

Corrective Action Plan for Nevada Rehabilitation Division

Quarterly CAP update for 07/31/2020 - current status: Partially Saved

Monitoring Report PDF format

Monitoring Report Publication Date 10/02/2019

Submitted by

Submitted on

Completed by

Completed on

Approved by

Approved on

CAP Resolved Date

Number of findings 0

Number of resolved findings 0

Percent resolved 0

Finding 1 - Untimely Development of the IPE

Finding Headline Untimely Development of the IPE

Finding

NBVR did not develop IPEs within 90 days from the date of eligibility determination for each individual.

Mandated Corrective Action

Mandated Corrective Action NBVR must assure that it will meet the requirements of 34 C.F.R. §§ 361.45 and 361.46 for the development and approval of IPEs in a timely manner for each individual determined to be eligible for VR services, but not later than 90 days after the date of eligibility determination, unless the VR counselor and the eligible individual agree to the extension of that deadline to a specific date by which the IPE must be completed.

RSA Focus Area

Agency Planned Corrective Action Steps

Corrective action 1.1

Action:

Assess and evaluate current procedures for tracking and monitoring counselor performance and efficient practices used by high performing VR counselors and supervisors to ensure timely IPE development, including the use of case management tools for, and supervisory review of, timely IPE development.

Standard to be met and method of evaluation: NBVR needs a report to track compliance of 90 days for IPEs. This can be accomplished with the Aware VR Aging Report. Sups and Mgrs. will review all cases in eligible status from the Aging Report each week to determine compliance with IPE timeframes. Aware allows staff to track due dates of IPEs & prompts for due dates.

Planned start date: 01/02/2020

Actual start date: 01/02/2020

Projected completion date: 06/30/2020

Actual completion date: **04/30/2020**

Quarterly updates:

- April 30, 2020 - Supervisors are utilizing Aging Reports within the AWARE case management system weekly to ensure that IPEs are developed within 90 days. In addition, supervisors are taking action through directive communication with staff when IPEs are not yet developed by the 80th day.
- **July 31, 2020 – Resolved on April 30, 2020.**

Resolved?

Corrective action 1.2

Action:

Develop goals and strategies to improve VR counselor performance specific to timely IPE development.

Standard to be met and method of evaluation: NBVR will require new counselors to take training on e-Rehab related to IPEs. All counselors will take this training annually as a refresher. Sups & Mgrs. will review the Aging report. They will notify counselors to take action on cases without an IPE at 80 days, including completion of the IPE or an extension. Based upon QA case reviews, Sups. & Mgrs. will develop goals and strategies on common issues noted in the reviews & utilize high performing counselors as part of training & mentoring to others.

Planned start date: 01/02/2020

Actual start date: 01/02/2020

Projected completion date: **10/31/2020**

Actual completion date:

Quarterly updates:

- April 30, 2020 - Please see attached "Training Tracker Updated 3-30-20" which is illustrated in columns "O" and "P" staff who have taken e-Rehab training. Nevada VR has contracted to update our e-Rehab training series, due to be completed by 7/13/20. Therefore, staff have not had access to e-Rehab while it's been under construction. The attached list called "Staff needing e-Rehab" lists all new hires since January 1, 2019 who need to take the new e-Rehab training, as well as existing staff that still need to take it as an annual refresher.
- **July 31, 2020 – The e-Rehab updates were initially completed on July 16, 2020. Small issues were noticed, and revisions were then made with the final product completed on July 27, 2020. On July 23, 2020 the Deputy Administrator sent an email to statewide managers informing them that e-Rehab was complete and reminding them of the requirement of all new staff, upon hire, and all staff annually, to complete e-Rehab. Administration is tracking e-Rehab completion for all staff along with all other training requirements and will submit the list of staff completers to RSA in NBVR's next quarter's response.**

Resolved?

Corrective action 1.3

Action:

Comply with 34 C.F.R. §§ 361.45(a)(1) and (e) to ensure IPEs are developed within the statutory 90-day time frame from the date of eligibility determination.

Standard to be met and method of evaluation: NBVR will achieve 90 percent compliance for the 90-day timeline to develop IPEs, illustrated by a quarterly report showing two consecutive quarters meeting or exceeding this standard.

Planned start date: 01/02/2020

Actual start date: 01/02/2020

Projected completion date: 06/30/2020

Actual completion date: **03/31/2020**

Quarterly updates:

- April 30, 2020 - As illustrated in the attached spreadsheet called, “Days-Elig-To-Plan_20200402_FINAL,” Nevada reviewed IPE development for all staff for the 2nd and 3rd quarters of PY2019 for compliance of plans developed within 90 days of the eligibility date or with approved, timely extensions. Nevada achieved 90% compliance in the 2nd quarter and 91% in the 3rd quarter.
- **July 31, 2020 – Resolved on March 31, 2020.**

Resolved?

Finding 2 - Internal Controls for Case File Documentation

Finding Headline Internal Controls for Case File Documentation

Finding NBVR's internal controls did not ensure that case files adhere to the record of service requirements at 34 C.F.R. § 361.47. Specifically, the internal controls did not ensure that NBVR adheres to the requirements for closing the record of services of an individual who has achieved an employment outcome pursuant to 34 C.F.R. § 361.56.

Mandated Corrective Action NBVR must develop and implement internal controls to ensure the service record requirements at 34 C.F.R. § 361.47 are being met. Specifically, the internal controls must ensure the following requirements are met: the development and amendment of the IPE pursuant to 34 C.F.R. § 361.45; and the requirements for closing the record of services of an individual who has achieved an employment outcome pursuant to 34 C.F.R. § 361.56.

RSA Focus Area

Agency Planned Corrective Action Steps

Corrective action 2.1

Action: Develop internal control policies and procedures to ensure that the provisions of 34 C.F.R. § 361.47 have been met and through service record documentation, the requirements at 34 C.F.R. §§ 361.56 are met.

Standard to be met and method of evaluation: NBVR will develop procedures to ensure the documentation requirements of CFR 361.47 and 361.56 are met before a case closes. NBVR will provide these procedures to RSA for review and approval.

Planned start date: 01/02/2020

Actual start date: 01/02/2020

Projected completion date: 06/30/2020

Actual completion date: **03/05/2020**

Quarterly updates:

- April 30, 2020 - Nevada has updated its Participant Services Policy and Procedures Manual for Section 19 "Closures" to ensure the provisions of CFR 361.47 and 361.56 are met before a case closes. See attached new procedures document called, "19_Closures (effective date 03-05-2020) highlighted." The changes to Section 19 to satisfy this finding are highlighted green.
- **July 31, 2020 – Resolved on March 5, 2020**

Resolved?

Corrective action 2.2

Action: Review current internal control mechanisms for effectiveness and adjust the internal controls as necessary.

Standard to be met and method of evaluation: NBVR Sups & Managers will review 2 open cases in employed status per counselor to review closure docs. ea. month to ensure NBVR procedures are followed in compliance with CFR 361.47 & 361.56 & address with staff as needed. NBVR will achieve 90% compliance for meeting case closure and documentation requirements, illustrated by spreadsheets kept of the monthly reviews, showing 6 months meeting all case closure and documentation requirements.

Planned start date: 01/02/2020

Actual start date: 01/02/2020

Projected completion date: **10/31/2020**

Actual completion date:

Quarterly updates:

- April 30, 2020 - Nevada has developed two tools which were just shared with program staff on 3/09/20. Please see attached "Case Closure- case review 3-2020," which is the matrix supervisors will use to review two cases per month, per counselor across the nine mandatory requirements that must be met for successful case closure, and "Closure Case Review Monitoring 3-2020" which explains the federal requirements. These tools are now being used to monitor for appropriate case closure documentation. We will have data to report next quarter.
- **July 31, 2020 – Using the tools identified in the April 30, 2020 update, Nevada reviewed 2 cases per month from all cases that had a closure in that month for the quarter ending June 30, 2020. The standard to be met in compliance with CFR 361.47 & 361.56 was that NBVR would achieve 90% compliance for meeting case closure and documentation requirements for 6 months. NBVR achieved 90.32% compliance statewide for the first three months of tracking this metric. (See attached "RSA Monitoring Summary for 2.2").**

Resolved?

Corrective action 2.3

Action: Review current mechanisms used to collect and aggregate the results of these reviews and use the results to inform the training and evaluation of staff.

Standard to be met and method of evaluation: NBVR will use the results of the case reviews/spreadsheets to inform one or more trainings and for the evaluation of counseling staff and provide training sign-in sheets to RSA. NBVR will also provide the case review instrument from the statewide case reviews in May 2020, illustrating improvement in closure documentation.

Planned start date: 01/02/2020

Actual start date: 01/02/2020

Projected completion date: **10/31/2020**

Actual completion date:

Quarterly updates:

- April 30, 2020 - Unfortunately, due to the COVID-19 pandemic, Nevada closed all non-essential agencies on March 16, 2020 and these remain closed. Nevada VR was considered non-essential. Thus, there is insufficient data currently available to inform future trainings. Additionally, the statewide case review was not scheduled to be conducted this quarter. It is slated for May 2020.
- **July 31, 2020 – Although NBVR met the 90% compliance requirement, in order to reinforce the practice with our new and existing staff, NBVR Administration is working with their Statewide Trainer to develop a formal training on the aspects of CFR 361.47 & 361.56 which define expectations for quality case closures. This training will be recorded and archived to ensure the ability to reinforce this training and closure expectations into the future.**

Resolved?

Finding 3 - Prior Approval Not Obtained

Finding Headline Prior Approval Not Obtained

Finding NBVR must obtain prior written approval from RSA before purchasing items requiring prior approval in accordance with 2 C.F.R. §§ 200.407 and 200.439.

Mandated Corrective Action NBVR must demonstrate it meets the prior approval requirements pursuant to the Uniform Guidance (2 C.F.R. § 200.407) and develop and implement written procedures for determining the allowability of costs in accordance with Subpart E — Cost Principles within Uniform Guidance (2 C.F.R. § 200.302(b)(7)).

RSA Focus Area

Agency Planned Corrective Action Steps

Corrective action 3.1

Action: Develop and implement policies and procedures, as well as a written internal control process, including a monitoring component, to ensure ongoing compliance with the prior approval requirements, including those in RSA Technical Assistance Circular (TAC) - 18-02.

Standard to be met and method of evaluation: NBVR contracted with Strategic Progress, LLC, an entity that provides grant development & management. They are developing a Prior Approval policy, guidelines, and internal controls document for NBVR, as per federal laws, regulations and the recent FAQ. • A draft version of the Prior Approval policy/internal controls document with some of the elements completed will be provided to RSA for review and feedback. A final policy/internal controls document will be provided to RSA for review and approval.

Planned start date: 01/02/2020

Actual start date: 01/02/2020

Projected completion date: **10/31/2020**

Actual completion date:

Quarterly updates:

- April 30, 2020 - Please see attached draft Prior Approval policy, guidelines, and internal controls document called, "Policy Implementation Tool-kit - 06 March 2020." This document is still in development.
- **July 31, 2020 – Due to the nationwide pandemic and Nevada’s declaration of emergency, work on the Prior Approval policy, guidelines and internal controls document by Strategic Progress, LLC was paused. It has since restarted, but a final Prior Approval document is not yet complete. NBVR should be able to provide the complete document in its next quarter’s response to RSA.**

Resolved?

Finding 4 - Obligations and Expenditures Not Properly Assigned

Finding Headline Obligations and Expenditures Not Properly Assigned

Finding NBVR did not meet the obligation and expenditure requirements in 2 C.F.R. § 200.71 and 34 C.F.R. § 76.707. NBVR did not assign obligations and expenditures to the correct Federal award in accordance with 34 C.F.R. § 361.12, 2 C.F.R. §§ 200.77, 200.302, 200.303(a), 200.309, and 34 C.F.R. § 76.702.

Mandated Corrective Action NBVR must be in compliance with the Federal requirements in 34 C.F.R. § 361.12, 34 C.F.R. § 76.702, and 2 C.F.R. § 200.302 to accurately account for and report non-Federal and Federal obligations and ensure expenditures are paid from the correct Federal award for the VR award. Additionally, the agency must develop sufficient internal controls to ensure that: 1) obligations and expenditures assigned to a FFY are only for allowable costs under the DSU's approved State plan during the period of performance of the award; 2) all obligation dates are correctly recorded in the agency's accounting system and assigned to non-Federal and Federal sources; and 3) all non-Federal and Federal obligations and expenditures are accurately reported on the appropriate Federal Financial Reports for the appropriate awards.

RSA Focus Area

Agency Planned Corrective Action Steps

Corrective action 4.1

Action: Make requisite revisions to its financial data collection and analysis process to bring it into compliance so that NBVR can—

- Ensure all Federal and non-Federal obligations (TPCA contracts, VR services purchased through authorizations, and personal services by NBVR employees) are properly accounted for and obligated to the correct funding source and FFY award in the agency's financial management system;
- Account for and accurately liquidate all expenditures from the correct FFY award, commensurate with the period of performance for the corresponding obligations based on when they were assigned; and
- Accurately report non-Federal and Federal obligations and liquidations on the SF-425 report for the corresponding period of performance for Federal awards.

Standard to be met and method of evaluation: NBVR's new Management Analyst IV is now a fiscal back up for the Operations Deputy and is responsible for fiscal oversight of NBVR's TPCAs, including monitoring. The position was filled on October 7, 2019.

- NBVR will develop and submit to RSA for review and approval, written policies, internal controls documents and training materials that it will use to assist our TPCA partners.

Planned start date: 01/02/2020

Actual start date: 01/02/2020

Projected completion date: 06/30/2020

Actual completion date: **07/31/2020**

Quarterly updates:

- April 30, 2020 - In Nevada's new case management system, AWARE, new obligations, called "authorization" are assigned to the FFY based on the date the agency made the commitment to obtain the services. For payments made outside of the AWARE system, Nevada accounting staff are trained to code the obligations to the appropriate job number based on the date of service. All payments go through two levels of audit before processing for payment; one in our accounting unit and another one in our financial management (FM) office. Nevada now records refunds to the appropriate FFY, effective 07/01/2019. See attached "DETR-FM-VR Grant Refund Procedure," which includes DETR's internal refund process, the G5 refund draw process, and updating the appropriate SF-425 report.
- **July 31, 2020 – The NBVR new case management system, AWARE, was designed to follow 34 CFR 76.707(c)(EDGAR). In the AWARE system, new obligations are assigned to the FFY based on the date the agency made the commitment to obtain the services. (See attached "AWARE-nypayment," pg. 10-11). For payments made outside of the AWARE system: Internal procedures have been implemented to identify the appropriate steps in determining the period of performance and which job number to code an expense to ensure the correct funding source and FFY are being used. (See attached "Job number – Determining the FFY of Obligation" Word document). DETR now records refunds to the appropriate FFY to comply with 2 CFR 200.406(a). DETR has contacted both RSA and the State of Nevada's Controller's Office for guidance on processing the returns to the appropriate awards. (See attached "RE Refund \$396.06").**

Resolved?

Corrective action 4.2

Action: Update and implement policies and procedures to accurately account for and report all obligations and expenditures to the correct FFY award period of performance, ensuring the policies address—

- The assignment of non-Federal and Federal obligations to the appropriate FFY award period of performance and the liquidation of such funds based upon the assignment of the obligation; and
- The obligation of contract services and bulk authorizations in the financial management system to ensure liquidations are based upon the FFY in which the contracts were obligated, or in the case of TPCAs, when the cooperating agency staff time was worked.

Standard to be met and method of evaluation: NBVR will develop & submit to RSA for review and approval, written policies & procedures including: Methods to track non-Federal & Federal activities; ensure expenditures are from the appropriate grant period of performance & the liquidation of such funds is based upon the assignment of the obligation; auditing & processing invoices for payment, and ensuring the accurate obligation of contract services& bulk authorization happens.

Planned start date: 01/02/2020

Actual start date: 01/02/2020

Projected completion date: 06/30/2020

Actual completion date: **07/31/2020**

Quarterly updates:

- April 30, 2020 - In Nevada's new "AWARE" case management system, new obligations are assigned to the FFY based on the date the agency made the commitment to obtain the services. See attached "nv payment" policy, procedure, internal controls draft document. For payments made outside of the AWARE system, a procedures document is currently being updated. Nevada has corrected its SF-425 reporting to ensure the value of TPCA certified staff time is not counted as obligated until they have worked the time. This correction took place starting on the 09/30/19 SF-425 report. Internal SF-425 reporting procedures are in the process of being drafted.
- **July 31, 2020 - The NV VR new case management system, AWARE, was designed to follow 34 CFR 76.707(c)(EDGAR). In the AWARE system, new obligations are assigned to the FFY based on the date the agency made the commitment to obtain the services. (See attached "AWARE-nvpayment," pg. 10-11). For payments made outside of the AWARE system: Internal procedures have been implemented to identify the appropriate steps in determining the period of performance and which job number to code an expense to ensure the correct funding source and FFY are being used. (See attached "Job number – Determining the FFY of Obligation" Word document). NBVR has made the correction to reporting TPCA contract balances as unliquidated obligations until the cooperating staff time worked can be verified. Correction took place starting on the 09/30/19 SF-425 reports.**

Resolved?

Corrective action 4.3

Action: Develop and implement a written internal control process, including a monitoring component, to ensure ongoing compliance with Federal requirements for the areas mentioned in corrective actions 5.2.1 and 5.2.2.

Standard to be met and method of evaluation: NBVR will demonstrate to RSA its new policies, procedures, internal controls and trainings are working to bring NBVR into compliance by monitoring the same twice annually. NBVR will provide the first monitoring report to RSA to demonstrate compliance, which will be illustrated in the SF-425 report as well.

Planned start date: 01/02/2020

Actual start date: 01/02/2020

Projected completion date: **12/31/2020**

Actual completion date:

Quarterly updates:

- April 30, 2020 - Nevada is in the process of completing the corrective actions for findings 4.1 and 4.2. A full Internal Monitoring will begin after a total resolution is reached for 4.1 and 4.2. RSA will be provided a report to demonstrate compliance.
- **July 31, 2020 – NBVR has resolved the corrective actions of 4.1 and 4.2 as of this reporting. NBVR will begin coordinating for a full internal monitoring with an anticipated completion date of December 31, 2020. RSA will be provided the monitoring report to demonstrate compliance.**

Resolved?

Finding 5 - Third-Party Cooperative Arrangements – Unallowable

Finding Headline Third-Party Cooperative Arrangements – Unallowable

Finding NBVR did not meet TPCA requirements in 34 C.F.R. § 361.28, including match requirements for the VR program in 34 C.F.R. § 361.60.

Mandated Corrective Action NBVR must ensure it meets the VR requirements in 34 C.F.R. §§ 361.28 or 34 C.F.R. 361.60 related to non-Federal share reported as match for the VR program, to properly implement internal controls to ensure cooperating agency staff time spent working on the TPCA is only for the direct provision of VR services to applicants and recipients of the VR program.

RSA Focus Area

Agency Planned Corrective Action Steps

Corrective action 5.1

Action: Cease reporting as match for the VR program any non-Federal funds that do not meet the requirements of 34 C.F.R. §§ 361.28 and 361.60.

Standard to be met and method of evaluation: NBVR has ceased reporting any non-federal funds as match, other than certified staff time of TPCA partner entities providing direct client services. This is evident in our new TPCA agreements effective July 1, 2019. All TPCA contracts will be submitted to RSA for review.

Planned start date: 01/02/2020

Actual start date: 01/02/2020

Projected completion date: 01/02/2020

Actual completion date: **01/02/2020**

Quarterly updates:

- April 30, 2020 - Nevada has ceased reporting any non-federal funds as match, other than certified staff time of TPCA partner entities providing direct client services. This is evident in our new TPCA contracts, which were effective 7/01/19. Please see these attached contracts: “WNC CareerConnect,” “Clark County School District JEEP,” “WCSD VOICE,” and “TMCC TPCA.”
- **July 31, 2020 – Resolved on January 2, 2020.**

Resolved?

Finding 6 - Internal Control Deficiencies

Finding Headline Internal Control Deficiencies

Finding NBVR did not maintain effective internal control over the Federal award to provide reasonable assurance that the agency is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the award.

Mandated Corrective Action NBVR must develop and maintain effective internal controls over the Federal awards necessary to provide reasonable assurances that it is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the award, as required by 34 C.F.R. §§ 361.3(a) and 361.12, and 2 C.F.R. §§ 200.302 and 200.303. Specifically, NBVR must develop sufficient mechanisms to monitor and reconcile the value of TPCA cooperating agency staff time, including those certified as match for the VR program or reimbursed with Federal funds, to ensure that expenditures reported are accurate, allocable and allowable, in accordance with 2 C.F.R. § 200.405, or to track, account and report program and fiscal data for service provision accurately on the RSA-2 or RSA-911 reports.

RSA Focus Area

Agency Planned Corrective Action Steps

Corrective action 6.1

Action: Develop and implement written policies and procedures governing the oversight of grant-supported activities, as required by 2 C.F.R. § 200.328(a), particularly with respect to—

- Requiring uniform requirements and tools TPCA cooperating agencies can use to submit certified expenditures and supporting documentation that accurately tracks non-Federal and Federal activities, and reflects costs and services provided under pre-employment transition services and VR services;
- Staff members' review of TPCA invoices prior to and during payment processing; and
- Ensuring certified expenditures of cooperating agency staff time spent providing services under TPCAs with NBVR are verified before reporting the non-Federal portion as match for the VR program, or reimbursing the cooperating agency with Federal VR funds.

Standard to be met and method of evaluation: NBVR will: develop a web-portal for TPCA vendors to submit invoices, review & revise current methods to track the non-Federal and Federal activities, develop policies & implement written procedures for accounting staff to follow when auditing and processing TPCA invoices for payment, & to ensure that cooperating agency staff time is verified prior to reporting the non-Federal portion as match. • NBVR will submit to RSA for review and approval, written policies & procedures & internal controls documents.

Planned start date: 01/02/2020

Actual start date: 01/02/2020

Projected completion date: **10/31/2020**

Actual completion date:

Quarterly updates:

- April 30, 2020 - The development of the web-portal is currently in the contracting process. See attached “TPCA Portal Proposal - Flow Chart” and “Attachment AA.1 - Web Page_Portal Construction_Hosting.” Nevada has begun development of uniform tools to provide to its TPCA partners. See attached “TPCA Match Tracker,” “TPCA-Personnel Hourly Rate Calculations,” and “TPCA New PAR - Concept Example.” TPCA partners will begin using these tools on 7/01/2020. The Mgmt. Analyst III has taken over the responsibility of reviewing and reconciling the TPCA invoices and provides guidance to partners. Nevada will verify the accuracy of the certified expenditures being reported. See attached procedures draft called, “TPCA Invoice Processing.”
- **July 31, 2020 – Due to the nationwide pandemic and Nevada’s emergency declaration, three out of NBVR’s four TPCAs have had their contracts cancelled. NBVR’s only remaining TPCA partner is the Clark County School District (CCSD), JEEP program. For this reason, NBVR will not go forward with creating an online portal for TPCA document submission. NBVR has developed uniform tools and has provided them to its TPCA partner, specifically, in relation to personnel hourly rate calculations, PAR forms and expense tracking, which were submitted to RSA in its prior quarter’s response. These tools will aid in more efficient monitoring and validation of TPCA billed activities. Meetings have taken place with CCSD to review and discuss the implementation of these new processes. CCSD has officially started using the new forms and processes as of July 1, 2020. NBVR will provide to RSA in its next quarter’s response, a live example demonstrating the implementation of the new forms and processes.**

The Management Analyst III (MA III) has taken over the responsibility of reviewing and reconciling the TPCA invoices. The MA III is in frequent contact with our TPCA partner as the invoice is being reviewed. The MA III provides guidance as it relates to 34 CFR 361.28 and 361.60. MA III will not approve reimbursement of an invoice or report non-Federal portions as match until all inquiries are answered and she can verify the accuracy of the certified expenditures being reported by the cooperating agency. (See attached “TPCA Invoice Processing”).

Resolved?

Corrective action 6.2

Action: Develop and implement a mechanism to ensure costs for all pre-employment transition services required activities provided through TPCAs and VR services are allocable and allowable in accordance with 2 C.F.R. § 200.405 and Sections 110(d)(1) and 113 of the Rehabilitation Act.

Standard to be met and method of evaluation: NBVR to monitor web portal & review Tech Manual for Fiscal Processes: Pre-ETS & ensure costs for Pre-ETS in TPCAs are allocable & allowable. “Group” authorization payment type will be created in AWARE. Management will review & approve authorizations in AWARE. • NBVR will submit written policies & procedures

including process for use of & monitoring the portal & for approval of authorizations & any revisions to NBVR's Tech Manual for Pre-ETS. NBVR will provide a monitoring report demonstrating the new process is working.

Planned start date: 01/02/2020

Actual start date: 01/02/2020

Projected completion date: **10/31/2020**

Actual completion date:

Quarterly updates:

- April 30, 2020 - A work group will update our Pre-ETS fiscal manual "PRE-ETS procedures - Final 07.01.2019." Nevada's Transition Coordinator team work closely with our vendors to verify the Pre-ETS services being provided prior to approval. Group authorization payment types are now used in our case mgmt. system, and include Pre-ETS clients, services, and payments. Specific account coding has been created to use at time of payment to identify & track required Pre-ETS activities ("Pre-ETS Activities Coding").
- **July 31, 2020 – NBVR will begin coordinating for a full internal monitoring with an anticipated completion date of October 1, 2020. RSA will be provided the monitoring report to demonstrate compliance.**

Resolved?

Corrective action 6.3

Action: Develop and implement policies and procedures to accurately collect and report program and fiscal data on Federal performance reports, including the RSA-2 and RSA-911 reports, which reflect the actual costs per service(s) provided to students receiving required pre-employment transition services activities and other VR services.

Standard to be met and method of evaluation: NBVR implemented state accounting coding solutions to track & collect expenditures for Pre-ETS activities to accurately collect & report data on Federal reports. We now have coding solutions to track staff hrs. spent on Pre-ETS activities. NBVR developed a Tech Fiscal Guide that explains processes in detail. AWARE includes these new coding solutions. • NBVR will submit written policies & procedures including any revisions to NBVR's Tech Manual for Pre-ETS & screen shots of AWARE upgrade for RSA review.

Planned start date: 01/02/2020

Actual start date: 01/02/2020

Projected completion date: 06/30/2020

Actual completion date: **07/31/2020**

Quarterly updates:

- April 30, 2020 - See attached “PRE-ETS procedures - Final 07.01.2019.” The guide will be continuously reviewed and updated to ensure compliance with both Federal and State guidelines and laws.
- **July 31, 2020 – See attached “Sample data for Pre-ETS Tracking&Coding.” This file provides a sampling of real transactions showing the implementation of the procedures from the “PRE-ETS procedures Final” document submitted in NBVR’s last quarter’s response. Additionally, it shows the reserving of the required 15% Pre-ETS funds from a sample taken from our Federal Draw workbook. See attached “AWARE Adding Pre-ETS Clients and Authos,” a necessary process in our AWARE case management system to collect the correct information and to be able to determine the actual costs per service per student. See attached “Sample Pre-ETS Students.” This data is a sampling of from our AWARE case management system which shows the cost per service per student and what Pre-ETS activity they received.**

Resolved?