



DEPARTMENT of
REHABILITATION

Employment, Independence & Equality

**Audit Report of the
Employment Placement Professionals (EPP)**

Fieldwork Date: October 20-24, 2014

Final Report Date: April 27, 2015

Control Number: 2014A-109

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Introduction

The Department of Rehabilitation (DOR) Audit Services has completed an audit of Fee-for-Service Employment Services (ES) provided by our Community Rehabilitation Program (CRP), Employment Placement Professionals (EPP).

EPP was founded in 2011 to provide services to persons with disabilities. The mission of EPP is to establish ongoing programs for training and education that engage persons with disabilities in productive work, social activity and satisfying daily lives. EPP services include Job Preparation, Resume Building, Job Search and Job Coaching. Each program is designed to help clients reach their employment goals.

Audit Scope/Procedures

The audit scope was to obtain reasonable assurance that the employment services (ES) authorized, provided, and invoiced are supported by appropriate records and are in compliance with the applicable state and federal regulations, as well as the Community Rehabilitation Program Guide to Certification and Vendorization (CRD Guide).

The audit focused on ES paid by DOR during the audit period of fiscal year 2013-2014 and included a review of invoices, supporting documentation and information shared during discussions with EPP and DOR staff. We also considered the extent to which EPP is achieving DOR's expectations in providing ES to DOR consumers. On-site fieldwork was conducted at EPP's facility office during the week of October 20, 2014, with the exit teleconference held on December 19, 2014.

This audit was conducted in accordance with Government Auditing Standards as defined by the Government Accountability Office except Standard 3.52 requiring an external peer review. The audit is subject to the inherent risk that material errors and irregularities, fraud, or non-compliance will not be identified.

Summary of Findings/Recommendations

We recognize EPP's commitment to provide exemplary service to DOR consumers. It was evident from our review that EPP has a genuine interest in working with DOR to achieve successful employment outcomes for DOR consumers and is amenable to making changes to its systems and operations to ensure quality services.

We commend EPP for implementing the Q90 system to track and monitor its services to DOR consumers and are aware several changes still need to be made as the system is a work in progress.

Although EPP is providing fee-for-service employment services to DOR consumers which result in some successful employment outcomes, we did find areas where

significant improvements can be made with regard to the delivery, documentation, and reporting of ES to DOR as documented in Attachment A.

Required Action and Follow Up

EPP shall ensure appropriate actions are taken to recognize and incorporate the service deficiencies and compliance improvements identified in this report by submitting a written plan of correction within sixty (60) days of the date of this report to DOR Audit Services with a copy to the DOR CRD Resource Specialist.

EPP shall consult with their DOR CRD Resource Specialist to assure DOR provides the needed guidance, to include the DOR CRD Guide, and that EPP's planned actions will be sufficient to correct the deficiencies noted in this report.

The contents of this report have been discussed with Enid Awad, EPP Executive Director, and Matthew Rivera, Executive Administrator. We truly appreciate their assistance with our audit.

1. EPP is not adequately preparing and utilizing the Individual Service Plan (ISP) to guide the delivery of services.

Although we found EPP prepares an Individual Service Plan (ISP) as required by the CRD Guide, EPP was not consistently utilizing the ISP to identify barriers to employment, service objectives, and strategies/activities to meet the objectives, for all employment services benchmarks. The majority of objectives and strategies identified on the ISP are related to Employment Preparation.

During the testing phase, auditors found:

- a. The ISP vocational goal does not match the DOR IPE goal. For example, the ISP lists “Open” for the vocational goal and the IPE identifies the employment goal as “All other helpers, Laborers and material movers.”
- b. In all five consumer samples tested, the ISP did not identify whether barriers to employment exist, e.g., physical limitations, work-hour restrictions, poor attendance, transportation, etc., or list proposed objectives and strategies/activities to address identified barriers to employment and successfully obtain and retain the employment goal.

Since the ISP is the plan to guide each of the remaining ES benchmark services (employment preparation, job development and placement, and retention), it should include objectives and strategies/activities for each ES benchmark, including addressing any identified barriers to employment, to successfully obtain and retain the IPE employment goal.

- c. The ISP does not appear to be individualized to the particular consumers needs but rather lists the same objectives consumer to consumer.
- d. The timeframes for completion of objectives/activities on the ISP is listed “As specified by the IPE” instead of an actual measure of time.

If the ISP doesn't adequately affirm the job development, placement and retention goals, objectives, time frames and persons responsible, EPP and the consumer may not have agreed upon expectations for service delivery. Lack of agreed upon and documented expectations may impede progress toward the consumer's successful employment outcome.

Failing to adequately develop, prepare and utilize the ISP to guide the delivery of services throughout the continuum of services places the DOR consumer at risk

of not securing meaningful employment and/or reaching a successful employment outcome.

Please refer to Attachment B for applicable ISP requirements as stipulated in the CRD Guide.

Recommendation

EPP shall begin developing and utilizing the ISP as a guide for the delivery of all ES in accordance with the DOR CRD Guide to include:

- EPP shall ensure the ISP identifies the employment goal, employment barriers to be addressed; services to be provided consistent with the IPE, employment objectives; proposed activities; proposed measurable outcomes; schedule/timeline for completion; and persons responsible.
- EPP shall ensure the ISP vocational goal matches the DOR IPE goal rather than stating “Open” to ensure they coincide with each other.
- EPP shall ensure the timeframes for completion of objectives/strategies are identified to ensure each benchmark is met and performed within each authorization period.

Additionally, EPP Job Developers should consult their DOR CRD resource specialist for guidance and feedback in the proper development and utilization of the ISP.

2. EPP inconsistently and ineffectively delivers the ES benchmarks of Employment Preparation, Job Development & Placement and Retention.

Specifically,

- a. In one sample tested, the consumer self-reported on the EPP Vocational intake assessment document that he is receiving SSI benefits; however, there is no documentation to support whether the Job Developer advised the consumer about what the impact of the earnings might have on his benefits or whether the consumer was referred to obtain the additional information despite having checked the Employment Preparation check boxes on the Employment Services Report form.
- b. Job developers are not assisting the consumers in employment preparation activities such as development of cover letter, resume and application, but rather are completing many of these tasks themselves. The DOR expectation is for the consumer and Job Developer to work collaboratively to ensure the consumer gains the skills necessary to prepare for and conduct job search activities on their own, where possible.

- c. Job Developers are not contacting employers during the job search process to identify job openings or obtaining information detailing qualifications and work site requirements for specific job opportunities to ensure applicant readiness and success on the job.
- d. Job Developers are not conducting Job site consultation to identify or modify barriers.
- e. EPP did not verify whether a consumer actually started employment and worked at least one day before billing the DOR for job development and placement services.
- f. During the 90 day retention period EPP job developer contacts with consumers, employers and DOR counselors did not consistently meet the requirements set forth in the CRD Guide.

Without effective service delivery including benefits counseling, employment preparation, job analysis, and worksite evaluation, the consumer may not be equipped to obtain and successfully maintain employment.

Employer relationships aren't being established in order to gain insight into future employment trends, skillsets and educational requirements for upcoming employment opportunities.

Without initiating communication at least twice monthly with the consumer and the employer, EPP cannot identify and report on specific support and resources needed to retain employment or determine satisfaction with employment terms for both the consumer and the employer.

Lastly, if the provision of services isn't adequate or EPP hasn't verified job placement and retention, DOR may be paying for services not rendered.

Please refer to Attachment B for applicable service delivery requirements as stipulated in the CRD Guide.

Recommendation

EPP shall ensure the Job Developers are providing actual employment services in accordance with activities outlined in the CRD guide.

EPP shall develop and implement procedures that guide the service delivery process and shall ensure consumer records reflect services provided.

EPP shall verify whether a consumer has actually started employment and worked at least one day before billing the DOR for job development and placement services.

3. The documentation maintained by EPP to support the delivery of Intake, Employment Preparation, Job Development & Placement and Retention services was insufficient in detail.

Intake

The Employment Services Report completed during intake services did not address the consumer's potential for employment or whether there were any additional services needed.

In all test samples reviewed, there was little to no information regarding the results of intake assessment, e.g., barriers to employment and whether the DOR employment goal can be achieved.

Employment Preparation

In regards to the Employment Services Report form, auditors found in 4 of the 5 consumer samples tested that there is no documentation to support whether employment preparation activities checked on the form submitted with the invoice were actually completed, and no information on the form about the consumer's progress or whether any additional services are needed.

Job Development and Placement

In several of the test samples reviewed there is no documentation to support that EPP submitted monthly progress reports to the DOR Counselor detailing EPP and consumer activities during the job development and placement phase of ES.

Retention

During the 90 day retention period, the EPP Job developers contact with the employer and consumer are minimal. While auditors did find some documentation that EPP made contact with the consumers, the respective DOR counselors and employers during the retention period, the number of contacts made did not meet the requirements set forth in the CRD Guide for all five consumer samples tested. In addition, there were times when the case notes that support the contacts contradicted the boxes that were checked on the monthly retention reports submitted to the DOR counselor.

Also, when communication is periodically initiated, it is not documented sufficiently and lack of documentation impacts the level of reporting to the SVRC and billing of retention services.

Without sufficient written documentation of the ES activities EPP has engaged in, DOR has no assurance that EPP has provided the services outlined in the CRD Guide.

Please refer to Attachment B for service delivery documentation requirements as stipulated in the CRD Guide.

Recommendation

EPP shall adequately document intake, employment preparation, job development and placement and retention activities engaged in to support the delivery and invoicing of the services including but not limited to providing:

- intake assessment results;
- the consumer's potential for employment;
- contacts with the consumer and/or employer, and the DOR Counselor, per the CRD Guide;
- information about the consumer's progress; and
- whether any additional services are needed.

EPP shall submit monthly progress reports to the DOR Counselor detailing EPP and consumer activities during the job development and placement and 90-day retention phases of ES. EPP shall submit a final report of retention activities to the DOR Counselor to include the consumer's ability to meet the employer's standards and performance.

EPP should consider submitting supporting case notes to the DOR at the same time of invoicing rather than at the end of the month if the service is completed before that time.

4. EPP provided ES without a valid DOR Authorization for Vocational Service (DR 297B).

- a. In two of the samples tested, Job Development and Placement and Retention services began prior to EPP obtaining a valid DOR authorization.
- b. In two of the samples tested, Job Development and Placement and Retention services began either before the Dates of Services listed on the DOR authorization or after the Dates of Service listed on the DOR authorization, but not within the authorized date range.

Failing to obtain a valid authorization for services prior to beginning a service and failing to deliver services within the authorized time period, places EPP at risk of not being paid for services rendered.

Recommendation

EPP shall obtain a valid authorization for services prior to beginning a service.

EPP shall ensure services are provided within the dates of service listed on the authorization.

5. EPP is inconsistent in their development, application and adherence to their own policies and procedures. Additionally, some of the existing policy and procedure documents are inadequate or inaccurate.

- a. EPP provided Auditors with multiple versions of policies, procedures and guidance documents (some which were not dated) which made it difficult to determine which documents were most current and in effect. EPP recently distributed an expectations document to its job developers on or about October 17; however interviews with job developers did not reference this document.
- b. EPP's "policy and procedure manual" does not define the services to be performed during employment preparation. Intake, job preparation and job placement are defined but not employment preparation. The description for job preparation speaks to the job development activities to be performed. Employment preparation activities such as master application, resume development, cover letter, and mock interviews are not described in the document.
- c. The Paper Work Preparation Manual and other EPP documents reflect another non profit organization's name, rather than EPP.
- d. As a practice, EPP does not retain copies of letter and email correspondence or job development monthly progress reports in the consumer's Q90 case file.
- e. There are inconsistencies in the distribution of the client handbook. Some consumers are asked to sign that they are in receipt of the client handbook although the handbook is emailed to them at a later time/date. EPP policy states the consumer handbook is to be provided to consumers during the initial intake meeting and the consumer is to sign they are in receipt of the handbook.

- f. Job developers inconsistently document intake activities in accordance with EPP policies. For example, not all consumer case records contain the required Vocational Intake Assessment form.

Without clearly defined policies, procedures and staff expectations, EPP employment services staff has no assurance that the services being provided are in accordance with DOR established guidelines. In addition, EPP's inconsistency in documenting and providing services and non-conformance to their own policies and procedures does not provide DOR assurance that DOR consumers will achieve meaningful employment opportunities leading to successful employment outcomes.

Recommendation

EPP policies and procedures must be comprehensive to cover all aspects of the organizations service delivery, employee duties and expectations and overall operations. EPP shall ensure Policies and Procedures to include any reference manuals, training guidance, and other documents are updated and continually communicated to EPP staff.

EPP shall ensure policies, procedures and guidance documents include a date, and that only the most current revision is used in day to day operations. In addition these documents shall reflect EPP rather than another organization name.

EPP shall retain copies of letter and email correspondence, monthly progress reports and other relevant documents to provide a complete service record to support reporting to and billing for DOR services rendered.

EPP shall ensure staff adheres to current policy regarding distribution of the client handbook as well as documenting and completing intake activities.

Individual Service Plan

The CRD Guide provides the following guidance:

- An Individual Service Plan (ISP) that guides the delivery of service(s) is developed by the consumer, CRP, and other relevant participants. Information reviewed at intake shall be considered when developing the ISP.
Characteristics of an ISP identify:
 - Overall goals
 - Specific measurable objectives
 - Methods, time frames, and techniques to be used to achieve objectives
 - Those responsible for plan implementation

- The CRP will conduct an initial and ongoing review of the appropriateness of the relevant service activity and revise the ISP based on the changing needs of the consumer.

- 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

Service Delivery

The CRD Guide requires:

- The CRP to have procedures in place that guide the service delivery process and that records of consumers will reflect that services were provided and documented so that the services coincide with the billing.

- 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

- The CRP to meet with the DOR consumer and complete the following Employment Preparation activities:
 - Interviewing techniques;
 - Resume development;
 - Application preparation;
 - Appropriate work behaviors and work ethics;
 - Relevant work practices;
 - Appropriate grooming and hygiene;
 - Assistance in becoming knowledgeable regarding the impact of employment on the consumer and his/her disability;
 - Assistance with benefits planning related to employment; and
 - Identification of additional support services such as meeting transportation, childcare, or other needs.

At the completion of Employment Preparation activities or monthly until completion, a written report summarizing activities and competencies/skills acquired as per the ISP is required.

- Upon determination of a DOR consumer's preparedness to engage in job search activities, the CRP and the DOR consumer will 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; and
 - Provision of job club or tools to assist in job search

Upon job placement:

- Job destination training;
- Job Orientation assistance;
- Information on conditions of employment, such as:
 - Job duties and job description
 - Performance expectations
 - Name of immediate supervisor
 - Responsibilities of the employee
 - Wage payment practices
 - Benefits

- Company policies and procedures including conflict resolution procedures and health and safety practices
 - Probation and performance evaluation procedures
 - Union status, as appropriate
- 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 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; and
 - Monthly communication with the DOR Counselor to discuss consumer progress and coordinate for any services
- The CRD Guide requires that an authorization for consumer services from the Senior Vocational Rehabilitation Counselor (SVRC) is required prior to the delivery of those services.

Documentation

The CRD Guide requires:

- The CRP to maintain confidential consumer records that communicate information that is complete, clear and current.
- Written policies and procedures shall be in place that guide the CRP's personnel operations and is shared with staff. Personnel practices, policies, and procedures will guide the CRP's recruitment, hiring, and termination practices, as well as generally identify employee and employer expectations of performance.
- The CRP shall have written guidelines for reporting a consumer's progress. Such guidelines should encompass all operational aspects of EPP's delivery of ES.
- A records retention policy shall be in place, based on federal, state, and local guidelines that guide the CRPs maintenance and process for destruction of records related to the delivery of services. This policy will include:
 - Timelines for retention of supporting invoicing documentation
 - Timelines for retention of closed / inactive consumer records.