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Government of the District of Columbia Department on Disability Services

POLICY	
Department on Disability Services	Subject: Internal Controls
Responsible Program or Office: Rehabilitation Services Administration	Policy Number: 2023-RSA-INT CNTR-POL001
Date of Approval by the Director: 1/11/2023	Number of Pages: 4
Effective Date: 1/17/2023	Expiration Date, if Any:
Supersedes Policy Dated: N/A	
Cross References, Related Policies and Procedures, and Related Documents: SOP on Quality Review and Supervisory Review (2016-RSA-QR-SOP-001); SOP on Referral, Application, and Intake Supplemental Protocols (2013-RSA-Intake-SOP-001); Case Closure Procedure (2019-RSA-PROC001); Documentation of Credential Attainment and Measurable Skills Gains in the Case Record (2021-RSA-CAMSG-SOP-01); SOP on Data Integrity (in development)	

1. PURPOSE

The purpose of this policy is to guide the development and maintenance of internal controls necessary to ensure data integrity and performance accountability consistent with the requirements set forth in the Work Force Innovation and Opportunity Act (WIOA) (Pub. L. 113-128, 128 Stat. 1425), codified generally at 29 U.S.C. § 1301 *et seq.*) and to provide reasonable assurance the services provided and funds expended are allowable and in conformance with the Uniform Grant Guidance (2 C.F.R. § 200) and Internal Controls (2 C.F.R. § 200.303).

2. APPLICABILITY

This policy applies to Vocational Rehabilitation (VR) Specialists, Rehabilitation Assistants (RAs), VR Supervisors and Program Managers, the D.C. Rehabilitation Services Administration (DCRSA) Deputy Director, the Quality Assurance and Performance Management Administration (QAPMA) Deputy Director, and the QAPMA Performance Management Administrator and Performance Management Staff.



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3. AUTHORITY

The authority for this policy is vested in the Department on Disability Services (DDS) as set forth in section 109 of the “Department on Disability Services Establishment Act of 2006,” effective March 14, 2007 (D.C. Law 16-264; D.C. Official Code § 7-761.01 *et seq.*(2018 Repl.)); and the “Rehabilitation Services Program Establishment Act of 2004,” effective April 12, 2005 (D.C. Law 15-332; D.C. Official Code § 32-331 *et seq.*(2019 Repl.)) and 29 DCMR § 100 *et seq.*; and 34 C.F.R. Part 361.

4. POLICY

- A. It is the policy of DCRSA to develop and maintain robust internal control to ensure that data used for the purposes of financial accountability, performance management and continuous quality improvement are accurate and reliable.
- B. Internal controls are defined as a process, implemented by DCRSA, designed to provide reasonable assurance regarding the achievement of objectives in the following categories:
 - 1. Effectiveness and efficiency of operations;
 - 2. Reliability of reporting for internal and external use; and
 - 3. Compliance with applicable laws and regulations.

5. RESPONSIBILITY

The responsibility for this policy is vested in the Deputy Director of Rehabilitation Services Administration. Implementation of this policy is the responsibility of the Rehabilitation Services Administration.

6. STANDARDS

- A. DCRSA shall establish and maintain procedures to ensure accurate data collection and financial accountability.



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1. Internal control processes shall include monitoring of Federal requirements, which would include ensuring the accuracy of internal data.
 2. DCRSA will review these internal control processes and monitor the RSA-911 to ensure that reported data are accurate.
 3. DCRSA will develop the written data validation processes consistent with RSA TAC 19-01.
 4. DCRSA will maintain financial accountability and oversight of the Operations and Budgeting Divisions that manage the VR grant funds and subsequent distributions of grant funds.
 5. DCRSA will continue to offer trainings both routinely, and, as necessary using the learning management system procured by the agency.
- B. DCRSA shall establish and maintain a case review process to verify supporting documentation in an individual's service record is accurate, complete in accordance with 34 CFR § 361.47(a) and supports data entered in the case management system including:
1. Eligibility determination
 2. IPE development
 3. Case closure
- C. DCRSA shall verify that the following data elements in the RSA-911 case service record match the supporting documentation:
1. Dates: Application, eligibility determination, IPE, start date and completion date of training programs, start date of employment in primary occupation at exit or closure, date of exit or closure
 2. Other: Hourly wage at 90-days after obtaining employment and achieving stability and at exit or closure, employment status and position title at exit or closure, type of exit or closure



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- D. DCRSA shall maintain a committee that meets regularly to review and revise policies and procedures related to maintaining data quality and integrity.
- E. DCRSA shall use internal control systems to identify ways to improve the effectiveness and efficiency of data processes.

Andrew P. Reese, Director

January 11, 2023

Date