

Department of Education
Office of Inspector General – Internal Audit
Eighteen-Month Status Report on: Independent Living Older Blind Program – Division of Blind Services
Report # A-1920-032 Issued: January 14, 2021
Status as of July 14, 2022

Finding	Recommendation(s)	Previous Management Responses	Management Response as of July 14, 2022	Anticipated Completion Date & Contact
<p>Comprehensive Functional Assessments occurred after the client’s individualized plan was developed and signed.</p>	<p>We recommend the Division clarify requirements for the recording of CFAs through its program manual and its contracts to better direct CRP case managers completing the CFAs.</p> <p>We recommend DBS monitor the CRPs to ensure the needs assessments are completed prior to the plans.</p> <p>DBS may also consider conducting training and technical assistance following these adjustments to ensure services rendered to older blind clients are offered through consistent application of assessment tools.</p>	<p>Management Response as of January 14, 2021 Concur. The action items to be taken are as follows:</p> <ol style="list-style-type: none"> 1. Clarify requirements: <ul style="list-style-type: none"> • Update program manual to match contract language. • Update AWARE Pages for CFA reporting consistency. 2. Contract Monitoring: The Contract Management and Compliance Team provides monthly reviews of client assessments and valid plans. However, beginning 1.1.2021, the team will begin to review and monitor the dates of completed assessments to ensure alignment with the Program Manual. 3. Technical Assistance <ul style="list-style-type: none"> • Draft memo clarifying requirements (to include updated 	<p>Completed. Program Manual and 2022-2023 Contracts direct CRP case managers in completing and recording CFA’s.</p> <p>AWARE CMS was updated to centralize CFA data. CRPs are recording Initial, Annual, and Post CFA data in Pages link, #6. This update ensures assessments are completed prior to plan development, unless utilized for eligibility purposes.</p> <p>Notification of updates was provided to AWARE users 4/21/22 and 5/19/22. Ongoing Technical assistance is provided via AWARE Helpdesk, Program administrator, and local offices.</p>	<p>Complete. Contact: Bridget Giles Mireya Hernandez</p>

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		<p>manual language) and AWARE changes.</p> <ul style="list-style-type: none"> •Set up training via TEAMS to review updates/requirements. <p>Management Response as of July 14, 2021</p> <p>1. Clarify requirements:</p> <ul style="list-style-type: none"> •Update program manual: Complete. Program manual language updated to match contract language. Update is pending final approval. •CFA reporting consistency in AWARE has been presented to IT for development. Awaiting completion and approval of changes. <p>2. Contract Monitoring: Program Manual is under final approval. The Contract Management and Compliance Team have been and will continue</p>	<p>Program updates and training provided during quarterly program meeting and will be ongoing as needed.</p> <p>An additional reminder notice was provided on 7/1/22 in conjunction with the start of the new contract year.</p>	

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		<p>reviewing and verifying completed assessment dates. Upon completion and approval of the Program Manual, Contract Management and Compliance team will update their process to align with the provisions outlined.</p> <p>3. Technical Assistance: Pending. Awaiting final approval of updated manual language and completion of AWARE reporting update.</p> <p><i>Anticipated Completion Date & Contact</i> October 1, 2021 Bridget Giles</p> <p>Management Response as of January 14, 2022</p> <p>1. Clarify requirements: •Update Program manual to match contract language: Complete.</p>		

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		<p>Program manual language updated to match contract language on assessments. Phase 1 of comprehensive review and revision of manual by field completed 11/1/2021. Phase 2 for Final Draft and implementation is in process.</p> <ul style="list-style-type: none"> •CFA Reporting consistency: Two AWARE enhancements have been developed A. IL CFA page created to streamline recording practices capturing initial, carryover, and final assessments. B. Actual service Mass Entry data page to ease CRP reporting of billable units for assessments. Both enhancements are currently in test aware and are expected to be released when testing is complete. <p>2. Contract Monitoring: Complete. Contract Management and Compliance Team monitors dates</p>		

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		<p>of completed assessments to align with contract and program requirements.</p> <p>Technical Assistance: Pending. Awaiting roll out of AWARE enhancements after testing is complete. In the interim, technical assistance is provided as needed through Helpdesk.</p> <p><i>Anticipated Completion Date & Contact</i> March 1, 2022 Mireya Hernandez Bridget Giles</p>		
<p>DBS could enhance the CRP Risk Assessment and subsequent monitoring.</p>	<p>We recommend in future monitoring, DBS finalize the monitoring reports and provide the reports and results to the CRPs.</p> <p>We recommend DBS modify the risk assessment to include a numerical score for</p>	<p>Management Response as of January 14, 2021 Concur. The action items to be taken are as follows:</p> <p>1. The Contract Monitoring and Compliance Team will finalize and send monitoring reports and results</p>	<p>All on-site and desk monitoring reviews have been completed. A copy of all monitoring reports providing an overview and feedback of services will be forwarded to each Contractor during the week of July 5-8, 2022.</p>	

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	<p>previous monitoring (monitored in the last year, 3 years, etc.).</p> <p>We additionally recommend DBS clearly define the type of monitoring that should be conducted based on the risk category.</p> <p>DBS should also consider developing a monitoring tracking system that displays timing of its monitoring process to include scheduled visits, summarized results of visits, findings identified, and the dates corrective actions were implemented and completed.</p>	<p>to CRP’s for the 2020-2021 fiscal year.</p> <p>2. The Contract Monitoring and Compliance Team updated the risk assessment to include a score for previous contract monitoring visits.</p> <p>3. The Contract Monitoring and Compliance Team updated the risk assessment to include the type of monitoring (desk or on-site) that is recommended based upon risk score and previous corrective action plans.</p> <p>4. The Contract Monitoring and Compliance Team created a tracking report for all desk and on-site monitoring visits.</p> <p>Management Response as of July 14, 2021</p> <p>1. The Contract Monitoring and compliance Team will finalize and</p>		

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		<p>send monitoring reports and results to CRP's.</p> <p>2. Complete 3. Complete 4. Complete</p> <p><i>Anticipated Completion Date & Contact</i> FY 2020-21 Amy Grissom</p> <p>Management Response as of January 14, 2022</p> <p>Contract Monitoring: 52% of 2020-2021 on-site visits will be conducted between January and March 2022. Remaining 9 CRP's are being monitored via a desk review. Reviews will be completed by June 30, 2022.</p> <p>2. Complete. 3. Complete</p>		

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		4. Complete <i>Anticipated Completion Date & Contact</i> June 30, 2022 Justin Mills Bridget Giles		