	15
FAAST-State HQ		135	63
Total	173	280	145
	Jul-Sept 2018 RDC Reports	NATADS - Jul- Sept 2018	Supporting Data Supplied By FFAST- Jul-Sept 2018
2018 - Device Loans Devices (Quarterly Goal: 270)	Devices	Devices	Devices
Central RDC	94	99	84
Gulf Coast RDC	99	100	98
Northeast RDC	113	62	21
FAAST-State HQ		320	468
Total	306	581	671

In both quarters, we noted that FFAST reported the number of loans provided to consumers per transaction instead of reporting the number of individual consumers who received loans. Per Contract #18-156 Deliverable Device Loans to Consumers, “FAAST shall provide assistive technology device loans to a minimum of one hundred sixty-five (165) consumers per quarter.”

During the period of January 1, 2018, through March 31, 2018, FFAST reported 265 device loans provided to consumers based on the NATADS reports. Based on the supporting documentation provided by FFAST; which detailed the loan numbers, consumer receiving the loan, and devices loaned, we determined FFAST provided 221 device loans to 157 unique consumers. During the period of July 1, 2018, through September 30, 2018, FFAST reported 280 device loans provided to consumers based on the NATADS reports. Based on the supporting documentation, we determined FFAST provided 287 device loans to 145 unique consumers.

While the numbers of device loans to consumers invoiced to DVR exceeded the deliverable requirements, FFAST was unable to provide supporting documentation for all the device loans to consumers reflected in the submitted NATADS reports. Therefore, we concluded FFAST did not meet the requirement to provide assistive technology device loans to a minimum of 165 consumers in either of the quarters reviewed.

Per the FFAST Executive Director, since 2005, FFAST has reported the number of consumers that receive device loans in the same manner, per transaction not per unique consumer. The NATADS report calculates consumers per transaction.

Discrepancies in reported deliverable data and not maintaining adequate documentation to support the achievement of deliverables, hinders DVR's ability to confirm FFAST is achieving the quarterly and annual goals as stipulated in the contract. The approval of invoices, without confirmation that deliverables were met, can result in DVR paying for services not provided.

Recommendation

We recommend FFAST streamline its data gathering and reporting procedures to ensure accuracy of reported deliverables and maintain adequate documentation to support performance. If FFAST makes adjustments subsequent to an approved invoice, they should provide an explanation and supporting documentation to DVR. We also recommend DVR clarify the contract language regarding device loans to consumers and enhance their procedures to ensure FFAST meets all deliverable requirements prior to final payment.

FAAST Management Response

Concur. FFAST reports device loans in accordance with the standards established by the Agency for Community Living (ACL). FFAST will work collaboratively with DVR to revise contract language regarding device loans to ensure reporting procedures align appropriately to contractual requirements.

DVR Management Response

Concur. The DVR plans to revise this contract to ensure that it provides maximum benefit to the Division. The Division will draft desktop procedures to ensure FFAST meets all deliverable requirements prior to final payment.

Finding 2: DVR did not conduct monitoring in accordance with the monitoring plan.

Attachment A, section I.F.5 of Contract #18-126, states "The Department will monitor the Contract in accordance with the annual monitoring plan."

DVR completed a risk assessment for the contract term of October 1, 2017, through September 30, 2020, and designated a high risk score to FFAST. The subsequent monitoring plan required DVR to conduct bi-annual desk monitoring and annual field visit monitoring if one or more of the following occurs: "a. Contractor has high number of errors when submitting invoices to the

appropriate DVR Contract Manager; or b. Documented complaints about Contractor from DVR Field Services staff and/or customers or c. Request for on-site visit from VR Program Administrator for this contract or DVR Field Services Staff; or d. Other issues that negatively affect service delivery.”

DVR did not conduct field visit monitoring during the period of our audit. DVR sent a letter to FFAST on October 31, 2018, stating DVR would conduct an onsite monitoring review on November 8, 2018. However, the onsite visit to FFAST was canceled on November 7, 2018, citing concern for overlap of our audit. DVR was additionally unable to provide documentation of the required bi-annual desktop monitoring. Per DVR staff, the monitoring was not conducted due to a leave of absence by the contract manager during the first bi-annual monitoring period and additional monitoring was placed on hold due to our audit of Contract #18-126. Therefore, we determined DVR failed to adhere to the monitoring plan developed for Contract #18-126 and did not adequately monitor FFAST for compliance with contract terms. The absence of documented monitoring hinders DVR’s ability to ensure FFAST is satisfactorily meeting the performance requirement of the contract. This can result in FFAST receiving reimbursement for expenses and deliverables that were not met.

Recommendation

We recommend DVR conduct monitoring in accordance with the risk assessment and subsequent monitoring plan. In addition, we recommend DVR promptly provide the monitoring results and recommendations for improvement to FFAST and ensure corrective action has been initiated on noted deficiencies.

DVR Management Response

Concur. The DVR will create and complete monitoring tools and procedures in accordance with the risk assessment and subsequent monitoring plan. Monitoring will be conducted. Results and recommendations will be provided to FFAST, and corrective actions on noted deficiencies will be tracked.

Closing Comments

The Office of the Inspector General would like to recognize and thank the Division of Vocational Rehabilitation and the Florida Alliance for Assistive Services and Technology, Inc. for their assistance during the course of this audit. Our fieldwork was facilitated by the cooperation and assistance extended by all personnel involved.

To promote accountability, integrity, and efficiency in state government, the OIG completes audits and reviews of agency programs, activities, and functions. Our audit was conducted under the authority of section 20.055, F.S., and in accordance with the International Standards for the Professional Practice of Internal Auditing, published by the Institute of Internal Auditors, and Principles and Standards for Offices of Inspector General, published by the Association of Inspectors General. The audit was conducted by Bradley Rich, MS and supervised by Tiffany Hurst, CIA, Audit Director.

Please address inquiries regarding this report to the OIG's Audit Director by telephone at 850-245-0403. Copies of final reports may be viewed and downloaded via the internet at <http://www.fldoe.org/iq/auditreports.asp#F>. Copies may also be requested by telephone at 850-245-0403, by fax at 850-245-9419, and in person or by mail at the Department of Education, Office of the Inspector General.