## Finding

Payments did not include sufficient documentation to support the authorizations and payment requests

## Recommendation(s)

We recommend DBS strengthen their policies and procedures to include requirements for supporting documentation in the form of invoices and/or receipts for maintenance payments. In addition, we recommend DBS rehabilitation specialists document their verification of client receipt of services in AWARE. We further recommend DBS perform periodic reviews to ensure payments are made for allowable and necessary services and contain the appropriate documentation.

## Previous Management Response

DBS will continue to conduct random desk reviews. Targeted desk and onsite reviews will be made to districts with higher incidences of non-compliance. DBS revised its VR manual in May 2016 as it applies to Client Services, Policy #9.1 “Fiscal Process and Procedure” to include “will collect receipts from clients when direct maintenance is provided.” DBS will work to revise the current maintenance policy to address efficiency and accountability. DBS will address the roles of the Rehab Specialists and the DBS Fiscal Office in documenting and verifying allowable payments by providing ongoing staff training.

**Response as of April 25, 2017:**

DBS conducts random desk reviews of each district quarterly. Due to a vacancy in the position responsible for this duty, the last desk reviews were conducted in May 2018. The new employee resuming this role is currently being trained to conduct these reviews. However, District Administrators continue to conduct monthly case reviews on each counselor. At this time, no onsite reviews have been conducted.

Policy 6.12 Maintenance was revised and implemented on April 30, 2018. District staff received detailed training on the revised policy during a
A schedule for targeted desk and onsite reviews is being developed.

DBS will work to revise the VR manual (directing staff to add supplemental documentation and receipts) and is revising the Maintenance Policy.

DBS will address the roles of the Rehab Specialists and the DBS Fiscal Office in documenting and verifying allowable payments by providing ongoing staff training. Staff is informed via emails, intranet updates, webinars and/or phone conference calls.

**Anticipated completion**
10/31/2017

**Robert Doyle**

Response as of October 25, 2017:

conference call on July 12, 2018.
The #264 Authorization Procedure Checklist and review process was created and was implemented July 1, 2017.

Reviews are conducted for each district, each month. The data collected via these forms will be used to focus training on specific areas included under “Fiscal Management and Authorizations” during the Annual VR training held October 9-13, 2017.


Affected policies and the VR program manual have been revised and are awaiting final review and approval.

**Anticipated completion**
11/3/2017
Robert Doyle
<table>
<thead>
<tr>
<th></th>
<th><strong>Response as of April 25, 2018:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>DBS revised the Form 264, Maintenance Authorization Procedure Checklist to ensure supervisory review and approval of maintenance services. Staff are instructed to pay vendors directly for maintenance and this procedure is reinforced by the state office. Case reviews are conducted to ensure maintenance payments are used for allowable services and documentation is scanned in AWARE. The revisions to revised Policy 6.12, Maintenance are under review.</td>
</tr>
<tr>
<td></td>
<td><strong>Anticipated completion 5/1/2018</strong></td>
</tr>
<tr>
<td></td>
<td><strong>Robert Doyle</strong></td>
</tr>
</tbody>
</table>