



Office of Inspector General Evolving Lives, Inc.

Project #A-2425DOE-009

October 2025

Executive Summary

In accordance with the Department of Education's fiscal year (FY) 2025-26 audit plan, the Office of Inspector General (OIG) conducted an audit of the fee-for-service agreement between the Division of Vocational Rehabilitation (DVR) and Evolving Lives, Inc. (Evolving Lives). The purpose of this audit was to determine if the internal controls in place at Evolving Lives and DVR ensure effective delivery of program services to individuals with disabilities and determine if DVR effectively manages and monitors the agreement for compliance.

During this audit, we noted that, in general, DVR and Evolving Lives have sufficient controls in place. However, we identified instances where Evolving Lives provided substantial Supported Employment Services with employees that did not possess the requisite credentials; Evolving Lives submitted invoices for service authorizations in the Aware case management system (Aware) that did not include documentation of all required elements and DVR approved the invoices for payment; and DVR failed to effectively monitor Evolving Lives in compliance with the Provider Monitoring Guidebook. The Audit Results section below provides details of the instances noted during our audit.

Scope, Objectives, and Methodology

The scope of the engagement included an examination of the fee-for-service agreement between DVR and Evolving Lives for the period of July 1, 2023, through June 30, 2024. The objectives of this engagement were to determine if:

1. Internal controls in place at Evolving Lives and DVR ensure effective delivery of employment services to DVR consumers;
2. Benchmark payments are made in accordance with the Service Provider Manual and the Programmatic Operations Resource Guide Handbook (PORGH); and
3. DVR effectively manages and monitors the provider's compliance with the Service Provider Manual and the PORGH.

To accomplish our objectives, we reviewed applicable laws, rules, and regulations; interviewed appropriate DVR and Evolving Lives staff; reviewed policies and procedures; reviewed a sample of authorizations and supporting documents through the Aware case management system; and evaluated DVR monitoring activity.

The methodology of our review included:

- Reviewing the DVR risk assessment and subsequent monitoring plan to determine whether DVR monitored the provider in accordance with the plan.
- Reviewing a sample of service authorizations and Monthly Progress Reports (MPRs) (aka case notes) to determine whether the required documents are maintained according to the PORGH, laws, rules, and regulations.
- Reviewing provider personnel to ensure staff are qualified to provide Employment Services, Supported Employment Services, and On-The-Job Training Services to consumers with disabilities in accordance with the Vendor Registration Qualification Manual.
- Reviewing the provider's personnel records and ensuring that the provider follows the level 2 background screening requirements.
- Reviewing a sample of invoices and supporting documentation to determine timeliness, accuracy, and completeness of submitted invoices, and ensuring each invoice contains proper approval prior to payment.

Background

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. The Vocational Rehabilitation (VR) State Plan is DVR's contract with the federal government which also explains how DVR helps people with disabilities find employment. The State Plan requires DVR to provide services throughout the state.

DVR entered into a fee-for-service agreement with Evolving Lives, on June 29, 2017, with a renewal agreement executed on May 2, 2025. The purpose of this agreement is for Evolving Lives to provide VR services to eligible persons with disabilities on a fee-for-service basis through referrals from DVR. The fee-for service agreements do not carry a specific cost because they are reimbursed based on a set fee for the number and type of services providers perform.

Evolving Lives is a nonprofit organization with a mission to facilitate services and partnerships to support people with disabilities, their families, caregivers, and community members to build more inclusive communities. By way of this agreement, Evolving Lives agrees to perform VR services in accordance with requirements outlined in the DVR Service Provider Manual, Programmatic Operations Resource Guide Handbook, and Service Provider Code of Conduct.

Audit Results

Finding #1: Evolving Lives provided substantial Supported Employment Services with employees that did not possess the requisite credentials.

According to the DVR Vendor Registration Qualification Manual, “all employees who will provide Supported Employment Services must also have a training certificate in Supported Employment from a state or nationally recognized Supported Employment Program.”

Additionally, Evolving Lives signed their Employment Services Provider Application, multiple DVR Fee-For-Service Provider Employee Contact Forms, and multiple Employment Specialist Applications containing the same language requiring all employees that provide Supported Employment Services to have a training certificate in Supported Employment (SE) from a state or nationally recognized Supported Employment Program. Lastly, the Programmatic Operations Resource Guide Handbook (PORGH) instructs providers of SE services that, “The provider must have at least one Employment Specialist certified for Supported Employment.”

Our review of Aware records determined that Evolving Lives provided 79 Supported Employment (SE) services from July 1, 2023, to June 30, 2024. Six Evolving Lives employees provided those services, but only two employees possessed the requisite credential at the time of the service. See the following table.

Supported Employment (SE) Services Certification Status	Number of SE Service Authorizations 7/1/2023 - 6/30/2024	Total Paid for SE Services provided - 7/1/2023 - 6/30/2024
Certified Employees (2)	26	\$32,750
Non-Certified Employees (4)	53	\$73,850
TOTAL	79	\$106,600

Of the 79 authorizations issued for SE services, certified employees provided 26 services; however, we found that employees not certified to provide SE services provided 53 additional services. We determined that DVR paid Evolving Lives \$106,600 for SE services, but \$73,850 was for SE services provided by non-certified employees.

Evolving Lives stated that their understanding was that the PORGH only required, “Providers must have at least one Certified SE staff in order to provide SE services.” They further stated, “this was part of the PORGH and what we’ve known during the time of having been SE certified.” Despite the other guidance outlined above, Evolving Lives did not believe that each employee that provided the services needed the certification, just that they employ at least one person with the certification.

Additionally, DVR does not have controls in place to ensure employees of fee-for-service providers are properly certified prior to approving and paying for SE services. DVR management indicated that Aware only records that the provider is eligible to provide SE services (meaning that there is at least one employee on staff that has the appropriate certification). However, Aware lacks the ability to determine that the provider employee that actually provided the SE services held the appropriate certification at the time they provided the service. Further, the DVR employees reviewing these SE services prior to approving the invoices for payment did not verify that the provider employee providing the service held the requisite credentials.

The guidance relative to the employee qualification necessary to provide SE services in the PORGH is less specific than, and potentially contradictory to, the guidance in the DVR Vendor Registration Qualification Manual, the Employment Services Provider Application, DVR Fee-For-Service Provider Employee Contact Forms, and Employment Specialist Applications. Unclear and inconsistent guidance coupled with insufficient internal controls regarding employee certification and SE service delivery resulted in payments made in the amount of \$73,850 for SE services provided by non-certified Evolving Lives employees.

Recommendation

We recommend that Evolving Lives ensure that a properly certified employee provides all SE services in accordance with the Vendor Registration Qualification Manual and the directives in both their signed Employment Services Provider and Employment Specialist applications. We recommend that DVR ensure that provider employees providing SE services have the proper certifications prior to approving and paying for those services, either through enhanced system controls or enhanced manual reviews. We recommend that DVR provide clarification in the PORGH to ensure consistency with the certification requirements listed in the Vendor Registration Qualification Manual and the directives in the Employment Services Provider and Employment Specialist applications.

DVR Management Response

Concur. Since DVR's case management system (Aware) does not track Supported Employment Services employees, DVR will send a list to providers biannually to verify the individuals certified for Supported Employment. This will be conducted in the Fall and Spring of each year, and DVR will verify the employees to ensure that all records are current. DVR is currently revising the Programmatic Operations Resource Guide (PORGH) to ensure consistency with the certification requirements in the Vendor Registration Qualification Manual and the directives in the Employment Services Provider and Employment Specialist applications. Additionally, DVR is updating Rule 6A-25.021, Florida Administrative Code along with the Employment Services Provider (Fee-for-Service) application. Changes will be made to each document to ensure consistency and alignment with the DVR mission and current policies and mission. The anticipated completion date is June 30, 2026.

Evolving Lives, Inc. Management Response

Disagree. Participants were serviced by SE certified specialist. We were unaware this included invoice documentations that are general to processing authorizations. We will ensure all staff having contact with SE participants are certified by approved agencies according to VR standards. Early 2026 other staff will be SE certified.

Inspector General's Rebuttal

Notwithstanding Evolving Lives, Inc.'s response, the DVR Vendor Registration Qualification Manual states, "all employees who will provide Supported Employment Services must also have a training certificate in Supported Employment from a state or nationally recognized Supported Employment Program." Evolving Lives, Inc. staff each signed their Employment Services Provider Application, multiple DVR Fee-For-Service Provider Employee Contact Forms, and multiple Employment Specialist Applications containing the same language requiring all employees that provide Supported Employment Services to have a training certificate in Supported Employment (SE) from a state or nationally recognized Supported Employment Program. Additionally on 53 occasions, non-certified Evolving Lives, Inc. staff signed documents attesting they delivered SE services. As such, this finding will stand as presented.

Finding #2: Evolving Lives submitted invoices for services with insufficient information and supporting documentation to demonstrate that they performed the services in compliance with the PORGH, and DVR paid those invoices.

The DVR PORGH 2024 defines the criteria that fee-for-service providers must follow when providing applicable services. The PORGH instructs that, "payment requests must be submitted in Aware within 30 days of service achievement." According to DVR, entering the Service End Date as well as the Invoice Date is not specified in the PORGH instructions but is the responsibility of the provider to enter the information in Aware as instructed in the Vendor Portal Manual. According to the Processing Authorizations – Vendor Portal notes, DVR Support Staff or the Invoicing Specialist should review the vendor's attached invoice to verify the service start date, end date, and amount. There is no requirement to verify that the vendor entered the correct invoice date.

The Service Requirements section for each service described in the PORGH lists specific documents to be completed and submitted in Aware with the payment request when a service has ended. These documents are specific to the service provided and are listed as Supporting Documentation and Evidence of Completion. For example, for Employment Services: Pre-placement Training (PPT), once the training has ended, the provider completes the supporting documentation, which is the Pre-placement Training Report showing the 20 required training hours and the Pre-Placement Training Survey. Evidence of Completion is both documents completed and signed which will be submitted with the invoice through Aware.

The PORGH states that, "participant Monthly Progress Reports (MPRs) are required for each month of service beginning with the date of open authorization and must be entered into Aware as a case note. Based on the service being provided, the Service Requirements and Guidance

sections require details of additional activities performed that must be documented in the MPRs. Additionally, entering MPR notes are requirements of both DVR and the provider. The PORGH states, “MPRs must include multiple entries per month, typically four or five entries per month” and “at least one to two face-to-face interactions with the participant.” According to the PORGH, DVR reserves the right to reject a request for payment if MPRs do not reflect an adequate level of documentation to verify interaction with the participant.

We requested a data file from the DVR Bureau of Compliance and Quality Assurance of all service authorizations referred to Evolving Lives from July 1, 2023, through June 30, 2024, to identify the services Evolving Lives provided during the scope of our review. We noted that DVR transitioned from the RIMS case management system to Aware during our review period. Based on the data file provided, Evolving Lives submitted invoices for 455 DVR services that DVR subsequently approved for payment. The following table shows the number and type of services Evolving Lives received payment for during our scope.

Service Type	Total Services by Type	Percent of Services by Type	Sampled Services by Type	Percent of Sampled Services by Type
On the Job Training	233	51%	26	52%
Employment Services	94	21%	7	14%
Supported Employment	79	17%	12	24%
Work Based Learning Experience	44	10%	2	4%
Self-Advocacy	2	0.4%	1	2%
Youth Work Readiness Training	3	0.7%	2	4%
Total Invoices FY 23/24	455	100%	50	100%

We randomly selected 50 services from the six service types provided by Evolving Lives during our review period. We noted that 14 (28%) of the 50 services reviewed contained all supporting documentation required by the PORGH in Aware. For the other 36 (72%) services that did not contain all required supporting documentation in Aware, we provided Evolving Lives with a list of the service authorization numbers and requested they provide copies of invoices and all supporting documentation required for each specific service type. We also provided the same list of service authorization numbers to the DVR Financial Payments Unit and requested copies of the associated payment documentation. We reviewed the additional documentation provided by Evolving Lives and DVR for the remaining 36 service authorizations in our test to determine

if the documentation met the PORGH requirements for each service type. The table below illustrates the discrepancies identified during our review of the 50 service authorizations.

Total Discrepancies Identified by Service Type				
Service Type	Documents not in Aware *	Invoice Date Missing *	Case Notes Missing MPR Elements **	Evidence of Completion or Support Documents Missing or Incomplete *
On the Job Training	16	13	14	9
Employment Services	6	4	4	5
Supported Employment	10	8	10	5
Work Based Learning Experience	1	2	2	0
Self- Advocacy	1	1	1	0
Youth Work Readiness Training	2	1	2	0
TOTAL	36	29	33	19
% of Sampled *(Based on 50 Auths)	72%	58%	83%	38%
** (Based on 40 Auths)				

During the transition of case management systems from RIMS to Aware, DVR experienced downtime for 12 business days, from August 11, 2023, to August 28, 2023. DVR provided copies of the instructions and guidance provided to the field offices and providers regarding what to expect during the downtime. According to the instructions, issuing authorizations, updating MPRs, and submitting and approving invoices for payment should occur via paper copies, activity logs, and email. In addition, instruction for after the *Go Live* date stated that, “Unit Supervisors and Area Leadership should play a role in determining how to prioritize what gets entered, by when and by who.” We requested instruction regarding the eventual clean-up of the data in Aware and any associated due dates for ensuring supporting documents are uploaded and MPR activity is updated in Aware. According to DVR management, they set an initial due date, but that date had to be moved several times because of various startup problems and there was not a hard date set for fully utilizing Aware. Evolving Lives stated, “Some VRC’s and technicians would process payments outside of Aware. They were unable to process through the system or receive documentation. Many would request documentation through emails and they would process payments on their end.” Evolving Lives reported sending documentation to DVR as requested, but neither DVR nor Evolving Lives ensured the documents were scanned into the case management system thereafter.

We noted that 29 (58%) of the authorizations in our test sample did not include the invoice date in the Aware record. Currently, the Aware system does not auto-populate the invoice date when the vendor submits the invoice. There is also no field edit for the invoice date field to ensure the invoice date is added prior to submitting the invoice. According to the Processing Authorizations – Vendor Portal notes DVR Support Staff or the Invoicing Specialist should review the vendor’s attached invoice to verify the service start date, end date, and amount. There is no requirement to verify that the vendor entered the correct invoice date.

On 19 (38%) occasions specific support documentation or evidence of completion documentation contained missing or incomplete elements; however, DVR approved the invoices for payment. For example, supporting documentation relating to eight authorizations for completed OJT services had missing signatures of the participant, DVR representative, or the provider. Also, one OJT Worksite Agreement contained missing pages. In another example, documentation on four authorizations relating to completed Employment Services had no Employment Verification form, a form completed by DVR to verify job placement with the participant. And in a final example, one invoice for a Supported Employment pre-placement training services contained a training report that was missing the times of each training session and the final date of the training.

To explain the 33 services that did not contain the requisite MPRs, Evolving Lives stated that DVR has given, “very little direction regarding case notes.” They also reported that DVR counselors told them that the counselors could not view lengthy case notes and instructed Evolving Lives to keep case notes short and brief. Evolving Lives acknowledged that the counselors instructed them that at least one case note is needed monthly to provide updates regarding each service authorization. Lastly, Evolving Lives staff stated, “they are not required to submit case notes for payment. Meaning they can request and submit payments without having them (MPRs) on the authorization record.”

DVR management’s decision to move to paper only operations during the case management system transition without clearly defined deadlines to have the backlog of case notes and scanned documents entered into Aware has resulted in missing documentation and incomplete progress reports in the participant records. Additionally, with the invoice date missing, determining if the provider met the 30-day invoice submission requirement could not be determined. The absence of required information and documentation along with inadequate review of invoices could result in overpayment of funds or payment for services that were not delivered.

Recommendation

We recommend that DVR review and clarify the PORGH language regarding invoice date submission and MPR documentation. Additionally, we recommend DVR ensure invoices and supporting documentation are complete and timely prior to approving the invoices for payment. We also recommend Evolving Lives enhance its internal procedures to ensure all required information and supporting documentation is maintained and provided to DVR with the submitted invoices.

DVR Management Response

Concur. DVR is updating language in the PORGH and will conduct a review to clarify invoice date submissions to ensure consistency with current DVR policies. DVR no longer uses monthly progress report (MPR) documentation; instead, DVR relies on documented case notes in Aware. Regarding the invoice date, DVR's Learning and Development Office (LDO) conducted trainings from September 17 through 22, 2025, that covered topics related to payment processing and included guidance on date requirements. DVR will ensure that LDO is available to offer additional training to staff. This is to ensure invoices and supporting documentation are complete and submitted on time before approval for payment. The anticipated completion date is December 31, 2025.

Evolving Lives, Inc. Management Response

Disagree. Payments cannot be provided to us without proper documentation by Tallahassee. Due to AWARE system not being functional at the time, errors or incomplete forms were addressed via email contact with VRC or Technicians. Effective immediately all documents will be reviewed and submitted through AWARE now that it has been updated to process payments.

Inspector General's Rebuttal

Notwithstanding Evolving Lives, Inc.'s response, the PORGH specifies that the "Vendor requested payment must be submitted in Aware." Invoices for nineteen of the sampled authorizations were paid by DVR even though the necessary documentation, such as evidence of completion or supporting documents, were missing in Aware. Further, Evolving Lives, Inc. did not provide sufficient evidence that they submitted all information and supporting documents with their invoices per the PORGH requirement, even if the submission occurred outside of Aware. DVR paid those invoices despite the missing information and documentation. As such, this finding will stand as presented.

Finding #3: DVR did not effectively monitor Evolving Lives in compliance with the Provider Monitoring Guidebook.

The DVR Provider Monitoring Guidebook 2021 states, "Risk Valuation Assessment is completed by a Provider Manager annually." This annual valuation process allows DVR to focus and prioritize monitoring resources and needs based on a risk valuation score. DVR assigns risk valuation scores to providers based on a numerical sum which is calculated based on certain risk factors, after which the provider is given a low, medium, or high risk ranking. According to DVR management, monitoring for fee-for-service providers should occur annually regardless of the risk valuation score.

We requested the risk assessment and all monitoring documentation from DVR for our review period. DVR provided a *Risk Assessment Tool* for the review period January 1, 2022 – November 30, 2022. DVR management stated that they did not complete an annual risk assessment during the 2023-24 fiscal year since Evolving Lives is a fee-for-service provider; however, they reported that they are conducting desktop monitoring.

The most recent risk score for Evolving Lives was 32 and fell within the medium risk value range. DVR provided no monitoring plan; however, they did provide two monitoring checklists – one for the period of December 1, 2022, to February 28, 2023, and one for the period of April 15, 2023, to July 15, 2023. Although one monitoring checklist included two weeks of the 2023-24 fiscal year, DVR did not send the results of that monitoring to the provider. DVR provided no other monitoring during our review period.

We contacted the Monitoring and Employment Contracting Unit to confirm the status of the monitoring plan for Evolving Lives. They responded that DVR did not finalize the 2023 monitoring packet due to the previous director placing all fee-for-service monitoring activity on hold. They added that the monitoring packets for the period of December 1, 2022, to February 28, 2023, and the period of April 15, 2023, to July 15, 2023, for Evolving Lives, were not sent to the provider because of the hold.

Due to management's decision to place fee-for-service monitoring activities on hold, DVR did not perform an annual risk analysis to determine monitoring needs and did not develop a monitoring plan for Evolving Lives as described in the Provider Monitoring Guidebook. As a result, DVR did not identify the issues discussed earlier in this report. Insufficient monitoring increases the risk that non-compliance with the terms of the services agreement and the PORGH will go undetected. In addition, with no risk assessment and subsequent monitoring plan DVR cannot monitor performance results and communicate recommended improvements, thus limiting the opportunity for Evolving Lives to improve its processes.

Recommendation

We recommend DVR conduct monitoring in accordance with the risk assessment and monitoring plan. After each monitoring event, we recommend DVR promptly provide the monitoring results in writing with any recommendations for improvement to Evolving Lives and ensure they complete corrective action on any noted deficiencies.

DVR Management Response

Concur. DVR previously conducted monitoring for Evolving Lives; however, a monitoring report was not submitted to the provider. The monitoring was not conducted in accordance with The Provider Monitoring Guidebook. The Provider Monitoring Guidebook has since been discontinued. Currently, DVR is creating an annual monitoring plan for providers. Biannual monitoring of the providers' Proven Functional System (PFS) is conducted randomly in the Fall and Spring. Monitoring for Evolving Lives is in progress for Fall 2025. Upon completion of the monitoring process, Evolving Lives will receive a letter of compliance or noncompliance. This corrective action is in progress with an anticipated completion date of June 30, 2026.

Closing Comments

The Office of Inspector General would like to recognize and acknowledge DVR staff, as well as the staff of Evolving Lives, Inc., 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 Global Internal Audit Standards, 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 Deena Shealy, MBA and supervised by Bradley Rich, MS, Audit Director.

Please address inquiries regarding this report to the OIG's Audit Director by telephone at 850-245-0403. Copies of final reports may be viewed and downloaded via the internet at <https://www.fldoe.org/about-us/office-of-the-inspector-general/audit-reporting-products.shtml>. Copies may also be requested by telephone at 850-245-0403, by fax at 850-245-9419, and in person or by mail at the Department of Education, Office of the Inspector General, 325 West Gaines Street, Suite 1201, Tallahassee, FL 32399.