

**Department of Education**  
**Office of Inspector General – Internal Audit**  
**Six-Month Status Report on: Alliance Community & Employment Services, Inc.**  
**Report # A-1819DOE-006 Issued: May 30, 2019**  
**Status as of November 30, 2019**

<b>Finding</b>	<b>Recommendation(s)</b>	<b>Management Response as of May 30, 2019</b>	<b>Management Response as of November 30, 2019</b>	<b>Anticipated Completion Date &amp; Contact</b>
<p>DVR did not conduct monitoring in accordance with the monitoring plan</p>	<p>We recommend DVR conduct monitoring in accordance with the provider’s risk assessment and subsequent monitoring plan. In addition, we recommend DVR promptly provide the monitoring results and recommendations for improvement to ACES and ensure corrective action has been initiated on noted deficiencies.</p>	<p>Concur. DVR has put new monitoring processes in place that changed the monitoring frequency associated with each risk level. We have reassessed risk level for all providers. Alliance Community and Employment Services, Inc. is now considered a medium risk Provider. New monitoring processes now include providing the monitoring results and recommendations to the Provider.</p>	<p>The Provider Manager is conducting consistent monitoring. The Provider Profile form is updated to reflect these monitoring efforts. The timeframe for the current monitoring period is January – December 2019. Results and recommendations will be completed within the first three months of 2020.</p>	<p>March 2020  Maggie Munsey 245-3386</p>

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<p>ACES placed customers in jobs that did not match the customer's IPE goal, and DVR paid for the placement benchmarks.</p>	<p>We recommend DVR review ACES placement benchmarks and ensure the jobs obtained match the IPE goal at the time of placement. For any payments made for placement benchmarks not matching the IPE goal, we recommend DVR consider asking ACES for repayment. We additionally recommend DVR include in their monitoring efforts a review of amendment dates compared to placement benchmark dates.</p> <p>We recommend DVR ensure counselors are appropriately trained and instructed to only approve NOAs in which the job goals match the IPE goal at the time of placement. In the event, the amendment</p>	<p>Concur. Current system limitations restrict the Provider Manager from confirming when an IPE amendment is signed off by the Customer or Customer's representative; and a qualified VR Counselor. DVR is working to secure a new case management system, at which time better reporting mechanisms can be put in place to verify this information.</p> <p>In the interim DVR will conduct random post audits of IPE amendments to verify whether placement occurred prior to IPE amendment. The Bureau of Vendor &amp; Contracted Services (BVCS) will share the results of these audits with Bureau of Field Services (BFS) management so that they may provide technical assistance to counseling staff.</p>	<p>RIMS changes are in process that will allow the system to update a change to the IPE job goal after the Counselor has entered the amendment signature date.</p> <p>Until this goes into effect, DVR will continue to conduct random audits of IPE amendments during monitoring efforts.</p>	<p>March 2020</p> <p>Maggie Munsey 245-3386</p>

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	occurred after the placement, the counselors should reject the NOA.			
Two ACES employees did not have proper credentials to provide SE services, and DVR approved a benchmark payment for a service provided by an employee that did not possess a required personnel credential.	We recommend DVR review RIMS documentation on a periodic basis and ensure the specialists assigned and working on DVR customer cases obtained the proper credentials to provide the services assigned. We recommend DVR deny benchmark payments to ACES in cases where uncertified specialists assist DVR SE customers. We additionally recommend DVR revise the provider manual to require the providers to submit an employee contact form upon modification of a specialist's status (Ex. Status change from an employment	Concur. RIMS data is compared to staffing reports on a quarterly basis to ensure Employment Specialists are certified in RIMS with the appropriate credentials. DVR recently completed a review of all Employment Specialists certified to provide SE services to verify if a SE certificate is on file. That project is now complete.	Complete.	Complete  Maggie Munsey 245-3386

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	specialist to a supported employment specialist).			
<p>ACES did not obtain approval prior to hiring customers at ACES, and DVR paid for benchmarks achieved prior to approval.</p>	<p>We recommend DVR reject NOAs and invoices for benchmarks met prior to receiving written approval in cases where the customer is hired in a position in which the provider has an ownership interest. We additionally recommend DVR add timeframes in which the DVR counselors must approve or deny prior approval requests to the next iteration of the Provider Manual.</p>	<p>Concur. The Provider Manager will begin verifying signature dates on placement prior approval forms.</p> <p>BVCS will also work with BFS to establish timeframes for counselors. Once established, leadership will share this expectation with counseling staff and included in appropriate training and technical assistance documents.</p>	<p>The Provider Manager responsible for processing invoices is rejecting any invoice where the prior approval form is not signed prior to the Customer being placed in a position in which the provider has an ownership interest.</p> <p>A notification was sent out via the Division’s October 2<sup>nd</sup> <b>What’s Up Wednesday</b> reminding staff prior approval is required for any OJT occurring at the Provider’s place of business.</p>	<p>Complete</p> <p>Maggie Munsey 245-3386</p>

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<p>ACES did not make timely contact with customers.</p>	<p>We recommend ACES begin regular contact with the customers within two weeks of referral acceptance in accordance with contract terms and document the contact with the customers in the MPRs. If ACES is unable to contact the customers, they should notify the VRC in writing to document contact attempts.</p>	<p>Management will meet with employment specialists regularly to inform them that contact has to be made two weeks prior to receiving a referral. Management will follow up to make sure that contact is made with clients when a referral is received in the REBA system. Management will notify the employment specialist if they are having a hard time reaching the client to email the VR counselor and copy management on the email.</p>	<p>Aces ES specialists have made the effort to reach out to VR customers within two weeks of receiving the referral and if we are unable to reach customers, we follow up with an email to DVR counselor asking for alternative means of contact to reach customer. If the VR counselor is unable to provide us with alternative contact phone number, Aces employment specialist also makes the effort by going to the client's home to try to make contact to schedule intake with the customers.</p>	<p>Aces Implemented new policy of making sure we meet with DVR customers within 2 weeks since June 1, 2019</p>

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<p>ACES placed customers in jobs that did not match the customer’s IPE goal, and DVR paid for the placement benchmarks.</p>	<p>We recommend that ACES obtain placement for customers that matches the current IPE goal, as developed by the customer and VR Counselor. Should the customer have a desire to revisit and amend an IPE, any amendment should precede actual job placement.</p>	<p>Management will inform the employment specialist at the initial meeting with the client, if the client suggests another employment goal, to notify the VR Counselor right away that the client has requested a different IPE goal before the client accepts employment under a different IPE goal.</p>	<p>Since June 1, 2019 when ACES ES specialist are conducting new customer intake, we ask the customers if there is any other alternate employment goal that there are interested, and if they mention an alternative employment goal other than the assigned IEP goal, ES informs the consumer to notify their DVR counselor after the intake is completed.</p>	<p>Unknown</p>
<p>Two ACES employees did not have proper credentials to provide SE services, and DVR did not ensure required personnel credentials were obtained prior to invoice approval.</p>	<p>We recommend ACES provide accurate quarterly staff reports to DVR in accordance with the Provider Manual and ensure all employees obtain SE certification prior to assignment to DVR SE customers.</p>	<p>Management will be careful when assigning supported employment clients to ES’s that are not qualified to provide supported employment services under the requirement of the</p>	<p>Since June 1, 2019 all supported employment consumers are assigned to ES specialists that have been approved by DVR and have completed the Agency for Persons with Disabilities (APD)"best practice supported employment course" to assist DVR</p>	<p>Unknown</p>

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			consumer's employment service.	
ACES did not obtain approval prior to hiring customers at ACES, and DVR paid for benchmarks achieved prior to approval.	We recommend ACES refrain from placing customers in businesses in which the provider has an ownership interest until after written approval from the VR Counselor and the VR Area Supervisor or VR Counselor Analyst.	Management will make sure, before considering any VR participant for employment, that ACES notifies the VR counselors and the area supervisor that ACES is considering the VR participant as a staff member	Since June 1, 2019 ACES has taken procedures to make sure that if any DVR consumers is considered for employment with ACES, that all the proper steps are taken prior to any employment offer is made to any current DVR consumer that is being for job placement in the community.	Unknown