



DEPARTMENT of
REHABILITATION

Employment, Independence & Equality

AUDIT REPORT

PARTNERSHIPS WITH INDUSTRY FEE-FOR-SERVICE EMPLOYMENT SERVICES

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Introduction

The Department of Rehabilitation (DOR) Audit Services Team completed an audit of Employment Services (ES) provided by the Community Rehabilitation Program (CRP), Partnerships With Industry's (PWI).

PWI was established in 1985 and focuses on creating jobs for individuals with disabilities living in San Diego County. The services PWI offers are ES, Job Coaching/Individual and Group, Personal, Vocational, and Social Adjustment, Situational Assessment, Supported Employment Placement Services, and Work Services. PWI has grown to four locations in San Diego County and in September 2013, launched its new entrepreneurial service of document destruction and recycling.

Audit Scope and Procedures

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

The audit focused on ES paid by DOR to PWI during the audit period of fiscal year 2013-2014 and included a review of invoices and supporting documentation and interviews with DOR and PWI staff. On-site fieldwork was conducted at PWI's facilities during October 14, 2014 through October 17, 2014 with the exit conference held on Wednesday, December 3rd, 2014. The audit also considered the extent to which PWI is achieving DOR's expectations in providing ES to DOR consumers.

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. This 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 PWI's commitment to provide exemplary service to DOR consumers. It was evident from our review that PWI, together with DOR have worked diligently to deliver effective and appropriate employment services to include improved communication and documentation. However, as identified in **Attachment A**, we found improvements can be made in the areas of case service documentation and reporting.

Required Action and Follow Up

PWI shall ensure appropriate actions are taken to recognize and incorporate the compliance improvements identified in this report. PWI shall consult with their DOR CRD Resource Specialist to assure DOR provides the needed guidance, to include the DOR CRD Guide, and that PWI's planned actions will be sufficient to correct the deficiencies noted in this report.

The contents of this report have been discussed with Mark Berger, President and Chief Executive Officer, and the Directors of the San Diego, South Bay, North County and East County offices. We appreciate their assistance with our audit.

1. While the PWI Vocational Assessment Service Specialists (VASS) conducts an initial intake interview, we found the documentation of services delivered during intake to be either insufficient at times and in some cases missing.

For all eight consumers tested, PWI's Intake documentation did not contain an assessment of the appropriateness of the referral or an assessment of the appropriateness of the consumer's job choice.

Upon referral, PWI receives a copy of the Individualized Plan for Employment (IPE). During interviews the VASS stated when they receive the DOR referral packet they will assess the appropriateness of the referral and their IPE employment goal, however this process is not documented.

Failing to adequately assess the consumer's readiness for employment and feasibility of the employment goal can effect the DOR consumer's achievement towards a successful employment outcome. In addition, lack of documentation of this process may call into question the adequacy of the assessment/results and full validation of such services.

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

PWI shall document all Intake activities performed to include an assessment of the consumer's appropriateness of referral and appropriateness of their job choice. The required documentation should be maintained in the consumer's case file.

2. PWI is not developing an Individualized Service Plan (ISP) to guide the delivery of services.

When reviewing the selected consumer's case files, there were instances where PWI Intake forms contained some elements of the ISP, specifically, the PWI Direct Placement Assessment form contains areas where the consumer's employment goals and objectives can be identified; and the PWI Direct Placement Services Referral form has a section titled "Reason for Referral"

identifying the consumer's vocational goal. However, these elements alone do not make up the ISP. A developed ISP guides the Employment Preparation, Job Development, Placement, and Retention services the consumer will receive.

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 and retaining 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

PWI shall ensure an ISP is developed for each DOR consumer receiving Intake Services. PWI shall insure the ISP identifies the employment goal, services to be provided consistent with the IPE, employment goals and objectives; employment components to be addressed; proposed activities; proposed measurable outcomes; schedule/timeline for completion; and persons responsible. A written report and copy of the ISP must accompany the Intake invoice when it is sent to DOR for payment and approval.

3. PWI's documentation of Employment Preparation (EP) service delivery was insufficient. While we found the VASS meets with the DOR consumers bi-monthly or monthly, the documentation of these services did not contain sufficient detail. Specifically:

- In two samples, the EP reports evidenced consumers had the following activities listed in their "Employment Preparation Plan", however the Employment Preparation reports did not document the consumer actually participated in the following activities: discussion on appropriate work behaviors and work ethics; relevant work practices; assistance to the consumer 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 needed.

Without sufficient documentation to support employment preparation activities, DOR has no assurance PWI provided all employment preparation activities identified. Documenting a “plan” for employment preparation activities without outlining in the summary actual activities engaged in does not provide assurance that the employment services were delivered and that the consumer’s competencies and additional needs were identified and addressed.

The CRD guide requires that upon determination of a DOR consumer’s readiness to engage in Employment Preparation Services, the CRP and DOR consumer will participate in the following activities as guided by the ISP:

- 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
- Identification of additional support services such as meeting transportation, childcare, or other needs

Recommendation

PWI shall adequately document all elements of the Employment Preparation activities including the consumer’s participation in interviewing techniques, application preparation, and the activities listed in their “Employment Preparation Plan”.

4. The documentation maintained by PWI to support Job Development and Placement (JDP) services was insufficient in detail.

Six consumer case files were reviewed for delivery of JDP services. While some of the samples reviewed were documented as to the delivery of job development and placement services, some were not.

The Audit Team identified various areas needing improvement in the delivery and documentation of services, such as:

- In all six samples tested, the JDP reports did not include evidence of qualifications and work site requirements for specific job opportunities or for the jobs they were actually placed in; job site consultation to identify or modify barriers, job destination training; job orientation assistance; performance expectations; identification of benefits; and probation and performance evaluation procedures
- In five samples there was no documentation of job duties and job descriptions; identification of the responsibilities of the employee upon receiving employment; or company policies and procedures including conflict resolution procedures and health and safety practices.
- In three of the six samples reviewed, the JDP report did not identify specific job openings as per the DOR IPE and ISP;
- In one instance the JDP report did not evidence contact of employers to identify job openings.

We found a few instances where the job development and placement reports failed to identify the name of the immediate supervisor or the wage payment practices or detail the activities and terms of employment i.e. hours, schedule, benefits, and identification of supports necessary to sustain employment.

Without sufficient documentation to support the job development activity, DOR has no assurance PWI engaged in sufficient job search and identified jobs with qualifications and requirements deemed appropriate for the consumer. Lack of sufficient JDP activities does not provide DOR with assurance the consumer is ready for employment and will be successful in their placement.

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

PWI shall include in their JDP report all activity in compliance with the CRD Guide. DOR also recommends the CRP work closely with the CRD Specialist to ensure compliance with and understanding of the JDP activity outlined in the CRD Guide.

5. The documentation maintained by PWI to support retention services was insufficient in detail to fully validate retention services were performed.

During the 90 day Retention period, the VASS's contact with the employer is very minimal. The VASS will contact the employer with permission from the consumer or if they have an established working relationship with the employer. The VASS will communicate with the consumer by email or by phone during the Retention period; however, it can be difficult to obtain a response back from the consumer.

Of the six case files reviewed for retention services, we found various areas needing improvement in delivering and documenting services:

- Four consumer case files did not evidence phone or personal contact, on or off the job, with the DOR consumer to determine ongoing satisfaction with the terms of employment.
- Six consumer case files did not evidence PWI provided assistance to the consumer with necessary minimal supports to sustain employment or initiate communication at least monthly with the DOR Counselor to discuss the consumer's progress or coordinate any additional services.

Without initiating at least twice monthly communication with the consumer and the employer, PWI 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. 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.

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

PWI shall contact both the consumers and employers to ensure satisfaction with the employment terms and assess any necessary supports and resources needed to sustain employment. DOR recommends PWI comply with the CRD Guide and their own internal policy by sending monthly progress reports to the DOR counselors well as a written report at the conclusion of Retention, prior to billing, which affirms the client's ability to meet the employer's standards and performance expectations and identifies any specific support and resources needed to retain employment.