Department of Education Office of Inspector General – Internal Audit

**Twelve-Month Status Report on: Vendor Background Screening** 

Report #A-1516-010 Issued: June 7, 2016

Status as of June 7, 2017

Finding	Recommendation(s)	Previous Management Response	Management Response as of June 7, 2017	Anticipated Completion Date & Contact
DVR did not adequately screen or disqualify all required individuals	We recommend DVR enhance policies and procedures to ensure BGS Unit employees utilizing the Clearinghouse properly screen vendor employees in accordance with Florida Statutes. We recommend DVR require vendors to background screen all directors. We also recommend DVR include language in its vendor contracts to hold the vendors accountable for timely background screenings and providing DVR with updated lists of their employees.	Response as of June 7, 2016: BGS policies and procedures will be updated to ensure vendor employees are properly screened. Language clarifying vendor responsibilities regarding background screening will be added to applicable contracts and registration approval letters. We do not agree that all directors should be background screened. DVR Management is currently working with the Office of General Counsel on legislation to align our background screening requirements for directors with AHCA's.  Response as of December 7, 2016: To ensure proper screening from the Clearinghouse, DVR BGS uses the Comprehensive Case Information System (CCIS) to corroborate CH information. DVR BGS receives reports of the vendors with an updated list of employees providing VR services. BGS request vendors to complete screening within 21 days. Language clarifying vendor responsibilities regarding background screening will be added to applicable contracts as they are amended and/or rewritten.	Complete and Ongoing. BGS policies and procedures have been updated, as well as applicable registration approval letters. Contracts are being addressed as they come up for amendment, renewal, or redraft.	Ongoing  Frankie Hernandez 245-3490.

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The IL Program did not screen all required individuals or ensure vendor employee screenings occurred in a timely manner, allowing employees to have contact with DVR clients before being cleared.	We recommend DVR require vendors to background screen interpreters. We also recommend DVR include language in its vendor contracts to hold the CILs accountable for timely initiating the background screening process and providing DVR with updated lists of their employees. We further recommend DVR transfer responsibility for CIL background screenings to the BGS unit in order to ensure a more consistent background screening process or develop policies and procedures specific to	Response as of June 7, 2016: Language addressing CIL responsibilities for initiating screenings and maintaining employee rosters will be included the next time the contracts are amended or rewritten. CIL and BGS staff will work collaboratively to ensure background screening processes are consistent, which may include transferring responsibility for CIL screenings to the VReg BGS unit. We do not agree that interpreters should be background screened. DVR Management is currently working with the Office of General Counsel on legislation to clarify our original intent that interpreters are not subject to background screening requirements.  Response as of December 7, 2016: CIL contracts are being rewritten now and will be in place July 1, 2017. CIL screenings are now being completed by the VR BGS Unit. We continue to work with the Office of General Counsel to clarify background screening requirements.	Complete and in progress  CIL contracts are being rewritten now and will be in place no later than October 1, 2017.  CIL screenings continue to be completed by the VReg BGS Unit.	October 1, 2017 Cathy McEachron 245-3274

**Department of Education** 

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Finding	Recommendation(s)	Previous Management Response	Management Response as of June 7, 2017	Anticipated Completion Date & Contact
	the IL Program to			
	ensure background			
	screenings are			
	conducted according			
	to statutory			
	requirements.			