

Department of Education
Office of Inspector General – Internal Audit
12-Month Status Report on: Self-Reliance CIL
Report # A-1415-017 Issued: December 30, 2015
Status as of December 30, 2016

Finding	Recommendation(s)	Previous Management Response	Management Response as of December 30, 2016	Anticipated Completion Date & Contact
<p>Self-Reliance does not meet the requirements for employment of individuals with disabilities.</p>	<p>We recommend DVR provide technical assistance as needed to ensure the CIL remains eligible for state and federal assistance</p>	<p>Response as of December 30, 2015: We will provide assistance to the CIL via both telephone and written instruction. Additionally, we will request the CIL develop a corrective action plan that details their timeline for coming in to compliance.</p> <p>Response as of June 30, 2016: Ongoing – Technical assistance is provided to the CIL on an ongoing basis. We are confident that the CIL will meet the requirement by the end of the calendar year.</p>	<p>Response – December 8, 2016 VR IL Staff followed-up with Self-Reliance Executive Director, Finn Kavanagh on 12/7 and 12/8/16.</p> <p>In February of 2016, and with the knowledge and support of the CIL’s Board Directors, Self-Reliance crafted a voluntary self-disclosure form, based upon the same form developed by the U.S. Department of Personnel Management – Form SF 256. All Self Reliance employees were provided with the self-disclosure form and were asked to complete it. However, Management clarified that completing the form was completely voluntary and that refusal to complete the form would carry no consequence for the employee. All employees from Self-Reliance completed the voluntary self-disclosure form. Results: Seven of eight full-time employees identified themselves as having a disability (87%). Two of three decision-making employees identified themselves as persons with disability. Self-Reliance is now in compliance with employee disability requirements.</p>	<p>Completed</p>

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CIL expenditures did not conform with the contract.	We recommend DVR perform periodic reviews of expenditures to ensure allowability and reasonableness. We also recommend DVR seek recovery of payments made for unallowable expenses, to include mileage reimbursements, flex account expenses, and payroll administration fees.	<p>Response as of December 30, 2015: We will perform periodic reviews of expenditures every six (6) months, beginning January 2016. Expenditures such as flex accounts expenses, payroll administration fees, etc. will be reviewed at that time. Additionally, we will begin requiring submission of travel expenditure documentation with each monthly invoice. We will continue to require this information until such time as we are satisfied that the expenditures conform to the contract. DVR is not seeking repayment of the funds as it takes away from the purpose of the program, helping persons with disabilities to live independently and function within their communities, maximize leadership, empowerment and if appropriate secure and maintain employment.</p> <p>Response as of June 30, 2016: Complete.</p>	N/A	N/A
DVR did not effectively monitor the contract.	We recommend DVR enhance its procedures to ensure that they monitor the contract and document the monitoring activities in accordance with procedures and the monitoring plan.	<p>Response as of December 30, 2015: As stated above, we will begin performing expenditure reviews every six (6) months. Outcomes of these reviews will be documented in the contract file. The monitoring plan for this contract will be updated to reflect this change.</p>	N/A	N/A

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		<p>Response as of June 30, 2016: Complete.</p>		
<p>DVR did not adequately and timely approve invoices.</p>	<p>We recommend DVR enhance its procedures to ensure they review and approve the CIL invoices in accordance with Florida Statutes. We also recommend DVR revise the monthly performance report format to include a section for the CIL to report information related to the independent living goals that were set during the month.</p>	<p>Response as of December 30, 2015: We will enhance our internal processes to ensure invoices are reviewed and approved appropriately. Additionally, the unit will better document on invoice in instances when additional information is needed/requested to process CIL invoices. The monthly performance report format will not be revised. The current format is appropriate, as the data collected is tied to evaluation of goals achieved per the State Plan for Independent Living. However, the next time the CIL contract model is amended, the language in the invoicing section will be updated to remove the word “set” from the monthly performance report requirement.</p> <p>Response as of June 30, 2016: Complete.</p>	<p>N/A</p>	<p>N/A</p>