



**Department of  
Workforce Services**

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October 1, 2019

Red Rock Center for Independence  
Ms. Barbara Leifler  
168 N 100 E #101  
St. George, UT 84770

Dear Ms. Leifler:

DWS-USOR has completed our review of the Pre-ETS contract with Red Rock Center for Independence (RRCI) for fiscal year 2019. The scope of this review is outlined in the procedures section of this report.

RRCI is responsible for adopting sound policies, establishing and maintaining effective internal control, and preventing and detecting fraud. DWS-USOR's responsibility is to conduct the reviews considered necessary to meet the objective of the contract and ensure contractor responsibilities are met. The resulting recommendations identified in the review are presented in this report.

Please provide a written response to each of the findings and recommendations no later than **October 14, 2019**. Please include the anticipated completion date for corrective action to assist in coordinating resolution and follow-up of these recommendations.

DWS-USOR recognizes and appreciates the cooperation and assistance of the personnel of the Utah Independent Living Center during the course of the review. Please contact Aimee Langone or Adrie Green if you have any questions regarding this report.

Sincerely,

Aaron Thompson, MRC, CRC, LVRC  
Assistant Division Director  
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**Utah State Office of Rehabilitation • A Division of the Department of Workforce Services**

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## INTRODUCTION

The review was conducted to evaluate the Pre-ETS contract (#19DWS0068) at the RRCI.

The pre-employment transition services are activities that achieve the following objectives:

1. Workplace readiness
2. Instruction in self-advocacy

## PROCEDURES

Federal and state laws, policies and procedures as well as contract requirements provide a framework of both suggested and required contract monitoring activities. This review was designed to evaluate whether the Pre-ETS contract was in compliance with these requirements. the following procedures were performed:

1. Onsite monitoring was conducted on **September 12, 2019**. During the onsite monitoring, special attention was paid to students served and the services provided.
2. DWS-USOR reviewed randomly selected case files, examined curriculum, met with staff, shadowed programs to students, reviewed HR files, and discussed/observed security measures.
  1. Case File Review: 10 case files were reviewed for correct eligibility determination, appropriate release forms and provision of the required Pre-ETS services.
  2. Site Visit: Conducted a tour of RRCI's program/class on 5/13/2019..

## FINDINGS AND RECOMMENDATIONS

### Findings:

1. DWS-USOR observed that RRCI did not have Pre and Post assessments for students as outlined in the contract. This was discussed during the monitor visit. It is required that RRCI develop a Pre/Post assessment prior to **10/3/2019**. It is required that RRCI provide DWS-USOR with assessment results collected for the next quarterly reporting period (on or before **October 15, 2019**).
1. DWS-USOR noted that RRCI was not compliant with collecting student releases and uploading them to student files (releases were missing from 3 of the 10 files reviewed). It is required that RRCI obtain student and parental consent when providing services to students and sharing data with DWS-USOR. It is required that RRCI implement internal controls to ensure releases are obtained prior to serving students or sharing data with DWS-USOR and inform DWS-USOR of the measures they are taking on or before **October 14, 2019**.

**Recommendation:**

1. It is recommended that RRCI obtain confirmation from Vocational Rehabilitation counselors that their service is in the student's plan under Pre ETS services and has been signed by both counselor and client prior to working with VR eligible students. No further action on this recommendation is needed.

*Contractor's Response:*

***Responsible Individual:*** Barbara Leifler/Allison Muir  
***Anticipated Completion Date:*** 10/14/2019