



**Audit Services, Cooperative Programs and Community Resources
Development
JOINT PROGRAM REVIEW REPORT**

CAMINAR

Fee for Service and Mental Health Case Service Contracts

Report Date: December 29, 2014

Review Dates: May 15-16, May 27-29, and July 28-30, 2014

DOR Review Team Participants:

Cheryl Adams, Cooperative Programs Section
Lisa Harris, Cooperative Programs Section
Wes Roberson, Cooperative Programs Section
Charlene Cowan, Cooperative Programs Section
Michelle Martin, Community Resources Development
Denise Barriteau, Community Resources Development
Rudy Maynard, Community Resources Development
Christopher Michel, Community Resources Development
Lucille McGuirk, Audit Services
Cecilia Miller, Audit Services
Valerie Massey, Audit Services

DOR Case Service Contracts Reviewed:

CAMINAR Butte County: 28556
CAMINAR San Francisco County: 28946
CAMINAR San Mateo County: 28844
CAMINAR Solano County: 28808

DOR Services Reviewed, Fee for Service:

- Situational Assessment
- Personal Vocational and Social Adjustment (PVSA)
- Supported Employment Intake, Placement, Retention
- Supported Employment Job Coaching
- Employment Services (Intake, Employment Preparation, Job Development and Placement, Retention)
- Non-Supported Employment Job Coaching

I. REVIEW PURPOSE AND PROCESS

The Department of Rehabilitation (DOR) conducts comprehensive program reviews in order to:

- Encourage a positive collaborative relationship among Community Rehabilitation Programs (CRP);
- Assess the quality and efficacy of services provided to DOR clients;
- Ensure activities of the program are allowable and appropriate;
- Ensure public expenditures are allowable, cost-effective, result in positive outcomes, and ultimately benefit the public;
- Identify areas of program strength;
- Assess the impact of the program on successful employment outcomes;
- Identify areas that need improvement and provide technical assistance, as needed.
- Evaluate fiscal & process information to determine whether fiscal processes and records are in compliance with federal and state requirements

This review team assessed the following information for this program review.

- The Case Service contracts listed above.
- DOR production and statistical reports
- DOR staff interviews
- CAMINAR staff interviews
- CAMINAR case file review
- DOR Service Invoices
- Time records to include personnel and activity reporting type documents
- Organizational Chart
- Accounting Systems Manuals

- Personnel Handbook
- Chart Of Accounts, General Ledger
- Board Minutes

The review team interviewed the following participants as part of the review:

DOR STAFF

Darlene Rutkowski, San Francisco District Administrator
 Jay Onasch, Northern Sierra District Administrator
 Carol Asch, Greater East Bay District Administrator
 Moiz Rydhan, San Francisco District
 Diane Gressani, Greater East Bay District
 Regina Muse, Northern Sierra District
 Harry Ellis, Northern Sierra District
 Aisha Jenkins, Greater East Bay District
 Stephanie Wong, Greater East Bay District
 Lana Lee, San Francisco District
 David Ruettiger, San Francisco District

CAMINAR STAFF

Chip Huggins, CEO
 Karen Gianuario, Senior Director, Business Development & Operations
 Michael Schocket, Program Director, Jobs Plus
 Jerry Datillo, Assistant Director, Jobs Plus
 Taylor Dial, Chief Financial Officer
 Mike Stimson, Finance Director
 Deborah Sherer, Controller
 Laura Virgen, Accounting Generalist
 Calleene Egan, Program Manager and Job Developer
 Maritza Ortiz-Sanchez, Job Developer
 Mark Gavartin, Job Developer
 Stephani Burlison, Job Developer
 David Pagano, Job Developer
 William Terri, Job Developer
 Jessie Pooni, Job Developer
 Glenda Glass, Job Developer
 Desiree Gonzales, Job Developer
 Cora McIntyre, Job Developer
 Stephanie Evans, Administrative Assistant
 Christy Taylan, Administrative Assistant
 Melissa Satram, Administrative Assistant
 Lela Jue, Administrative Assistant

Brianne Ka'ili Crabbe, Case Service Coordinator
Kristy Adams, Case Service Coordinator
Natasha Wawiluk, Job Coach
Katie Miranda, Job Coach
Alicia Tamanoff, Job Coach
Joi Budnik, Job Coach
Julie Martin, Assessor and Job Coach
Carl Sunshine, Assessor and Job Coach
Sara Poland, Assessor and Job Coach
Spencer Zerby, Assessor and Job Coach
Corla Bertrand, Assessor and Job Coach
Alyssa Cozine, Assessor and Job Coach
Purcell Edwards, Assessor and Job Coach
James Irmer, Assessor and Job Coach

Following the staff interviews and review of the case files, the review team provided the review participants with an exit conference November 5, 2014 and is subsequently providing this written report of the program review.

II. PROGRAM PROFILE

CAMINAR is a Community Rehabilitation program (CRP) provides vocational rehabilitation services to clients of the San Francisco, Greater East Bay, and Northern Sierra DOR Districts. Some services are provided on a fee for service basis, and others are provided through case service contracts in association with Mental Health Cooperative contracts with the counties of San Mateo, San Francisco, Solano, and Butte. In addition to these DOR services, Caminar also provides vocational services to Regional Center consumers as well as Mental Health services, including housing.

Caminar Butte contract that provides:

- **Employment Services**
 - Intake
 - Employment Preparation
 - Job Development & Placement
- **Vocational Assessment**
- **PVSA**
- **Non-SE Job Coaching**

The Caminar Butte contract amount for FY 13/14 is \$142,371.

The fee for services in this area include:

- **Employment Services**
 - Intake
 - Employment Preparation
 - Job Development & Placement
 - Retention
 - Non-SE Job Coaching

- **PVSA**
- **SE Placement: Intake**
- **SE Placement: Placement**
- **Situational Assessment**
- **SE Job Coaching**

Caminar San Francisco contract that provides:

- **Employment Services**
 - Intake
 - Employment Preparation
 - Job Development & Placement

The Caminar San Francisco contract amount for FY 13/14 is \$416,788.

The fee for services in this area include:

- **Employment Services**
 - Intake
 - Employment Preparation
 - Job Development & Placement
 - Retention
 - Non-SE Job Coaching

- **PVSA**
- **SE Placement: Intake**
- **SE Placement: Placement**
- **Vocational Assessment**
- **Situational Assessment**
- **SE Job Coaching**

Caminar San Mateo contract that provides:

- **Employment Services**

- Intake
- Employment Preparation
- Job Development & Placement

The Caminar San Mateo contract amount for FY 13/14 is \$254,017.

The fee for services in this area include:

• Employment Services

- Intake
- Employment Preparation
- Job Development & Placement
- Retention
- Non-SE Job Coaching

• PVSA

- SE Placement: Intake**
- SE Placement: Placement**
- Vocational Assessment**
- Situational Assessment**
- SE Job Coaching**

Camarin Solano contract that provides:

• Employment Services

- Intake
- Employment Preparation
- Job Development & Placement

The Caminar Solano contract amount for FY 13/14 is \$300,000.

The fee for services in this area include:

• Employment Services

- Intake
- Employment Preparation
- Job Development & Placement
- Retention
- Non-SE Job Coaching

- Vocational Assessment**
- Situational Assessment**

III. STRENGTHS

The review team comments on program areas that demonstrate a particular area of strength or a best practice.

The following are observed areas of strength:

- CAMINAR is CARF accredited and is approved to provide the DOR services of Situational Assessment, Personal Vocational and Social Adjustment (PVSA), Employment Services, Supported Employment placement services, and Job Coaching.
- CAMINAR provides services in three DOR districts and four counties, where they also have strong ties to the Mental Health and Regional Center systems.
- CAMINAR has a long standing relationship with DOR, especially in the San Francisco bay area, where they are headquartered.
- CAMINAR is open to serving people of all disabilities, but specializes in Developmentally Disabled and Mental Health Populations.
- CAMINAR also provides a variety of Mental Health services and supports including residential treatment, independent living, housing, and medication management.
- Staff at CAMINAR show enthusiasm and a dedication to serve people with disabilities
- Staff at CAMINAR have a clear understanding and share the mission of employment for DOR consumers
- CAMINAR job developers have made strong connections with many retail employers in the community

IV. PREVIOUS PROGRAM REVIEW FINDING(S)

1. The County of San Mateo Vocational Rehabilitation Services and Caminar CSC was last reviewed July 25, 2012. The findings and issues in the written report were as follows:

- Identified Findings
 - DOR Consumer Service Individualization
 - IPE Goal Different from Employment Outcome
 - Confidentiality

2. The County of Solano County Mental Health and Caminar CSC was last reviewed June 25, 2012. The findings and issues in the written report were as follows:

- Identified Findings
 - IPE Goal Different from Employment Outcome

V. WRITTEN RESPONSE - FINDING(S) AND RECOMMENDATIONS

Effective program functioning is important for providing quality services, which result in employment outcomes. The following findings and resulting recommendations are required to meet the terms of the contract and to maintain the integrity of the cooperative program, avoid audit exceptions, and improve processes in serving clients, and meet or exceed program goals.

Fiscal Findings

Finding 1: Unsupportable service invoices

Caminar provided source documents in support of the salary, benefit and operating expense amounts billed on the service invoice. However, the amounts invoiced by Caminar for the November 2013 Service Invoice (801B) for the San Mateo, Solano, San Francisco & Butte service contracts could not be validated

a. Personnel Expenses

- i. The salary allocation methodology for the four case service contracts could not be validated.

The 2012/2013 DOR Contract Handbook provides calculation guidance for the allocation of time worked. Using Caminar employee, Michael Schocket, as an example, the following chart illustrates the correct distribution of time worked.

Sample-Michael Schocket- 611 San Mateo – 11/22/2013 pay period	Leave Included (Incorrect method)	Leave Excluded (correct Method)
Total DOR Contract Hours (611 SM)	22	22
Total Hours Worked	80	72
% of Actual Time: DOR Program	27.5%	30.56%

As seen in the example noted above, it is optimal to ensure leave time is not included in Total Hours Worked for DOR Contract and Total Hours Worked. By using this method, it is assured that the DOR portion of leave benefits is paid by DOR through the increased % of Actual Time in DOR Program. Further, it is essential that the % of Actual Time in DOR Program is accurately determined in order to correctly calculate the actual salary and benefit amounts to bill DOR.

Leave time, such as holiday, vacation, and/or jury duty was incorrectly included in total time worked which lowers the percent of total time to be allocated and billed to DOR.

Based on the above figures, the corresponding salary allocation to this program code should be 30.56% of \$5279.83 or \$1,613.28. Instead, other amounts were recorded and subsequently invoiced to DOR:

Sample-Michael Schocket- 611 San Mateo – 11/22/2013 pay period

Gross Salary per QCR	Gross Salary per GL	San Mateo Allocated Amount per QCR	San Mateo Allocated amount per GL	Invoiced Amount	Correct Amount
\$4,159.86	\$5,279.83	\$1,271.07	\$2,140.45	\$1,979.94	\$1,613.28

As shown in the above chart, the amounts in the Quick Check/Payroll Register (QCR) did not reconcile to amounts in the 'full' General Ledger (GL) which did not reconcile to the amounts indicated on the service invoice which are not the correct amounts to be billed DOR. Entries differed between the QCR and the GL and in some cases entries were present on one document and absent on another.

In summary, the method of salary allocation Caminar utilized did not mirror the correct methodology as shown by the Contract Handbook.

- ii. Allocated salary and benefit amounts for the November 22nd pay period were based on an unsupported, higher salary amount. Caminar advised that the higher amounts may be attributed to a vacation accrual payout which occurred during the period.

Sample- 611 San Mateo

Employee	Pay period	Gross Salary per QCR	Gross Salary per GL	Allocated Salary Amount to San Mateo 801b	Allocated amount to San Mateo per GL
Jerry Datillo	11/22/13	\$2,980.77	\$6,626.14	\$3,644.37	\$3,644.37
Marissa Ortiz-Sanchez	11/22/13	\$1,923.08	\$2,936.54	\$1,982.17	\$1,982.17

- iii. The methodology for allocating the employer-paid portion of employee benefits could not be validated for the four case service contracts.

As an example, according to the November 2013 Guardian and Kaiser Permanente billing documents and the Abila MIP benefit printouts provided by Caminar, the total employer-paid portion of employee benefits for Michael Schocket is \$1,081.05.

Using the same percentage of actual time MS worked on the San Mateo contract presented in item a. above, the allocated portion of employer-paid benefits to be billed to DOR is \$1,081.05 x 30.56%, or \$200.19; however, per the GL Caminar billed DOR \$228.47.

b. Indirect Cost Rate

The indirect cost amounts claimed on each specific case service contract did not reconcile with the indirect cost rate support documentation submitted and thus could not be validated.

- i. Caminar's Indirect Cost Rate (the year ending June 30th, 2014) contains a cost policy statement which indicates a 13%, provisional, indirect cost rate. The documentation submitted does not indicate this to be a federally approved indirect cost rate.
- ii. Caminar is using a calculated indirect cost rate of approximately 11.65%, which is the ratio of all Caminar monthly indirect costs (\$143,543.09) divided by the total (\$1,232,476.13-direct & indirect) costs for the month.
- iii. However, given (a) and (b) above, there is no application of either the provisional indirect cost rate (a.) or the calculated indirect cost rate (b.) to the DOR monthly service invoice.
- iv. Rather, in calculating the monthly indirect cost amounts, Caminar estimates the indirect costs by summing the personnel line item subtotals with the operating expense line item subtotals and then applies the indirect cost percentage as set forth in the contract (13%). The supporting documentation provided does not indicate that actual indirect costs specific to each contract was determined monthly or reconciled annually.
- v. Certain unallowable expenses such as membership dues & bank fees, were included as indirect cost (program code 100) on the general ledger,

Recommendation: Caminar shall:

- a. Properly account for and bill all contract expenses in compliance with the applicable contract, state & federal administrative regulations;
- b. Secure a federally approved Cost Allocation Plan that accurately reflects the actual method used to allocate allowable expenses across all funding sources;

Finding 2: Personnel and Activity Reports (PARS)

Discrepancies were found in the Caminar staff JOBS PLUS- Personnel Activity Reports (PARS) for the November 2013 Service invoices for the San Mateo, Solano, San Francisco & Butte service contracts as follows:

- a. Incorrect calculation of hours worked.
 - i. Total Co-op hours worked for the week of October 21, 2013 for the position of job developer (Calleene Egan) under the Butte contract were

listed as 43, however, the manual entries on the PARS support total Co-op hours worked of 42. The excess hour was correctly not included in total hours worked for the Butte contract and hence, was not charged in the invoice submitted to DOR.

- ii. Total Co-op hours worked for the week of October 21, 2013 for the position of job developer (Mark Gavartin) under the San Mateo contract were listed as 21 and 19 for total non Co-op hours. However, manual entries on the PARS support total Co-op hours worked of 23 and total non Co-op hours worked of 17. The total hours worked for the pay period for both Co-op & non Co-op remained the same and hence the amount invoiced to DOR was not impacted.

b. PARS Coding

- i. The activity code (code) fields on PARS were left blank: :
 - PARS for the week of October 21st for assistant director position (Jerry Datillo) for the San Francisco and San Mateo contracts;
 - PARS for the week of October 21st for the project director position (Michael Shockett) for the San Francisco, San Mateo & Solano & the program manager (Michael Shockett) position for Butte
- ii. The program code (program) field on PARS was either left blank or were not defined /included in the program legend box on the PARS such as:
 - The PARS of October 25th, 2013 for the job developer position (Calleene Egan)for the Butte contract does not contain any program codes;
 - The PARS for the weeks of October 21-28th, 2013 for the job developer position (Stephanie Burlison) for the Solano contract contain a program code of 695661 which is not defined in the program legend box;
 - The PARS for the week of October 21st & November 4th, 2013 for the assistant director position (Jerry Datillo) for the san Francisco contract contains a program code of 671-14 and 670-14 which are not defined in the program legend box;
 - The PARS for the entire November pay period for the project director position (Michael Shockett) for the San Francisco, San Mateo & Solano & the program manager (Michael Shockett) position for Butte contain program codes (671-11, 699-88, 830-11, 831-19, 852-11) which are not defined in the program legend box.

- iii. PARS were not completed for the project director position (Karen Gianuario) for the Solano contract and the executive director position (Karen Gianuario) for the Butte contract.

Recommendation:

- a. Caminar shall properly account for and bill all contract expenses in compliance with applicable state and federal administrative regulations and the executed contract.
- b. Caminar personnel shall
 - i. implement a quality control process to identify and correct data entry errors and discrepancies noted in the PARS documents;
 - ii. standardize all PARS documents to properly reflect all activity and program cods worked during the applicable months;
 - iii. ensure all contract employees record their actual time spent on contract related activities using a PARS.
- c. Caminar should consider using the electronic timekeeping system (ADP) to record/track actual staff time spent on contract and non-contract activities and move away from using a paper PARS. Caminar's electronic system is currently set up to record/track an employee's time and related costs by program code and activity per regulatory requirements. Improved accuracy in time reporting and elimination of duplicity in recording time on both the paper PARS and in the ADP system may result in significant time savings for Caminar personnel.

Finding 3: Inadequate contract management and monitoring across the four Caminar case service contracts.

Inconsistencies were found in the personnel line items across the 4 Case service. A comparison of the Service Budget (801 A) Personnel line items found that:

- a. Total Annual Percent FTEs across the four case service contracts are in excess of 100% for positions held by Jerry Datillo, Maritza Ortiz-Sanchez and Michael Schocket:

	San Mateo # 28844 (611)	Solano #28808 (641)	San Francisco #28946 (671)	Butte #28556 (831)	Annual Percentage FTE Across Contracts
Annual Percentage FTE (801 A) 2013/2014					
J Datillo	25%	85%	50%	N/A	160%
M Ortiz-Sanchez	75%		50%		125%
M Schocket	15%	30%	50%	17%	112%

Annual Percent FTEs totaling in excess of 100% for direct staff listed in the Personnel section of the Service Budget could result in an over-billing to DOR.

- b. Annual Salary amounts (salary plus benefits) differ across contracts for Jerry Datillo and Michael Schocket as shown below.

	San Mateo # 28844 (611)	Solano #28808 (641)	San Francisco #28946 (671)	Butte #28556 (831)
Annual Salary (801 A) 2013/2014				
Datillo	\$ 93,600.00	\$ 63,500.00	\$ 85,000.00	
Schocket	\$ 130,000.00	\$ 127,000.00	\$ 127,000.00	\$ 130,915.00

When billing personnel costs, Caminar bills for time spent in each contract/program as supported by source documents. There was no impact from this issue found on billing during the sample month selected.

- c. Caminar staff interviewed indicated the discrepancies and inconsistencies outlined above are due to different staff having prepared the multiple contracts with no overall coordination for all four contracts.

Monitoring four Caminar contracts has proved challenging both to Caminar and DOR due to the fact that there are four separate case service contracts in multiple Caminar and DOR offices with multiple Caminar & DOR contract administrators. The DOR contract administrators do not view the contracts,

budgets, or invoices of other DOR offices. Consequently, they are not able to see how CAMINAR staff time is allocated either on the budgets or the invoices to ensure appropriate billing.

Recommendation: For all elements of finding number 3, **effective immediately**, Caminar shall:

a. In regards to Budgets:

- CAMINAR will develop a tracking tool that provides a detailed account of the 801A budgets for all four contracts with DOR. This will be updated and provided to all of the DOR contract administrators at the time of contract renewal or when a contract amendment is submitted.
- The salary and benefits cost for positions that are providing services in more than one contract must be consistent across contracts. CAMINAR staffs that are providing services in more than one contract cannot be budgeted for more than 1 FTE total.
- All positions listed on any of the CAMINAR Case Service Contracts' 801A service budgets that are part of CAMINAR's indirect rate cost allocation need to be removed as direct line items. This should be corrected via an amendment to all applicable contracts. CAMINAR will cease billing on these positions and will submit an amendment correcting the issue no later than 60 days from the date this report is received by CAMINAR.

b. In regards to Invoicing:

- CAMINAR will provide the following documents to **all** DOR contract administrators on a monthly basis:
 - CAMINAR will develop tracking tool that includes all four contracts and reports monthly invoiced amounts for all line items, and year to date totals
 - CAMINAR will provide copies of PARs time tracking distributions of positions' that are being invoiced on multiple contracts
- CAMINAR will provide the following documents to the **local** DOR contract administrator on a monthly basis:
 - Personnel Activity Report (PARs) for each contract staff position and all other supporting documentation for operating expenses billed that month. These documents will be submitted with each monthly invoice to the respective DOR contract administrators for a minimum of 1 year starting with the January 2015 invoices. PARs will clearly indicate the actual time spent providing contract services as well as any time spent on providing services in other funding sources. If a position is funded from more than one source (i.e. DOR fee for service, multiple DOR

case service contracts, mental health funds) the PAR for this individual must clearly show the amount of time worked in each separate funding stream. In addition, one positions' monthly amount invoiced for actual time spent providing contract services cannot exceed 1 FTE of billable time for that month across all funding streams.

Finding 4: Questionable service delivery to DOR consumers under the Solano contract.

The former job developer in Solano (Jerry Datillo) was promoted to an assistant director role for the San Mateo & San Francisco contracts in mid November 2013. There were no hours worked or billed for this Job developer during November 2013 under the Solano service contract which calls for an 85% FTE position.

Caminar advised that another employee back filled the role of job developer in Solano during this time. However, no work hours are indicated on the PARS for this individual under the Solano program code. Nor were there any hours invoiced to DOR for this individual.

It is uncertain whether Caminar was able to deliver services as outlined in the Solano contract to DOR consumers following the promotion of the Solano job developer to the position of Assistant Director in San Mateo & San Francisco.

Recommendation: We recommend that the vendor fill (if not already completed) and/or re-direct staff resources to fill the job developer position or amend the contract to properly reflect the use of DOR funds to serve consumers.

Programmatic Findings

Finding 5: Personal Vocational and Social Adjustment

CAMINAR is to provide Personal Vocational and Social Adjustment services to DOR consumers, as authorized by the DOR.

- This service is intended to assist a DOR consumer to develop or re-establish skills, attitudes, personal characteristics, interpersonal skills, work behaviors and functional capacities to achieve and maintain positive employment outcomes.

- The goal of PVSA is to address one or more barriers that are preventing a consumer from successfully completing his/her DOR Individualized Plan for Employment (IPE).

By definition, PVSA is a training service.

- Training is time-limited, individualized and provided in the environment where the identified appropriate behavior is needed or occurs.
- PVSA training activities should target the elimination/reduction of identified barriers to employment.
- Consumers may require training on: appropriate interaction in the workplace; grooming and hygiene as related to work; mobility training in use of public transportation; and other work-related behaviors.

It is evident from the review that staff members are providing the PVSA service inappropriately at the various contract sites.

At the Chico site, the team found that PVSA was being used to provide consumers with support that appeared to be mental health case management activities.

Examples included:

- Going on walks in the park or bike rides with consumers
- Making sure consumers went to AA meetings
- Assisting consumers with housing issues

At various sites, it appeared that PVSA was being used to purchase clothing for consumers in the employment service. This appeared to be done as a regular practice with all consumers.

- All services should be provided based on individual consumer need.
- Consumers should be provided training and not just assistance in obtaining the clothing.
- It is expected that the consumers get some assistance with appropriate interview clothing during the preparation phase of the employment service. The use of PVSA would be appropriate in situations where the consumer required additional one-on-one training that is above and beyond what is provided during the employment preparation phase. For example, a consumer might require training in their residence on how to utilize an available washer/dryer.

Documentation of the PVSA service (within the case files and the reporting documents to DOR) needs to be improved. Documentation lacked details and consistency across the Caminar sites.

Recommendation:

Caminar and DOR staff need to align the use of the PVSA service with the service specifications outlined in the CRP Guide to Certification and Vendorization. CRD will provide the necessary technical assistance and training to Caminar and DOR staff.

Caminar staff needs to improve their documentation of the PVSA service. The Caminar Individual Service Plan shall detail goals and objectives and the proposed training activities. Monthly progress reports should identify progress made toward those objectives. And, there should be documentation on how the provision of the specific PVSA training assisted the consumer in meeting their IPE goal. Documentation should clearly reflect the training nature of the service. Jobs Plus Administration will ensure:

- documentation includes the details of the services,
- will train staff for consistency in the documentation and,
- will monitor case files for compliance.

Finding 6: Caminar Case File Documentation

a. Documentation consistency-The Caminar staff maintain case notes, but these notes do not consistently indicate what contract services were provided. In addition these case notes are not consistently in the hard file. It does not appear that monthly progress reports are being consistently completed in the same format. It appears that each geographical region served by Caminar has their own style of completing monthly progress reports and case notes. As a result there is a lack of documentation of specific contract service that substantiates services provided for Caminar/DOR client's progress in their vocational rehabilitation plan. Progress reports and case file notes are also an important part of the supporting documentation for the personnel costs attributed to the invoicing on the Service Invoices. CFR Sec. 361.47 Record of services (a) states: The designated State unit (DOR) must maintain a record of services for each applicant and eligible individual. In an audit, the case notes and other service documentation, such as monthly progress reports, are used to determine if the personnel time spent providing contract services is appropriate. In the event of an audit, the auditors cannot determine if staff activities are appropriate to the contracted services, it could lead to an audit exception and a requirement for Caminar to reimburse DOR for the unsupported Service Invoice expenditures.

b. **Documentation Format**

The review team found that Caminar has been using Supported Employment Job Coaching (DR 383) and Placement (DR 382) forms in place of an actual monthly progress report. This is a problem because it was difficult for the review team to determine which clients were actually regional center consumers and which ones were non-supported employment consumers. Supported employment documents should only be used for those consumers who are regional center consumers and who are receiving specific supported employment services. Per pages 61- 62 of the DOR Contract Handbook requires a monthly progress report that substantiates contract services and shows collaboration between agencies. There is a lack of documentation showing that the Caminar staff are actually providing the contracted services. Without clear case notes and progress reports outlining the contracted services provided, it is difficult to show the client's progress in those services. In addition, a monthly progress report is required per Exhibit F or G of the contract. Additionally, disallowed service invoices due to inadequate service delivery documentation could result in DOR being required to reimburse the Federal Rehabilitation Services Administration (RSA) for federal funds inappropriately invoiced on.

c. **Documentation Redundancy**

From the interviews with Caminar staff, the review team heard the Caminar electronic time keeping system (Easy Labor Manager) is currently being used as a means of case file documentation on top of the actual Caminar case files. In some cases, Caminar staff were entering the case file documentation in both the hard case file and electronic record keeping system, thus resulting in an untimely duplication of documentation of contract services. In some contracts, Caminar staff are using the electronic time keeping system strictly as a time keeping system. The electronic time keeping system allows for case note documentation to be specific to real time spent on the contract, which if used correctly could be printed and included as case notes in the client's hard file. It did not appear that all Caminar staff are utilizing this feature of the electronic time keeping system in the same way. This is a problem because it results in a duplication of case file documentation and is an inefficient use of service provider time. This ultimately results in less time spent by the service provider with the consumer.

d. **Collaboration/Communication Between Agencies is not being Documented**

The review team found that in the case files there was little to no documentation of collaboration/Communication between agencies. Example: there was no documentation of phone calls and or meetings between DOR and Caminar. In addition, there was little to no contract specific services being

discussed in the case notes and or progress reports, other than authorization requests for job coaching and or PVSA. This is a problem because the RSA and California Code of Regulations (CCR) require there be documentation of communication between agencies regarding contract services. Additionally for cooperative programs, the DOR case file must demonstrate the collaboration between the counselor and Caminar staff to mutually serve the consumer.

e. Social Security Numbers and I-9 Documents in Hard Case Files

The review team found the consumer's social security number and photo copies of their I-9 documents (i.e. driver's license and social security card) were in the case file documentation. This is problematic because of a potential risk for breaching confidentiality and increases the potential for identity theft.

Recommendations –

- All contract services need to be documented via case notes in the Caminar files.
- Monthly reports of individual client progress need to be sent to the referring DOR counselor in a standardized documentation format that is not on Supported Employment forms. Caminar needs to determine what their preferred method for case note documentation is (i.e. Electronic Time Record System vs. word document) to reduce the redundancy and extra time spent duplicating case notes.
- Monthly Progress reports should indicate client's progress in the specific contract services being provided for that month, as well as any challenges, and the next steps to be taken in the clients' vocational rehabilitation plan. Caminar staff, in conjunction with appropriate DOR staff, should develop a progress report that contains adequate information to document contract services provided (i.e. job development and placement). These progress reports should be completed and provided to the DOR counselor on at least a monthly basis. In addition, Job Coaching reports can be incorporated in the monthly progress report for consumer's receiving non-supported employment job coaching.
- Documentation of collaboration and communication between agencies needs to take place. Caminar staff and DOR staff meet on a regular basis to discuss client progress and programmatic issues. This time spent collaborating with DOR staff on program related issues need to be documented.
- Caminar should remove or black out any I-9 related documents (i.e. copies of social security card, driver's license, birth certificates etc.) as

these identity sensitive documents are a potential risk for identity theft should the case file become lost or stolen.

Collaborative Services and CRD staff can also provide technical assistance, if requested. DOR and Caminar Supervisory staff should periodically review case files to ensure documentation is in compliance.

Finding 7: Inappropriate Use of Supported Employment Forms

The review team found an issue with the usage of the Supported Employment (SE) forms. Based on Caminar staff interviews, job coaching is provided to consumers, but how and why the service is being used varies by each case. The Caminar staff appear to be using SE forms for most reporting. For example Non-Supported Employment (NSE), Job Coaching reporting was being completed on the supported employment job coaching form (DR384) for all consumers served including non supported employment and supported employment consumers. Also it appeared that the supported employment placement form (DR383) was being used as a monthly progress report form. As a result it was difficult to determine if a consumer was receiving NSE or SE services. Using SE forms for NSE cases could result in authorization expenditures from an inappropriate fund source. It also results in inaccurate documentation of services provided.

Additionally in some cases, it appeared the DOR counselor(s) were authorizing job coaching as a blanket service for all consumers. In most case-files reviewed the DOR counselor(s) were authorizing 80-100% hours for job coaching in the first month of the consumer's placement in employment. This is problematic because services need to be individualized and based on the consumer's needs. Therefore the DOR Counselor should be an active participant in discussions regarding the amount of job coaching hours that are necessary and appropriate. Job Coaching services should be discussed and the number of hours agreed upon between the job developer and DOR counselor before DOR issues an authorization.

Recommendation

From this point forward, SE forms should not be used for NSE consumers and services. SE forms should only be used for those consumers receiving SE services. As stated in recommendation #2, Caminar and appropriate DOR staff should develop a progress report that contains adequate information to document NSE contract services provided (i.e. job development and placement). These progress reports should be completed and provided to the DOR counselor on at least a monthly basis. In addition, NSE Job Coaching reports can be incorporated in the monthly progress report for consumer's receiving NSE job coaching.

Prior to authorizing job coaching services the DOR counselor should meet or discuss with the job developer to determine if job coaching is needed and/or the appropriate number of job coaching hours for the consumer.

Finding 8: Extended Services Funding Streams

The review team had difficulty determining the funding source of extended services for DOR SE consumers. The review team was told that Caminar has agreed to provide the extended services for SE Consumers. However, instead of ongoing extended services, in reality the extended services are provided only for an additional two months after DOR case closure. SE extended services are required for the life of the placement.

Extended Services is the ongoing support services which occur after transition. The long term funding source should not put a cap or outer limit on how long term support is defined, thus a two month cap should not be in place. Each case should be looked at individually and determine that SE services should be provided for as long as the consumer requires it, or until the consumer is able to work without SE, or until the consumer has obtained natural supports to use in place of SE.

Extended services include regular contact with the individual, the employer, the parents, family members, guardians, advocates, or authorized representatives of the individuals, and other suitable professional and informed advisors, in order to reinforce and stabilize job placement.

Recommendation

DOR and Caminar need to have a conversation about how to provide extended services for MH SE consumers after DOR closes the case. Caminar should determine if they are able to provide extended services to SE MH consumers, given that there is no funding stream for this service, like with DD regional center consumers. If Caminar determines that they are not able to provide ongoing support for SE MH consumers, DOR is responsible for identifying a source of ongoing support for these SE MH consumers.

We ask that key program individuals meet, discuss the provided information, and mutually develop plans to address these areas.

The Program **Contract Administrator** is responsible for sending a **written response** regarding the action taken on all areas addressed in **Section V** within **60 calendar days** of receipt of the final report.

VIII. FUTURE COLLABORATION

This program review is intended to support a positive process of mutually and continuously planning for program improvement. This report points out areas that contribute to successful employment services, as well as identifies issues to be addressed. It is recommended program partners work together locally to use the program review information presented in this review, along with technical assistance, as appropriate, for future collaboration, planning, continuous improvement, and program development. Thank you for providing excellent services to assist our mutual consumers to become successfully employed.

IX. PROGRAM STATISTICS

The data tables at the end of this report are an important part of the program review report. The statistics provide program partners with a concise data overview of their program, including employment goals and outcomes, success ratio, cost per closure and demographic information.

APPENDIX

The following information is provided to the local cooperative partners as a resource for planning and service provision

1. Employment Outcomes Over the Life of the Program
2. Success Ratio
3. Cost per Successful Closure
4. Caminar Service Goals and Outcomes
5. Utilization of Service Budget Funds
- 6a. Fee for Services – Services Provided
- 6b. Fee for Services – Expenditures by Region