



**Audit Report of the  
Dreamcatchers Empowerment Network**

**Fieldwork Date: March 12-26, 2014**

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## **Introduction**

The Department of Rehabilitation (DOR) has completed an audit of fee-for-service Employment Services provided by Dreamcatchers Empowerment Network (DC). The employment services provided to DOR consumers assists them to prepare for, obtain, and retain employment, and include Intake (Procedure Code CRP124); Employment Preparation (Procedure Code CRP125); Job Development/Placement (Procedure Code CRP126); and Employment Retention (Procedure Code CRP127).

DC is a California nonprofit, tax-exempt, public charity incorporated in the State of California. DC provides support to recovering mental health clients and people with physical disabilities as they transition to leading independent lives within their communities. DC's services range from assisting participants with initial hurdles like securing social security cards or medical documentation, to providing vocational training and actual job placement with businesses in the community.

## **Audit Scope/Procedures**

Our on-site audit fieldwork was conducted March 12-26, 2014, and our exit teleconference was held on June 10, 2014. We conducted our audit in accordance with Government Auditing Standards as defined by the Government Accountability Office except Standard 3.52 requiring an external peer review. Our audit is subject to the inherent risk that material errors and irregularities, fraud, or non-compliance will not be identified.

The audit included a review of invoices submitted as well as supporting documentation and information shared during discussions with DOR and DC staff. The audit focused on employment services paid by DOR during the audit period of fiscal year 2012-2013. The scope of this audit was to obtain reasonable assurance that the employment services authorized, provided, and invoiced are supported by appropriate records and are in compliance with the applicable regulations, as well as the Community Rehabilitation Program Guide to Certification and Vendorization (CRD Guide).

## **Summary of Findings/Recommendations**

We found that the fee-for-service Employment Services billed to DOR were materially in compliance with the CRD Guide, and DC staff appears knowledgeable about employment services and are genuinely interested in providing quality services to DOR consumers. However, we noted several areas for improvement as identified in Attachment A.

## **Required Action and Follow-up**

DC shall ensure appropriate actions are taken to recognize and incorporate the compliance improvements identified in this report. DC shall consult with the DOR CRD Resource Specialist staff to assure that the planned actions will be sufficient to correct any deficiencies noted.

1. The DC Employment Specialist (ES) conducts an Intake assessment; however, there is no evidence documented in the consumer case record that the ES determined the appropriateness of the consumer referral and the feasibility of the vocational goal identified in the Individualized Plan for Employment (IPE). The ES explained that at times they are hesitant to document their assessment of appropriateness of referral and vocational goal as they don't want to adversely impact their relationship with the DOR counselor which may result in less referral.

If it is determined during the Intake assessment that the consumer is not ready for employment or the employment goal is not feasible, DOR consumers may not achieve a successful employment outcome. In addition, lack of documentation may call into question the adequacy of the assessment/results.

The CRD Guide requires the CRP to meet with the DOR consumer and complete the following Intake activities:

- Assessment/review of appropriateness of referral and job choice
- Review of the IPE
- Review of job choice in relation to the availability of employers and job postings in the local labor market
- Determination if consumer will benefit from services

### **Recommendation**

The ES shall adequately document all elements of the Intake assessment including a determination of appropriateness of referral for services and feasibility of the IPE goal.

2. All DOR consumers receive Employment Preparation services post Intake, even though the ES makes a determination during the intake process that a consumer may not benefit from services for reasons such as:
  - consumer is not job ready (e.g. identified barriers not addressed by DOR)
  - the employment goal is not feasible
  - consumer failed to engage in the process including showing up for scheduled appointments
  - consumer agrees that they are not ready for employment services (e.g. wants to go to school)

DC receives a combined Authorization for Vocational Rehabilitation Services (DR 297B) from DOR for both Intake and Employment Preparation services. Many times the Intake and Employment Preparation services overlap/flow from one service into

the next. In addition, the ES indicated that they may not have an opportunity to discuss reservations with the DOR counselor or there are times the DOR counselor advises the ES to move forward regardless of reservations.

The CRD Guide requires the CRP to meet with the DOR consumer during the intake process and determine if the consumer will benefit from additional services.

### **Recommendation**

DC shall ensure the employment goal is feasible, the consumer is willing and able to participate in employment services, and the consumer will benefit from employment services, prior to initiating Employment Preparation services. Communication between DC and the DOR counselor must be maintained.

3. Our review of DC Individual Service Plan (ISP) revealed that it contains many required components but it can be improved as follows:

- The ISP contains a field for “Anticipated Outcome/Vocational Goal”; however, it typically includes wording such as “Administration and Clerical” rather than containing a statement with more details about the desired job, not just the job field.
- The ISP contains three “Objective” fields; however, the fields sometimes describe activities the consumer and ES will be engaging in rather than the goals/objectives that the activities support.
- The ISP contains a field for the consumer to identify “Areas that Need Improvement (to be addressed in the program)” and “I may need help with,” but there are no details included in the plan that describe how the identified employment barriers will be addressed by the consumer and ES.
- The ISP tends to lack emphasis on activities/strategies for sustaining the employment outcome. The goals and activities typically focus on job prep and job development. As the ISP is the plan to guide all employment services, the ISP should also include strategies for addressing barriers to successfully retaining employment, e.g., poor attendance, transportation, and childcare.

If the ISP does not contain sufficient information to affirm the consumer’s employment goal, identify services to be provided to assist the consumer in obtaining the DOR IPE goal, and objectives and strategies to address the consumer’s barriers to employment, DOR consumers may not achieve a successful employment outcome.

The CRD Guide requires that upon authorization of Intake services, the CRP will meet with the DOR consumer and develop an ISP to affirm the employment goal, identify services to be provided consistent with the IPE, and include the following:

- Employment goals and objectives
- Employment components to be addressed
- Proposed activities
- Proposed Outcomes (measurable)
- Schedule/timeline for completion
- Persons responsible

### **Recommendation**

When documenting the vocational goal in the ISP, DC shall consider utilizing a detailed statement to ensure the employment goals and objectives are affirmed rather than identifying a broad job area/field.

DC shall consider modifying the ISP form slightly to distinguish between the objectives and the activities that support accomplishment of the objective. For example, an objective statement may read “Consumer will be fully prepared to engage in job search” and the additional field that describes the activities may read “prepare resume, develop master application, and address appropriate work behavior and work ethics.”

DC shall ensure the ISP includes strategies to address the consumer’s identified barriers, to assist the consumer in achieving and sustaining their employment goal.

4. The DC Records Clerk forwards the referral packet to the ES even if the referral packet submitted to DC by DOR is missing a required referral document such as the IPE or DR 297B. DC indicated they believe they always have authorization and would not provide services until a DR 297B is received. We interviewed three DOR counselors who explained that the referral packets are sent to DC by regular mail and the DR 297B is sent separately by email. The goal is that DC receives the referral packet and the DR 297B on the same day.

By forwarding a referral packet to the ES without a DR 297B, DC is at risk of providing a service not yet authorized and therefore not reimbursable.

The CRD Guide requires DOR counselors to complete CRP referral forms and provide pertinent information from the DOR case file, including the DOR IPE that outlines the employment goal, work restrictions, employment history, and other job placement considerations, along with the written DR 297B.

## **Recommendation**

DC shall consider having the Records Clerk forward the referral packet to the ES only after the packet contains all necessary referral documents from DOR including the DR 297B required prior to the provision of service.

5. The documentation maintained by DC to support Job Development services provided to consumers could be improved as follows:
  - The case record typically contains a Job Lead Log that tracks the job leads; however, the Log and the Daily Updates lack details to illuminate the ES involvement in the job search activities as described during our interviews, e.g., the ES browsed for online job leads with the consumer; the ES provided guidance/advice on how to successfully apply for online job openings, and the ES drove with the consumer to various job sites to submit applications. The Daily Updates appear to reflect more notations about job search activities conducted by the consumer.
  - The consumer case record doesn't reflect details on qualifications/work site requirements for a particular job opening to ensure job appropriateness for the consumer and success on the job.

DC explained that the ES do work to maintain case documentation but they must be sure to focus on service delivery. We agree that service delivery is essential; however, lack of case documentation may call into question the adequacy of the job development services being provided by the ES.

The CRD Guide requires the CRP upon determination of a DOR consumer's preparedness to engage in job search activities, and the DOR consumer to collaborate in the following activities as guided by the ISP:

- Identification of specific job openings appropriate for the DOR consumer as indicated in his/her IPE and ISP
- Contact of employers to identify job openings
- Obtaining information detailing qualifications and work site requirements for specific job opportunities to ensure applicant readiness and success on the job
- Job Site consultation to identify or modify barriers
- Negotiating job carving, work site analysis, or other job accommodations
- Assisting job applicant in the interviewing process
- Assisting the job applicant in coordinating transportation needs
- Provision of job club or tools to assist in job search

## **Recommendation**

DC shall ensure all elements of Job Development services provided are documented in the consumer case record (e.g., the Job Lead Log and/or Daily Updates) to adequately reflect both the ES and consumer's involvement in job development/search. Further, the case records should reflect details on qualifications/work site requirements for a particular job opening to ensure job appropriateness for the consumer and success on the job.

6. Our review of Job Placement and Employment Retention Services provided by DC revealed the following:
  - The consumer's job placement does not always match the DOR IPE or DC's noted employment goal. The ES explained that some DOR counselors advise the ES to place the consumer in a job that does not align with the DOR IPE and will not amend the IPE until the consumer is placed.
  - In one instance, DC billed all four employment services even though the consumer found her own job before she was referred for employment services and kept the same job at the conclusion of employment services. The consumer wanted full time employment with benefits, so DC continued working with her. While the Employment Services Authorization Summary report indicates that DC assisted the consumer with advocacy, the Daily Updates don't speak to any advocacy services provided by DC that enhanced or modified the existing job placement. As such, it is unclear what job development and job placement services were actually provided. Additionally, the ES documented only one contact with the consumer in the Daily Updates, 11 days after case closure, to support the billing of the Employment Retention service.
  - In another instance, one consumer found her own job during the Intake and Employment Preparation services phases. A friend of the consumer's grandfather needed in-home health services and the consumer was employed to provide the in home care; however, DC still billed DOR for Job Development/Placement services without adequate case documentation as to the actual job development services. As such, it is unclear what services were actually provided.

The CRD Guide requires the following:

- CRP and the DOR consumer to collaborate in identification of specific job openings appropriate for the DOR consumer as indicated in his/her IPE.
- The CRP to maintain confidential consumer records that communicate information that is complete, clear and current.

- The CRP will provide at least 90 days of the following Employment Retention activities:
  - Phone or personal contact with the consumer and the employer to determine ongoing satisfaction with the terms of employment
  - Two (2) or more contacts a month for a minimum of 90 days
  - Monthly communication with the DOR Counselor to discuss consumer progress and coordinate for any services

### **Recommendation**

DC shall work toward job placement that aligns with the DOR IPE goal and work with DOR to address the challenges; communication between DC and the DOR counselor must be maintained and documented in the consumer case record. Additionally, DC shall consider developing a cadre of employers to ascertain skill sets required for available or upcoming positions and match consumers with potential employers. DC shall adequately document the progress and activity related to job placement in the case record as required by the CRD Guide.

DC shall ensure that Employment Retention services are provided as stipulated in the CRD Guide to include two or more contacts per month with the consumer and employer to support consumers and employers for assurance of a successful placement.

The contents of this report have been discussed with Regina Kaiser, DC Executive Director; Christina Canevari and Amy Stahl, Resource Specialists, DOR Community Resources Development; and Stephanie Wong, Staff Services Manager, DOR Fairfield office. We appreciate their assistance with our audit.