



Audit Report of the
Southern California Resource Services for Independent Living
(SCRS)

Date: August 28, 2014

Control Number: 2014A-103

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Introduction

The Department of Rehabilitation (DOR) Audit Services has completed an audit of Employment Services (ES) provided by our community rehabilitation program, Southern California Resource Services for Independent Living (SCRS).

SCRS is a California nonprofit public benefit corporation which serves people with disabilities in Southeast Los Angeles County, California. Per their website:

SCRS was founded in 1979 by a group of individuals with disabilities. Since then, SCRS programs have served over 10,000 individuals with disabilities within Los Angeles, Orange, Riverside, and San Bernardino Counties. SCRS develops comprehensive programs, responding to the needs of the disability community, enabling them to lead healthy, independent, and productive lives. Most services are provided free of charge to all persons with disabilities. Funds for programs come from federal, state, county and city governments, and grants from private foundations, corporations, and individuals.

Services include: advocacy, peer counseling, housing assistance, information and referral, personal assistance services, independent living skills training, systems change advocacy, cross disability peer counseling, assistive technology, and advocacy for deinstitutionalization, advocacy for youth, transition advocate and vocational services.

Audit Scope/Procedures

Our on-site audit fieldwork was conducted the week of March 18, 2014 and our exit teleconference was held on June 6, 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 SCRS staff. The audit focused on ES paid by DOR during the audit period of fiscal year 2012-2013. The scope of this audit was to obtain reasonable assurance that the 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 (CRP Guide).

The audit also considered the extent to which SCRS is achieving DOR's expectations in providing ES to DOR consumers.

Summary of Findings/Recommendations

We recognize SCRS's commitment to provide exemplary service to DOR consumers. It was evident from our review that SCRS, together with DOR have worked diligently to deliver effective and appropriate employment services to include improved communication and documentation.

As part of this continued improvement, we noted a few areas for improvement as identified below.

1. SCRS continued to provide post-intake employment services to consumers who did not appear ready or able to participate or benefit from services due to past history of non-committal to the job development (job search) process.

It should be noted, at times, the local DOR offices request SCRS continue working with consumers who are non participatory. However, both DOR and SCRS need to work together to determine those consumers that are willing and able to engage in employment services and those consumers that are not truly engaging or participating in such services and close out.

Specifically:

- Consumer PR participated in Intake on 10/15/12 and Employment Preparation on 11/30/12, but was difficult to reach when calls were made for the consumer to participate in Job Development activities. Subsequently, the consumer participated again in Intake services on 9/26/13 and Employment Preparation on 9/27/13, but was difficult to reach when calls were made for the consumer to participate in Job Development activities.
- Consumer GP received initial intake services in October 2012, but was difficult to reach when calls were made to participate in Employment Preparation and Job Development activities. Approximately nine months later, the consumer repeated Intake and participated in Employment Preparation activities, but was difficult to reach when calls were made for the consumer to participate in Job Development activities.
- Consumer GS received initial intake services in March 2012, but was difficult to reach when calls were made to participate in Employment Preparation and Job Development activities. Approximately a year later, the consumer repeated Intake and participated in Employment Preparation activities in July 2013 but not in Job Development activities because the consumer was attending school.

Criteria

The DOR CRP Guide provides the following guidance:

- Job Related Services assists a consumer, in an organized planned manner, to prepare for, obtain, and retain employment. A continuum of services provides guidance and direction to a consumer in the development of job search techniques and appropriate work-related “soft skill” behaviors that will enhance the consumer’s employability.
- The CRP will meet with the DOR consumer during the Intake process to determine if the consumer will benefit from services.

Failing to properly determine the consumer’s readiness for ES can impact the overall effectiveness of employment service delivery and ultimately successful employment outcomes for DOR consumers.

Recommendation

At the initial intake process, SCRS shall determine and document how feasible it is for consumer to benefit from all ES components considering the consumer’s past history of non-committal to job preparation or job development.

2. Although we found that SCRS prepares an Individual Service Plan (ISP) as required by the CRP handbook as support for intake billing, SCRS was not consistently utilizing the ISP to identify service expectations and strategies for all employment services. The majority of Objectives and Strategies identified on the ISP are related to Job Preparation but rarely Job Development, Job Placement and Retention.

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

Criteria

The DOR CRP Guide provides the following guidance:

SECTION 3. GENERAL SERVICE STANDARDS, page 28

- 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.

Failing to develop an ISP that guides the delivery of services throughout the continuum of services places SCRS and consumer at risk of not working together to achieve shared goals and objectives to attain successful employment outcomes

Recommendation

SCRS shall begin developing and utilizing the ISP as a guide to the delivery of all employment services in accordance with the DOR CRP Guide. An effective ISP will empower the consumer to achieve successful employment by:

- Being meaningful to each particular consumer
- Containing realistic and achievable goals, objectives and timeframes
- Containing strategies used to achieve goals, objectives and timeframes
- Defining the roles and responsibilities of the consumer and SCRS

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

3. During our review of consumer case records, we observed that several resumes created by SCRS Job Developers and the DOR consumers, were not adequate in presentation, were insufficient in detail to showcase the consumer's skills/experience, and/or were photocopies used from prior provision and billing of job preparation services. Specifically:
 - Consumer DD's resume from 2012 appears to follow the Functional Resume format, but is very limited in its content.
 - Consumer ER's resume appears to follow the Combination Resume (lists skills and experience first), but listed the skills last and in limited detail.
 - Consumer PR's resume from 2013 was identical to the resume from 2012, even though the intention was to update the resume and highlight the consumer's job choice as a janitor.
 - Consumer GP's resume from 2013 was a photocopy from 2012 and included handwritten notes and edits on the resume itself rather than developing an updated resume.

Criteria

The DOR in conjunction with our CRP vendor share a common goal of successful employment outcomes for DOR consumers served. In meeting this goal, the effective delivery of employment preparation services shall include the development and implementation of a resume that will enhance the consumer's employability and ultimately result in a successful employment outcome.

Per SCRS Employment Preparation Guide, the first step to writing a good cover letter is to have a good resume.

Without a proper resume and cover letter, the potential employer may not be convinced of the consumer's employability which may ultimately result in an unsuccessful employment outcome.

Recommendation

The SCRS job developers shall work to develop and implement a resume that will enhance the consumer's employability and ultimately result in a successful employment outcome. The job developers shall also familiarize themselves with the "Resume Red Flags" as found in the SCRS Employment Preparation Guide.

4. SCRS billed DOR for Employment Preparation services prior to completion of employment preparation activities. SCRS has blended both employment preparation and job development as one SCRS ES component, rather than as separate ES components separately defined in the DOR CRP Guide. Specifically:
 - Consumer DD—Employment Preparation services were initially authorized beginning in July 2012 and were reauthorized through October 2013. SCRS billed for employment preparation services on 7/27/12 which should indicate completion of employment preparation activities; however, the Job Development Monthly Progress Report of July 2013 references resume development activity at that time. As such, the resume was not developed prior to the July 2012 billing of Employment Preparation services.
 - Consumer ER— Employment Preparation services were authorized from 8/22/13-6/30/14. SCRS billed for employment preparation services on 11/15/13 which should indicate completion of employment preparation activities; however, the Job Development Monthly Progress Report of December 2013 references assistance with hygiene and proper speech, Employment Preparation activities.

Criteria

Per DOR CRP Guide:

- Employment Preparation Services include: resume development, appropriate grooming and hygiene, appropriate work behaviors and work ethics, and identification of additional support services such as meeting transportation, childcare and other needs.
- Job Development Services include: development of job search skills, coordination of job searches activities, and identification of appropriate job openings.

When consumers continue to receive employment preparation activities into the job development phase, this indicates that the consumer is may not be ready for the next phase of ES which ultimately has a ripple effect on the ability to obtain and retain successful employment outcomes. Additionally, billing in advance of completing an employment service component may result in SCRS being paid for services not delivered.

Recommendation

SCRS shall comply with all requirements of the DOR's CRP Guide to ensure appropriate and effective delivery of job preparation before moving forward to job development services. Further, SCRS shall complete each service component prior to billing DOR for the service.

5. SCRS is not consistently adhering to their own Polices and Procedures in regards to Restrictions/Terminations when the consumers are inactive or non-participatory in the employment preparation process. For example:

Consumer PR was authorized for the employment services of intake and employment preparation from 7/1/12-6/30/13. Intake services were completed in October 2012 and employment preparation in November 2012; however, the consumer failed to show up to job clubs during the months of December 2012 to February 2013 as evidenced by the Job Development Monthly Progress Reports. The consumer was reauthorized for services from August 2013 to June 2014 but failed to show for job club during the months of October 2013 to January 2014.

Criteria

SCRS Client Handbook (Page 6)

- Grounds for Restriction or Termination (e.g. Lack of participation or communication in services)

SCRS Continuation of Services Agreement

- Client is required to follow all these expectations and demonstrate active participation. Client's case with SCRS will be closed if any expectations are not met.

SCRS has additional policies on the process for termination in SCRS Policies 6.13 through 6.20.

Allowing consumers that are inactive or non-participatory to continue to participate in the delivery of ES has the potential to prevent other eligible DOR consumer from receiving services.

Additionally, failing to adhere to one's own policies and procedures can lead to cost and time inefficiencies and failing to deliver services.

Recommendation

SCRS shall adhere to their own policies and procedures pertaining to termination of services for non participation. Policies must be followed and relevant actions communicated to DOR in order to ensure appropriate delivery of ES to eligible DOR consumers.

6. SCRS job developers are rarely completing the necessary activities when providing the employment retention service. Specifically, job developers advised the auditors during interviews that they seldom make phone or personal contact with the consumer's employer to determine ongoing satisfaction with the terms of employment.

We found two instances, whereby the monthly Job Placement and Retention forms as well as corresponding case notes indicate no contact with the employer over the 90-day period the DOR consumer supposedly received placement. Specifically:

- Consumer SO - Authorizations for job retention services were authorized for the time period of 4/11/13-6/30/13 and again from 7/12/13-8/20/13. The consumer was placed in a job on 4/11/13. SCRS invoiced job retention services on 8/15/13 and was subsequently paid by DOR. The monthly Job Placement and Retention forms of April, May, and June as well as corresponding case notes for this period indicate no contact with neither the employer, nor the DOR consumer.
- Consumer CM - Authorizations for job retention services were authorized for the time period of 12/2/13-3/31/14. The consumer was placed in a job on 9/30/13. SCRS invoiced job retention services on 1/14/14 and was subsequently paid by DOR. The monthly Job Placement and Retention forms of September, October, November and December as well as corresponding case notes for this period indicate no 2nd contact with the employer, only the DOR consumer.

Criteria

DOR CRP Guide (Employment Retention)

Upon DOR consumer acceptance of employment of a job that is consistent with the IPE goal and meets the needs for hours, wages, and benefits, the CRP will provide at least 90 days of the following Employment Retention activities:

- Phone or personal contact, on or off the job, with the DOR consumer to determine ongoing satisfaction with the terms of employment
- Phone or personal contact with the employer to determine ongoing satisfaction with the terms of employment
- No less than two (2) contacts a month are required for a minimum of 90 days

Failing to perform the activities associated with employment retention such as phone or personal contact with the consumer's employer can lead to unsuccessful employment outcomes for the DOR consumer.

Recommendation

SCRS shall comply with all requirements of the DOR CRP Guide to ensure appropriate and effective delivery of employment retention prior to billing DOR.

The contents of this report have been discussed with Jim Baker (Executive Director) and Mario Galdamez (Vocational Program Manager). We truly appreciate SCRS's assistance with our audit.