



Audit Report of the

TOOLWORKS FEE FOR SERVICE

EMPLOYMENT SERVICES

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DOR Audit Services Team:

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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), Toolworks.

Toolworks was founded in 1975 by Curt Willig and two other individuals with disabilities who entered into a small contract with Pacific Bell to repair tools used by PacBell linemen, hence the name Toolworks. As a human service agency Toolworks has dedicated itself to providing the tools and resources that promote independence, equality and personal satisfaction. Toolworks has established the following goals:

- To provide services that increase economic and social opportunities for people with disabilities
- To create programs driven by individual choice
- To encourage personal growth to increase one's potential
- To educate the community to value the strengths and abilities of each individual

In addition to providing employment services and specialized services, Toolworks also operates a six million dollar janitorial business and serves over 500 individuals with disabilities a year.

Audit Scope/Procedures

On-site testing of ES was conducted during the weeks of April 7, 2014 and April 14, 2014 with an exit teleconference held on July 9, 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 Toolworks staff. The audit focused on ES paid by DOR during the audit period, state 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 regulations, as well as the Community Rehabilitation Program Guide to Certification and Vendorization (DOR CRD Guide). The audit also measured the extent to which Toolworks is achieving DOR's goals and objectives in providing ES to DOR consumers.

Summary of Findings/Recommendations

The ES billed were materially compliant with applicable regulations, the DOR CRD Guide and Toolworks' internal policies. However, as identified in **Attachment A**, we found improvements can be made in the areas of case services documentation and reporting.

Required Action and Follow-up

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

The contents of this report have been discussed with Kristy Feck, Vice President, and Karen Berniker, Director of Employment Services. We truly appreciate their assistance with our audit.

Attachment A

1. Toolworks does not develop nor utilize an Individual Service Plan (ISP) for each consumer that outlines the specific goals, objectives, and services intended to meet the consumer’s vocational goal. Toolworks does; however, utilize intake forms that contain some elements of the ISP but often times the fields were left blank. Specifically:

- Toolworks has an Employment Department Intake form that contains a field for the Vocational Interest/Goals which is a component of the ISP.
- Toolworks developed an Employment Services Intake form that contained fields for ISP and two spaces for corresponding objectives.
- Toolworks developed a Placement Plan (used for the Employment Preparation ES) that contained fields for the vocational goal, objectives, persons involved and target dates, all of which are pertinent fields for the ISP. However, we found the objectives typically noted included statements such as “cooperate with job development” and “attend all scheduled meetings” which read more as expectations, not measurable outcomes relating to the vocational goal. Also the target dates/completion dates were not definitive but read as “ongoing” or “active”.

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 attaining the employment goal, and strategies to address barriers to employment, DOR consumers may not achieve a successful employment outcome.

Criteria

The DOR CRD Guide requires, upon authorization of Intake services, the CRP will meet with the DOR consumer and develop an ISP to affirm 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

Toolworks shall develop an ISP in compliance with the DOR CRD Guide. The ISP shall address the individual consumer’s vocational goal and specific objectives and activities that are designed to meet the individual consumer’s needs in achieving the vocational goal. Further, Toolworks should consider

modifying or condensing intake documents for concise and complete reporting of activities required during the intake service.

2. Intake activities did not appear to be fully compliant with the DOR CRD Guide and were not always adequately documented in the consumer case records.

Toolworks has several forms associated with the intake service and while job developers appear to have an understanding of the fundamentals of the intake activity, the ES intake activities were not fully compliant with the DOR CRD Guide as follows:

- The consumer case files and discussion with Toolworks' job developers do not support the assessment or review of the appropriateness of the DOR referral or the consumer's job choice (IPE goal).
- The consumer case files and discussion with Toolworks' job developers do not support a determination that the consumer will benefit from the provision of employment services.

If it is determined during the intake assessment that the consumer is not ready for employment, the employment goal is not feasible, or the consumer may not benefit from services Toolworks can provide, the DOR consumer is likely not to achieve a successful employment outcome. In addition, lack of documentation may call into question the adequacy of the intake assessment/results.

Criteria

The DOR 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

The DOR CRD Guide also requires the CRP to have organization standards that include the maintenance of consumer records to reflect that services were provided.

Recommendation

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

3. Job Preparation Services are not consistently supported and documented in the consumer case records.

- A. While Toolworks has a Service Guidelines and Responsibilities form which indicates that Toolworks staff will assist the clients in developing job seeking skills “included but not limited to”: resume writing, applications, and interviewing techniques, we did not see consistent evidence in the sample case files that these services were provided.
- The Service Guidelines and Responsibilities form was not consistently maintained in client case files reviewed.
 - There was not consistent evidence of applications, resume development, and interviewing techniques in the consumer case files reviewed even though the job developers stated they provide these services.
 - Although the job developers indicated they may engage in discussions with the clients about proper work behaviors, work ethics or relevant work practices, these activities were not documented in the case file.
- B. The Placement Plan was described as the document that accompanies the DOR invoice and is used to support employment preparation; however, we noted the following inadequacies:
- The section marked “vocational interests and skills” is often left blank.
 - The client case notes and Placement Plan lacked identification of the employment preparation activities that actually occurred (past tense) e.g. updated resume to include most recent job; refined master application; conducted two mock interviews. Activities noted on the placement plan read more as recommendations or responsibilities of the client as indicated on the Service Guidelines and Responsibilities form e.g. “meet with job developer regularly” and “attend all meetings”.

The employment preparation services do not appear to be individualized if the approach communicated in the service guidelines are presented as a listing of predetermined services.

Without sufficient documentation to support the employment preparation activity, the DOR has no assurance that the CRP has assessed the consumer’s readiness for community employment and engaged in employment preparation activities that are unique to the consumer’s needs, as identified in the IPS and necessary for successful job development and placement.

Criteria

The DOR CRD Guide states:

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

The DOR CRD Guide also requires the CRP to have organization standards that include the maintenance of consumer records to reflect that services were provided.

Recommendation

Toolworks consider modifying their Service Guidelines and Responsibilities form to reflect the individual nature of services to be provided as it relates to client needs, guided by the individualized ISP. Toolworks should not advise consumers that a multitude of job preparation services will be provided by using language such as "included but not limited to", if the services will be tailored to the individual consumer need.

Toolworks shall adequately and accurately document all employment preparation activities engaged in to support the delivery and invoicing of the service. Additionally, support for job application preparation, resume development and interviewing techniques, as appropriate for each client, shall be maintained in the case record.

4. While discussion with the job developers supported the provision of job development and placement services, such activities were not consistently and adequately documented in the consumer case records. Specifically:

- Case notes or other documentation to support specific job openings appropriate for the consumer as indicated in his/her IPE and ISP were not always found in the client case files.
- While some case notes identified the names of employers included as part of job search, there was no information on job qualifications and work site

requirements for those specific job opportunities that would ensure the client's suitability and success on the job.

- If contact was made with potential employers to identify appropriate job openings, the contact made was not documented
- If collaboration between the job developer and client resulted in a job lead, we did not see documentation of a discussion about job qualifications, work site requirements, other job accommodations
- While Toolworks utilized a DR383 form to report on the job placement, the forms often lacked detailed conditions of employment e.g., job expectations and job duties

Without sufficient documentation to support the job development activity, the DOR has no assurance that job openings are identified and deemed appropriate for the consumer in alignment with the ISP and moreover, that the consumer is ready for employment and will be successful in his/her placement.

Criteria

The DOR CRD Guide states that 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/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

Upon job placement, the CRP and the DOR consumer will collaborate in the following, as determined necessary guided by the ISP:

- Job destination training
- Job orientation assistance
- Understanding of 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

Recommendation

Toolworks shall ensure an understanding of the Job Development and Placement ES activities as outlined in the DOR CRD Guide and develop case documentation guidance/ forms to assist in the adequate documentation and reporting of job development and placement services.

5. Retention services designed to support DOR consumers and employers in achieving a successful employment outcome and in meeting DOR's criteria for case closure could not be fully supported.

While discussion with job developers supported some understanding of the activities involved with the ES retention service, most retention activities could not be supported in the client case files. Specifically:

- In one instance, we found that a job developer submitted a final retention report and invoice for retention services; however, the DOR case record indicated that the client did not retain the job for 90 days.
- Through our discussion with job developer JH, and review of her client case files, we saw limited to no support of phone or personal contact with the client at least twice a month for a minimum of 90 days to determine and document satisfaction with the employment terms.
- Through our discussion with job developer TM, and review of her client case files, we saw some support of phone or personal contact with the clients to determine and document satisfaction with employment terms. However, we saw only two instances where the Final Job Placement Retention report submitted to DOR by job developer TM contained comments about the client's progress on the job. In only one instance did we see support for contact with the employer.
- There was little to no documentation within the case files to support phone or personal contact with the employer on their satisfaction with employment terms. In only one instance did we see support for contact with the employer.
- There is no evidence in the case files to support the job developer communicating monthly with the DOR SVRC on the client's progress and to coordinate any additional support and services that may be required to help the client retain employment.
- Although we saw some instances where job coaching was noted, there was no identification documented in the case file of consumer's need for assistance with necessary minimal supports to sustain employment or intensive support

Without initiating twice monthly communication with the consumer and the employer, Toolworks cannot identify and report on specific support and resources needed for employment retention 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. Lastly, DOR may pay for retention services unnecessarily, if Toolworks does not provide documented evidence of service completion as required by the DOR CRD Guide.

Criteria

The DOR CRD Guide requires the CRP to provide the following activities upon a DOR consumer's acceptance of employment of a job that is consistent with their IPE goal and meets their needs for hours, wages, and benefits:

- 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 for a minimum of 90 days
- Communication with DOR SVRC at least monthly to discuss progress and coordinate for any additional services that may be required
- Assistance with necessary minimal supports to sustain employment.

Recommendation

Toolworks shall make every effort to contact both consumers and employers to ensure satisfaction with the employment terms and assess any necessary supports and resources needed to sustain employment. Toolworks shall also comply with the DOR CRD Guide and their own internal policy by sending monthly progress reports to the DOR counselor as 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.

6. Reporting on the provision of Employment Services to the referring DOR counselor at appropriate intervals could not be supported.

While discussion with the job developers supported some communication with DOR during the provision of ES, the case files did not support nor contain monthly reports to the SVRC for Intake, Employment Preparation, Job Preparation and Development, and Retention.

- Although Toolworks submits an Employment Department Intake form and Employment Services Intake form along with the invoice for Intake services, there is no evidence that a written report was submitted to the DOR SVRC on

the consumer's potential for community employment consistent with his/her IPE and including any recommendations for additional services.

- Although Toolworks submits a Placement Plan along with the invoice for Employment Preparation services, there is no evidence that a written report was submitted to the DOR SVRC which summarizes Employment Preparation activities and the client's competencies/skills toward their vocational goal.
- Although Toolworks submits a Job Placement Information Form along with the invoice for Job Development and Placement to support the Job Development and Placement service, there is no evidence of a monthly written report submitted to the SVRC that summarizes Job Development and Placement activities that would align with a client's Individual Service Plan
- Although Toolworks submits a Final Job Placement Retention Report to support 90 days retention along with the Invoice for Retention services, there is no report provided to the SVRC that addresses the consumer's ability to meet employer's standards and performance expectations and identifying any specific support and resource needs necessary to retain employment.

Without monthly communication and reporting to the DOR Counselor, the CRP cannot report on specific ES activities that the client engaged in nor support the service billed. Without submission of the detailed reports, any additional supports needed by the client to help them progress through ES and ultimately reach and retain employment may not be addressed timely by DOR or the CRP.

Criteria

The DOR CRD Guide states:

REPORTING REQUIREMENTS:

At completion of the Intake activities, the CRP will provide a written summary to the referring SVRC of the DOR consumer's potential for community employment consistent with the IPE and recommendations for additional service needs. For consumers who will continue with Employment Services, an ISP is developed which affirms vocational goals and objectives with details of services to be provided.

At the completion of Employment Preparation activities, or monthly until completion, a written report will be provided to the SVRC summarizing activities and competencies / skills acquired as per the ISP, with recommendations for additional service needs.

At completion of job development and placement activities, or monthly until completion, a written report will be provided to the SVRC summarizing activities provided as per the ISP. Reports will include employer contacts made on behalf of the consumer as well as consumer contact, and identifies supports and/or resources necessary to ensure employment. Upon placement, employment information

identifying employer, hours, wages, and benefits and other conditions of employment will be provided.

At completion of Employment Retention activities, and/or after 90 days of employment, a final report will be provided to the SVRC. The report addresses the consumer's ability to meet the employer's standards and performance expectations. The report will identify any specific support and resource needs necessary to retain employment.

Recommendation

The following actions shall be taken to report timely to DOR on the delivery of ES as authorized and provided:

- Toolworks shall submit a written report for the Intake Employment Service which shall assess the appropriateness of the DOR referral and the consumer's potential for community employment. Both the written report and the ISP shall accompany the invoice for Intake service.
- Toolworks shall submit a written report for the Job (employment) Preparation Employment Service which shall document the employment preparation activities in which the vendor and client engaged in.
- Toolworks shall document and submit to the SVRC monthly, all Job Development and Placement activities in support of the ISP and the client's vocational goal. Reports will include employer contacts made on behalf of the consumer as well as consumer contact, identification of supports and/or resources necessary to ensure employment, employment information identifying employer, hours, wages, and benefits and other conditions of employment will be provided.
- Toolworks comply with the CRD Guide and their own internal policy by sending monthly progress reports to the SVRC as 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.