

DRS
MONITORING
OVERSIGHT
AND
INTERNAL
CONTROLS



DRS System Processes for Monitoring Oversight And Internal Controls



Revised 02/19/2016 v3

TABLE OF CONTENTS

MOSAIC PLAN TIMELINE 2

PROCESS FLOW OF OVERSIGHT AND INTERNAL CONTROLS..... 3

MOSAIC REPORTING TIMELINE 4

OVERVIEW 5

 PURPOSE AND SCOPE..... 5

 PRINCIPLES OF MOSAIC’S PROCESSES AND PROCEDURES 5

 ATTRIBUTES OF EFFECTIVE OVERSIGHT 6

 DEFINITIONS AND TOOLS 8

UNIT MONITORING & OVERSIGHT 14

 STEP 1: LOCATE QUARTERLY UNIT CASE REVIEW PLAN 15

 STEP 2: LOCATE UNIT DATASET AND PLAN FOR THE NUMBER AND TYPE OF REVIEW TO BE CONDUCTED 15

 STEP 3: IDENTIFY AND PULL CASES TO REVIEW..... 16

 STEP 4: CONDUCT CASE REVIEWS 17

 STEP 5: ENTER REVIEWS IN TxROCS..... 17

REGIONAL MONITORING & OVERSIGHT..... 18

 STEP 1: REVIEW QUARTERLY MONITORING RISK AREAS AND ANALYZE DATA. 19

 STEP 2: CONDUCT ASSESSMENT OF CASES ENTERED IN TxROCS. 19

 STEP 3: USE DATA ANALYSIS AND REPORTS IN TxROCS TO DEVELOP (REGIONAL) ACTION PLANS. 19

 STEP 4: SUBMIT STATEWIDE MONITORING REPORT TO CENTRAL OFFICE. 19

 TEMPLATE INSTRUCTIONS: 21

CENTRAL OFFICE MONITORING & OVERSIGHT..... 22

APPENDICES..... 24

APPENDIX A: DRS STATEWIDE MONITORING REPORT TEMPLATE..... 25

APPENDIX B: UNIT MONITORING AND OVERSIGHT: BEST MANAGEMENT PRACTICES..... 27

 UNIT MONITORING & OVERSIGHT ACTIVITIES 27

 ASSESSING UNIT FEDERAL AND STATE PROGRAMMATIC COMPLIANCE 27

 ASSESSING UNIT KEY PERFORMANCE MEASURES 28

 ASSESSING UNIT FISCAL MANAGEMENT 28

 ASSESSING UNIT PARTNERSHIPS/SPECIAL POPULATIONS 29

 ASSESSING UNIT CONSUMER RELATIONS..... 29

APPENDIX C: LINK TO COMPLIANCE & QUALITY CASE REVIEW GUIDE..... 31

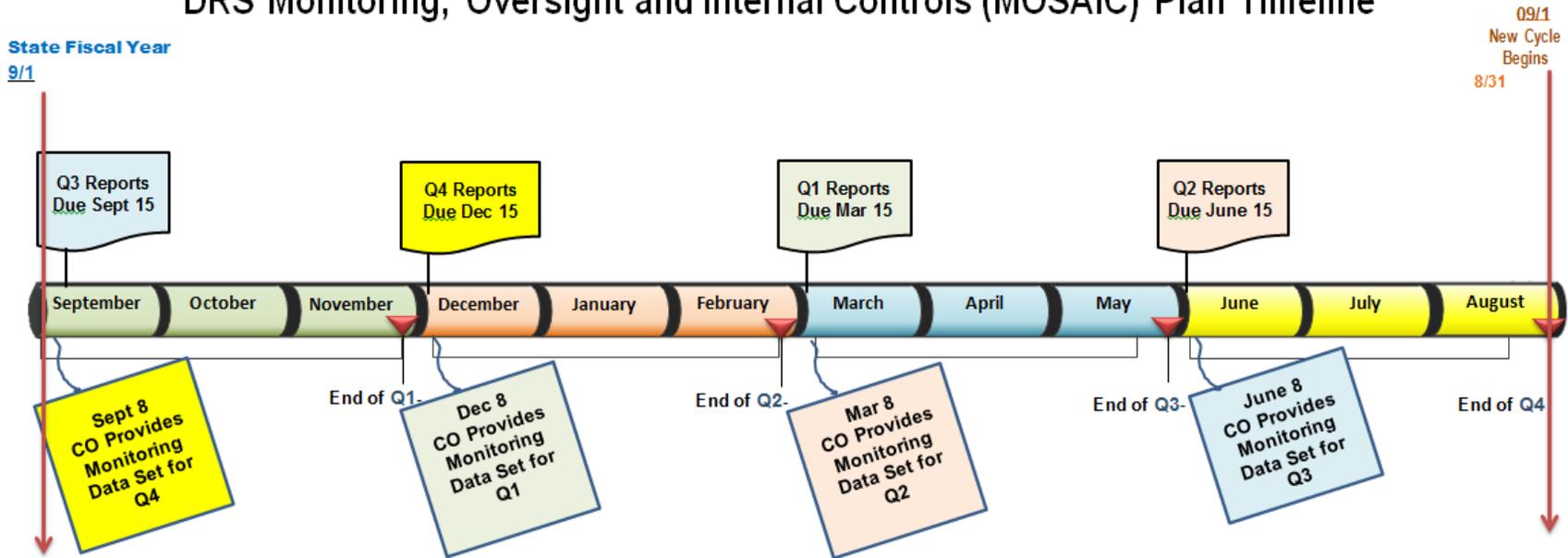
APPENDIX D: DRS CORE VALUES..... 33

APPENDIX E: DRS LEADERSHIP PRINCIPLES 34



DRS System Processes for Monitoring Oversight And Internal Controls

DRS Monitoring, Oversight and Internal Controls (MOSAIC) Plan Timeline



DARS/DRS Last
Update: 02/02/2016
Dates are based on
calendar days



Process Flow of Oversight and Internal Controls

Unit

- Routine monitoring/oversight activities
- Coaching and redirection of staff
- Implementation of actions and assess for needed change
- Keep Region informed of any results from corrective actions taken
- Unit implement any needed changes for continued quality improvement



Region

- Routine monitoring & oversight activities
- Analyze and identify risks/patterns
- Consult and plan actions to be taken with unit management
- Address unit and region wide risks/patterns on regional action plan
- Send Regional Monitoring Report to Central Office
- Provide follow-up of corrective actions and report results in Quarterly Monitoring Report



Central Office

- Routine monitoring/oversight activities
- Analyze and identify statewide risks/patterns and develop action plan to address statewide issues
- Share findings with each Region
- Monitor regional action plans for region wide risks/patterns and follow up on results achieved
- Process any policy changes, if needed, to increase compliance or quality assurance



DRS System Processes for **M**onitoring **O**ver**S**ight **A**nd **I**nternal **C**ontrols
(MOSAIC) Overview

MOSAIC Reporting Timeline

Quarter	Data Set Provided	Regional Report Due
Q1: September, October, November	December 8	April 15
Q2: December, January, February	March 8	June 15
Q3: March, April, May	June 8	Sept 15
Q4: June, July, August	September 8	December 15



Overview

PURPOSE AND SCOPE

The purpose of MOSAIC's processes and procedures is to

- ensure consistency in application of oversight and internal controls,
- create the necessary environment of accountability and transparency, and
- ensure that the division's business operations are effectively carried out through a process of continuous improvement.

MOSAIC will communicate to stakeholders the Division's statewide systems for continuous program performance oversight. The expected outcome is to increase transparency for required federal and state reporting and consistency in oversight for quality and compliance improvement.

The scope of the MOSAIC process and procedures is shaped by the following principles of good governance:

1. The activities of DRS are fully in accordance with its mandates as framed by the Rehabilitation Act and its certifying regulations, the Texas Administrative Code, the Rehabilitation Policy Manual and best practice;
2. The funds provided to the organization are fully accounted for and in full compliance with federal and state purchasing laws and regulations;
3. The activities of the organization are conducted in the most efficient and effective manner, and duplications and inefficient use of resources are avoided since stewardship is part of fundamental values and code of ethics;
4. The staff and the Division's officials of the organization adhere to the highest standards of professionalism, integrity and ethics.

PRINCIPLES OF MOSAIC'S PROCESSES AND PROCEDURES

General Principles

DRS execution of oversight functions includes three essential elements that are designed to work as a comprehensive system which provides reasonable assurances that DRS activities are efficient and effective:

- An accountability framework holding management responsible for the efficiency and effectiveness of DRS programs
- A comprehensive, rigorous, and transparent assurance system that includes DRS central office, regional and field level oversight processes



DRS System Processes for Monitoring Oversight And Internal Controls (MOSAIC) Overview

- Oversight activities are performed in accordance with the established processes and procedures and technical direction for the use of TXROCS, as well as adhoc analyses performed by management. DRS's practices will continue to evolve in order to keep pace with the changing environment. DRS will adhere to the evolving standards and communicate these changes broadly as necessary

Values

In accordance with the established values of DRS, all decision making in regards to coaching actions, outcomes, performance management and documentation of such will reflect careful consideration of the agreed upon values of DRS. See DRS Core Values, Appendix D

ATTRIBUTES OF EFFECTIVE OVERSIGHT

Leadership expectations for orderly and ethical conduct, as well as, economical, efficient and effective practices from DRS staff at all levels and at all times, are set by the chain of command management philosophy for transformational and servant leaders; operating style and organizational culture is the foundation for ethical and effective oversight. See Leadership Principles, Appendix E

Risk assessment and management

Management is responsible for continuously monitoring and reviewing changes in the environment; progress and constraints in achieving results; financial management and reporting; audit findings; and findings from major reviews and evaluations. This analysis should be summarized into a risk assessment, which will be annually updated to evaluate new information.

Continuous improvement and lessons learned

Oversight processes help to identify ways to make business processes more efficient and effective through improved performance. Thus, findings at each level of internal control activity will require assessment, action and follow up.

Responsibility and accountability for results

DRS personnel are held accountable for the achievement of defined results within their respective areas of work. Performance management and job descriptions along with coaching by management ensure that expectations of staff are clear. Strategies will be put in place to measure progress and to reassess for evidence of positive sustainability.

Oversight Roles and Responsibilities

The oversight roles and responsibilities encompass those related to assurance and accountability. Effective oversight results from the synergy between the respective roles



DRS System Processes for Monitoring Oversight And Internal Controls (MOSAIC) Overview

and responsibilities of: Central Office management, regional management, field office management, and all direct service delivery staff.

A process of assurance is in place as follows:

1. Direct Service delivery staff are provided policy, guidance and information that establish parameters within which to operate. Direction from line management and consultation by subject matter resources contribute to the accuracy and effectiveness of the implementation of programmatic and financial activities in service delivery;
2. The Unit Management Team has responsibilities related to coaching, training, and directing of direct service delivery staff to ensure appropriate implementation of DARS policies, processes and practices;
3. Identified Regional office staff has responsibility to carry out oversight and monitoring activities to identify risks and address findings in areas of non-compliance, in accordance with the monitoring plan.
4. Select Central office staff have responsibility to recognize systemic findings statewide and to address policy, process or practice issues reported that cause barriers to effective service delivery and inefficiencies in providing quality services for consumers. Management is responsible for the systems of governance, risk management, the internal control framework, the measurement of performance and the evaluation of results and impact. It is responsible for communicating results in a reliable, timely, accurate, open and transparent manner. Management is also responsible for the implementation of the DRS MOSAIC accountability framework and of other applicable policies related to oversight activities. Management is accountable for exercising its oversight role in the particular areas of its responsibility. As part of its evaluation responsibilities, DRS management plans, organizes, and directs the performance of sufficient actions to provide reliable information that goals, outcomes, outputs and results are achieved and have an impact on services to consumers as measured by standards and measures set forth by federal, state and local partners and stakeholders.

The scope of the evaluation function includes: (a) verifying that program strategies are relevant to the needs of consumers as identified through the Comprehensive Statewide Needs Assessment (CSNA), the DRS State plan, DARS HHS/DARS Strategic Plan, DARS Operations Plan, and DRS Business Plan; and that DRS program projects (and pilots) include all required and appropriate indicators and methodologies for measuring performance and impact; (b) verifying the measurement of the performance and impact of program and projects; (c) ascertaining compliance with and alignment of program or projects with the goals and objectives of the division through identification of risks in audit findings from both internal and external sources; (d) reviewing the available expertise and capacity in DRS and amongst partners to manage for results and further develop capacity to do so; and (e) commissioning or performing interventions where needed to improve results or outcomes.



DRS System Processes for Monitoring Oversight And Internal Controls (MOSAIC) Overview

The expanse of information, strategies and activities that are developed as a function of internal controls will be used to guide needs assessment for monitoring and clarification of expectations for performance as categories of findings are cleared and sustained.

DEFINITIONS AND TOOLS

For the purpose of the DRS MOSAIC, the following definitions will apply:

- **Assurance process** means an objective examination of evidence for the purpose of providing an internal assessment on risk management, control or processes for the organization. Reasonable assurance means an acceptable and satisfactory level of confidence under given considerations of costs, benefits and risks. The assurance process alone, even when performed with due professional care, does not guarantee that all significant risks will be identified.
- **Accountability** means the obligation to demonstrate that work has been conducted with agreed upon rules and standards and to report fairly and accurately on performance results using required monitoring template plans.
- **Dynamic risk factors** are risk factors that constantly change, as opposed to static risk factors, which take a longer time to change. Dynamic risk factors are risk-based, meaning that if during MOSAIC monitoring, an issue is identified as an opportunity for improvement, the risk will continue to be monitored until improvement is observed. Examples of dynamic risk factors include purchasing and case management activity, like presumptive eligibility or cases that remain in application phase for longer than 60 days.
- **Full case review** means a Compliance and Quality (C&Q) review of all parts of a case that has reached at least IPE, up to the current date, and a Technical and Purchasing (T&P) review of information in the electronic and paper case record and of specific purchasing requirements
- **Internal control activities** mean those policies and procedures which are established and implemented to help ensure that the necessary internal controls are effectively carried out.
- **Internal control framework** means all the policies, procedures, monitoring and communication activities, standards of behavior and other assurance activities to ensure orderly, ethical, economical, efficient and effective operations. It consists of five interrelated components: control environment; risk assessment; control activities; information and communications; and monitoring.
- **Internal control** means a process, performed by management and other delegated personnel, designed to provide reasonable assurance regarding the achievement of objectives in the categories of: (a) effectiveness and efficiency of operations; (b) reliability of financial reporting; and (c) compliance with applicable laws, regulations, standards and policies.
- **Management** means the persons who oversee, lead and direct DRS or who are delegated the authority to do so.



DRS System Processes for Monitoring Oversight And Internal Controls (MOSAIC) Overview

- **Oversight** means the general process of review, monitoring, evaluation, supervision, reporting and analysis of the programs, activities, policy implementation and results. This is to ensure organizational, financial, operational and ethical accountability, effectiveness of internal controls and prevention of fraud and non-compliance.
- **Partial case review** means a review of part of a Compliance and Quality review of Technical and Purchasing review (see Appendix C). Case readings also count as a partial case review.
- **Performance management** are strategic risk factors that are included in the Statewide Monitoring Plan. Performance management was included in the Statewide Monitoring Plan to address a key recommendation the Sunset Advisory Commission made to develop mechanisms to more effectively plan for, track, and evaluate the performance of its programs and staff.

DRS has defined performance management as full case reviews that are designed to highlight counselors' best work by their estimation, and identify issues contributing to the limited success of identified populations creating an opportunity for coaching and improved outcomes.

- **Static risk factors** are risk factors that tend to stay the same, or take a long time to change over time, as opposed to dynamic factors that tend to change constantly. According to findings from DARS Internal Audit (August 2014), factors, like the tenure of a VR counselor and a counselor's expertise in serving specific disability groups are static risk factors, which do not indicate changes in DRS processes and controls quickly enough because these factors take a long time to change. Other examples of risk factors include activities that the Sunset Advisory Commission identified as static risk factors, like, case cost (greater than \$25,000, for example) and the length of an active case (longer than five years, for example).
- **Strategic population** refers to populations that were defined in the 2015-2019 HHS Strategic Plan and include:
 - Veterans with disabilities
 - Persons with developmental or intellectual impairments
 - Persons with neurodevelopmental disorders, such as autism
 - Persons with mental health disorders, such as bipolar or schizophrenia
 - Persons with other disabilities in addition to blindness, and
 - Deafblindness

Strategic populations are referenced as part of Performance Management, which is a Strategic Risk that is identified as part of the Statewide Monitoring Plan (refer to Central Office Monitoring & Oversight)



DRS System Processes for Monitoring Oversight And Internal Controls (MOSAIC) Overview

- **Transparency** means a process by which reliable and timely information about existing conditions, decisions, and actions relating to DRS activities is made accessible, visible and understandable by Consumer Services Support (CSS) on behalf of the Assistant Commissioner to the regions for action at the unit level.
- **Unit case review plan** is the plan each unit will follow quarterly. The unit case review plan indicates the number and type of case review each unit will conduct quarterly. The risk areas for monitoring are outlined in the Statewide Monitoring Plan each state fiscal year.
Area managers can find their unit's case review plan on DARS Intranet under MOSAIC Case Review. Quarterly case review plans will be included in an Excel document, which will include case review plans for each unit (50 rows of information, one row for each unit). Each unit's plan will indicate how many full and partial case reviews need to be conducted for each risk area. Also see Appendix B, Step 1.
- **Unit dataset** is the data area managers will use to identify cases for review each quarter. The unit datasets will be saved on the MOSAIC Share Point site. There will be a single Excel file for each risk area being monitored each quarter. Also see Appendix B, Step 2.

For the purpose of DRS MOSAIC, the following tools will be used:

- **Risk Level Grid** is a risk assessment tool that is used by DARS Internal Audit to assess risk to the agency. DRS adopted DARS Internal Audit's Risk Level Grid to determine the level of risk each kind of potential threat presents to DRS. To use the Risk Level Grid, one first determines the level of impact the risk presents to the organization (i.e., DARS or DRS) if the risk were to occur. The level of impact ranges from negligible to extreme (negligible, low, medium, high, extreme).

DRS has defined impact as follows:

High Impact

- Health and safety for staff or consumer
- Non-compliance with law
- Indefensible expenditure
- Negative perception of the agency (Sunset, legislature)

Medium Impact

- Delay of service
- Noncompliance with policy (not law based) or procedure
- Less than quality values-based decision making
- Poor public perception (audit, news headlines)

Low Impact

- Diminished quality indicators/poor quality decisions



DRS System Processes for **Monitoring Oversight And Internal Controls (MOSAIC) Overview**

Next, one determines the likelihood that the risk will occur before any controls are put in place. The likelihood of occurrence ranges from remote to certain (remote, unlikely, possible, probable, certain).

Then, one aligns the degree of impact with the likelihood that the risk will occur to determine the level of risk, which may be critical risk, high risk, moderate risk, or low risk.

An example follows:

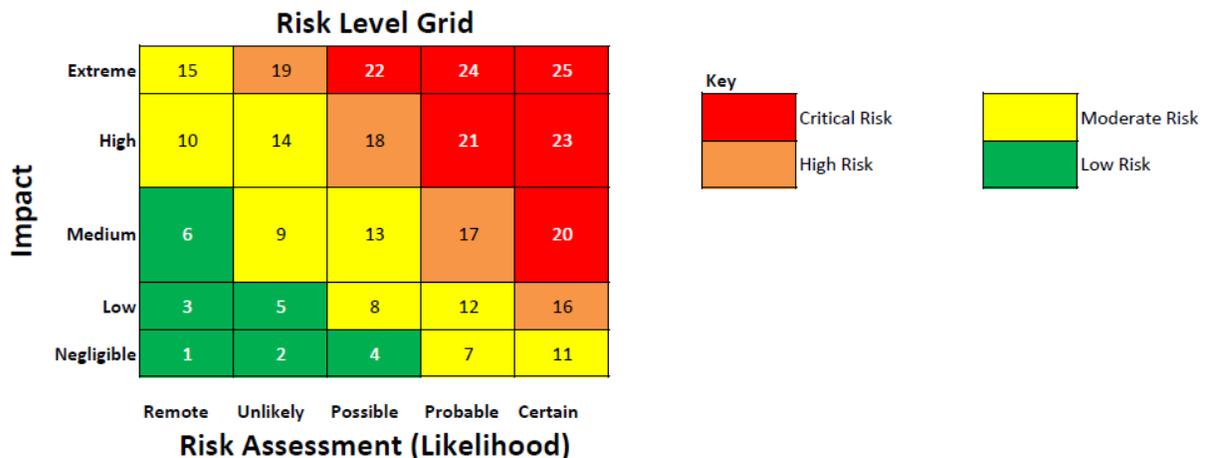
Risk to assess: vacant caseload or change in counselor
 The impact on DARS if the risk were to occur: Medium

The likelihood that the risk will occur before any controls are put in place: Certain

Using the Risk Level Grid, the risk to DARS when a caseload becomes vacant or there is a change in counselor is critical (risk level score 20)

A picture of the Risk Level Grid is shown below.

DARS Internal Audit Risk Level Model



- **Statewide Monitoring Plan** is a plan that DRS will develop each year and will include risks identified through internal activities (e.g., DARS Internal Audit) and external activities (Sunset Advisory Commission review).



DRS System Processes for Monitoring Oversight And Internal Controls (MOSAIC) Overview

At the unit level, the Statewide Monitoring Plan identifies the risk areas that every unit will conduct case reviews on. At the regional level, the Statewide Monitoring Plan establishes the areas of risk each of the five regions will monitor and report on to Central Office. At the statewide level, the Statewide Monitoring Plan communicates to internal stakeholders' the areas of dynamic and static threats DRS monitors quarterly.

The Statewide Monitoring Plan will always include risks that are categorized into four groups:

- Financial Risks
- Operational Risks
- Strategic Risks
- Compliance Risks

After DRS determines the impact on DARS if the risk occurred and the likelihood that the risk will occur before any controls are put in place, the division uses the Risk Level Grid (see above) is used to determine the Risk Level Output.

A table of the Statewide Monitoring Plan for the state fiscal year is shown on the following page.



**DRS System Processes for Monitoring Oversight And Internal Controls
(MOSAIC) Overview**

Statewide Monitoring Plan

Risk	Risk identified through	Impact on DARS if risk occurred	Likelihood risk will occur	Risk level output
Operational Risks				
One-time maintenance total >\$300	VR Audit	Medium	Possible	Moderate Risk-13
Vacant caseload or change in counselor	MOSAIC	Medium	Certain	Critical Risk-20
Strategic Risks				
Unsuccessful closure by strategic population	Strategic Plan	High	Probable	Critical-21
Successful closure		Low	Unlikely	Low-5
Compliance Risks				
Case cost >\$25,000	Sunset	High	Possible	High Risk-18
Case length >5 years	Sunset	High	Possible	High Risk-18
Presumptive eligibility (SSI/SSDI)	MOSAIC	High	Certain	Critical Risk-23
In application phase >60 days	MOSAIC	High	Certain	Critical Risk-23
>90 days to IPE	MOSAIC	High	Possible	High Risk-18
No counseling and guidance >180 days	MOSAIC	Medium	Probable	High Risk-17



Unit Monitoring & Oversight

Unit

- Routine monitoring/oversight activities
- Coaching and redirection of staff
- Implementation of corrective actions and assess for change
- Keep Region informed of any results from corrective action taken.
- Unit staff implement any needed changes for continued quality improvement



DRS System Processes for Monitoring Oversight And Internal Controls (MOSAIC) Overview

Step 3: Identify and pull cases to review

1	directorate_nbr	field_hq_name	ccs_id	id_case	cur_phase_desc	Days from Appl to Elig	Meets Risk Criterion?
2	11	DRS Amarillo Field Headquarters	1559	1516605	Application	0	No
3	11	DRS Amarillo Field Headquarters	1107	1512328	Application	5	No
4	11	DRS El Paso East Field Headquarters	1108	1516612	Application	12	No
5	11	DRS Lubbock South Field Headquarters	1256	1518262	Application	1	No
6	11	DRS Lubbock West Field Headquarters	2854	1516832	Application	32	Yes
7	12	DRS Dallas Northeast Field Headquarters	1600	1519504	Application	7	No
8	12	DRS Dallas Northeast Field Headquarters	1264	1513276	Application	56	Yes
9	12	DRS Dallas Northwest Field Headquarters	1175	1518650	Application	14	Yes
10	12	DRS Dallas Northwest Field Headquarters	1109	1509284	Application	23	Yes
11	12	DRS Dallas Northwest Field Headquarters	1009	1511769	Application	8	No
12	12	DRS Dallas Northwest Field Headquarters	1175	1510690	Application	5	No
13	12	DRS Dallas Southeast Field Headquarters	1091	1518969	Application	9	No
14	12	DRS Dallas Southwest Field Headquarters	1176	1519221	Application	23	Yes
15	12	DRS Sherman Field Headquarters	1132	1511398	Application	23	Yes
16	13	DRS Beaumont Field Headquarters	1759	1516547	Application	8	No
17	13	DRS Beaumont Field Headquarters	1652	1511985	Application	9	No
18	13	DRS Beaumont Field Headquarters	1133	1504990	Application	23	Yes
19	13	DRS East Austin Field Headquarters	1240	1516855	Application	6	No
20	13	DRS East Austin Field Headquarters	1329	1514886	Application	3	No
21	13	DRS East Austin Field Headquarters	1126	1517590	Application	7	No
22	13	DRS East Austin Field Headquarters	1299	1516392	Application	15	Yes
23	13	DRS East Austin Field Headquarters	1323	1511217	Application	8	No
24	13	DRS East Austin Field Headquarters	1323	1509271	Application	9	No
25	13	DRS East Austin Field Headquarters	1240	1503754	Application	23	Yes
26	13	DRS East Austin Field Headquarters	1299	1514619	Application	32	Yes
27	13	DRS East Austin Field Headquarters	1299	1507440	Application	7	No
28	13	DRS East Austin Field Headquarters	1323	1509745	Application	8	No

Area managers will locate his or her unit's MOSAIC datasets and/or supplemental MOSAIC tools in the sharepoint document library (only RDs, AMs and authorized regional office and CO staff will have access) and plan for the number and type of review (full or partial) to be conducted.

Central Office will provide the Excel documents that include the datasets each area manager will use to monitor quarterly risk areas in the Statewide Monitoring Plan

- The dataset document will include one spreadsheet for each risk area being monitored each quarter
- Each spreadsheet will include a column that will flag a case that meets the risk area being monitored
- Area managers will choose from 'flagged' cases that meet the risk criteria ("Yes" meets risk criterion)
- Area managers will conduct the number of case reviews indicated in the unit's monitoring plan
 - If no cases are flagged, then no review is required for this risk area
 - If the dataset includes less than the number of cases to be reviewed, the area manager will review all flagged cases for that particular risk.
 - If the dataset includes more than the number of cases to be reviewed, the area manager will choose which cases to review (from the cases flagged "yes), up to the maximum number of cases required for review
 - For Performance Management Reviews, the area manager conducts Full Reviews on 5 cases/caseload/year. VRC picks 2 cases from dataset Closures for Strategic Populations that exhibit sample of their best work. The area manager selects 3 cases from Unsuccessful in Strategic Populations for each caseload.



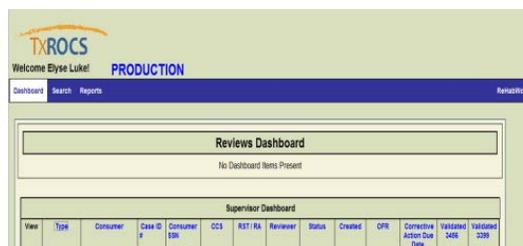
DRS System Processes for Monitoring Oversight And Internal Controls (MOSAIC) Overview

Step 4: Conduct case reviews



After planning for the number of type of reviews to conduct, full or partial, area managers will then conduct the required number of case reviews needed each quarter. Case Review must show up on TxROCS reports as finalized to be counted.

Step 5: Enter reviews in TxROCS



After completing case reviews, area managers will enter their reviews in TxROCS.

Refer to the [Compliance & Quality Case Review Guide](#) for instructions.



Regional Monitoring & Oversight

Region

- Routine monitoring & oversight activities
- Analyze and identify risks/patterns
- Consult and plan corrective actions to be taken with unit management
- Address unit and region wide risks/patterns on regional action plan
- Send Regional Monitoring Report to Central Office
- Provide follow-up of corrective actions and report results in Quarterly Monitoring Report



DRS System Processes for Monitoring Oversight And Internal Controls (MOSAIC) Overview

Monitoring at the Regional Level

The MOSAIC Case Review Plan for Regional Offices in Four Steps

Work at the regional level will follow case review activity at the unit level. The MOSAIC Case Review Plan for regional offices can be summed up in four steps:

Step 1: Review quarterly monitoring risk areas and analyze data.

Work at the regional level will follow case reviews conducted at the unit level. Regional offices will use the Statewide Monitoring Plan to identify risk areas being monitored during a quarter. Regional offices can also use each unit's quarterly case review plan to find out how many full and partial reviews each unit will conduct for each risk area being monitored. In addition, regional offices will have access to each unit's datasets for the entire region, which include the number and type of case review each unit must complete each quarter.

Step 2: Conduct assessment of cases entered in TxROCS.

The last step units (i.e., area managers) take during their quarterly case review plan is to enter their reviews in TxROCS. By the end of each quarter, area managers should complete 25 percent of the case reviews required each year. Regional offices will be able to assess case reviews completed in TxROCS at any point during a quarter as managers enter them.

Step 3: Use data analysis and reports in TxROCS to develop (regional) action plans.

Regional Office staff will use data analysis of datasets and reports in TxROCS to identify patterns or areas of risk for the units and provide feedback to each unit manager. For any identified risk, the regional office will work with unit management to agree on actions to be taken and report results by the date indicated in the DRS Monitoring, Oversight and Internal Controls (MOSAIC) Plan Timeline. The Regional Action Plan will include monitoring of outcomes related to regional findings as well as any expectations defined in unit follow-up monitoring on specific actions.

Step 4: Submit Statewide Monitoring Report to Central Office.

Regions will submit their statewide monitoring report to Central Office by the DRS Monitoring, Oversight and Internal Controls (MOSAIC) Plan Timeline.



DRS System Processes for Monitoring Oversight And Internal Controls (MOSAIC) Overview

Additional guidance regarding monitoring and reporting

The regional office also continually monitors and participates in a wide variety of oversight activities in the region including, but not limited to:

- Contracts and services from Community Rehabilitation Program providers
- Transition service delivery in the region
- Key Performance Measures for the region
- Self-Employment plans
- Tracking consumer complaints from DARS Inquiries Unit and requests for appeal through mediation and independent hearings
- Hospital contracts
- Comprehensive Rehabilitation Services (CRS), Independent Living Services (ILS), Pre-employment Transition Services (Pre-ETS) and Supported Employment (SE) budgets, expenditures and service delivery

Depending on the unit performance reports and program oversight, regional office staff will continue to conduct assessment of risks and any patterns or trends that need to be addressed, based on the risk-driven monitoring plan. MOSAIC findings will be reported along with the results of other monitoring activities in the plan. There is an expectation that there would be at least three additional monitoring activities (not identified on the monitoring plan) as a matter of best practice since the monitoring plan will not identify all geographically pertinent activities for all the regions

An example of this reporting may be use of the Consumer Tracking Spreadsheet, use of the Service Authorization reports, and required case reviews conducted for CRS. Findings may be listed in the appropriate category, (Service Authorization/expenditure findings in financial category, service delivery issues for CRS in Operations category, etc.). Associated actions taken and planned follow-up would be listed in the reporting template.



DRS System Processes for Monitoring OverSight And Internal Controls (MOSAIC) Overview

Template Instructions:

- Complete the **Regional Monitoring Report** for the VR program
- In the **Findings** section of the report, describe the sample reviewed to indicate the relative value and contribution of patterns and identified risk issues. List all the identified patterns or risk areas.
- Identify a regional **action plan** to address areas of concern, document action taken throughout the review period and report results to Central Office by date certain.
- Identify a “**Date for Follow-up,**” which is the date and the name of the regional office person responsible for following up with unit management to ensure that the identified action has taken place.

NOTE: Periodic requests from Central Office to a regional office will be made to confirm that planned actions were implemented as part of CO oversight activity.



Central Office Monitoring & Oversight

Central Office

- Routine monitoring/oversight activities.
- Analyze and identify statewide risks/patterns and develop action plan to address statewide issues
- Share findings with each Region
- Monitor regional action plans for region wide risks/patterns and follow up to identify results
- Process any policy changes, if needed, to increase compliance or quality assurance



Central Office Monitoring & Oversight

- The Director of CSS will appoint staff to **gather information from Regional Monitoring Reports** to **assess statewide patterns** and to identify regional risk areas.
- Central Office CSS provide coaching to **assist the regions** in addressing compliance issues or need for quality enhancing strategies where needed or requested.
- Central Office will **provide oversight** of all regional action plans and utilize statewide data reports to verify improvement following the implementation of each region's action plan.
- Central Office will **conduct independent oversight and monitoring activities** described in the Central Office Oversight and Internal Control section of this document.

Instructions:

CSS staff will report any statewide identified patterns or risks common among all five regions.

The Senior Management Team will work together to develop an action plan to address any statewide patterns or risks and will establish timeframes for resolution.



Appendices



DRS System Processes for **Monitoring Oversight And Internal Controls**

Appendix A: DRS Statewide Monitoring Report Template

Regional Monitoring Report for [Click here to enter Region ID and Quarter](#)

Focus Area	Methodology	Responsible Party
Financial Risks	No financial risks will be monitored during SFY	
Operational Risks	Report on <ul style="list-style-type: none"> • One-time maintenance total >\$300 • Vacant caseload or change in counselor 	
Strategic Risks	Report on <ul style="list-style-type: none"> • Successful Closures • Unsuccessful closure by strategic population 	
Compliance Risks	Report on <ul style="list-style-type: none"> • Case cost >\$25,000 • Case length >5 years • Presumptive eligibility (SSI/SSDI) • Cases in application phase more than 60 days • Cases that took more than 90 days to complete IPE • No Counseling & Guidance more than 180 days 	

REGIONAL FINDINGS & ACTION PLAN

Topic Findings (describe sample)	Action Taken	Date for Follow-up
Financial Risks		



DRS System Processes for Monitoring Oversight And Internal Controls

Operational Risks		
Strategic Risks		
Compliance Risks		



Appendix B: Unit Monitoring and Oversight: Best Management Practices

Unit Monitoring & Oversight

Having a schedule of unit level monitoring & oversight is good practice and necessary to the systems of accountability, performance management and operations.

- Unit area managers do not complete a quarterly monitoring report. However, they will provide feedback to the Region to address concerns raised by the Regional Monitoring & Oversight Process, and via required case reviews for identified monitoring topics.
- Unit area managers will work with regional office staff to identify action plans and follow-up related to performance.

Unit Monitoring & Oversight Activities

Unit managers will conduct required case reviews based on the provided risk assessments for performance management and monitoring topics to provide feedback and coaching for field staff. Managers implement and report on corrective actions in TxROCS to address identified concerns. Other risk issues routinely identified by regular operations of the unit should be addressed quickly and effectively to ensure staff perform competently within the programmatic parameters provided by policy and applicable laws and regulations.

Unit area managers may additionally implement unit level monitoring practices in any of the categories described below. Managers may choose one or more of these actions as indicated to help keep their unit on track with compliance. The list is not exhaustive and should be considered as practical guidance for unit operations but not required for purposes of the MOSAIC process.

Assessing Unit Federal and State Programmatic Compliance

- **Weekly monitoring of Time-In-Phase and Frequency of Contact** reports found in ReHabWorks. Managers should not just review but take action by analyzing issues that cause delays or bottlenecks in service delivery. Use an action plan to make any changes and coach staff to clarify expectations. Assess within 30 days to determine whether the desired change has occurred.
- **Weekly monitoring of Social Security recipients** to assess whether presumptive eligibility is in compliance. Note any issues and take action such as, redirection, coaching or training if needed and then assess within 30 days to determine if the action results in the change desired.
- **Routinely review reports from the case review system** for issues or patterns in corrective actions identified in compliance areas and take



DRS System Processes for **Monitoring Oversight And Internal Controls**

action needed to address issues or patterns. Provide staff direction, training, and coaching and convey clear expectations about quality and compliance performance management.

- **Track Case Readings** by entering partial reviews in TxROCS to identify compliance issues found and corrective actions taken to determine if there are any patterns that need to be addressed on a caseload or for the unit as a whole.

Assessing Unit Key Performance Measures

- **Routinely monitor caseload size and assess the need for referral source** development. Caseload size is an indicator of projected numbers of consumers served and successful outcomes by increasing the pool of qualified applicants to meet the needs of DRS's business partners. Number of consumers served is also a key performance measure that requires intentional action to meet federal requirements.
- **Routinely review unit progress** in increasing # of consumers served, number of applicants, number of transition students served, number of transition students with successful outcomes, number of Supported Employment cases with successful outcomes
- **Routinely monitor unit progress** to decrease transition students with unsuccessful outcomes and increase services to students with disabilities in IDD, Behavioral Health and/or Autism.
- **Routinely monitor underserved and unserved populations** as identified in the DRS Operational Strategic and Business Plans. Review and establish a unit plan to address needs. Assess what actions could be implemented to decrease the number of unsuccessful cases.

Assessing Unit Fiscal Management

- **Routinely review purchasing reports** related to high cost cases, medical services purchase orders > 200 days with no activity, physical restoration services >\$80,000. Pull unit reports from purchasing reviews and note any patterns. Make sure that purchasing reviews are routinely completed on Supported Employment, Independent Living and Comprehensive Rehabilitation Services cases as well as VR. These reviews are retroactive. If issues are discovered, identify proactive ways to coach, train, review and change results in the unit performance.
- **Assess the average cost** of successful closures and the average cost of unsuccessful closures after plan. Analyze reasons for the costs and determine if an action is needed to reduce the cost/closure. Identify a date by which you will assess if a change has occurred.



DRS System Processes for **Monitoring Oversight And Internal Controls**

- **Routinely track budgets** for all programs including monitoring of percent allocated and percent paid, accuracy of budget projection, and timely movement of funds to support service provision.

Assessing Unit Partnerships/Special Populations

- **Review CRP** desk and onsite corrective actions for system improvement.
- **Track business relations** for your unit. Track the number and nature of accounts you have and the nature of the relationship for successful outcomes. If the unit has not achieved success, analyze possible reasons why and take any action needed to effect a positive change. Identify a date by which you will assess if any actions produced a positive change. Consider DARSForce unit systems to track business relations.
- **Work with Contract Oversight and Support** to monitor providers in your unit. Are there any patterns that you are seeing that require corrective action? If so, develop an action plan and identify a date by which you will reassess to see if a positive change has occurred. Follow up after monitoring completion to see that all errors reported have been corrected by the provider. Spot check new cases after 30 days to see if the error is still occurring.
- **Consider a unit implementation plan** that addresses strategies for students to enhance outcomes. Explore the unit's successes with
 - Students in school, of transition age, not served by special education;
 - Youth with disabilities no longer in school
 - Youth with disabilities in foster care
 - Youth with disabilities transitioning from correctional facilities
 - Youth with Autism, IDD, serious and persistent mental illness or other significant disabilities.

Assessing Unit Consumer Relations

- **Track cases with inquiries** to see if consumers contacted DARS to ask for information or to take an actual complaint. Show how many of each type of inquiry occurred and identify legislative inquiries. Note DRS staff that were involved and the resolution. Also note any patterns such as certain staff involved. Take an action if needed to correct a pattern or trend and then identify a date by which you will assess if a positive change has taken place (may refer to DARS inquiries unit reports).
- Have a plan to staff vacant caseloads. Consider systems such as:



DRS System Processes for Monitoring Oversight And Internal Controls

- Dividing the caseload among existing Vocational Rehabilitation Counselors by alphabet, holding staff accountable for keeping the cases up to date
- Use of Unit Program Specialist to monitor and review vacant caseloads
- Use of MSS/UST to ensure that every consumer is contacted to inform them of the counselor vacancy position and provide each counselor with contact information of the interim counselor.

Although relieved of reporting for the purposes of this plan, the manager is still expected to manage compliance, alignment and quality delivery of services to consumers in accordance with policy, standards and codes of ethical behavior.



DRS System Processes for Monitoring Oversight And Internal Controls

Appendix C: Link to [Compliance & Quality Case Review Guide](#)





Appendix D: DRS Core Values

- We serve consumers in ways that achieve their goal of suitable employment.
- We value the consumer/counselor relationship as the foundational principle of VR.
- The time we spend in the community is essential to the success of our consumers.
- Our active relationship with business, providers and others contributes to the success of our consumers to achieve their employment goals.
- We thrive in, and support, an environment of teamwork and internal collaboration.



Appendix E: DRS Leadership Principles

1) LEADING BY EXAMPLE

By Definition: DRS fosters an environment of success through modeling core values. Our Core Values ground us in providing direction for staff who find themselves in ambiguous situations. As DRS leaders, we must lead by examples that mirror DARS vision, mission, and goals. DRS leaders must ensure everyone understands these values and secondly must guide staff to practice them. DRS leaders promote an atmosphere that impact staff who in turn seek to emulate the behaviors of a successful leader and tries to equal or surpass his or her accomplishments. DRS leaders must lead by good example, a necessary practice which staff are constantly interpreting. DRS leaders must project an unshakable belief that the objective can and will be accomplished. DRS leaders serve as models of group unity and must use their talents of influencing the team to serve and to take care of other needs first. DRS leaders need to know the way, show the way and go the way and by doing so, they will have earned the right to insist that others do the same. By doing this, DRS leaders will have learned how to influence in a manner which promotes a desire to want to follow their lead.

By Practice: It is the DRS leader that uses the talent of influencing the team to serve and to take care of other needs first. A DRS leader adopts our division's core values, vision and mission to serve our consumers, and leads by walking the talk and by lending a hand daily; always looking for opportunities to serve and assist others with solving problems. The DRS leader's behavior, attitude, beliefs and mindset are modeling the way to empower others to think and to dare to be different. DRS leaders must make sure everyone understands the values, and secondly, must guide staff to practice them. Leading by example means that DRS leaders understand that values ground an organization-providing direction for staff who find themselves in ambiguous situations. They are guides for decision making. DRS leaders never forget that organizational values start and end with them the leader. Whether their example is good or bad, they recognize staff around them will follow their lead.

Example: When something goes wrong, DRS leaders accept the blame; when things go right they give away the credit to those deserved.

Example: Staff are much more likely to follow a leader when they believe in that leader. What leaders often have to say to their followers can directly conflict with their followers' beliefs and their long standing habits. Whenever that happens, your best bet is to step back and lead through positive example.

Example: DRS leaders understand it is about the other person and understanding what motivates that individual in order to ensure success.

Example: When faced with a problem, DRS leaders maintain integrity and look for



DRS System Processes for Monitoring Oversight And Internal Controls

solutions that benefit everyone.

Example: Staff believe what they see for themselves, if leaders are having trouble influencing others to follow, find a way to show them a truth rather than simply telling them the truth.

Example: DRS leaders admit when mistakes are made and discuss them openly. They demonstrate to staff that it is best to appreciate and learn from mistakes instead of covering them up.

Example: DRS leaders incorporate the CORE values + the 4 way test in such areas as staffing a case with a counselor.

2) CLEAR AND OPEN COMMUNICATION/FEEDBACK

By Definition: The skill and demonstration of providing, receiving, and/or exchanging information based on situational needs whether through spoken or unspoken language thus fostering a culture of trust and open mindedness.

By Practice: DRS leaders communicate with each person in a manner which promotes their best reception of what is being conveyed. The most effective leader invests time to learn the individual communication styles of each of each person, thus addressing their needs accordingly. The DRS leader speaks openly and honestly, building trusting relationships with each person. DRS leaders are available for feedback and/or discussion of the expectations staff of them. DRS leaders clearly communicate and incorporate our DRS Mission, Vision, and Core Values on a daily basis both verbally and non-verbally. DRS leaders provide consistent and helpful guidance in order to foster growth. DRS leaders provide clarity in stating expectations that will enable others to strive to achieve their best as well as to carry out group goals and initiatives.

Example: DRS leaders provide clear expectations and demonstrate active listening skills. Say what needs to be said, both positive and challenging, and be willing to work through differences.

Example: DRS leaders seek first to understand, then to be understood.

Example: DRS leaders demonstrate an open door policy; be available / be approachable / be attentive (for consumers and staff).

Example: DRS leaders acknowledge mistakes and engage discussion for a positive resolution with staff.

Example: DRS leaders are mindful of the impact of feedback. DRS leaders are good at holding the attention of staff when providing comments.

Example: DRS leaders seize every opportunity to demonstrate how activities are in line with core values and E3.



DRS System Processes for Monitoring Oversight And Internal Controls

Example: DRS leaders are mindful of what our body language is saying to our receiver. Non-verbal gestures and spoken words need to match when listening or providing guidance.

Example: DRS leaders recognize and embrace diverse ways of thinking and being so as to exhibit a personality of objectivity.

Integrity/honesty/transparency

By Definition: These are the foundational principles of any successful organization. These three virtues are an important part of how trust is developed and maintained within our DRS organization. DRS leaders position themselves to provide consistent information, even when it is inconvenient or difficult to do so. They understand and accept that mistakes will be made and in congruence, they will recognize them, be accountable for them and then choose to take the next and most appropriate action, by internalizing the process as an opportunity for learning. The highest test of honesty and integrity is the level of transparency that an organization allows.

By Practice: The DRS leader raises the bar for others through the standards they set for themselves. It does not mean they walk in perfection. It does mean that they walk in a set of standards that are rooted in a set of beliefs that their worth is only enhanced by what they are able to give away. Transparency creates the opportunity to replicate the success of others. Challenging and complex choices made for the benefit of consumers that are routed in integrity commonly lead to positive results, even when there is a need to adjust the decision. By revealing the positive and the negative and by providing the staff with tools and resources. DRS leaders help staff identify their own opportunities or challenges for growth and personal development.

Example: DRS leaders provide consistent information, even when it is inconvenient or difficult. They are mindful of personal actions, character and reputation and assure they are in alignment with core values and mission.

Example: DRS leaders choose to take the best, right action.

Example: DRS leaders insure that all staff have access to one another's work information, to include the viewing of each other's calendars. Additionally, our staff are afforded the opportunity to volunteer for workgroups rather than being selected. DRS leaders convey to staff that they do not have all the answers, and demonstrate that mistakes can be the most teachable moment for all.

Example: DRS leaders insure that their staff are immediately kept abreast of current agency updates while fostering a positive atmosphere even when conveying such news as a freeze on agency hires/promotions/merits.

Example: DRS leaders place value on feedback interchange and evaluations. As a result, processes can be enhanced for the purpose of meeting objectives that lead to effective results. Based on feedback and evaluation from staff around the state, it was determined that the existing case review process was not achieving the desired



DRS System Processes for Monitoring Oversight And Internal Controls

results. Therefore, leaders explored a different process, which incorporated staff involvement. The case review process was modified and consequently a stimulating environment for learning evolved.

Example: DRS leaders purposefully cultivate an environment in which our staff develop the confidence to express their mistakes or concerns to their leader with the assurance they will receive guidance and support versus ridicule. DRS leaders focus 10% on the problem and 90% on the solution.

Example: A DRS leader creates a team spirit amongst staff through recognition and appreciation.

Example: DRS leaders take time to coach and help with challenging issues

3) Creating an exceptional environment (inspires/motivates/provides resources/allows risk/facilitates creativity, etc.)

By Definition: A safe work setting where staff are wholeheartedly invested in performing at a high level. The DRS leader encourages creativity and innovation to serve consumers and other partners, to achieve their goals, and to honor accomplishments and contributions, as well as demonstrating positive role modeling that results in development of a culture that inspires all concerned.

By Practice: The DRS leader has a clear set of standards that they expect their staff to live up to and they communicate these clearly and openly to them. DRS leaders believe that no matter what their role, staff can achieve the high standards that have been set. DRS leaders are always on the lookout for exemplars of our values and standards. DRS leaders get to know their staff personally; they learn about their likes and dislikes, their needs and interests. Then, when it comes time to recognize a particular staff member, they know a way to make it special, meaningful, and memorable. DRS leaders learn to tell the story of why someone did well, which provides a behavioral map that other staff members can easily remember and recall. This allows staff to put the behavior in a real context and understand what has to be done in that context to live up to expectations. DRS leaders celebrate together to bring their staff closer as a team and facilitate the essential support needed by the team. The DRS leader personally takes the initiative to recognize individual contributions, celebrate team accomplishments, and create an atmosphere of confidence and support. They understand and make sure that staff must experience in their hearts, what they do matters.

Example: The DRS leader makes sure their team has the necessary tools, information, and opportunities to succeed in their jobs and grow both professionally and personally.

Example: DRS leaders utilize DRS business plan “whiteboard” to share, expand, and execute team ideas.

Example: DRS leaders allow for flexible working schedules.



DRS System Processes for Monitoring Oversight And Internal Controls

Example: DRS leaders witness staff performing well and provide affirmation of their gifts/strengths both publicly and in private.

Example: DRS leaders impart the vision of success to the team members; the vision for what each team member can be and how the team will be stronger with each member's talents and strengths.

Example: A DRS leader creates a team spirit among staff through providing symbols of appreciation.

Example: DRS leaders take time to coach and help with challenging issues.

Example: DRS leaders allows for calculated risks to be taken.

Example: DRS leaders set the vision, but do not dictate the path.

Example: DRS leaders walk the walk. When someone makes an error, ideal leaders coach through it for improvement and never hammer or belittle in front of others.

Example: DRS leaders always give credit where credit is due; never appear to be taking somebody's idea as your own.

Example: A DRS leader creates a team spirit among staff through providing symbols of appreciation.

