

**State of Washington
 Status of Audit Resolution
 December 2017**

Department of Services for the Blind

Agency 315

Audit Report	Finding Number	Finding and Corrective Action Plan
2016 F	009	<p data-bbox="483 422 662 449">Finding:</p> <p data-bbox="670 422 1442 548">The Department of Services for the Blind failed to establish adequate internal controls over, and was not compliant with, federal requirements to determine client eligibility for the Vocational Rehabilitation program within a reasonable period of time.</p> <p data-bbox="483 583 602 640">Corrective Action:</p> <p data-bbox="670 583 1451 768">In December 2016 and January 2017, the Department held meetings with management and staff to identify and address the common reasons causing delays in eligibility determinations. Training was also provided at these meetings on the required elements on clients' case notes justifying a delay, which include circumstances, expected completion date and client agreement.</p> <p data-bbox="670 804 1445 1056">Previously, management had been relying on reviewing monthly reports from the case management system to identify delayed eligibility determinations. These reports were reviewed by Regional Area Managers to assist counselors in meeting the 60-day deadline for each case. For the cases that were overdue, Regional Area Managers review justification for the delay to ensure it was adequately and properly documented in the client's case notes within the case management system. The completed monthly reviews were sent to the Deputy Director to be filed.</p> <p data-bbox="670 1092 1466 1276">However, the exceptions identified by the audit revealed the limitations of monitoring by monthly reports. Since the reports only showed a snapshot in time, they did not include those delayed eligibility determinations that had been resolved before the date the reports were generated. Consequently, management was not alerted and were missing the required justification and documentation.</p> <p data-bbox="670 1312 1458 1535">As of August 2017, the Department completed the testing of an actions-due feature called a dashboard in the case management system, and determined that the data values provided by the dashboard were sufficiently reliable to be used as a tool to monitor compliance. Case managers had since received appropriate training to use the tool weekly to manage their caseloads on a real-time basis. With the implementation of this new process, the Department discontinued the use of monthly reports as a monitoring tool.</p> <p data-bbox="670 1570 1435 1755">As of September 2017, management had also implemented a process to identify eligibility determinations nearing the 60-day deadline for the upcoming week and to remind counselors of the required components for documenting a delay justification if a determination is not expected to be made within the 60-day timeframe. Managers also perform weekly monitoring of the use of the dashboard tool by the team.</p> <p data-bbox="670 1791 1458 1944">The Department has informally communicated to Regional Managers a target of less than ten percent overdue eligibilities for the agency, by region and counselor. As of October 2017, performance data showed that agency-wide delayed eligibility determinations decreased to less than ten percent compared to the previous fiscal year. In addition, there were improvements</p>

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2016 F	009 (cont'd)	<p>in the number of days taken to complete eligibility determination. The Department may consider adding the performance expectations to the Regional Managers' 2018 performance evaluation process.</p> <p>The Department is in the final stage of revising the Washington Administrative Code (WAC) to align with the new Workforce Innovation and Opportunity Act of 2014 which will include the requirements of delay justification documentation. As of October 2017, the policy revision has been sent out to external partners and stakeholders for initial feedback. The revised WAC is expected to be published by December 2017 for public comments before being adopted as final policy.</p> <p>By December 2018, the Department will update sections of the Vocational Rehabilitation Procedures Manual including eligibility determination and related requirements, which will occur in tandem with the implementation of a new case management system. The updated procedure manual will reflect the internal controls in place for the eligibility determination process.</p> <p>Completion Date: Completion date is estimated to be complete by December 2018</p> <p>Agency Contact: Michael Mackillop Deputy Director PO Box 40933 Olympia, WA 98504-0933 (206) 906-5520 Michael.mackillop@dsb.wa.gov</p>

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2016 F	010	<p>Finding: The Department of Services for the Blind failed to establish adequate internal controls over, and was not compliant with, federal requirements to establish timely individual plans of employment for Vocational Rehabilitation program clients.</p> <p>Corrective Action: As of January 2017, the Department has provided training to management and agency field staff on the required elements justifying an Individual Plans of Employment (IPEs) extension past 90 days, including client agreement and a specific expected completion date.</p> <p>Previously, management had been relying on reviewing monthly reports from the case management system to identify delayed IPEs. These reports were reviewed by Regional Area Managers to assist counselors in meeting the 90-day deadline for each case. For the cases that were overdue, Regional Area Managers review justification for the delay to ensure it was adequately and properly documented in the client’s case notes within the case management system. The completed monthly reviews were sent to the Deputy Director to be filed.</p> <p>However, the exceptions identified by the audit revealed the limitations of monitoring by monthly reports. Since the reports only showed a snapshot in time, they did not include those delayed IPEs that had been resolved before the date the reports were generated. Consequently, management was not alerted of delayed IPEs that were missing the required justification and documentation.</p> <p>As of August 2017, the Department completed the testing of an actions-due feature called a dashboard in the case management system, and determined that the data values provided by the dashboard were sufficiently reliable to be used as a tool to monitor compliance. Case managers have since received appropriate training to use the tool weekly to manage their caseloads on a real-time basis. With the implementation of this new process, the Department discontinued the use of monthly reports as a monitoring tool.</p> <p>As of September 2017, management had also implemented a process to identify IPEs nearing the 90-day deadline for the upcoming week and to remind counselors of required components for documenting a delay justification if an IPE is not expected to be developed within the 90-day timeframe. Managers also perform weekly monitoring of the use of the dashboard tool by the team.</p> <p>The Department has informally communicated to Regional Managers a target of less than ten percent overdue IPEs for the agency, by region and counselor. As of October 2017, performance data showed a decrease in agency-wide overdue IPEs compared to the previous fiscal year though not within the target range. Nonetheless, the average number of days taken to complete IPEs for all individuals has fallen to less than the required 90 days.</p>

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