# Vocational Rehabilitation Services Manual Section D-400

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## Notes on the Manual

On October 1, 2017, Texas Workforce Commission’s Blind Services Division and Rehabilitation Services Division combined to create a single designated state unit (DSU) to administer the vocational rehabilitation program for Texans with disabilities.

The combined Vocational Rehabilitation Services Manual (VRSM) was initially published on October 1, 2017. The latest update to this manual is reflected in the chapters below.

Please note that VRSM includes links to information that is intended to provide additional decision-making supports to VR staff. Some of this information may not be available to individuals who are accessing the VRSM outside of TWC's firewall. Copies of materials that cannot be accessed directly through links can be made available upon request.

Substantive revisions to the content are noted in the VRSM List of Revisions. Any printed versions may not contain the latest policy changes.

If you have any questions about VRSM content, please contact the TWC Vocational Rehabilitation Division Policy Team at state office by sending an email message to vrsm.support@twc.texas.gov.

## Manual Overview

The VR Services Manual:

* helps ensure VR customers receive quality services to assist them in achieving successful competitive integrated employment outcomes as a result of their participation in vocational rehabilitation services.;
* helps to ensure taxpayer funds are spent wisely and each purchase paid for with public funds represents full value to the taxpayer; and
* provides published policies and procedures for maintaining compliance with federal and state laws, statutes, and rules or regulations.

The latest update to this manual is reflected in the chapters below. Any printed versions may not contain the latest policy changes.

# Vocational Rehabilitation Services Manual D-400: Quality Assurance and Continuous Quality Improvement

## Introduction

The Quality Assurance and Continuous Quality Improvement framework implements continuous quality assurance and continuous quality improvement through the use of a mission statement and strategic planning, leadership, communication, customer satisfaction results, data analysis, monitoring, and performance evaluation. The aim of the framework is to achieve compliant, high-quality, consistent outcomes for all Vocational Rehabilitation (VR) stakeholders.

## D-401: Legal Authorization

**2 CFR §200.328(a)**

**Monitoring and reporting program performance**

"Monitoring by the non-Federal entity. The non-Federal entity is responsible for oversight of the operations of the Federal award supported activities. The non-Federal entity must monitor its activities under Federal awards to assure compliance with applicable Federal requirements and performance expectations are being achieved. Monitoring by the non-Federal entity must cover each program, function or activity."

**2 CFR §200.303**

**Internal controls**

"The non-Federal entity must:

(a) Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in 'Standards for Internal Control in the Federal Government' issued by the Comptroller General of the United States or the "Internal Control Integrated Framework", issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

(b) Comply with Federal statutes, regulations, and the terms and conditions of the Federal awards.

(c) Evaluate and monitor the non-Federal entity's compliance with statutes, regulations and the terms and conditions of Federal awards.

(d) Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings.

(e) Take reasonable measures to safeguard protected personally identifiable information and other information the Federal awarding agency or pass-through entity designates as sensitive or the non-Federal entity considers sensitive consistent with applicable Federal, state, local, and tribal laws regarding privacy and obligations of confidentiality."

## D-402: Quality Assurance Policy

Quality assurance and continuous quality improvements require commitment from all levels of service delivery. Oversight functions include elements that are designed to work as a comprehensive system that provides reasonable assurances that agency activities are efficient and effective.

VR monitoring and oversight to ensure quality assurance and continuous quality improvement are performed in a variety of ways throughout the Texas Workforce Commission (TWC). The expected outcome is to ensure that VR is in compliance with all applicable laws, regulations, policies, and standards, including the Workforce Innovation and Opportunity Act and its implementing regulations, the Rehabilitation Act and its implementing regulations, agency rules found in 40 Texas Administrative Code, VR policy, and industry best practices.

Detailed information and resources for VR staff can be found on the Quality Assurance and Quality Improvement (QAQI) intranet page.

## D-403: Monitoring Processes and Procedures

### D-403-1: Operations Monitoring Reviews

Administrative and business requirements are monitored by means of quarterly reviews of division activity and by monitoring the operations of each region. These reviews establish a standardized, documented method for VR to monitor administrative and customer services budgets, purchasing, performance, inventory, and staff. The review process includes the identification of risks, tasks, tolerances, time frames, and the roles and responsibilities of VR staff at the state office, regional offices, and field offices.

Detailed information and resources for VR staff can be found on the Performance Analysis – Planning and Reporting intranet page.

### D-403-2: Monitoring Oversight and Internal Controls

Monitoring Oversight and Internal Controls (MOSAIC) is a comprehensive, rigorous, and transparent assurance system for program performance oversight at the state, regional, field, and case levels. Policies, procedures, relevant regulations, and processes are reviewed systematically. Plans for improvement are made based on the reviews. The case-review cycle is repeated quarterly to identify deficiencies and implement improvements.

Information about risk-ranking, focus areas, guidance for selecting and documenting cases for review, and quarterly reporting requirements is available in the MOSAIC Process Guide on the intranet.

### D-403-3: Case Reviews

VR management teams are required to monitor the services that are provided to VR customers and ensure compliance with published policies and procedures. Case reviews are part of this monitoring.

Published VR policy and procedure manuals, the MOSAIC Process Guide, and the Quarterly Unit Case Review Plan serve as references for management to identify the type and quantity of required case reviews.

For a detailed list of VR manuals and guides, refer to the TWC Online Manuals page on the intranet.

#### ReHabWorks

Case reviews are conducted on case documentation located in ReHabWorks; supporting content is maintained in each customer's paper case file.  Case reviews are documented by the reviewer (or their representative, such as the State Office Program Specialist for Physical Restoration Services) in Texas Review, Oversight, and Coaching System (TxROCS). When a case review is conducted as part of a required review or consultation to approve or deny a specific case action or service, a case note must also be entered in RHW indicating decision that was made as a result of the case review.

Information about RHW functionality is documented in the ReHabWorks User Guide located on the intranet and in the RHW-FAQ's located on the VR SharePoint team site.

#### Texas Review, Oversight, and Coaching System

The Texas Review, Oversight, and Coaching System (TxROCS) is the electronic system within ReHabWorks used to capture and organize data from individual customer case reviews that are conducted statewide by TWC-VR management.

Information about TxROCS functionality is documented in the TxROCS User's Guide (Word) on the intranet.

### D-403-4: Risk Management

The TWC Risk Management program is a proactive approach to risk management, ensuring that risk-management best practices are embedded in all agency operations. The TWC Risk Management program strives to ensure that agency risks are identified, analyzed, managed, mitigated, and maintained at acceptable levels.

For information about this program, refer to the TWC Risk Management Plan on the intranet.

### D-403-5: Fraud Deterrence and Compliance Monitoring Division

The TWC Fraud Deterrence and Compliance Monitoring Division (FDCM) is responsible for investigating reports of potential fraud, waste, abuse, and misconduct. FDCM includes the VR Contract Oversight and Support department. The mission of the VR Contract Oversight and Support department is to conduct remote and on-site monitoring and provide oversight of contracted VR customer services. The department also performs other services related to and in support of the monitoring function.

For more information, refer to the Fraud Deterrence and Compliance Monitoring SharePoint site on the intranet.

### D-403-6: Office of Internal Audit

The Office of Internal Audit is an independent assurance and consulting function that uses a systematic approach to evaluate and improve the effectiveness of TWC's risk management, control, and governance processes. The Office of Internal Audit's activities are designed to provide TWC's three-member Commission and executive management with independent assurances regarding the integrity of TWC's financial and operational information, the effectiveness and efficiency of operations, the safeguarding of assets, and TWC's compliance with applicable laws and regulations.

For detailed information, refer to the TWC Office of Internal Audit on the intranet.

### D-403-7: Division of Operational Insight

The Division of Operational Insight (DOI) is responsible for evaluating operational, programmatic, and outcome data to provide information that TWC and its partners can use to improve quality throughput and efficiency to better meet the needs of employers and workers in Texas. DOI's mission is to deliver timely, relevant, consistent, and actionable information to allow early and informed decision making and to help transform TWC into an evidenced-based learning organization.

For detailed information, refer to the TWC Division of Operational Insight on the intranet.

### D-403-8: Employee Performance and Development

Enhancing the skills and knowledge of TWC employees is vital to expanding and improving VR services. The Human Resources Department is responsible for TWC's day-to-day operations with respect to its employees. The Training and Development Department helps enhance employee workplace skills and productivity through the development, coordination, and delivery of learning opportunities and human resource development systems.

For detailed information, refer to the TWC Training and Development Department on the intranet.

## D-404: Internal Controls

An internal control is a process that helps an entity to achieve its objectives and safeguard public resources as an integral part of every aspect of business.

For the Vocational Rehabilitation Division (VRD), internal controls are one of the mechanisms that help provide reasonable assurances regarding the achievement of VR objectives in the following categories:

* Effectiveness and efficiency of daily operations to produce the intended results in a manner that minimizes the waste of resources
* Reliability of reporting for internal and external use in support of decision-making and for program performance evaluation
* Alignment of VRD policy, procedure, and performance accountability supports and ensures successful program compliance with applicable laws and regulations

The VRD must establish and maintain internal control processes necessary to ensure our ability to comply with federal grants, law, and regulations.

Types of internal controls used by VRD include the following:

* Separation of Duties: More than one individual is needed to complete a process or series of steps.
* Access Controls: Staff members are limited to their user-specific roles within ReHabWorks (RHW).
* Internal Audits: Internal Audit conducts audits of various aspects of the VR service delivery process to ensure compliance with policy and procedures.
* Standardized Documentation: VRD processes are documented and available to staff via the VRSM, guidance memos, and documented standard operating procedures.
* Periodic Reconciliations: Budget checking of service authorizations ensures availability of funds and helps with budget management.
* Approval Authority: Authorization is required for the provision or purchase of services and must be appropriately documented in the customer's case file.

### D-404-1: Legal Authority and References

Pursuant to requirements for the implementation, operation, and administration of the VR program in accordance with 34 Code of Federal Regulations (CFR) §§361.12, 361.47, and 361.56, and 2 CFR §§200.61, 200.302, and 200.303, internal controls are implemented by VRD to ensure accurate data collection, appropriate data documentation, and financial accountability.

The US Government Accountability Office's Standards for Internal Control in the Federal Government, or the "Green Book," sets the standards for an effective internal control system for federal agencies.

For more information, reference the Green Book at <https://www.gao.gov/greenbook/overview>.

For Rehabilitation Services Administration guidance and additional supporting information on Internal Controls, reference <https://www2.ed.gov/policy/fund/guid/uniform-guidance/internal-controls.html>.

### D-404-2: What Must Be Covered by Internal Controls

The following are examples of how internal controls apply to VR:

* We must ensure that our data entry in RHW accurately collects the information necessary to support federal reporting.
* We must ensure that VR staff members complete training necessary to ensure the collection and reporting of the required data.
* We must use internal control processes to ensure the accuracy and validity of the data.

### D-404-3: Internal Controls in ReHabWorks

The following are examples of the application of internal controls to the VR process in RHW:

* In the Application Process, completion of the Monthly Financial information is required as a prerequisite to accessing the Application Signature page.
* Edits on the Monthly Financial page help to ensure that basic living requirements (BLR) are addressed with the customer and properly documented.
* Before determining eligibility, the VR counselor must document the level of significance and the relevant disability information to access the Eligibility page—ensuring documentation of information essential to appropriately assessing and planning needed services with the customer—and only staff with an appropriate user role can make and enter the eligibility determination in RHW.
* For caseloads, system data enables VR counselors to manage their cases and be informed as to compliance with eligibility determination and plan development time frames.
* The Purchasing Approval Requests process supports planning, ensures and documents policy compliance, engages active supervision, and helps with caseload budget management.
* For Service Records, edits in the system help ensure the correct use of Basic Support or Preemployment Transition Services (Pre-ETS) budget and the proper categorization of the service.
* For Service Records, the pop-up message about using Medicaid helps support the application of comparable benefits.
* For the purchasing process, new edits in the system direct the Basic Support or Pre-ETS characterization of the service to help ensure allowable use of funds and support accurate fiscal reporting.
* For the purchasing process, system edits support the application of contracts to service authorizations for goods and services requiring contracts.
* For the purchasing process, system edits prevent any one individual from creating or changing, receiving, and/or paying a service authorization to enforce separation of duties. (This is called a compensating control.)
* For the purchasing process, system edits allow vendors to be suspended from providing services when needed based on contract monitoring or other issues.
* For the purchasing process, references associated with the specifications provide staff with a quick guide on where to look in policy for governance and guidance on the service.

When possible, internal controls to support data accuracy, consistency, integrity, reasonableness, and completeness are incorporated into the RHW business process to actively support proper program performance as an integral part of the customer service delivery process.

### D-404-4: Documentation and Data Corrections

Case documentation is essential to showing compliance with applicable requirements and demonstrating the proper use of funds. This applies to all VR customers throughout the case life cycle.

Paper copies of supporting documentation, such as medical records, provider reports, grade reports, transcripts, certificates, diplomas, and other relevant documents, must be obtained from the customer or service provider and used when RHW is updated. Copies of these documents are maintained in the customer's paper case file.

For assistance with situations in which the VR counselor is not able to directly enter, update, or correct data in the system, refer to the ReHabWorks Users Guide and ReHabWorks and TxROCS Support page on the intranet for information on submitting data corrections to reconcile fixes, anomalies, and omissions.