

Department of Education
Office of Inspector General – Internal Audit
Six-Month Status Report on: Jobs for Florida’s Graduates
Report # A-2021DOE-019 Issued: July 30, 2021
Status as of: January 30, 2022

Finding	Recommendation(s)	Management Response as of July 30, 2021	Management Response as of January 30, 2022	Anticipated Completion Date & Contact
<p>DVR did not provide effective monitoring in accordance with the monitoring plan and risk assessment.</p>	<p>We recommend DVR complete monitoring plan in accordance with the risk assessment and reflect sufficient activities to monitor medium risk providers. We additionally recommend DVR conduct monitoring in accordance with the risk assessment and monitoring plan. We recommend that DVR promptly provider any monitoring results and recommendations for improvement to JFG and ensure corrective action plans have been created and initiated on noted program deficiencies. We additionally recommend DVR update monitoring plans as necessary to accommodate for changing circumstances.</p>	<p>DVR is currently in the process of developing a new contract, to be effective August 2021. Part of that process will be to reassess risk and develop new monitoring plans. Those plans will include incremental monitoring activities, as well as clear procedures for communicating deficiencies to JFG.</p>	<p>After extensive negotiation, VR entered into a series of purchase orders with JFG for services. The purchase orders covered Sept 2021, October 2021, November 2021, and December 2021 through June 2022. The purchase orders include detailed requirements for VR to review all required documentation throughout the term of the purchase order.</p>	<p>June 30, 2022 Monica Moyer 850-245-7004</p>

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DVR did not inspect and approve invoices timely.	We recommend that DVR streamline its invoice gathering, inspection, and approval procedures to ensure timely approval of invoices. We recommend that DVR establish a plan to address staffing changes to ensure they continue to receive documents, review submittals in a timely manner, and verify achievement of deliverables. We additionally recommend that DVR clarify contract language to specify the supporting documentation to be included with invoice submittals.	The contract set to begin August 2021 will be assigned to staff dedicated strictly to managing contracts. Additionally, the payment structure in the new contract will be streamlined to allow for efficient and timely invoice review and approval.	Because there are still vacancies within the bureau, the bureau chief remains the contract manager of record for the purchase orders; however, a small team of individuals review each monthly submission to ensure that service hours are counted for students that have been appropriately referred to the provider. The provider is informed of deficiencies within the 10 days permitted by the purchase order and have an opportunity to make corrections, as needed. To date, the invoices have been processed within the timeframes provided in the purchase orders.	June 30, 2022 Monica Moye 850-245-7004
Contractual Payment Terms and Financial	We recommend DVR consider updating the payment schedule and ensure	The new contract will include a different payment structure that	The purchase order payment structure requires the contractor to document the	

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<p>Consequences did not align.</p>	<p>the contract language meets the intent and desired deliverables of the program. We additionally recommend DVR consider restructuring the payment schedule in the contract to require payment to JFG for services provided each month, as reflected on the monthly Model Service reports, rather than equal monthly payments that require a reconciliation in the final month of the contract. See Finding 4.</p>	<p>will allow for payment of actual services delivered only.</p>	<p>hours of service provided to each student. The hours are verified by VR staff to ensure that the student was appropriately referred from VR to the contractor. Any services rendered prior to the documented referral date are deducted from the total number of hours provided in the month. The contractor is then paid a fixed hourly rate (\$38.00 per hour) for each validated service provided.</p>	
<p>Students served were not in the VR or Student Transition Activities Record (STAR) system in an active status at commencement of services.</p>	<p>We recommend DVR modify the contract language to require that services commence after DVR refers the student to JFG. DVR should work with JFG to develop a more efficient process to record and track all student referrals. We recommend that DVR</p>	<p>The referral requirement will be clarified in the new contract. DVR will also work with JFG to develop a mutually acceptable process to record and track student referrals. The Employment Programs Unit will provide additional training to all Youth Techs prior to execution of the new contract. The new</p>	<p>VR has made the VR Request for JFG Services Form a specific requirement for each student. This form is generated by the VR case management system, and the purchase order specifies that services may not be billed unless that form is provided to the contractor.</p>	<p>June 30, 2022 Monica Moyer 850-245-7004</p>

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	<p>provide additional training to the DVR Youth Techs to ensure all staff are consistently following the new process for student referrals. We further recommend that DVR consider restructuring the payment schedule in the contract to require payment to JFG for services provided each month, as reflected on the monthly Model Service reports, rather than equal monthly payments that require a reconciliation in the final month of the contract. The DVR contract manager should ensure all students have appropriate referrals prior to approving payment for services to those students and ensure that contractual caps on student hours are not exceeded.</p>	<p>contract will include a different payment structure that will allow for payment of actual services delivered only.</p>	<p>Services may begin on the date of the form. VR runs regular reports that include the date of the referral. When an invoice is submitted, the Model Service Reports are compared to the dates contained the report. If students have hours reported prior to the date of the referral, those hours are reduced from the monthly payment calculation. The contractor is notified of any adjustments in advance and has an opportunity to make corrections. This process ensures that the contractor will be paid only for services delivered that have been validated each month.</p> <p>VR staff have received intensive training on the</p>	

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	<p>If DVR continues with the current process, we recommend the contract manager request the referred students to prior to the start of the school year, review their status in the VR or STAR system, alert JFG to those students who are approved for services, and deny payment for any student that is not in an active status.</p>		<p>purchase order requirements and associated processes. In the event that VR or the contractor identify problems with implementation, additional training and technical assistance is provided to all parties.</p>	
<p>Internal controls to track service hours for students in non-credit classes need improvement.</p>	<p>We recommend DVR implement internal controls to require additional evidence of services rendered to students outside of the public, for-credit courses. This could be accomplished by requiring sign in sheets for the students as well as notations on the monthly service reports that</p>	<p>DVR will require JFG to submit a Model Services Report monthly along with a Comprehensive Services and Hourly Roll-Up report monthly, which will include further detail for internal controls. This requirement is included in the new contract.</p>	<p>In addition to the processes list above, VR has implemented a share file system to maintain all documentation in a single location. VR and the contractor have primary points of contact for managing the information. This process has improved communication and</p>	<p>June 30, 2022 Monica Moyer 850-245-7004</p>

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	reflect that unique status of the students.		accountability for all parties.	
Certain instructors provided Pre-ETS services without the required credentials.	We recommend that DVR request a copy of the Professional Educator’s Certificate or a current Temporary Certificate during their monitoring process to ensure compliance with contractual language. We additionally recommend DVR require JFG to provide a list of the teachers providing Pre-ETS services under the contract periodically throughout the school year to ensure that teacher contact information is accurate and the teachers possess the required certifications. If the parties mutually agree to allow otherwise qualified individuals to provide services, the contract	DVR will require JFG to submit a list of teachers assigned to the contract, along with appropriate certification documents, prior to contract execution. The new contract will include a requirement that JFG submit an updated roster of teachers any time a teacher is deleted, added, or their contact information changes. JFG will be required to submit a current list of teachers to the DVR contract manager no less than quarterly for routine monitoring.	The PO provides that, “The Contractor shall provide a list of teachers assigned to the project, including teacher certification documentation and contact information, on the first monthly report due in the Purchase Order Period. A revised roster must be submitted, including teacher certification documentation and contact information, must be submitted at any time a teacher is deleted, added, or the contact information changes. The Contractor must submit a current list of teachers quarterly, even if no modifications have been made.” The contractor has complied with this	June 30, 2022 Monica Moyer 850-245-7004

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	language should be modified accordingly.		requirement, and one teacher was disqualified because they did not meet this standard.	
Students served were not in the VR or Student Transition Activities Record (STAR) system in an active status at commencement of services.	We recommend JFG work with DVR to develop an efficient student referral process that allows both parties to identify and track which students are eligible for services. We recommend JFG ensure that students are eligible prior to billing for services.	The VR produced contract of 2019-20 (19-183 & 19-184) stated that students must be found in the VR system or in STARS system. In 2020-21 (21-100), that language was broadened to read “the VR system”. None of the contracts included a definition of “VR system”. As stated, for the purposes of these contracts, JFG does not use VR technology platforms (STARS, REBA, RIMS, PERM, etc.) with the exception of the background screening clearinghouse. As also stated in the IG report, JFG was directed in writing that services could and should be report retroactively to the beginning of the school year. JFG disagrees	JFG had no responsibility in or authority to determine commencement of service dates. As the IG report stated, VR was solely responsible for monitoring the commencement of service dates. That failure and the failure to communicate any questions, comments or concerns about commencement of services to any member of the JFG team led to this audit finding, contractual language changes, reporting changes and personnel changes within VR. In September 2021, VR proposed a new process to more effectively	December 2021

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		<p>that students were served erroneously. However, we do concur that process improvements are warranted and necessary to insure VR services comply with federal law.</p>	<p>communicate the status of individual students, which JFG agreed to without hesitation. VR then assigned two new individuals to monitor and oversee JFG monthly reports. The new process and the increased collaboration has improved the student referral process significantly. The negotiated language governing our 2021-22 relationship reads:</p> <p>“The Department will notify Contractor through the VR Request for JFG Services Form, Attachment F to this Purchase Order (the “Form”) that a student with a disability has made an informed choice to participate in Contractor’s program. The Department</p>	

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			<p>will submit the Form electronically to the below-designated point of contact for Contractor for purposes of receiving Forms and supporting documentation under this purchase order agreement until Contractor provides written notification to the Department’s contract manager that it has designated another point of contact. The Date of Referral on the Form is the date billable service hours may begin for the specific student. No payments will be made for services provided to a student before the Date of Referral on the Form.”</p>	
<p>Certain instructors provided Pre-ETS services without the required credentials.</p>	<p>We recommend that JFG comply with the contract language requiring all individuals hired to provide</p>	<p>JFG disagrees that the two educators in question violated the terms of the contract. It is accurate that the educators are</p>	<p>This recommendation has been incorporated into the DVR / JFG contractual relationship. The VR</p>	<p>September 2021</p>

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	<p>services under this contract hold either a current Professional Educator’s Certificate or a current Temporary Certificate. We recommend JFG obtain copies of the certificates for their records and provide the certificates to DVR upon request.</p>	<p>not registered with the FLDOE, however both educators hold the education and credentials required by state law to act as the teacher of record and are authorized to issue grades and credit. JFG does concur that this language needs to be addressed moving forward. Traditional vendors offer VR services are required to have a mix of education, experiences and credentials. JFG contends similar requirements are more applicable to this contract to avoid the unintended consequence of limiting or even prohibiting services to community and faith-based organizations, private schools, post-secondary institutions and juvenile justice facilities.</p> <p>Inspector General’s Rebuttal:</p>	<p>authored language regarding teacher qualifications reads:</p> <p>“The Contractor shall require that all teachers hired to provide services under this purchase order agreement in public or private schools must hold an active Professional Certificate or Temporary Certificate issued pursuant to s.1012.56, Florida Statutes, and rules of the State Board of Education. Individuals who will provide Self-Advocacy Training and/or Postsecondary Educational Counseling and Job Exploration Counseling must also successfully complete DOE/DVR’s Self-Advocacy Provider Training, including</p>	

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		<p>JFG management indicated in their response that educators in question were not registered with the department, but held the education and credentials required by state law to act as the teacher of record.</p> <p>Notwithstanding JFG’s response, we determined neither of the educators in question held a Professional Educator’s Certificate or a current Temporary Certificate, as confirmed by the Bureau of Educator Certification. The Office of Inspector General maintains that is a violation of Contract #21-100, E.5, which states, “The Contractor shall require that all individuals hired to provide services under this Contract hold either a current Professional Educator’s Certificate or a current Temporary Certificate.”</p>	<p>passing a post-assessment test.”</p>	

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		Consequently, the finding and related recommendation stand as presented.		