



## RESPECT Program Quality Reviews

May 12, 2014

RESPECT Program Reviews have proven to be a very useful exercise in identifying potential risks for the RESPECT program and are generating information that assists with our quality review process.

Prior to conducting the reviews, the *RESPECT Policies and Procedures Handbook* was developed and became effective in April 2012. Development of the handbook was considered to be the first step in the Quality Review process since we determined that the policy and procedure requirements had to be clear and that RESPECT Employment Centers had to understand the program expectations outlined in law, rule, and the DMS contract. The Handbook was amended again in January 2014 to further clarify expectations and to communicate amended program requirements. Generally, separate reviews are being conducted for production of commodities and for service contracts.

**The following are Program Review Guidelines used for both RESPECT Service and Commodity contracts.**

### Program Review Guidelines

**Objective:** The RESPECT Program Review process will examine key areas of risk that could affect the RESPECT of Florida program and the Employment Centers that participate in the program. These risks are primarily risks to the individuals with disabilities employed by the Employment Centers and as such, this review will examine their appropriate compensation, utilization and their access to competitive employment options.

During and following the reviews, RESPECT will provide consultation to the Employment Centers to help them achieve the shared mission of our respective organizations. RESPECT is committed to providing direction and support as may be required throughout this review.

**Authority:** Sections 413.032-413.033, Florida Statutes, Florida Administrative Code 60E-1.0004 3(3), Central Non Profit Agency Contract 914-000-10 and RESPECT Policies and Procedures Part III, II, D, 1, a.

**Methodology:** RESPECT will examine the following areas using the noted methodologies:

- **Wages** – RESPECT will ensure that proper wages are being paid at or above the Florida minimum wage or at a commensurate wage with the Employment Center possessing a current 14c certificate from the United States Department of Labor. In order to accomplish this, RESPECT will take the following steps:

- Pull time cards or other record keeping system for hours worked for a month;
  - Compare to payroll or register for same period; and
  - Walk through from time cards to payment to ensure minimum wage or that they have a 14c certificate.
- **Documentation of Disability** – The RESPECT program must provide employment opportunities for Florida’s disabled population as intended. RESPECT will ensure compliance with this policy goal by doing the following:
    - Look at 100% of employees sampled above;
    - Use “significant impairment to employment” definition;
    - Examine the documentation for each employee to see their proof of impairment; and
    - Note any deficiencies in documentation.
- **Hours “Costed” Versus Hours Worked** – Labor estimates are included in RESPECT pricing packages in expectation of providing hours of employment for disabled Floridians. RESPECT will examine staff hours to see if these estimates are accurate and credible. In order to accomplish this, RESPECT will take the following steps:
    - Pull costed hours from pricing packages;
    - Pull actual hours from scheduling and payroll information;
    - Request any additional staff time that does not appear on pricing packages; and
    - Analyze variance on both rate and volume.
- **Ratios of Disabled to Non-Disabled** – RESPECT Employment Centers must maintain a 75% or greater ratio of disabled labor hours over non-disabled hours worked agency wide. In order to accomplish this, RESPECT will examine the following:
    - Use data derived from above steps to derive the ratio for the sampled time period.
- **Employment Activities** – RESPECT is charged with promoting employment activities within the Employment Centers that would place more disabled Floridians in competitive and integrated employment settings while providing these employees with more choices. RESPECT will examine the steps the Employment Centers are taking in support of this goal in order to identify suggested improvements for Employment Centers and appropriate supports of this mission which RESPECT might provide. In order to accomplish this, RESPECT will take the following steps:
    - Determine methodology or policy for Job Placement in competitive employment;
    - Request information on training opportunities;
    - Request documentation of any vocational evaluation, adjustment or employment services;
    - Request any evidence of annual client surveys for choice and satisfaction;
    - Determine if any staff are assigned to placement and support;
    - Look for any relationships with Vocational Rehabilitation, Workforce Florida or other entities serving as partners toward placements and supports; and
    - Look for any agency based micro-enterprise or home-based business opportunities for the disabled.

At the conclusion of the Program Review, RESPECT will note any areas that need improvement and offer the appropriate technical assistance to resolve these issues. Issues which cannot be resolved may be elevated for further examination and action such as the request for a formal Corrective Action Plan and an independent audit.