

**Department of Education**  
**Office of Inspector General – Internal Audit**  
**Six-Month Status Report on: Nassau County School Board WBLE**  
**Report #A-1920DOE-008 Issued: May 19, 2020**  
**Status as of November 19, 2020**

<b>Finding</b>	<b>Recommendation(s)</b>	<b>Management Response as of May 19, 2020</b>	<b>Management Response as of November 19, 2020</b>	<b>Anticipated Completion Date &amp; Contact</b>
<p>DVR did not provide effective monitoring in accordance with the monitoring plan.</p>	<p>We recommend DVR conduct and document monitoring activities in accordance with the risk assessment and subsequent monitoring plan. We recommend DVR provide the monitoring results and recommendations for improvement to Nassau County School Board and ensure corrective action has been initiated on noted deficiencies. We recommend DVR conduct semi-annual Rehabilitation Electronic Billing Application (REBA) data analysis, conduct sample case reviews, and conduct full monitoring semi-annually for the duration of the Nassau County School Board WBLE contract based</p>	<p>Concur. DVR will continue to conduct monitoring in alignment with the risk assessment, and utilize the 2018 Provider Monitoring Guidebook for monitoring(s). Monitoring results will be communicated with the contractor, corrective action will be initiated, and follow-up will take place, as warranted.</p>	<p>The Contract Manager performed the contract close out process prior to releasing the final payment. The contract expired on July 31, 2020 and was not renewed. VR did not conduct formal monitoring before expiration. The Provider currently provides the WBLE services through our customary fee for service model.</p>	<p>Contract expired July 31, 2020, and is no longer active.</p> <p>Monica Moye 245-7004</p>

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	<p>on the risk evaluation. We further recommend DVR utilize the DVR 2018 Provider Monitoring Guidebook or develop new procedures to include monitoring practices for contracts.</p>			
<p>Tier level determinations in the contracts were vague.</p>	<p>We recommend DVR clarify and strengthen the contract language regarding tier level determinations for students. We additionally recommend DVR provide training to all Vocational Rehabilitation Counselors who provide WBLE guidance to ensure tier levels are consistently and accurately determined, correlate with the IPEs, and align with the mission of the program.</p>	<p>Concur. DVR Program Office and Field Staff (VRCs) will continue to collaborate and make tier determinations accurately. DVR will work to amend the contract language to include language that clarifies the tier level determinations for each student.</p>	<p>The contract expired on July 31, 2020 and was not renewed. Provider is rendering services through the fee for service model. WBLE Tiers are not applicable under the fee for service model, all services are paid at a flat rate.</p>	<p>Contract expired July 31, 2020, and is no longer active.</p>
<p>Plan &amp; Agreement WBLE Goals do not</p>	<p>We recommend DVR ensure the WBLE goals align with</p>	<p>Concur. DVR Program Office and Contracts Unit will conduct</p>	<p>The contract manager ensured that the final plan</p>	<p>Contract expired July 31, 2020,</p>

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always align with WBLE Experiences.	WBLE experiences in the Plan & Agreements, and if services do not align, ensure the provider has provided a valid explanation of the variances prior to payment. We additionally recommend DVR provide training to all Vocational Rehabilitation Counselors who provide WBLE guidance to ensure communication with the providers is consistent and aligns with the mission of the program.	more training with the Areas Office Staff and School Districts to ensure they understand that the WBLE Goal must align with WBLE experience.	and agreements coincided with the experiences before releasing the final payment. The contract expired on July 31, 2020 and was not renewed.	and is no longer active.
Nassau County School Board did not report WBLE service hours in the Final Reports.	We recommend DVR revise the WBLE final report form to include a data reporting field for WBLE service hours related to the contract. We further recommend DVR ensure the minimum service hours have been met by Nassau County School Board	Concur. DVR has initiated a Sign-in Sheet to be submitted with the Final Report to ensure the Plan & Agreement hours are met.	The contract manager verified that all of the service hours were properly documented prior to releasing the final payment. The contract expired on July 31, 2020 and was not renewed.	Contract expired July 31, 2020, and is no longer active.

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	prior to issuing the final payment.			

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<p>Tier level determinations in the contracts were vague.</p>	<p>We recommend Nassau County School Board ensure the appropriate tier level for WBLE services that correlates with the students' IPEs and IEPs.</p>	<p>We concur with the findings that tier level determinations in the WBLE contract were vague. We further support the recommendation for DVR to clarify and strengthen language regarding tier level determination for students. We also support the recommendation that DVR provide training of Vocational Rehabilitation Counselors (VRCs) to ensure levels are consistently and accurately determined. 1) Tier levels will be noted in the Plan and Agreement (P&amp;A) and a detailed description of the level of support the student required will be outlined in the Final Report. In the event that NCSB's tier determination does not align with the recommendations of VRCs, NCSB would ask the provider liaison to review all collateral documentation to verify that the</p>	<p>WBLE has changed from contracted services to a fee for service model. With this change the guidelines for services have changed so that there is no longer a tier distinction for service required.</p>	<p>Contract ended on 7/31/2020. Fee for service model executed 8/1/2020.  <b>Contact:</b>            Employment Specialist (ES),            NCSB Point of Contact (POC)</p>

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		<p> IPE aligns with the IEP. 2a) NCSB will establish monthly meeting with VRCs, to discuss tier selection. Should tier level support change from one WBLE rotation to another, NCSB and VRCs will discuss in their monthly meetings prior to the beginning of the next scheduled WBLE rotation so that NCSB and VRCs are in agreement on this tier selection. 2b) NCSB will meet monthly with DVR Contract Manager and VR Senior Consultant Program Administrator through Teams meetings to verify that all deliverables are being met in accordance with the contract. 3) In addition, NCSB will provide training for the VRCs in collaboration with the Florida Diagnostic &amp; Learning Resource System (FDLRS) and Project 10: Transition Education Network on IEP development procedures and the quality indicators within the IEP that should be </p>		
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		considered in the development of the IPE.		
Plan & Agreement WBLE Goals do not always align with WBLE Experiences.	We recommend Nassau County School Board ensure that all students participating in WBLE services are placed in WBLE experiences that align with their WBLE goals through the Plan & Agreement process. If WBLE services differ from the goal, we recommend Nassau County School Board provide a detailed explanation on how the desired work experience relates to targeted WBLE goals or expected outcomes in the student’s Plan & Agreement.	We concur that WBLE services should align with WBLE Plan & Agreement. If WBLE services differ from the goal, NCSB will meet with the VRC to discuss and provide a detailed explanation on how the desired work experience relates to targeted WBLE goals or expected outcomes. 1) NCSB will meet on a monthly basis with VRCs to ensure that Plan & Agreement WBLE goals are in alignment with WBLEs. In the event that WBLE services differ from the goal, NCSB will discuss the WBLE selection with the VRCs to determine if transferrable skills and a variation of experiences will be of benefit to the students in the effort to reach his/hers IPE goal. 2) Should this site be determined to be of benefit in providing valuable work experience related to the targeted WBLE goal, language in the WBLE Plan and	The WBLE Plan and Agreement and WBLE Final Report have changed with the fee for service model. We are now required to use the OJT Plan and Agreement and OJT Final Report. The targeted employment outcome details the type of WBLE the student will participate in. The language to support the alignment of the employment outcome is documented in the section “How desired OJT relates to targeted employment outcome.”	Completed - New forms required as of 8/1/2020  <b>Contact:</b> Employment Specialist (ES), NCSB Point of Contact (POC)

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		Agreement and the WBLE Final Report will provide a detailed explanation of the variance and how this unique experience will be of benefit and aligns with the students’ targeted WBLE goals.		
Nassau County School Board did not report WBLE service hours in the Final Reports.	We recommend Nassau County School Board report WBLE service hours, including supporting documentation, in accordance with the contract. In addition, we recommend Nassau County School Board maintain WBLE timesheets for student service hours in accordance with the WBLE start and end dates reflected in the rating forms.	NCSB supports the recommendation that DVR provide a field for reporting service hours on the WBLE Final Report. NCSB concurs that WBLE service hours should be provided in accordance with the contract. NCSB also concurs that this documentation should be reported in WBLE timesheets for student service hours and in WBLE rating form start and end dates. 1) NCSB has implemented the recommendation to clearly capture and report WBLE service hours. NCSB implemented such action for the 2019-2020 WBLE contract year and will continue to provide such supporting documentation through student timesheets, WBLE rating sheet start and end	WBLE Service hours were reported in the WBLE final report as of the completion of the second WBLE rotations for the contracted year 2019-2020. The current required OJT Final Report forms note completed WBLE hours in two of the sections: “Total number of actual OJT hours” and well as “If total number of actual hours differs from anticipated hours, provide justification of discrepancy.” NCSB maintains timesheets to verify student service hours.	Completed - 12/2019 New OJT final report forms required as of 8/1/2020  <b>Contact:</b> Employment Specialist (ES), NCSB Point of Contact (POC)

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		dates, detailed hours provided in the Final Report, and anecdotal notes in the final SPR for that WBLE rotation. This documentation will be submitted in the REBA system to be reviewed by the contract manager.		
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