



Office of Inspector General Interpreter Services Program

Report # A-1920DOE-007

April 2020

Executive Summary

In accordance with the Department of Education's fiscal year (FY) 2019-20 audit plan, the Office of Inspector General (OIG) conducted an audit of the Interpreter Services Program. The purpose of this audit was to determine if the Division of Vocational Rehabilitation (DVR) effectively manages and monitors the Interpreter Services Program and if payments are made in accordance with the DVR Sign Language Interpreter Services Application terms.

During this audit, we noted that DVR generally had sufficient controls in place and provided oversight of the Interpreter Services Program. However, there were instances where improvements could be made to strengthen some of these controls. For example, we cited instances where Sign Language Interpreter Agencies did not submit their Semi-Annual Employee/Contractor reports in the time frame required by the application; DVR paid for invoices which included services provided by an unqualified interpreter; and DVR paid for invoices which did not identify the interpreter providing services. The Audit Results section below provides details of the instances noted during our audit.

Scope, Objectives, and Methodology

The scope of this audit included an examination of interpreter services provided by individual and group agencies during the period of September 1, 2018, through August 31, 2019. Our objectives for the audit included:

1. Determining if DVR effectively manages and monitors the Interpreter Services Program for compliance with the Florida Statutes, the DVR Sign Language Interpreter Services Application, and the DVR Guide for Provision of Interpreting Services for Individuals with Hearing Loss; and
2. Determining if payments are made in accordance with the DVR Sign Language Interpreter Services Application terms.

To accomplish our objectives, we reviewed applicable laws, rules, and regulations; interviewed DVR and Interpreter Services staff; reviewed policies and procedures; reviewed the DVR Sign Language Interpreter Services Application; reviewed the DVR Guide for Provision of

Interpreting Services for Individuals with Hearing Loss; reviewed semi-annual contact reports and related documents; reviewed a sample of invoices and related documents; and reviewed a sample of interpreter credentials and background screenings.

Background

The Division of Vocational Rehabilitation (DVR) is a federal-state program committed to helping people who have physical or mental disabilities find and maintain meaningful employment and enhance their independence. DVR accomplishes this by providing employment support and job placement assistance to eligible individuals with disabilities. DVR utilizes vendors for people with disabilities who require specific services or equipment to help them prepare for, gain, and retain employment.

DVR recognizes the critical nature of communication access for its individuals and staff who are deaf, hard of hearing, late deafened, and deaf-blind. Among the various methods of accommodations provided to these individuals is the provision of quality interpreting services. The VR Guide for Provision of Interpreting Services for Individuals with Hearing Loss was developed to serve as a guideline when securing quality interpreting services. The manual incorporates the latest standards and practices of professional interpreters who work for, and with, DVR and provides the framework for service consistency throughout DVR statewide. The purpose of the manual is to establish uniform guidelines to provide effective interpreting services to individuals with hearing loss.

The Interpreter Application is mandatory for individuals or group agencies that are interested in becoming an Individual Interpreting Vendor or a Group Interpreting Agency Vendor for DVR. The application includes the accepted qualification and credentials, the background screening requirements, the invoice requirements, and the employee/contract contact form requirements. The current Interpreter Application took effect in September 2018. Upon completion of an application, DVR staff enter the Individual Interpreting Vendor and Group Interpreting Agency Vendors into the Rehabilitation Information Management System (RIMS), including the certification status, background screening dates, and contact information for the interpreters.

Audit Results

Finding 1: Sign Language Interpreter Agencies did not submit their Semi-Annual Employee/Contractor reports in the timeframe required by the application.

The DVR Sign Language Interpreter Services Application states, “All staff assigned to VR customers must be approved by VR’s Vendor Registration Unit before providing services. Group Interpreting Agencies must submit the attached Employee/Contractor Contact Form with initial registration. After the initial registration, agencies must submit the Semi-annual Employee/Contractor Report no more than 15 days after the 1st day of the months of January and July.”

We selected 13 of the 23 group agencies that provided services during our scope and reviewed their contact reports to ensure the reports were submitted no more than 15 days after the first day of the months of January 2019 and July 2019 in accordance with the application terms.

For the January 2019 submission, we determined that all 13 (100%) sampled agencies failed to submit a semi-annual employee/contractor report in the timeframe required by the application. The 13 agencies submitted the report between 125 and 145 business days after the due date.

For the July 2019 submission, we determined that eight of thirteen (62%) sampled agencies failed to submit a semi-annual employee/contractor report in the time frame required by the application. The eight agencies submitted the report between 1 and 14 business days after the due date.

Per DVR staff, the untimely reports were due to a change in duties with DVR staff, which resulted in a gap in following up with the agencies to request the reports. Untimely filed reports could lead to inaccurate information from the group agencies and an inability for DVR to ensure the interpreters listed as credentialed in RIMs are currently employed with the agency and eligible to provide interpreter services.

Recommendation

We recommend DVR monitor contract submissions by agencies to ensure reports are submitted in accordance with guidelines established in the Interpreter Application. We additionally recommend DVR ensure the interpreters identified on the Employee/Contractor Reports have been appropriately added to RIMS.

DVR Management Response

Concur. VR is currently conducting a full internal audit of all registered interpreters. Interpreters with expired credentials are being removed until updated credentials have been received. A tracker has been developed to monitor credentials and a process is being developed to ensure on-going monitoring is being completed.

Finding 2: DVR paid for invoices which included services provided by an unqualified interpreter and paid for invoices which did not identify the interpreter providing services.

The DVR Sign Language Interpreter Services Application states, “Individual Interpreting Vendors and Group Interpreting Agency Vendors must submit an invoice on company letterhead to submit billing for services to VR. The invoice must contain the interpreter’s name and current credentials. Failure to submit this information may result in a delay in Invoice processing.”

DVR received and paid 3,377 invoices for interpreter services rendered from September 1, 2018, through August 31, 2019. We selected a sample of 33 of the 289 invoices submitted by 8 sampled Individual Interpreting Vendors and 137 of the 1,740 invoices submitted by 13 sampled Group Interpreting Agency Vendors for in depth review of invoice submission and payment.

We identified one interpreter listed on a Group Interpreting Agency's invoices who was not listed in RIMS as a certified interpreter. We noted the interpreter was present on four of the five invoices from the Group Interpreting Agency in the sample, and DVR paid the Group Interpreting Agency between \$2,300 and \$2,525 for the total services provided by the interpreter. DVR staff researched the interpreter and determined the interpreter was listed on the Employee Contact Form of the May 2018 Sign Language Interpreter Services application. Their initial review of the application shows that the identified interpreter passed the background screening but did not have the required credentials to provide interpreter services for DVR.

We confirmed for the sampled Individual Interpreting Vendors that all invoices were submitted on company letterhead and listed the interpreter's credentials. We confirmed for the sampled Group Interpreting Agency invoices that all invoices were submitted on company letterhead. We additionally confirmed 135 of the 137 invoices contained the interpreter's name and listed credentials. We identified two invoices which did not include the name of the interpreter. The invoices without interpreter identification were identified as invoice #ELX6880 in the amount of \$661.00 and invoice #ELXG316 in the amount of \$187.50.

In response to the invoices, DVR staff reviewed the RIMS case notes and confirmed the case notes identified a need for services to be performed but did not include a follow up identifying the interpreters who accepted the assignments through the agencies nor who provided the services. Paying for services without an identified interpreter and paying for interpreting services by individuals who do not possess the required credentials could lead to ineffective and inaccurate interpreting services for DVR clients.

Recommendation

We recommend DVR ensure all invoices include the interpreter's name and verify that the interpreter is certified to provide services prior to payment of the invoices in accordance with the DVR Sign Language Interpreter Services Application.

DVR Management Response

Concur. Interpreters no longer certified are being removed from Group Interpreters. This will eliminate authorizations being created for unqualified interpreters. A tracker has been created to monitor Interpreter credentials and a process is being created for on-going monitoring. Additional guidance will be sent out to field staff advising the interpreter name needs to be included on all authorizations/invoices.

Observation

During our testing of Interpreter Credentials, we found 57 of the 134 sampled interpreters held certifications which expired on or before June 30, 2019, but were listed as "Certified" in RIMS as of January 2020. While we did not identify instances of services provided and paid after the expiration date of the credentials, this presents a risk for the VR Counselors when authorizing invoices. Currently, the VR Counselors utilize RIMS to determine the certification status of the

interpreter who provided the service per the invoice. Since RIMS does not capture the certification expiration date and the invoice only lists the certification held by the interpreter, this practice could lead to payment for non-certified interpreters. We recommend DVR staff develop a tracking mechanism to include the expiration dates of interpreters in order to accurately identify the credentials of interpreters and provide DVR the ability to notify interpreters and Interpreter Group Agencies when credentials have expired.

Closing Comments

The Office of the Inspector General would like to recognize and acknowledge the DVR and staff, for their assistance during the course of this audit. Our fieldwork was facilitated by the cooperation and assistance extended by all personnel involved.

To promote accountability, integrity, and efficiency in state government, the OIG completes audits and reviews of agency programs, activities, and functions. Our audit was conducted under the authority of section 20.055, F.S., and in accordance with the International Standards for the Professional Practice of Internal Auditing, published by the Institute of Internal Auditors, and Principles and Standards for Offices of Inspector General, published by the Association of Inspectors General. The audit was conducted by Clinton Albritton and supervised by Tiffany Hurst, CIA, Deputy Inspector General.

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