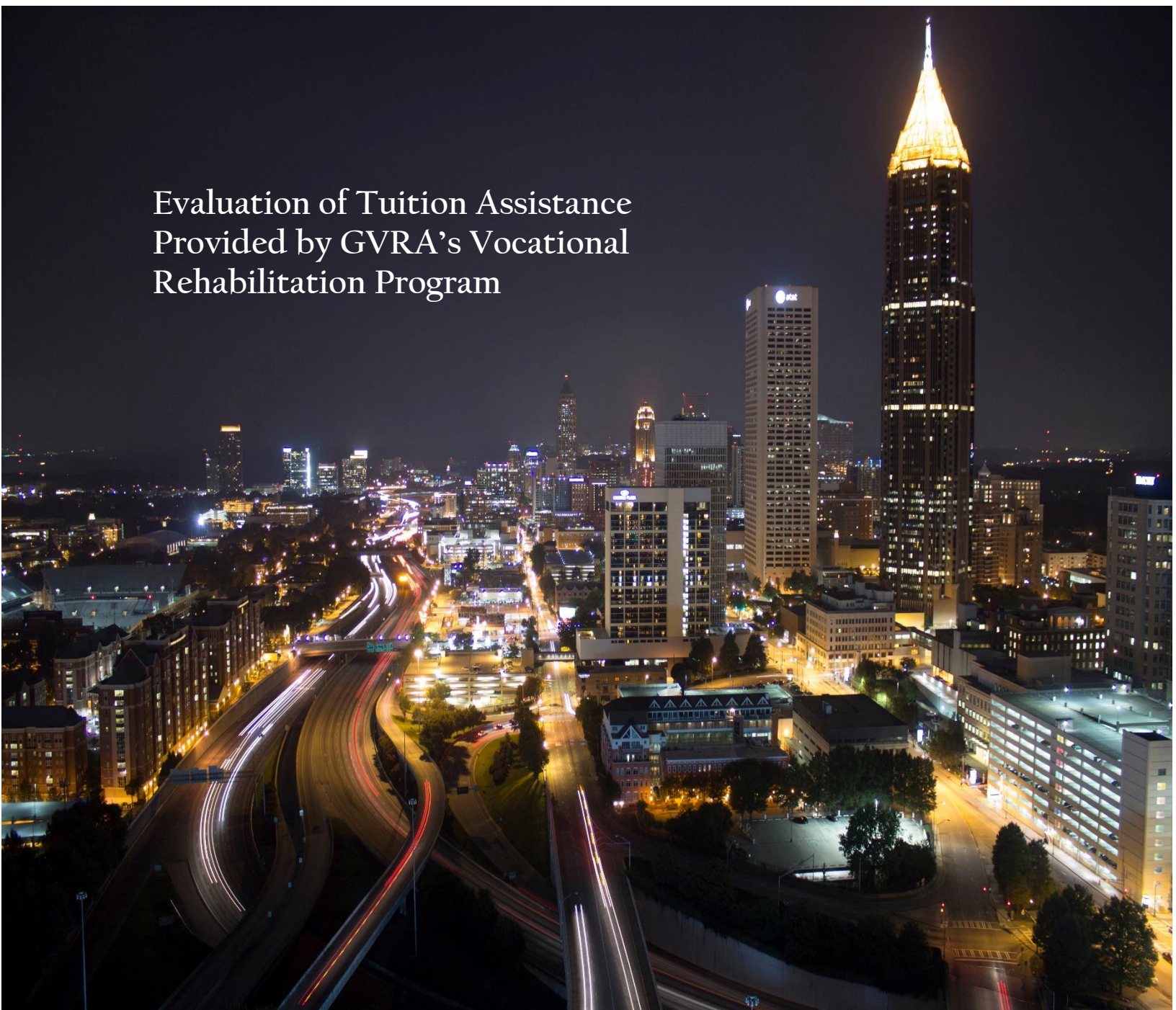


Evaluation of Tuition Assistance Provided by GVRA's Vocational Rehabilitation Program



August 25, 2022

Office of the State Inspector General



Office of the State Inspector General

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Why We Did This Review

Under Executive Order 01.13.03.02, after detecting acts of fraud, waste, abuse or corruption, the duties of the Office of the State Inspector General (OIG) include reviewing and evaluating state agency policies and procedures to form recommendations to prevent similar conduct. In August 2021, an OIG investigation revealed that the tuition assistance program provided by the Georgia Vocational Rehabilitation Agency (GVRA) had been significantly compromised, resulting in an estimated financial loss of over \$1.3 million due to fraudulent activity. This investigation is ongoing.

This financial loss was largely the result of tuition assistance paid to Vocational Rehabilitation (VR) clients not actually enrolled in post-secondary education. By reviewing this aspect of GVRA's services, OIG sought to determine whether additional fraud occurred within the tuition assistance program, and to identify improvements to strengthen GVRA's internal controls and management of tuition assistance disbursements.

What We Found

During fiscal years (FY) 2019 and 2021, the Georgia Vocational Rehabilitation Agency (GVRA) made 1,475 tuition assistance payments to 705 Vocational Rehabilitation (VR) Program clients. Through collaborations with the University System of Georgia (USG) and the Technical College System of Georgia (TCSG), OIG reviewed and identified 21 payments made to 15 VR clients that were not enrolled in a college or university program, and one additional payment made to an enrolled VR client who only paid the educational institution a portion of the tuition assistance. These 22 payments resulted in a total loss to GVRA of approximately \$200,935. Of these 22 payments, 10 were related to five fraudulent VR clients previously identified by OIG which prompted this evaluation. The remaining 12 payments, associated with 10 VR clients, totaled \$25,984.

Prior to FY21, GVRA provided tuition assistance payments directly to the VR client rather than the college or university. Effective July 31, 2020, GVRA's change in policy to make payments directly to the educational institution reduced the opportunity for payment to an unintended recipient. The effectiveness of the policy change is evidenced by the fact that 21 of the 22 (95%) erroneous payments identified by OIG occurred before July 31, 2020.

Looking specifically at the 11 tuition payments made to non-enrolled VR clients, OIG verified that 9 VR clients were not enrolled during the semester of the intended payments. One payment was made directly to the respective educational institution, while 10 payments were paid directly to the VR client. For the one payment made after the policy change, the client was approved for direct payment, as the institution only allowed online payment for an online course.

Administratively, OIG found inconsistent case note documentation within Aware, GVRA's case management system, which contributed to various errors in client tracking and overpayment. For example, documentation verifying enrollment could not be found in Aware for each identified erroneous tuition payment. In one instance, GVRA records indicated that a tuition payment made directly to a VR client was for attendance at a USG school, while other records in Aware demonstrated that the client attended an out-of-state school.

In addition, OIG found that district supervisors personally handled caseloads to meet performance benchmarks. By assigning themselves an extensive case load, supervisors limit their ability to oversee counselor activities and act as a deterrent against fraud, waste, and abuse. To properly serve clients, supervisors must ensure that counselors record pertinent information in Aware that identifies and addresses client needs.

OIG found no indication of internal fraudulent activity associated with the newly identified erroneous payments, and will pursue efforts to recoup these funds from the former VR clients.

Recommendation Summary

OIG recommends that GVRA implement the following:

1. Designate a liaison between each GVRA district office and educational institutions to confirm enrollment for each client before semester payments are approved.
2. Standardize the Individual Plan for Employment (IPE) format to incorporate the Post-Secondary Academic and Vocational Training Job Aid form to maximize client accountability and ensure clients are aware of their responsibilities.
3. Revise current policy to allow notice of tuition assistance suspension upon failure by the client to provide required documentation for each completed course of study or semester.
4. Require that district office supervisors analyze supporting documentation for legitimacy before tuition assistance approval.
5. Supplement the monthly report provided by VR to district office supervisors and counselors with additional information to increase efficiency.

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Background

History of GVRA

Created by legislation effective July 1, 2012, the Georgia Vocational Rehabilitation Agency (GVRA) operates five integrated and interdependent statutory programs that share a primary goal - help people with disabilities become fully productive members of society by achieving independence and meaningful employment. The largest programs are the Vocational Rehabilitation (VR) Program, Disability Adjudication Services, and Roosevelt Warm Springs/Cave Spring Center. The two other programs, the Business Enterprise Program and Georgia Industries for the Blind, serve clients with visual impairments.

Vocational Rehabilitation Program

The VR program helps people with disabilities find and maintain employment by providing a variety of customized and individualized services. For example, through federal and state funding, the VR program provides career exploration, employment planning, disability management through counseling, therapies, treatments, or assistive devices, training to enhance skills using instruction and work experiences in work sites or through educational partnerships, and job search assistance. The VR program also provides post-secondary education through tuition assistance.

Funding

Per financial data contained in the Budgetary Compliance Report (BCR) and Governor's Budget Report, funding for the GVRA VR Program between FY19 and FY22 averaged approximately \$93.5 million annually as shown in Exhibit 1. More than half of GVRA's budget is dedicated to the VR program. GVRA's budget is primarily supported by a combination of federal and state funding. The majority of the agency's other funding is received from the Ticket to Work program administered through the Social Security Administration.

Exhibit 1 - GVRA Budget

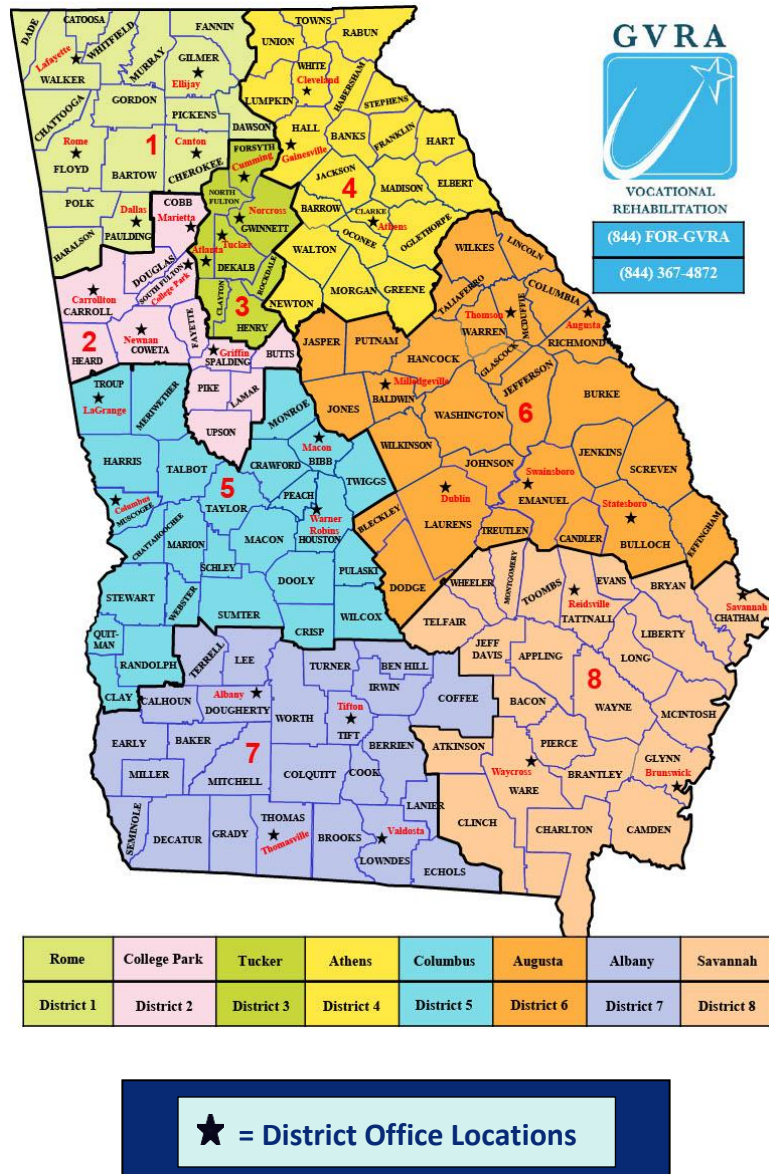
Fund Type	FY 19	FY 20	FY 21	FY 22*
State	\$20,741,234	\$19,978,732	\$18,266,370	\$19,204,307
Federal	\$87,051,538	\$63,784,769	\$44,764,784	\$65,054,061
Other	\$10,617,953	\$11,391,812	\$8,137,737	\$5,072,644
Total	\$118,410,725	\$95,155,313	\$71,168,891	\$89,331,012

* Amounts displayed reflect the Amended FY 22 Budget per Governor's Budget Report; FY 22 BCR Budget amounts are unavailable.

Organization

GVRA operates over 30 field offices across the state in eight designated districts.

Exhibit 2 – GVRA District Map



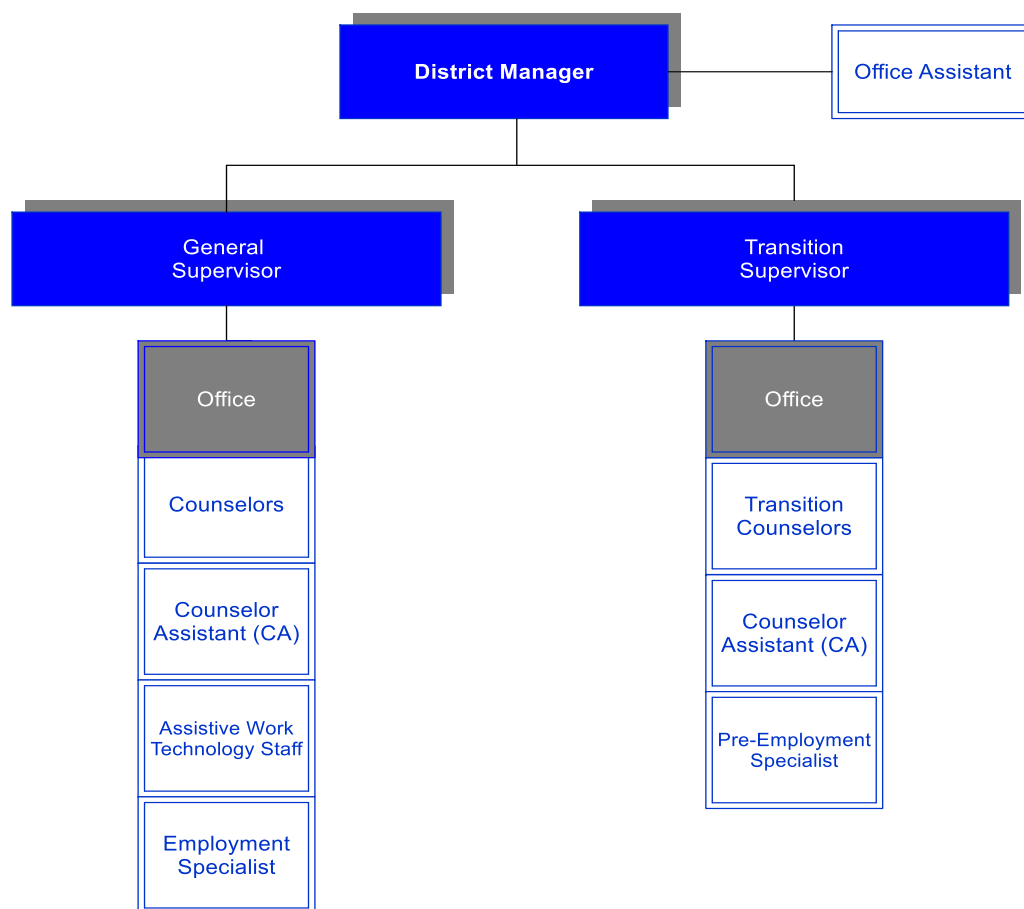
District Office Structure

The state is divided into eight districts and each district is comprised of multiple offices, generally three to five in number. A District Manager oversees the activities of all VR offices within a district. An office is headed by a Supervisor who reports directly to the District Manager. The supervisor may be a General Supervisor or a Transition Supervisor, or there may be one supervisor overseeing staff that are both general and transition divisions. Each office is staffed with counselors/transition counselors who assist students and youth with transition from school to work and general counselors who help adults obtain

and maintain employment. Some of these counselors have earned the Certified Rehabilitation Counselor (CRC) credential. Once an individual applies for services, the counselor determines their eligibility and completes a comprehensive needs assessment with the client to determine their needs. The number of counselors in each office vary based on staffing needs. The structure within each district varies, but they may for example, be organized as shown in Exhibit 3.

Exhibit 3

GVRA District Office Organizational Chart



As of March 7, 2022, 23 supervisors operate the 33 VR Offices throughout Georgia. Of GVRA's 23 Supervisors, 11 oversee multiple offices instead of one office as intended by GVRA management. There are also four vacant supervisor positions, two of which are occupied by temporary supervisors.

Exhibit 4 – GVRA District Office Staffing *

Districts	Number of VR Offices	Number of Supervisors	Number of Counselors	Total Staff	Number of Counties Served
District 1	5	3	15	25	17
District 2	5	4	17	30	12
District 3	3	4	11	19	7
District 4	3	2	11	17	22
District 5	4	3	10	17	26
District 6	5	3	12	21	28
District 7	4	2	9	15	25
District 8	4	2	7	13	23
Total	33	23	92	157	160**

*As of March 7, 2022

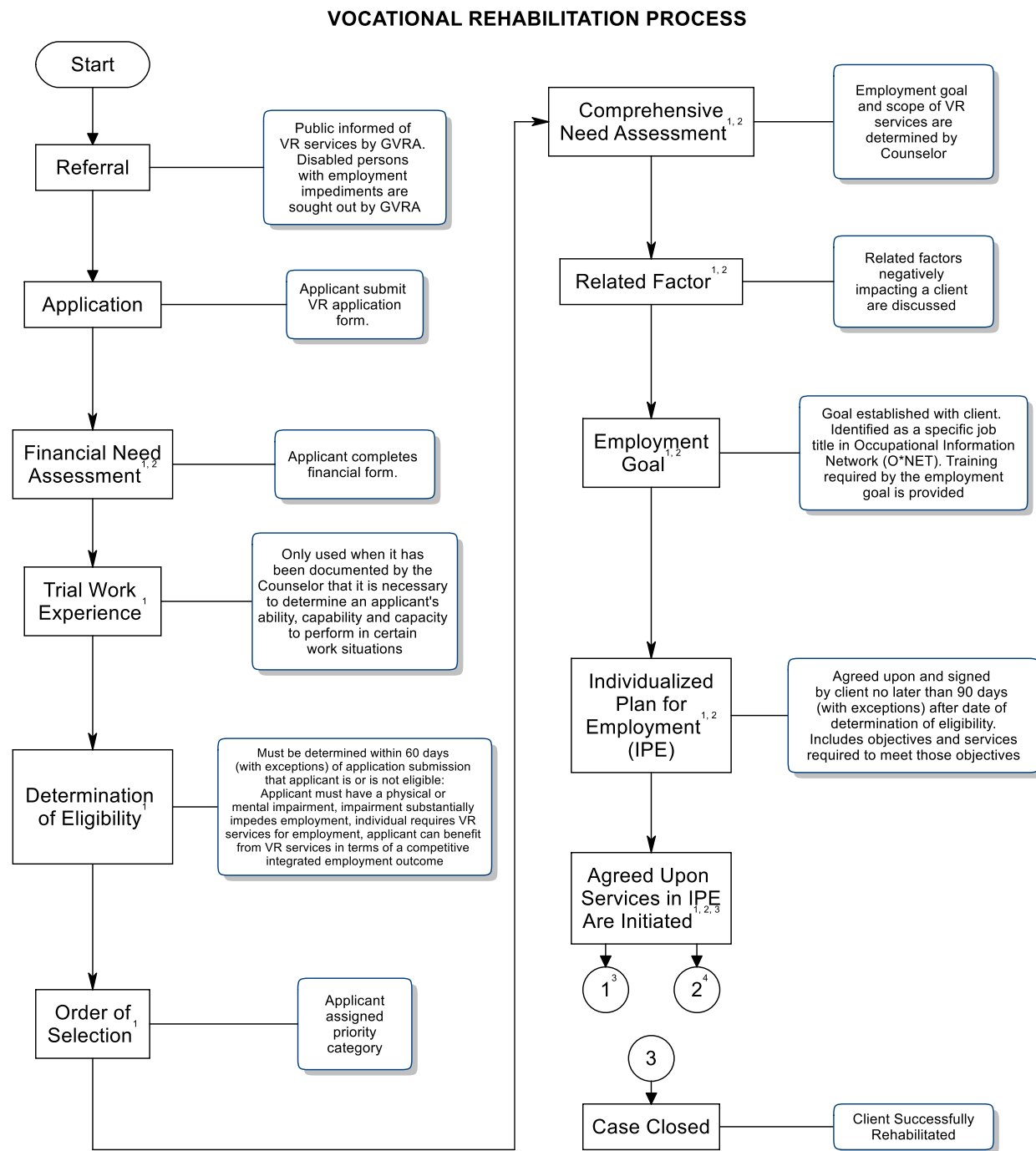
**Districts 2 & 3 share service area in Fulton County

GVRA typically recruits Counselors with a background in case management, social services, and knowledge of policy regarding people with disabilities with an emphasis on individuals who are accredited Certified Rehabilitation Counselors.

Vocational Rehabilitation Process

To receive VR Services, an applicant must have a documented physical or mental impairment that constitutes, or results in an impediment to employment and require VR services to prepare for, secure, retain or regain employment. Applications are completed electronically or in person at a local office. An eligibility determination is made once all documentation (medical, psychological, personal information, etc.) is received. A financial needs assessment is also completed at application to determine the individual's income and, if mandatory based on that income, cost sharing amounts for services that are not financially exempt. The counselor and client complete a comprehensive needs assessment to determine an appropriate employment goal and the services required to meet that goal. The required services are detailed on an Individualized Plan for Employment (IPE). The IPE is a signed agreement between the client and the counselor consisting of objectives, services and responsibilities designed to assist the client achieve an employment goal consistent with their unique strengths, concerns, abilities, and interests. Assistance in achieving an employment goal may include post-secondary education. The IPE is amended as necessary and reviewed as needed but no less than yearly. Exhibit 5 further outlines the VR application process.

Exhibit 5 – VR Process



If a client requires post-secondary education to achieve their goals, as determined by a counselor, verification that the school is approved must be made prior to any obligation to the client verbally, in an IPE or through an authorization of funds. Determination of the need for post-secondary education is treated on a case-by-case basis that can include input from a district office supervisor. The client's responsibilities as they relate to post-secondary education are outlined in the IPE. Once an institution is approved, the selected institution is included in the IPE. After the Operations Analyst Technician (OAT) reviews and approves the post-secondary worksheet and required documentation, the counselor can begin the authorization process by initiating a payment request to provide funding for post-secondary education.

Counselors are expected to document contact and/or service delivery progress as required on the IPE. The preferred caseload per counselor is 150 clients. The counselor is expected to contact the client once every 90 days, at a minimum, via letter, email, phone, or in person in addition to conducting an annual IPE review. A progress report from a service provider who made personal contact with the client can also satisfy the contact requirement.

Client contact is considered "deficient" when a client has not been contacted within 90 days. GVRA recently identified significant instances of deficient client contact in the metro Atlanta area (Districts 2 & 3). To address the concern, GVRA rehired three retired CRCs to reestablish contact with clients in approximately 1,200 case files. In approximately 900 of the 1,200 cases, clients were reassigned to permanent counselors and VR services continued. The remaining 300 cases are outstanding and GVRA continues to make efforts to reestablish contact.

Case Closure

To deem a VR client rehabilitated and close their case, a client must obtain and maintain employment for a minimum of 90 days. Proof of sustained employment is provided by paystubs and uploaded into Aware. Active recipients of tuition assistance must continue to provide counselors with grades for each enrolled semester through the conclusion of studies leading to receipt of a diploma or certificate.

If there is no response from a client, the counselor is required to attempt at least two contacts, one being in writing, prior to case closure. With some exceptions, a notice of change (NOC) letter informing the client of case closure must be sent 30 days prior to case closure.

Quality Assurance

VR recently added three members to the Policy Unit that will provide improved management oversight for the Quality Assurance (QA) team to conduct reviews. Additionally, a "report card" was implemented to track the monthly progress of counselors and other client-involved staff. This will allow general supervisors to identify counselor strengths and weaknesses and implement corrective actions to target specific areas of deficiency. The QA team and supervisors will conduct random quarterly reviews of cases managed by counselors. Further reviews of specific counselors or focus areas are conducted as warranted.

Counselors are expected to accomplish the following:

- 1) Contact an applicant within five days of referral
- 2) Contact client, at a minimum, once every 90 days
- 3) Document all contact with client
- 4) Determine client eligibility within 60 days of application
- 5) Develop the client IPE within 90 days of eligibility

The following key performance indicators are used to assess counselor performance:

- 1) Number of referrals to application
- 2) Average number of days from referral to application
- 3) Number of applications
- 4) Number of eligibility determinations
- 5) Number of ineligible determinations
- 6) Percentage of eligibility determinations completed within 60 days of application date/extension date
- 7) Average number of days to determine eligibility
- 8) Number of initial IPEs developed
- 9) Percentage of IPEs developed within 90 days of eligibility date
- 10) Average number of days to develop IPE
- 11) Number of current active cases
- 12) Number of open cases with case entries within 90 days
- 13) Percentage of cases with current case entries
- 14) Number of closed cases
- 15) Number of successfully closed cases
- 16) Percentage of cases closed successfully

Currently, a VR business analyst provides district managers and supervisors a monthly report of the last six contacts for each client. This assists in maintaining contact and provides counselor performance information. They are also provided information on unpaid authorizations and fund expenditures. An informational interview with the VR business analyst revealed that reports can be generated on a bi-weekly basis to identify compliance with these key performance indicators.

Exhibit 6 provides the status of all active VR cases across the state of Georgia as of January 26, 2022, and consolidates the statewide total number of open cases of VR clients in each district. As summarized, approximately 1,448 clients have been deemed eligible for VR services. Additionally, 970 IPEs were created for clients who have been accepted in the VR program, and GVRA closed 782 cases for rehabilitated clients. Cases are closed and designated “successfully rehabilitated” when clients are provided appropriate and substantial services, in accordance with their IPE, which contributed to the employment outcome and the client achieved and maintained suitable employment for a minimum of 90 days. Approximately 3,225 client cases were closed due to various reasons other than rehabilitation i.e., unresponsiveness, health/medical reasons, lack of interest in services, death, commission of a criminal offense, or transfer to another state agency.

Exhibit 6 – District Office Case Status *

District	Office	App YTD	Eligible YTD	IPE YTD	Closed Rehab YTD	Closed Other YTD
Grand Total		2,057	1,448	970	782	3,225
District 01	Total	340	209	133	88	387
	Canton	37	27	22	15	113
	Dallas	35	15	5	9	84
	Ellijay	95	65	46	24	79
	Lafayette	128	65	41	25	39
	Rome A	29	27	13	15	52
	Rome B	16	10	6	0	20
District 02	Total	181	144	129	132	994
	Carrollton	31	42	36	29	93
	College Park 11A	7	6	9	10	45
	College Park 11B	8	8	0	9	7
	College Park A	47	8	6	17	280
	College Park B	20	11	7	4	42
	Griffin	13	14	11	6	14
	Marietta A	33	31	27	35	373
	Marietta B	3	3	5	2	7
	Marietta C	9	6	13	7	111
	Newnan	10	15	15	13	22
District 03	Total	142	112	114	166	415
	Atlanta A	22	12	20	24	78
	Atlanta B	9	7	7	11	23
	Cumming A	25	12	21	35	27
	Cumming B	1	0	0	0	0
	Decatur A	1	4	10	15	45
	Decatur B	9	7	7	0	38
	Norcross A	22	21	11	23	36
	Norcross B	27	24	19	32	48
	Tucker A	10	8	14	16	75
	Tucker B	16	17	5	10	45
District 04	Total	474	166	102	83	254
	Athens A	286	36	9	21	36
	Athens B	74	62	61	35	137
	Cleveland	41	43	16	10	47
	Gainesville	73	25	16	17	34
District 05	Total	238	210	133	83	305
	Columbus	100	78	28	29	122
	LaGrange	25	27	25	16	39
	Macon	84	78	61	29	109
	Warner Robins	29	27	19	9	35
District 06	Total	301	263	133	101	222
	Augusta A	106	81	40	33	81
	Augusta B	23	23	10	15	21
	Dublin	75	62	27	32	55
	Milledgeville	18	24	16	5	16
	Statesboro	57	53	34	15	34
	Swainsboro	22	20	6	1	15
District 07	Total	229	191	143	84	282
	Albany A	116	99	67	40	106
	Albany B	0	0	0	5	3
	Thomasville	42	14	7	11	72
	Tifton	32	39	37	12	28
	Valdosta	39	39	32	16	73
District 08	Total	152	153	83	45	366
	Brunswick	34	21	17	15	67
	Reidsville	18	34	28	4	113
	Savannah A	42	30	12	11	32
	Savannah B	17	16	10	8	42
	Waycross	41	52	16	7	112

*As of January 26, 2022

Post-Secondary Academic and Vocational Training

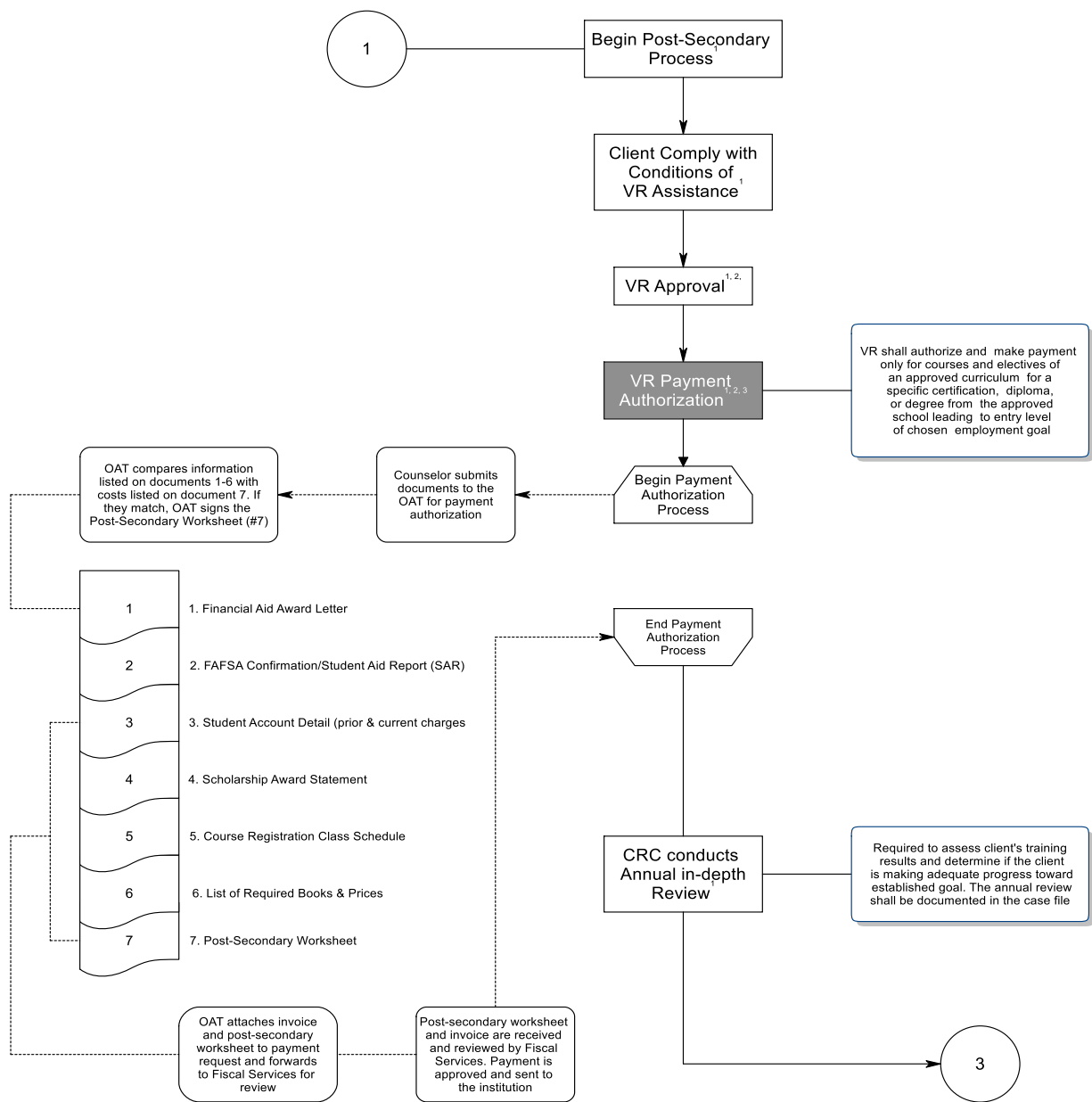
If post-secondary academic or vocational training is required by the agreed upon employment goal, several steps are involved to authorize the services that prepare a client for entry-level employment:

- 1) **Begin Post-Secondary Academic Assistance Process:** The process begins when post-secondary training is required by the employment goal.
- 2) **Clients Comply with Conditions of VR Assistance:** The academic training must be necessary to reach the entry level of the specific occupation for their employment goal. They must take a full course load, as defined by the institution. Additionally, the client is required to maintain a 2.0 grade point average or the minimum cumulative grade point average necessary to maintain good standing with the school. Finally, the client must maintain regular contact with their CRC and make no changes to their employment goal or training program unless agreed upon in advance by the CRC. Any changes must be reflected in an amended IPE.
- 3) **VR Approval:** In concert with the counselor, the OAT verifies that the school is approved. Verification must be made prior to any obligation to the client verbally, in an IPE, or through an authorization of funds.
- 4) **VR Payment Authorization (Exhibit 7):** VR authorizes and makes payment for those courses and electives outlined in an approved curriculum for a specific certification, diploma, or degree from the approved school, and only for courses that lead to the certification, diploma, or degree required for entry level into the chosen employment goal.
 - a) Counselor initiates request for payment authorization on behalf of a client.
 - b) A Post-Secondary Worksheet and supporting documents are sent with the request. Supporting documents should also include the invoice from the institution that lays out the total amount of tuition costs and financial aid information.
 - c) The OAT matches supporting documentation with costs on the Post-Secondary Worksheet to ensure the correct tuition amount is paid. The OAT stamps the Post-Secondary Worksheet, indicating approval.
 - d) If the information does not match, the documents are returned by the OAT to the counselor. If the documents are approved by the OAT, an authorization is created.
 - e) A request is sent to provider management for review and processing. Once it is determined all documents are complete, the payment is approved and released for payment in the case management system. An upload file is created, processed in PeopleSoft Financials and a check is issued for payment from PeopleSoft Financials.
- 5) **VR Payment Disbursement:** Tuition assistance payment policy was changed effective July 31, 2020, to make colleges and universities the primary payee. Clients may be the primary payee on

a case-by-case basis for costs associated with transportation, rent, work adjustment, or individual meals, etc.

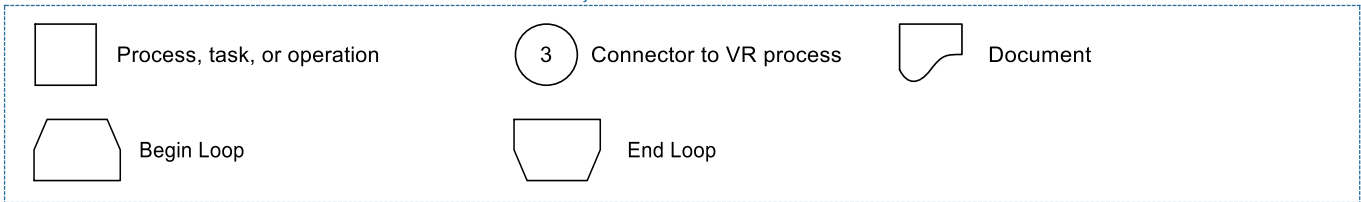
- 6) **VR Reimbursement Policy:** When a client is approved for tuition assistance, the amount is determined by the initial financial needs assessment combined with the class schedule provided for the relevant semester. A client can also receive funding for maintenance costs, which consists of client needs such as rent, utilities, payment of school housing, or a school meal plan. If the client does not officially enroll in all classes they intended, or transfer to another school in between semesters, the client is responsible for reimbursing GVRA for any funding received. Per Client Services Policy Manual, effective July 1, 2021 (Policy Manual), Section 446.1.22, the client must immediately refund GVRA, agree to a payment plan, or have future payments adjusted to correct overpayment. For example, overpayment can take place when the client decides to make a partial payment toward tuition costs and retain the remainder of the tuition assistance funds.
- 7) **Counselor Conducts Annual Review:** An in-depth review of the IPE is required to assess each client's training results and determine if a client is making adequate progress toward established goals, including post-secondary training. An annual review prevents a client from being locked into a potentially unsuccessful plan. The Policy Manual requires that an annual review be documented in the case file. In matters pertaining to post-secondary training, the Post-Secondary Academic and Vocational Training Job Aid document (Appendix 1) is used by counselors as a tool to remind clients of their responsibilities while receiving tuition assistance. Although not required by policy, some counselors have incorporated the Job Aid into the IPE, documented client acknowledgment of responsibilities in case notes in the Aware system and have provided a copy of the Job Aid to the client. This procedure is not consistently practiced.

Exhibit 7 – Post Secondary Payment Authorization Process



- Notes:
- 1. Counselor involved
 - 2. District/Office Supervisor involved
 - 3. Operations Analysis Technician (OAT) involved

Chart Key



How We Conducted the Review

Proactive Review of VR Clients Receiving Tuition Assistance in FY19 and FY21

Objective

The objective of this review was to assist GVRA in determining if fraud is widespread within the tuition assistance program, specifically relating to VR clients who received tuition assistance but did not enroll in college or university programs as required. If applicable, OIG identified case files within the GVRA case management system that required further investigation.

Scope

OIG reviewed all tuition assistance payments GVRA made to VR clients during FY19 and FY21. OIG focused on identifying all payments made for VR clients not enrolled in a college or university in Georgia. Further, OIG reviewed the circumstances surrounding payments for red flags of fraudulent activity versus overpayments because of error. For the purposes of this review, VR clients known by OIG as enrolled in out-of-state programs were excluded.

Methodology

- 1) Requested a master listing of tuition assistance (TA) recipients from GVRA, during the period of 2018 through 2021.
- 2) Filtered master list into populations that displayed TA recipients during FY 2019 and FY 2021.
- 3) Separated master list into three separate listings for students enrolled in:
 - a. USG schools
 - b. TCSG schools
 - c. Non-USG/Non-TCSG schools (out-of-state schools)
- 4) Collaborated with USG and TCSG for verification of student enrollment for semesters contained therein.
- 5) Identified unenrolled recipients of tuition assistance payments as reported by USG and TCSG.
- 6) Reviewed client case files and contacted VR clients directly and registrars for specific schools to further confirm a lack of VR client enrollment.
- 7) For clients enrolled in Inclusive Post-Secondary Education (IPSE) programs or any institution providing summer camp programs or professional/continuing educational programs, academic records are generally not kept in the registrar's office, hence were not found enrolled in USG/TCSG databases. Confirmation of enrollment for these programs was verified with the specific schools with the assistance of USG and TCSG.
- 8) Verified with GVRA that tuition assistance paid to VR clients who were not enrolled in a college or university was not repaid to GVRA as required per policy.
- 9) Interviewed and reviewed case files and information provided by GVRA to determine the recipients of the payments, the circumstances surrounding the reason for payment, evidence of fictitious or altered documents provided as support, and the CRC associated with requesting the payment. OIG reviewed the information obtained for patterns and similarities among the payments that are indicative of fraudulent activity versus overpayments as a result of an error.

-
- 10) Calculated the total amount of loss to GVRA for payments made on behalf of unenrolled GVRA clients.

OIG received from GVRA a list of 2,271 tuition payments distributed to 794 clients. Filtering the tuition payment dates of the master list for FY 2019 (07/01/2018 through 06/30/2019) and FY 2021 (07/01/2020 through 06/30/2021) reduced the population to 1,475 payments distributed to 705 clients. The list was delivered to USG, where the payments were classified by school system based on the school attended by a GVRA client. USG returned a listing of 1,014 payments to clients who attended USG schools and 164 payments to clients who attended TCSG schools. USG conducted its enrollment verification process and returned a USG listing of 222 payments for unverified enrollments. When it was discovered that the verification process did not account for client enrollment in Inclusive Post-Secondary Education (IPSE) programs, USG conducted the verification process again, this time returning a listing reduced to 43 payments for unenrolled clients. Five of these payments were later found to have been made toward enrollment in out-of-state institutions. Similarly, TCSG was asked to verify enrollment for 164 payments made on behalf of clients. The listing was returned with nine payments for unenrolled clients. OIG then contacted clients for explanation regarding failure of enrollment and for supporting documentation to verify enrollment for any dispute they had with a registrar's enrollment determination.

Internal Controls Surrounding the Tuition Assistance Program

Objective

To review the process surrounding the tuition assistance program and management of tuition assistance disbursements. OIG seeks to assist GVRA in strengthening internal controls and lowering the risk of future opportunities for fraud.

Scope

OIG reviewed the internal processes governing the administration of tuition assistance from payment request to disbursement of tuition funds for FY19 and FY21 and reviewed the VR process from the initial client application through case closure. OIG specifically focused on the internal controls in place in FY19 versus FY21 when GVRA made internal process improvements to deter inappropriate activity.

Methodology

- 1) Reviewed the Policy Manual for the GVRA VR Program.
- 2) Reviewed district office structure and staffing model.
- 3) Interviewed GVRA staff members occupying the following departments and positions to gain understanding and insight:
 - a. Client Services
 - b. District Officer Manager
 - c. General Supervisor
 - d. Operations Analyst Technician (OAT)

- 4) Conducted an analysis of the timing when payments were made for VR clients not enrolled and the effect of internal controls in place in FY19 versus FY21.

Although non-binding for state-level inspectors general, OIG conducted this review in accordance with the Council of the Inspectors General on Integrity and Efficiency's (CIGIE) Quality Standards for Inspection and Evaluation ("Blue Book," December 2020). This evaluation cannot be relied upon to disclose all errors, fraud, or illegal acts that may exist. GVRA is not under any legal obligation to accept or adopt our final recommendations.

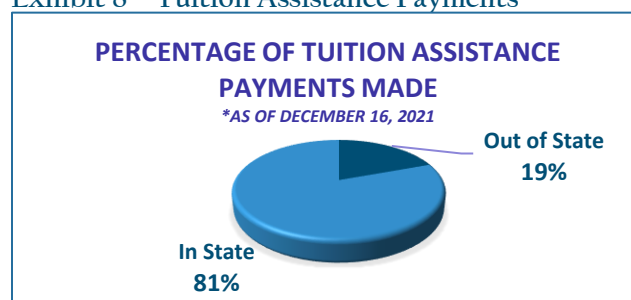
Findings

Tuition Assistance Payments

During FY 2019 and FY 2021, GVRA made 1,475 tuition assistance payments to 705 VR clients. Approximately 1,178 (81%) tuition assistance payments were made to educational institutions located in Georgia, while 284 (19%) payments were made to out-of-state institutions (Exhibit 8). Through collaborations with the USG and TCSG, OIG verified enrollment of VR clients attending in-state schools. OIG identified a total of 21 payments were made to VR clients not enrolled in a college or university program.

An additional payment was made to an enrolled VR client that paid the university a portion of the assistance received from GVRA toward tuition costs. The 22 payments resulted in a loss of approximately \$200,935 to GVRA. Of those 22 payments, 10 are associated with the fraudulent activity OIG previously investigated that led to this review. Those 10 payments comprised \$174,951 of the \$1.37 million fraud loss. The other 12 payments resulted in an additional loss of approximately \$25,984. Payments were either: made to the school or client where enrollment could not be verified; paid directly to clients who claimed they were enrolled but were not; enrolled in fewer classes than agreed; were enrolled but made partial payment toward tuition costs and retained the remainder of funds. Of the 12 payments, 11 were made in FY19 before a policy change required tuition payments be paid directly to the institution. Ten of the payments were paid directly to the client and one was paid directly to the institution. For the one remaining payment made in FY 21 after the policy change, the client was approved for direct payment, as the institution only allowed online payment for an online course.

Exhibit 8 – Tuition Assistance Payments*



OIG's review of client case files revealed additional concerns, including the following:

- 1) Case Management Practices: Excluding the five clients previously under investigation, OIG reviewed 36 client case files. We classified the clients as follows:
 - a. Rehabilitated client no longer in need of GVRA services: Of eight case files in this category, six case files showed no evidence of completion of an annual IPE review, two case files had no IPE, one case file had no verification of employment before case closure, and one case file had no grades/transcripts in Aware.
 - b. Closed case with outcome other than rehabilitated: In all nine case files in this category, clients either failed to respond to GVRA contact attempts by phone, email, or letter. In one file, the case was closed due to client lack of interest in receiving VR services.
 - c. Active client: Of 19 case files in this category, no evidence of completion of an annual IPE review could be found in 14 case files. No IPE was found in one case file, while only the signature page was uploaded to Aware in two case files. Additionally, no grades/transcripts were found in two case files. In one case file, where case notes indicated OAT approval of post-secondary documents for two semesters, no documents were found in Aware. Finally, in two case files, no case note entries were noted for a significant amount of time, one with no entry since a 10-Day Contact Letter dated 9/27/2021 and date noted in Aware by OIG on 4/5/2022 (approximately six months), and the other with no entry for 11 months (1/02/2019 – 12/27/2019).
- 2) Client referrals for Assistive Work Technology (AWT) services were documented in eight case files. OIG verified that the client received technological equipment based on documentation in Aware in only five of the cases. As for the other three:
 - a. Client was referred to AWT on 8/21/2018. Quotes were received for a notebook, smart pen, and fitness watch. Case notes dated 1/11/2019 indicate items were picked up from a district office for delivery to another district office. However, no documentation could be found in Aware indicating that the items were received by the client.
 - b. Client was referred to AWT on 2/14/2018 for a hearing-impaired E-Scope. Case notes dated 3/01/2018 indicate that the item was ordered. No other reference to the item was found in Aware to determine the disposition of the item.
 - c. Client was referred to AWT on 1/23/2019 for a laptop. Case notes dated 2/19/2021 indicate that the item delivered to the client's mother. However, no documentation was found in Aware indicating that the item was signed for and received by the client or the client's mother.

Unaccounted for AWT equipment was not within the scope of OIG's evaluation, however indications were present that these purchases are vulnerable to waste and abuse, and OIG believes further evaluation of this aspect of the VR program would be beneficial.

Internal Control Weaknesses

Tuition Assistance

Client account overpayment occurred when the client dropped a class or enrollment without the CRC's knowledge. For example, in one case, GVRA paid the client approximately \$7,000 in tuition assistance for a full schedule, but the client only paid the educational institution approximately \$400 for the semester. Although GVRA changed its policy effective July 31, 2020, to convey tuition assistance directly to the educational institution, CRCs retain the ability to circumvent the policy change and pay a client directly by listing the client as a vendor in Aware. Specifically, CRCs can initiate a check under the payment threshold of \$5,000. The lack of segregation of duties in the tuition assistance process creates an opportunity for fraud when CRCs can submit payment requests directly to VR Provider Management for processing of tuition payments.

CRC payment without proper client documentation also presents a risk of financial loss. For example, after the policy change, a CRC requested a tuition assistance payment be sent directly to the client for a class without documentation confirming enrollment. According to Aware case notes, the check was not sent to the correct address because the client contact information was not updated.

OIG did not identify a pattern of one counselor handling a large percentage of the payments associated with financial loss. Nor were there fictitious or altered documents identified in the case files. Therefore, these payments appeared to be made in error rather than with the intent to defraud GVRA.

Case Supervision

As highlighted in Exhibit 4, GVRA had a staff of 92 counselors as of March 7, 2022. At the end of February 2022, VR had 21,928 active cases under supervision, which averaged 238 cases per counselor. This exceeded GVRA's preferred caseload of 150 cases per counselor. Staffing challenges directly impact a district office's ability to effectively supervise clients. Due to high caseloads, changes in client status can be overlooked and neglected for an extended period. The risk of wasteful spending for unnecessary services is increased while client supervision is decreased.

Additionally, assigning client caseloads to district managers and supervisors increases risk by burdening their primary function of supervising and training counselors. Removing this responsibility would allow random reviews of casework and encourage counselors to make better counseling decisions.

Some counselors are not consistent in maintaining client contact. As a result, counselors may be unaware of changes involving a client's academic progress, current field of study, or in some cases, the educational institution attended. In this case, the client may have violated the terms of the IPE, which is grounds for suspension of GVRA support and possible case closure. In instances where a client has received a direct tuition payment and failed to maintain status updates, waste of funds is possible, as a client may fail to enroll or drop classes before or during the semester.

Notable control weaknesses include:

1. Case notes within Aware are either inaccurate or incomplete. This presents issues with keeping track of client case files in the event of staff turnover and may result in overpayment or payments to the wrong institution.
2. Direct payments to clients receiving assistance for maintenance expenses, such as meals for a semester or rent for a 12-month lease term, may increase risk of overpayment due to inaccurate case notes in Aware or failure to contact the client every 90 days. For example, if a client is attending a school in another county outside of their primary residence, a lease for the second residence near the school must be provided. A client can then leave a college dorm or apartment for various reasons and move back into their primary residence without counselor knowledge resulting in wasted lease payments.

District Office Internal Concerns

District office staff raised several concerns during informational interviews. First, due to reported staff shortages, multiple positions are handling tasks outside of their assigned responsibilities, including supervisors. OATs keep track of case management for multiple districts which makes oversight difficult when evaluating the need for funding proposals, legitimacy of documents, and matching of allowable costs between Post-Secondary Worksheets and supporting documents.

In addition, district office staff noted concerns about various providers continually marketing their services to district offices to increase business. The risk of waste and abuse may increase when providers are compensated for services that do not address client needs. Providers may also recommend that clients continue services that are no longer needed or effective. As a result, a risk exists that client services become “provider-driven” rather than client-driven. Specifically, a client can receive services for a longer period than necessary, or clients can receive a service that they do not need in order for vendors to maintain a steady number of clients.

Program Recommendations

1. Designate a liaison between each GVRA district office and educational institutions to confirm enrollment for each client before semester payments are approved. This should reduce erroneous payments by verifying actual classes registered by the client and reduce the possibility of the client deviating from courses previously approved by the OAT.
2. Standardize the Individual Plan for Employment (IPE) format to incorporate the Post-Secondary Academic and Vocational Training Job Aid form (Appendix 1) to maximize client accountability and ensure clients are aware of their responsibilities. Standardization would promote a consistent application of GVRA policy and provide the same expectations of all clients for compliance while advising them of the consequences for compliance failure.
3. Revise current policy to allow notice of tuition assistance suspension upon failure by the client to provide required documentation for each completed course of study or semester. Clients have not consistently submitted the required documentation (grades/transcripts) that demonstrate they have made satisfactory progress in the goals outlined in their IPE. Knowledge of possible tuition assistance suspension should incentivize the client toward compliance.
4. Require that district office supervisors analyze supporting documentation for legitimacy before tuition assistance approval. Supervisors should review a percentage of documents, at a minimum, before it is sent to the OAT for approval. An additional layer in the approval process would provide more district office accountability.
5. Supplement the monthly report provided by VR to district office supervisors and counselors with additional information to increase efficiency. This information should alert them of clients that are beyond:
 - a. Due date of annual IPE review
 - b. Ninety days of GVRA contact
 - c. Date Notice of Change letter must be sent to meet the minimum 30-day notice requirement prior to case closure
 - d. Number of days (to be determined by VR) for client submission of documents for the relevant semester

This would further reduce the likelihood of case file neglect or lack of communication with the client.

Appendix I

POST-SECONDARY ACADEMIC AND VOCATIONAL TRAINING JOB AID FORM

The provision of financial assistance and/or Vocational Rehabilitation (VR) Program support during your training program is based on the required training for entry level for your specific occupation, the availability of program funds and is subject to VR Program policies. These policies and your responsibilities include the following:

1. You must meet with your VR Counselor at least annually to review your Work Plan and required documentation for your case file. You must also maintain regular contact with your VR Counselor during the school term.
2. You must meet and continue to meet financial need criteria. You must report any changes in your financial circumstances to your VR Counselor and provide any requested documentation needed to reconcile your account.
3. Each year, you must apply for, and present proof of a completed application for available financial aid including the Free Application for Federal Student Aid (FAFSA). It is your responsibility to check with the school to which you are applying for the deadline to complete the FAFSA to ensure the availability of financial aid. You must accept all available financial aid with the exception of loans. You must provide a copy of your Student Aid Report (SAR) which is provided upon the completion of the FAFSA, a copy of your financial aid award letter and a copy of your student account detail report from the institution for each semester/quarter, before the VR Program will authorize payment for training related expenses. These documents must be provided by you no later than 30 days prior to the institution's due date for payment of tuition and fees for the semester/quarter or no later than five days after the information is made available by the institution(s). Failure to submit the required documentation by the due dates may result in non-payment by the VR Program or a late payment. Any late fees associated with your failure to submit required documentation by the due date shall be your responsibility. Funds from your financial aid will be applied toward all of the costs of your training, including tuition, mandatory fees, books and maintenance (housing and meals). The amount of assistance you receive from the VR Program will be based on VR Program approved fees for each training service minus the financial aid you receive. Neither loans nor unrestricted merit scholarships will be considered in determining your level of VR training support.
4. You must utilize all available comparable benefits. VR will not provide funding for services covered by a comparable benefit.
5. You must inform your VR counselor within ten (10) days if you are approved for any additional financial aid or if you directly receive funds related to your training.
6. If you decide to attend a post-secondary training institution that is not a part of the Georgia State College and University System, you are responsible for all training related expenses beyond what is allowed per VR Program policy and payment procedures.
7. You are required to take a full academic load (as defined by your school) unless there are some special medical circumstances documented by a licensed specialist in the field of your disability and approved by your vocational rehabilitation counselor each semester/quarter. No more than two (2) semesters/quarters during which you take less than a full load will be authorized by VR during your training program. Blanket approval for taking a reduced course load based solely on your disability will not be given.
8. You must maintain a minimum cumulative (overall) grade point average of 2.0 or the minimum cumulative grade point average necessary to maintain good standing with the school and to graduate from your approved course of study required for your vocational goal, whichever is greater. The VR Program sponsorship will be suspended or terminated for failure to maintain the required GPA. If your cumulative GPA falls below the required GPA, you may be allowed one probationary semester/quarter to bring the average back up before the VR Program discontinues funding. No more than two (2) probationary semesters/quarters will be authorized during your time in training.
9. You must provide your VR counselor with a copy of your grade report at the end of each semester/quarter within five (5) days of the school posting of grades.

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10. You must contact your VR Counselor if there are problems that affect your approved training program (such as failing grades, suspension notices, excessive absences, medical problems, etc.). Any change in your work goal or training program must be agreed upon, in advance, by you and your VR counselor, and must be reflected by an amended and signed work plan in order for VR support to continue.
 11. The VR Program will pay for no more than three (3) remedial or non-credit courses.
 12. Prior to dropping a class, you must contact your VR counselor. The VR Program will pay for the taking of a class only once. Refunds received from dropping a class after VR approval must be refunded to the VR Program within ten (10) days.
 13. You must take only those courses that count toward your certification/diploma/degree. Prior to VR Program's payment for any classes, you must submit a class schedule each semester/quarter to your VR counselor. The VR Program will pay for the taking of a class only once. The VR Program sponsorship for a freshman pursuing an undergraduate degree (bachelor's degree) shall be limited to five (5) years and for each year thereafter shall be decreased by one (1) year based on your enrollment status (sophomore, junior, senior). VR Program support for any other post-secondary training will be defined by your training curriculum and as reflected on your work plan.
 14. The VR Program will support fall, spring and summer semesters or fall, winter, spring and summer quarters.
 15. The VR Program will pay up to the maximum rate but not exceeding the actual cost each semester/quarter as established by the Business Unit to cover books/supplies required for approved courses. Receipts signed by you are required. As appropriate, comparable benefits must be applied.
 16. During the first two years of undergraduate training you are expected to attend an available institution within 35 miles of your home. If you choose not to attend an available institution within 35 miles of your home, VR will only provide support at the level that would have been provided at your local institution. You will be responsible for any difference in cost resulting from your choosing not to attend an institution in your local area.
 17. If your school is more than 35 miles from your home, and the VR Counselor has determined maintenance (which includes housing and meals) is appropriate and necessary, VR shall authorize no more than the monthly individual amount for SSI. VR maintenance (housing and meals) assistance will be discontinued during breaks in your training exceeding thirty (30) days. Proof of payment must be provided. If maintenance for housing is provided, proof of payment for this service is required.
 18. You must provide a student account detail report from the institution for the current, and where applicable, previous semester/quarter, before the VR Program shall authorize payment for post-secondary training expenses. You must reimburse the VR Program when the following circumstances apply: (1) you receive financial aid funds for school services already paid for by VR; (2) you receive a refund from dropping a class; and/or (3) you do not utilize VR training funds for the purpose they were intended. If you received an overpayment during a semester/quarter, you must immediately refund the VR Program, agree to a payment plan or agree to have future payments adjusted to deduct the overpayment.
 19. You may reimburse VR by:
Paying the full amount of the required reimbursement no later than 45 days prior to the institution's due date for payment of tuition and fees for the next semester/quarter or, have the amount deducted from the next authorization(s) until the balance has been paid in full. If you refuse to refund VR, your VR school support will be suspended, and your case may be closed for fraud/misuse of Program funds.

Appendix 2

GVRA Response

Brian P. Kemp
Governor



Chris Wells
Executive Director

Georgia Vocational Rehabilitation Agency

August 24, 2022

Scott F. McAfee, Inspector General
Office of the State Inspector General
2 MLK, Jr. Drive
Atlanta, GA 30334

RE: Response to OIG Evaluation of Tuition Assistance Provided by GVRA

Dear Inspector General McAfee,

Thank you for the opportunity to respond to the review your office conducted of tuition assistance payments administered by the Georgia Vocational Rehabilitation Agency (GVRA) in FY19 and FY21. Below you will find a response to the five recommendations made by the Office of the State Inspector General (OIG). As detailed below, GVRA is working towards or has already implemented many of the suggested recommendations or has implemented alternative internal controls/processes to address the identified concerns.

1. **Recommendation:** Designate a liaison between each GVRA district office and educational institutions to confirm enrollment for each client before semester payments are approved. This should reduce erroneous payments by verifying actual classes registered by the client and reduce the possibility of the client deviating from courses previously approved by the OAT.

Response: GVRA has created a Statewide Transition Coordinator and Transition Supervisors to increase competencies in transition cases and to establish a clear line of communication between the agency and educational institutions. In addition, in July 2020, a new standard operating procedure (SOP) was implemented to verify student enrollment and to require direct payments to institutions.

2. **Recommendation:** Standardize the Individual Plan for Employment (IPE) format to incorporate the Post-Secondary Academic and Vocational Training Job Aid form (Appendix 1) to maximize client accountability and ensure clients are aware of their responsibilities. Standardization would promote a consistent application of GVRA policy and provide the same expectations of all clients for compliance while advising them of the consequences for compliance failure.

Response: Counselors are currently reviewing the Post-Secondary Academic and Vocational Training Job Aid with every client who receive post-secondary education assistance and are documenting the review in the client's electronic case file. Members from the GVRA Policy and Compliance and Business Applications Units are working together to revise the existing IPE format to include information that maximizes client accountability and responsibility. Further, in the Spring of 2022, all existing counselors received Post-Secondary Training, which is also now provided when onboarding all new counselors.

3. **Recommendation:** Revise current policy to allow notice of tuition assistance suspension upon failure by the client to provide required documentation for each completed course of study or semester. Clients have not consistently submitted the required documentation (grades/transcripts) that demonstrate they have made

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August 24, 2022
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satisfactory progress in the goals outlined in their IPE. Knowledge of possible tuition assistance suspension should incentivize the client toward compliance.

Response: GVRA policy currently provides for clients to be notified that services, including tuition assistance, may be suspended due to noncompliance for failing to provide required documentation. *See, Client Services Policy Manual (CSPM) 136.0.00 et seq.*

4. **Recommendation:** Require that district office supervisors analyze supporting documentation for legitimacy before tuition assistance approval. Supervisors should review a percentage of documents, at a minimum, before it is sent to the OAT for approval. An additional layer in the approval process would provide more district office accountability.


Response: In July of 2022, an SOP was implemented to address “Authorization Monitoring.” This SOP requires supervisors to run reports on all open and closed authorizations under \$5,000.00 on the last day of the month and that they review 5% for accuracy and appropriateness. This report is required to be submitted to the District Manager for review by the 10th day of the next month.

5. **Recommendation:** Supplement the monthly report provided by VR to district office supervisors and counselors with additional information to increase efficiency. This information should alert them of clients that are beyond:
 - a. Due date of annual IPE review
 - b. Ninety days of GVRA contact
 - c. Date Notice of Change letter must be sent to meet the minimum 30-day notice requirement prior to case closure
 - d. Number of days (to be determined by VR) for client submission of documents for the relevant semester

Response: To increase efficiency, GVRA created a Data Team in August 2020 to provide additional information to counselors and supervisors. Currently, a ninety-day contact report is pulled by the GVRA Data team and reported monthly for each counselor on a counselor’s monthly report card. The monthly report card is then reviewed by each supervisor. Additionally, counselors are required to track the due date of their annual IPE reviews and dates by which a Notice of Change letter must be sent. Current policy requires a thirty (30) day window for document submission (five (5) days for grades at the end of the semester). This is reviewed during the post-secondary training and will continue to be monitored by the supervisor prior to the beginning of each semester. Additional clarification is being requested from the Vocational Rehabilitation Technical Assistance Center for Quality Management to address when services can be discontinued due to client non-compliance.

Although GVRA began evaluating tuition assistance payments and improving the processes and procedures related to the administration of tuition assistance prior to this review, GVRA appreciates OIG’s assistance with identifying areas for improvement. GVRA continues to be committed to improving internal controls in all program areas and preventing fraud, waste, and abuse throughout the agency.

Sincerely,


Chris Wells
Executive Director



OIG Contact & Staff Acknowledgements

Contact For more information, contact the Office of the State Inspector General at ig@oig.ga.gov or visit www.oig.ga.gov.



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