

STATEWIDE



MASSACHUSETTS REHABILITATION COMMISSION
REHABILITATION COUNCIL

Chairperson

Dawn Clark

**Vice
Chairperson**

Secretary

Members at Large

Steve Aalto

Policy Committee

600 Washington Street, Boston MA 02111

March 7, 2019

11:00 AM -12:30 PM

Meeting Minutes

Call to Order/Introductions

Dawn Clark (SRC), Steve Aalto (SRC), Richard Colantonio (SRC), Naomi Goldberg (SRC), Kate Biebel (MRC), Alex Scarlis, Theresa Casey (MRC)

Phone: Inez Canada

Approval of Meeting Minutes

Meeting were approved by the committee members

New Business

RSA Audit Monitoring Report

Terry Walsh and Karin Cale from MRC attended the meeting to discuss the 2017 RSA Monitoring Report. RSA is focusing on the following nine areas of concern that need to be addressed:

- Untimely eligibility determination
- Untimely development of IPEs
- No Provision for Pre-Employment Transition Services
- Internal Control Deficiencies
- Incorrect Assignment of Obligations and Expenditures to Federal Awards
- Accurate Coding and Reporting of Services Provided
- Incorrect Assignment of Personal Costs
- Prior Approved Requirement Not Met

- Funding One Stop Infrastructure Costs under VR

1. Untimely Eligibility Determination

Corrective Action Steps:

Comply with by making eligibility determinations within the required 60-day period or when appropriate ensure a properly documented and approved eligibility determination is in place.

Agency Response: MRC has demonstrated improvement to ensure eligibilities are completed in 60 days over the past several years. MRC management and supervisors will continue their efforts to monitor and evaluate eligibility and will use time in status reports to increase compliance in this area through quality assurance reports and case reviews.

Coding and Reporting of Services Provided

Provide staff training to achieve accurate recording of services provided, including that IPE contain all VR and supported employment services needed and provided, whether or not purchased, provided by agency staff, or as comparable benefits and services, to achieve the supported employment outcome goal.

2. Untimely development of IPE's

Corrective Action Steps:

Comply with and to ensure IPE's are developed within the 90 day Federal timeframe from date of application.

Agency Response: MRC recognizes that we need to greatly improve on IPE development within the 90 day Federal timeframe. We have been and will continue to actively review caseload size, statuses, and composition of these cases. This will allow counselors time to develop IPS's in a timely manner. This will also be assisted by our plan to move towards Order of Selection. We will coach and train counselors that IPS's can be amended to evolve over time. MRC will also monitor the use of waivers where appropriate.

3. No Provision of Pre-Employment Transition Services to Potentially Eligible Students with Disabilities

Provision of Pre-Employment transition Services Not Compliant with State IDEA Minimum Age Requirements

Corrective Action Steps:

Jointly adopt a minimum age for the provision of per-employment transition services to students with disabilities that is not greater than Massachusetts IDEA age for transition, which is currently age 14.

Agency Response: MRC leadership has developed a new policy and procedure to adopt a minimum age of 14 for students with disabilities. MRC sought input from RSA in developing this policy. The new policy corresponds to the Massachusetts General Law for both MRC and MCB.

4. Internal Control Deficiencies

Corrective Action Steps:

Update policies, procedures, and internal controls to reflect new Federal requirements, as required by RSA.

Agency Response: MRC leadership has established an internal controls working group to assess existing internal controls, identify gaps, and barriers, and develop solutions on strategies to enhance controls, all of which can be sustained in the long term. The internal controls working group had its first meeting on June 11, 2018 to develop a work plan. Policies and procedures will reflect compliance with requirements.

5. Incorrect Assignments of Obligations and Expenditures to the Federal Award

Corrective Action Steps:

Retain sole responsibility for its non-delegable functions as a DSU, as required.

Agency Response: Update and implement policies and procedures to accurately account for and report Federal and non-Federal obligations and expenditures to the correct period of performance.

Agency Response: The MRC Internal Controls workgroup will develop a set of Recommendations regarding policies and procedures that address obligations and expenditures as they relate to period of performance. MRC will then establish an Internal Controls implementation team to develop and implement new written policies and procedures.

6. Accurate Coding and reporting of Service Provided

Corrective Action Steps:

Use IT service records review process to identify casework practices that result in inaccurate recording and reporting of services provided.

Agency Response: MRC will enhance our service record review process, which will include random sampling throughout the year to ensure accuracy of service reporting. Findings will be reviewed with staff, supervisors, and management to make corrections and to inform training efforts on accurate coding of services. MRC is committed to developing and moving towards an EDM/paperless case record system to improve and monitor the accuracy of reporting.

7. Incorrect Assignment of Personnel Costs

Corrective Action Steps:

Retain sole responsibility for its non-delegable functions as a DSU, as required.

Agency Response: MRC management is analyzing the data and currently putting systems in place to ensure discontinuance of using VR funds to pay for personnel cost that are non-VR cost objectives. MRC will develop a policy and procedure to ensure this practice is discontinued.

8. Prior approval Requirements Not Met

Corrective Action Steps:

Developed and implement a policy and procedure, as well as a written internal control process, including a monitoring component, to ensure ongoing compliance with the prior approval requirements.

Agency Response: MRC management will finalize its policy and procedures on prior approval to ensure compliance with RSA policy and expectations as well as obtain guidance from RSA on the report, then implement the practice. Once final, we will incorporate this into our internal control plan within the agency.

9. Funding One-Step Infrastructure Costs under the VR Program

Corrective Action Steps:

Retain sole responsibility for its non-delegable functions as a DSU, as required.

Agency Response: MRC Management will develop individual Infrastructure Funding Agreement (IFA) with local careers centers establishing both shared infrastructure costs based on an analysis with each center that identifies a budget and a mechanism to track and monitor expenditures. MRC staff will directly monitor these expenditures as required.

Timeline:

Prior approval education for youth from ages 14-21 is due in April 2019

New supports start in July 2019

The responses deadline is September

Discussion on IPES:

- Think about what our focus is.
- Are there ways to support job ready consumers?
- Outcome of entry level work. MRC is an entry level agency. Federal regulations focus is on advancement.
- MRC needs to be career focused on an advanced level agency.

Consumers do not understand what an IPE is and what it means. The IPE needs to be explained in detail. We need to ask questions to make sure they understand what an IPE is and what it means to achieve employment.

The committee needs to understand why this is happening and then they can work on repairing this issue.

- How can we develop a system to be sure that the consumer understands what they are doing to achieve employment?
- What can the Committee do to assist with the understanding of the IPE?
- Explain to the consumer how the IPE is processed. Talk to them about what it is, what it means and how it will affect the steps that need to be taken in order for them to achieve employment. Doing so will help to develop a better relationship between the counselor and consumer.

- Have the consumer attend an orientation so the consumer understands what MRC can offer them in order for them to achieve employment with the assistance of their counselor and their IPE.
- The consumer needs to know what their plan is, it is not just about getting a job.

Some consumers from MRC come to Client Assistance Program without a copy of the IPE. Some have no idea what an IPE is. We have to make sure that the consumer has the IPE and that they understand what it means.

- What's the issue with the counselor requiring a wet signature to ensure that consumer gets IPE?
- Moving to electronic files, so wet signature will be a problem with the RSA because there will be two different dates on the IPE
- Develop a roadmap for the consumer to what the next step in moving towards employment.
- Electronic signature will not help because the consumer will click saying that they understand the process when they don't, the counselor can then submit it to CAP not knowing that the consumer does not understand the IPE.

There has to be another way that the committee can assist with assisting consumers with employment.

- Entry level employment providers cannot pay entry level to consumers.
- Why is it that to find employment the consumer has to apply for employment online?

Is it a policy issue? Policy and the SRC needs to know what is happening with entry level employment for consumer in order to assist the consumer.

- How do we go beyond entry level employment?
- Is there any other committee who can take on this issue?

The concerns of lack of understanding by the consumers of the IPE process has to be presented to the SRC so that the Committee can bring the concern to the attention of MRC. MRC can then recommend placement into advanced employment opportunities.

Terri Walsh will take the committee's concerns to the Internal Control committee.

Other:

Internal Control Discussion:

- What data is MRC using to monitor where the consumer is with achieving employment?
- Input from consumers is key in order for the committee to assist with the understanding of their IPE.
- Ask the RSA for guidance on ideas on how MRC can monitor consumer. Ask the consumer often if they understand what the IPE is and what it means to their future.

What others methods can the counselor use to best educate the consumer to understanding their IPE?

History shows that people with disabilities do not move on to advanced employment. (I am not sure about this although I know that in response to the finding about advancement CAP noted that some VRCs talk about MRC assisting with entry level employment only and disregarding the obligation to assist with advancement.)

How will this be addressed across the agency going forward?

How can we change how employers think about persons with disabilities advancement within their companies?

Consumers fear that if employment brings in too much money they will lose use their benefits from SSI/SSDI, health insurance etc.

How can we engage with the SRC to get the councils input on the process?

- When we see patterns that are working for the consumer we should continue using that pattern.

The counselors are welcoming the changes that are happening with the process that MRC has chosen to take in order to best assist their consumers.

RSA Audit Report Action Items:

Thinking about the Policy Committee

- In what ways does the committee interacted with the SRC?
- MRC VR counselors need to be involved with the SRC.
- What are the focus points?

What should the materials that MRC will be providing the consumers look like?

Anyone should be able to read the materials and understand the information that is stated in the material.

- Do we provide any materials that will be beneficial in serving SRC & CAP?

RSA wants to see what MRC is doing for consumers to assist them in the process of employment.

Shift from Regulations to Policy & Procedures.

Terry Walsh will look into seeing if the policy and procedures can be posted on the mass.gov/MRC/SRC website.

- The committee's goal is to assist with achieving the goal of posting the Policy and Procedures on the MRC website.
 - There seems to be a common issue of consumers not understanding the IPE. Is this being addressed with training or with the creation of new written materials.
 - How can the Policy and Procedures Committee work with the SRC policy committee and what policy issues are common.
 - (I thought that these were the action items)

Terry and Karin will provide the Policy committee with a copy of MRC policies and procedures so the committee can:

1. Understand what existing policies and procedures are
2. Determine which should be online
3. Determine which policies to target for messaging improvement, both to consumers and area office staff

We need to think differently, think bigger. We will achieve the committee's goal, but there will be challenges along the way.

Adjourn: 3:00

Next Meeting Date: April 4, 2019