



Florida Rehabilitation Council (FRC)

Michael Wiseman – Chair

DRAFT Full Council Conference Call Minutes-May 1, 2018

Members Present

Mikey Wiseman
Ann Robinson
Don Chester
Beth Moore
Donte Mickens
Michael Adamus
Allison Flanagan

Staff

Roy Cosgrove
Kim Thomas

The following represents a summary of deliberations, advice, comments and motions that comprise this meeting regarding the RSA Monitoring Report.

Agenda Item Discussion

Call to Order

Mikey Wiseman, FRC Chair, called the meeting to order.

Quorum was not established

Mikey thanked all for coming to the call and asked Allison to walk members through the report, letting the Council know where the agency is at with each of the recommendations and/or findings and what their priorities for addressing them are. He said he would like to have an internal conversation as a council as to how to review the report and to make sure there's a pipeline for dialogue.

Allison explained that the report contains observations, recommendations and findings. Observations and recommendations do not need to be responded to by the agency but responses were submitted for the recommendations. Findings require that a corrective action plan be written. She said that overall, the report is pretty good but there's always work to be done. She then went over each of the recommendations and findings and what the agency is doing to address them, guiding members to Appendix C, where the agency's responses are stated.

Recommendations:

- **2.1-Data Accuracy:** The agency provided RSA with corrected data when they were here. Allison said they are making adjustments and continuing to improve. A new case management system would greatly improve the issue.
- **2.2-Exiting the VR system:** Allison said the agency has already been working on the issue since RSA was here. 8 months had passed since RSA was here to monitor so the issue had already been addressed prior to receiving the final report.
- **2.3-Internal Controls:** Allison said this is always an area that needs improvement. IT and programs are currently working on a mapping process to improve.
- **2.4-Employment Outcomes:** The agency has an intensive TA, Pre-ETS, peer mentoring and Career Index Plus agreement with WINTAC to address. She expects this to have an impact on employment outcomes.
- **3.1-Youth with Disabilities:** They will continue to track and work with schools. Referrals have doubled in the last 4 months. WINTAC is assisting in this area as well.

- **4.1-Absence of Finalized Policies and Procedures Reflecting the Changes from WIOA:** Policies were not in place when RSA was here but they are now. WINTAC assisted in reviewing the policies related to WIOA, i.e., Pre-ETS and 511.
- **4.2-Lack of Supported Employment Service Consideration for Those with Severe and Persistent Mental Illness:** The agency refuted the recommendation because VR does provide services to that population. The barrier in Florida is that there are long-term support dollars for those with adults with developmental disabilities but not as much for those with persistent mental illnesses. Long term supports cannot be paid for by VR.

Corrective Actions: VR will need to submit a plan and timeline when they receive the format it should be delivered to RSA in.

- **2.1-Untimely Eligibility Determinations:** Since the monitoring, there have been changes in RIMS; ticklers to counselors that cases are nearing the 60 day mark. This was also a part of the AG investigation. Training has been provided. 95.2% are in compliance; a 9.5% increase and they will continue to address.
- **2.2-Untimely Development of the IPE:** Same ticklers as for the eligibility determinations as well as training. University of Austin has a rapid engagement program that they are looking at. 91.6% are in compliance; a 10.5% increase.
- **2.3-Internal Controls and Monitoring:** Allison said they know they can improve. Procedures need to be in place, which they are working on. Field Service Operating Procedures (FSOP) are continuing to be rewritten. They are getting away from policies and moving towards rule-making; judges want rules when the agency goes to hearings. Ann raised a concern that some things have not always been run by the council that have been policy; then the council hears that those things are procedures and not policy, so the inference is that the council doesn't need to be involved. This circumvents the council's job to review, analyze and advise as well as educating the council. The council really needs to be on the front end of the administrative rules; unlike the monitoring report, which the agency had known about for a while. Both policies and procedures are important for the council to have input on since they relate to implementation of the program. Allison said that policies and regulations will go to the FRC. She was planning on reporting on them at the quarterly meeting in May. They are not where they had hoped to be. Legal is leading the effort; nothing has been implemented or finalized. She said it is a joint effort and the agency needs the council's input. Mikey voiced his concern that a lot has happened or is happening but the council is only finding out about it now. The agency is addressing issues but he has not heard of them. Members have asked specific questions but information has been deferred. The reasons led him to believe nothing had been done. He said that it's now clear that there has been a well thought out plan, direction and implementation but this is the first he's hearing about it. Allison said that DOE has asked if rules need to be changed or updated; Legal has said that some policies and rules are conflictive or duplicative. Nothing has been finalized; research only at this point. Allison said that DOE wants the agency to make sure the council is aware that the discussion is happening, which Allison was planning to discuss at the May quarterly. She said the draft policies and rules would be brought to the council at the right time. Donte asked which findings were the most concerning to the agency and were any of them surprising. He said, if not, then why weren't they shared on the front end?
- **5.1-Personnel Cost Allocation and Reconciliation Not Consistent with Requirements:** This was the most concerning. RSA said that what DOE charges for personnel and fringe are not being charged correctly. VR talked to DOE fiscal staff, who said that the process had been approved by USDOE. This is the same process and they charge the same amount for all agencies under DOE. FLDOE is working with USDOE to correct; corrections will need to apply to all agencies. VR asked for TA on the issue.
- **5.2-Prior approval Not Obtained:** Agencies must request prior approval from RSA on certain expenditures over \$5,000 and non-mandated FRC travel, per the Uniform Guidance at 2CFR 200.407. Florida's threshold is \$1,000. New guidance has just come out and a webinar is upcoming on the issue. VR has a process in place with forms and requirements. No TA requested. Mikey said he had a good respect for the agency for the work they've done to comply with the requirement.
- **5.3 Obligations and Expenditures Not Properly Assigned to Correct Period of Performance:** VR asked RSA to come down to provide fiscal technical assistance in order to get in compliance.
- **5.4-Third-Party Cooperative Arrangements-Unallowable Match-**Allison said this is not a concern because the TPCAs will not be renewed after June 30, 2018. The programs will continue but not as a TPCA. Allison believes more schools will be engaged because they won't have to put up a match.

- **6.1-Funding Mechanism for One-Stop Infrastructure Costs Not Consistent with Requirements**-Commissioner signed over signatory authority to Allison on infrastructure funding agreements and MOUs with CareerSource locations.

Ann thanked Allison for the explanation and asked when the initial report was delivered to the agency. Allison said VR received the report at the end of February and had 21 calendar days to issue a response so they were on tight timeframe. Ann said that the council wants to be a help but they were confused because they had not been informed that the report had been submitted. Ann offered a recommendation that the FRC Administrator participate in senior leadership meetings in order to facilitate better communication between the agency and the council. She said that one of the roles of the council is to be made aware and to give constructive feedback .

Mikey thanked everyone for their openmindedness and thanked Allison for her time and shedding light on the concerns. He was appreciative of the collaborative tone of the conversation. He said the council has work to do and asked how they wanted to proceed with an official response, delineating questions, concerns, categorizing areas of concern by priority. Ann offered that the report is a professional audit and some things are now historical; the agency has already made some corrections. She suggested that the agency give the council the same information that they're giving to RSA. She thinks things are already moving in a positive direction; the agency is changing dramatically and hopes for increased dialogue and transparency with the council. She reiterated the idea of recommending that the FRC Administrator attend leadership meetings when the council has a quorum to vote on it. Mikey asked if the council would like to have the highlights reviewed at the May quarterly, along with the points that the council expressed; then to petition the agency to strengthen the partnership and to use the council as the asset that they are there for. Donte said that if there were any items that the agency had been given a preview to, it would have been helpful for the council to have a heads up ahead of time. Allison said the exit interview was done in early September to go over some things that would be addressed in the report. She feels like the council should be told what happens in the exit interview. The report was only final in April and she doesn't not feel it's helpful to share information from the Federal level until it's final. Donte asked that Roy send out a link to other states' reports that may be of comparable size in order to put the report in context.

No further discussion.

Adjourned