

Department of Education
Office of Inspector General – Internal Audit
Eighteen-Month Status Report on: Space Coast Center for Independent Living
Report #A-1516-009 Issued: August 8, 2016
Status as of February 8, 2018

Finding	Recommendation(s)	Previous Management Response	Management Response as of February 8, 2018	Anticipated Completion Date & Contact
<p>The CIL continued to charge consumers a fee for transportation services despite DVR’s failure to develop guidelines.</p>	<p>We recommend DVR develop guidelines for charging consumers for the cost of IL services or disallow the practice.</p>	<p>Response as of August 8, 2016: WIOA changed the definition of “Center for Independent Living” by adding the words “regardless of age or income”. The addition of this language brings the legality of financial testing/participation into question. We have sought clarification from our federal partner, the Administration on Community Living, but until final regulations are published we won’t know the answer. In the meantime, CILs are forbidden from charging consumers with disabilities for services provided with VR funds. All CILs have been notified of this prohibition, including via a “Technical Assistance Reminder – Charging Consumers for Services” email on March 14, 2011. Space Coast CIL was also specifically reminded of this prohibition in the findings of the Rehabilitation Services Administration Compliance Review Report dated October 14, 2014, which were reinforced by VR during the site visit. Space Coast CIL was most recently reminded of the prohibition via email on July 6, 2016.</p>	<p>Response as of February 8, 2018 The Independent Living Program Manager is in the process of scheduling a March 2018 site visit that will include an on-site review of policies regarding transportation services provided by Space Coast CIL. Because there continues to be no guidance by the authorizing agency, ACL, VR continues to enforce the contractual prohibition charging fees for service as outlined in all CIL contracts (see below). <i>“The Center shall not require financial needs testing or financial participation by consumers of independent living services funded under the State Plan for Independent Living (SPIL) unless or until guidelines are developed in collaboration with the Division of Vocational Rehabilitation and the Florida Independent Living Council, and approved by a majority of the Center Directors”.</i></p> <p>Anticipated Completion: March 2018</p>	<p>March 2018 Maggie Munsey 245-3386</p>

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		<p>Response as of February 8, 2017: As a result of WIOA on November 28, 2016 the final rule outlining the amendments to the Rehabilitation Act of 1973, which transferred the administrative duties for Centers for Independent Living from the Federal Department of Education Rehabilitation Services Administration to Health and Human Services’ Administration on Community Living, went into to effect. The amendments provided limited direction to CILs on the development of fee for service policies. The language stated, “The final rule does not address the use of fee-for-service models, though we encourage CILs to consider how to ensure that any application of such a model is accomplished in a way that is consistent [with independent living philosophy]”.</p> <p>Response as of August 8, 2017: To date the Administration on Community Living has provided no guidance regarding financial means testing. To address this issue Vocational Rehabilitation has inserted the following language in the contract template for Centers for Independent Living to begin being used October 2017:</p>		
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		<p><i>“The Center shall not require financial needs testing or financial participation by consumers of independent living services funded under the State Plan for Independent Living (SPIL) unless or until guidelines are developed in collaboration with the Division of Vocational Rehabilitation and the Florida Independent Living Council, and approved by a majority of the Center Directors”.</i></p> <p>Anticipated Completion: October 2017</p>		
<p>The CIL did not meet employment requirements.</p>	<p>We recommend DVR provide technical assistance as needed to ensure the CIL remains eligible for state and federal assistance.</p>	<p>Response as of August 8, 2016: In March, the independent living director and two performance improvement consultants visited the center and provided extensive technical assistance, including reviewing current policies and process mapping.</p> <p>Response as of February 8, 2017: VR will continue to provide technical assistance regarding the qualifications of staff and will include a review of staff qualifications based on accepted levels of expertise established by the field as part of periodic monitoring. VR will also, as a part of future monitoring, review CILs for polices regarding the onboarding and on-going training of CIL staff as it pertains to IL best</p>	<p>Response as of February 8, 2018 The Independent Living Program Manager is in the process of scheduling a March 2018 site visit that will include an on-site review of policies regarding staff qualifications for new hires. VR staff will provide technical assistance as needed to ensure the Space Coast CIL remains in compliance with state and Federal guidelines regarding CIL Staff qualifications.</p>	<p><i>March 2018</i> <i>Maggie Munsey</i> 245-3386</p>

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		<p>practices and job-specific content. In 2017, VR in conjunction with CILs and the Florida Independent Living Council will provide a statewide conference on independent living. Mandatory training will be provided to all attending CIL staff with subject matter based on IG findings and repeated technical assistance provided by the program and contract manager.</p> <p>Response as of August 8, 2017: Vocational Rehabilitation will begin on-site monitoring of Centers for Independent Living in the fall of 2017. Review of staff qualifications and training based on position will be part of the process. Vocational Rehabilitation staff will make recommendations based on any identified deficiencies in staff expertise. Vocational Rehabilitation staff is scheduled to provide training at the 2017 Statewide Independent Living Conference, September 13-14, and will include as part of the training, how Centers can mitigate deficiencies identified through administration reviews.</p> <p>Anticipated Completion: September and October of 2017</p>		
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<p>The CIL did not provide the four independent living core services to one of the two counties.</p>	<p>We recommend DVR add language in its contracts with the CILs to specify service delivery areas.</p>	<p>Response as of August 8, 2016: This language will be added when new contracts are developed in 2017.</p> <p>Response as of February 8, 2017: VR has included language in the new contract that directs CILs to provide the 5 core services to the CIL’s federally established service area.</p> <p>Response as of August 8, 2017: VR is currently developing the revised contract templates for Centers for Independent Living. The target for executing new contracts with all Centers for Independent Living is October of 2017. Language in the new contract will address the provision of core services Centers for Independent Living are federally mandated to provide.</p> <p>Anticipated Completion: October 2017</p>	<p>Response as of February 8, 2018 The Independent Living Program Manager is in the process of scheduling a March 2018 site visit that will include an on-site review of policies regarding the provision of the 5 core services. VR staff will provide technical assistance as needed to ensure the Space Coast CIL remains in compliance with state and Federal guidelines regarding the provision of the 5 core services. The new Contract is going through final DOE review. The execution of the Contract is planned for July 2018.</p>	<p><i>March 2018</i> <i>Maggie Munsey</i> <i>245-3386</i></p>
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<p>The CIL did not meet employment requirements.</p>	<p>We recommend the CIL develop an improvement plan to bring them into compliance with the Code of Federal Regulations. We recommend the CIL develop and implement employee and board training and development programs to ensure employees providing IL services and those administering the IL program have the skills and knowledge necessary to perform their duties.</p>	<p>Response as of August 8, 2016: As of January 2, 2016 the IL staff either transitioned to other jobs or found employment outside the CIL. The new IL staff was selected from a pool of candidates with prior social service experience. All staff is now required to go through the Independent Living Research Utilization’s (ILRU) training in ‘Foundation for Independent Living’ course within their first 90 days of employment. Board members also have access to ILRU’s training as well. A self-paced workbook with tools for improving the governance practices of non-profit organizations is in the process of development.</p> <p>Response as of February 8, 2017: Staff training took part in new and old staff taking 4 part course through the ILRU website. Additionally VocRehab training for both staff and Board held on 2/2/2016. Process Mapping held on 4/7-4/8/2016; The staff participates in continuous training. The Board also attended a training on Board Governance January 27, 2017,</p>	<p>The CIL continues to ensure that all new personnel goes through the ‘Foundation for Independent Living’ course with ILRU within their first 90 days of employment; The Board is in its final stages of finishing the By-Laws update and the New Board training material</p>	<p>Ongoing and Mar 2018 respectively</p>

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		<p>they are now working on creating material to train new Board members.</p> <p>Response as of August 8, 2017: The Board is currently working on updating the organization’s By-Laws and training packet based on the Board Governance training attended on January 27, 2017. This will provide new board members with the knowledge of Independent Living Centers and the Space Coast Center for Independent Living’s mission. The packets are nearing the final draft, at which time the board will review for approval and implementation.</p> <p>Anticipated Completion: October 2017</p>		
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<p>The CIL policies and procedures need improvements.</p>	<p>We recommend the CIL update its financial policies and procedures so they do not conflict with contract terms and consistently follow its established policies and procedures.</p>	<p>Response as of August 8, 2016: Space Coast CIL board policy committee is reviewing the financial policies and procedures to ensure the policies accurately reflect the needs of the contractual terms.</p> <p>Response as of February 8, 2017: Board and Staff are working together in finalizing the review and updating of agency’s Policies and Procedures.</p> <p>Response as of August 8, 2017: The Board is finalizing the Financial Policies review process. They are nearing the final draft, at which time the board will review for approval and implementation.</p> <p>Anticipated Completion: October 2017</p>	<p>Finalization of this endeavor was delayed due to impact to individuals working on this from the storms & hurricanes that hit our area. Work is resuming this quarter.</p>	<p>June 2018</p>
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