

Chapter 55

Social Services—Supervision of Community-Based Organizations

1.0 MAIN POINTS

In 2012, we audited the Ministry of Social Services' (Ministry) processes to plan for, contract with, and monitor community-based organizations (CBOs) providing services to intellectually disabled people and their families, and made eight recommendations. At September 30, 2014, the Ministry had implemented three recommendations but has more work to do for the remaining five.

The Ministry continues to work to establish program objectives, and outcome performance measures and targets to monitor and evaluate the services CBOs deliver. It also needs to develop and implement complete policies and procedures for addressing risks identified at CBOs, follow its established policies to obtain all the required reports from CBOs, and follow established monitoring procedures as outlined in the agreements with CBOs. In addition, the Ministry needs to analyze and document its review of serious incidents and incident trends at CBOs and determine how to address the increasing trend in incidents.

2.0 INTRODUCTION

This chapter reports the results of our follow-up of eight recommendations initially made in our *2012 Report – Volume 1*, Chapter 22 about the effectiveness of the Ministry's process to plan for, contract with, and monitor CBOs providing services to intellectually disabled people and their families.

In 2012, we reported that the Ministry needed to:

- › Improve its agreements with CBOs by establishing program objectives, outcome performance measures and targets
- › Document the rationale for CBO selection and the funding decisions associated with each CBO that provides services to individuals with intellectual disabilities
- › Improve its monitoring and evaluation of service delivery to individuals with intellectual disabilities

To do this work, we followed the standards for assurance engagements published in the *CPA Canada Handbook – Assurance*. To evaluate the Ministry's progress towards meeting our recommendations, we used the relevant criteria from the original audit. Management agreed with the criteria in the original audit.

We examined the Ministry's policies and procedures manuals, serious incident reports and other relevant documents. We also tested a sample of CBO agreements.



2.1 Ministry Mandate

The mandate of the Ministry is to support vulnerable citizens as they work to build better lives for themselves through economic independence, strong families, and strong community organizations.¹ The Ministry provides programs and services for people with intellectual disabilities,² works with them, and helps them access a variety of community-based services. *The Residential Services Act* and *The Rehabilitation Act* give the Ministry the authority to enter into agreements with community-based organizations (CBOs) to provide these services.

3.0 STATUS OF RECOMMENDATIONS

This section sets out each recommendation including the date on which the Standing Committee on Public Accounts agreed to the recommendation, the status of the recommendation at September 30, 2014, and the Ministry's actions up to that date. We found that the Ministry has implemented three recommendations but has more work to do to fully meet the remaining five recommendations.

3.1 Agreements with CBOs Improving

We recommended that the Ministry of Social Services work with community-based organizations (CBOs) to establish program objectives, and outcome performance measures and targets to be used to monitor and evaluate the services CBOs deliver to intellectually disabled people and their families. (2012 Report – Volume 1; Public Accounts Committee agreement June 17, 2014)

Status – Partially Implemented

For group homes and day programs, the Ministry's agreements set out the core program outcomes and indicators, which are based on meeting the needs of the individuals residing in the group homes or utilizing day programs. In 2012-13, the Ministry began requiring Person-Centred Planning (PCP) for these individuals. The PCP is an individualized approach that addresses such things as health, safety, basic needs, and quality of life. It involves setting goals with individuals and taking action to achieve those goals.

For general service contracts or specialized programs, the Ministry is working with CBOs to develop outcome performance measures and targets for inclusion in their agreements.

Including performance measures and targets in all CBO agreements would allow the Ministry to better evaluate CBO performance and ensure the services delivered achieve the results the Ministry had intended.

¹ Ministry of Social Services, *Annual Report for 2013-14*, p.3.

² *The Rehabilitation Act* defines intellectual disability as "a condition of arrested or incomplete development of mind whether arising from inherent causes or induced by disease or injury."

3.2 Selection Process Documented

We recommended that the Ministry of Social Services document the program selection and funding decisions associated with each community-based organization that provides services to individuals with intellectual disabilities. (2012 Report – Volume 1; Public Accounts Committee agreement June 17, 2014)

Status – Implemented

Ministry staff meet to discuss, evaluate, and rank the budget requests that all CBOs submit based on established criteria (e.g., level and urgency of needed services). The Ministry now documents these discussions, including the rationale behind program selection and funding decisions.

3.3 Policies and Procedures Not Updated

We recommended that the Ministry of Social Services develop and implement complete policies and procedures for addressing risks identified in community-based organizations that provide services to individuals with intellectual disabilities. (2012 Report – Volume 1; Public Accounts Committee agreement June 17, 2014)

Status – Not Implemented

The Ministry has not updated its *Policy Manual for CBO Accountability*. The manual indicates that several key policies covering the risk assessment process will be added at a future date. However, management indicated that the Ministry communicates risk assessment procedures to staff on an informal basis.

Without complete policies and procedures, it is difficult to communicate expectations to staff and hold them accountable. The lack of formal policies could also lead to inconsistent risk assessments being completed.

3.4 Compliance with Amended Annual Work Plan

We recommended that the Ministry of Social Services require staff to comply with the annual work plan to attend annual general board meetings of all community-based organizations that provide services to individuals with intellectual disabilities on the Ministry's behalf or amend the annual work plan to incorporate a risk-based focus for meeting attendance. (2012 Report – Volume 1; Public Accounts Committee agreement June 17, 2014)

Status – Implemented



The Ministry has amended its annual work plan. The plan no longer requires staff to attend all annual general board meetings. Instead, the plan requires staff to maintain regular contact with the CBO and the board.

Management indicated that CBOs that are medium and high risk are prioritized on an informal basis. Meeting attendance is then coordinated based on this prioritization. During our review of a sample of CBOs, we found that Ministry staff maintained regular contact with their respective CBO and the board.

3.5 Established Policies Need to be Followed

We recommended that the Ministry of Social Services require its staff to follow established policies to obtain all required reports that are not submitted by the due date from community-based organizations that provide services to individuals with intellectual disabilities on the Ministry's behalf. (2012 Report – Volume 1; Public Accounts Committee agreement June 17, 2014)

Status – Partially Implemented

The Ministry's policy manual provides guidance to staff on what to do when CBOs do not comply with reporting requirements as set out in the CBO agreements. In 10% of the files reviewed, we noted that staff did not follow the established policies to obtain all the required reports not submitted by the due date, nor was there any evidence of staff following up on the late reports (e.g., sending emails, letters).

To effectively monitor CBOs' delivery of services, the Ministry needs to ensure CBOs submit all the required reports. If the reports are not received, staff need to follow the established policies to obtain those reports.

3.6 More Monitoring Needed

We recommended that the Ministry of Social Services follow their established monitoring procedures as outlined in their agreements with community-based organizations that provide services to individuals with intellectual disabilities. (2012 Report – Volume 1; Public Accounts Committee agreement June 17, 2014)

Status – Partially Implemented

The Ministry has processes, such as regular reviews of CBOs' financial information as well as an annual financial analysis, to determine whether CBOs spend money in accordance with the agreements and for the purposes intended.

The agreements with CBOs require Ministry staff, at least once every two years, to review CBOs' policies and procedures, verify compliance with those policies and procedures, and develop action plans to address non-compliance. However, we found that only 43% of the CBOs' files that we sampled had this review completed within the

last two years. Lack of timely monitoring increases the risk that CBOs may not use public resources for the stated objectives and may not achieve the objectives of the Ministry.

3.7 Analysis of Serious Incidents Needed

We recommended that the Ministry of Social Services analyze and document its review of serious incidents and incident trends at community-based organizations that provide services to individuals with intellectual disabilities and determine how to address the increasing trend in incidents. (2012 Report – Volume 1; Public Accounts Committee agreement June 17, 2014)

Status – Partially Implemented

Staff prepare and provide to management reports on serious incidents (e.g., by type, sector, region) to monitor any developing trends. However, these reports do not include analysis on the causes for incidents, risks, actions to mitigate the risk, or provide any explanation of developing trends.

The reports show that the number of serious incidents is increasing (i.e., 291 incidents in 2012-13 compared to 552 incidents in 2013-14). The report noted that the increase may be partly attributable to improved reporting compliance and increases in group home and day program spaces, but did not include any further details.

Analyzing and documenting the review of serious incidents and incident trends is important. This analysis would help the Ministry determine what actions are required to reduce the number of incidents in the CBOs.

3.8 Timely Action Taken to Address Service Quality Issues

We recommended that the Ministry of Social Services take timely action to address service quality issues at community-based organizations that provide services to individuals with intellectual disabilities on the Ministry's behalf and document their actions taken. (2012 Report – Volume 1; Public Accounts Committee agreement June 17, 2014)

Status – Implemented

As part of the incident report, staff identify the three CBOs in each region with the highest number of serious incidents. However, the incident reports do not identify the root causes of these incidents and the steps needed to mitigate or eliminate them.

For example, the 2013-14 incident report identified one CBO with 173 serious incidents. 145 of these incidents related to medication abuse, but there was no documentation setting out what caused the incidents or what must be done to correct them.



However, once the Ministry became aware of the issue, it regularly communicated to CBO staff, senior management, and the Board about the importance of addressing such service quality issues. The Ministry also reviewed policies and procedures with the CBO and discussed corrective actions.