

Chapter 37

Social Services—Supervising Community-Based Organizations Delivering Programs to Intellectually Disabled People

1.0 MAIN POINTS

The Ministry of Social Services provides programs and services for people with intellectual disabilities by working with and helping them access a variety of community-based services. The Ministry uses community-based organizations (CBOs) to deliver residential and day programs to people with intellectual disabilities. *The Residential Services Act* and *The Rehabilitation Act* give the Ministry the authority to enter into agreements with those CBOs.

By August 2021, the Ministry improved its processes to monitor CBOs serving intellectually disabled people and their families, but needs to make further improvements.

The Ministry continued to work on establishing measures and targets to better monitor and evaluate the results of services CBOs deliver. In addition, the Ministry is updating its risk assessment processes to improve its ability to detect and mitigate risks that could impact a CBO's ability to deliver uninterrupted service.

The Ministry is not yet monitoring CBOs' performance within expected timeframes outlined in CBO agreements. We found 23 out of 78 CBOs have not had basic standards reviews done in the past two years as expected.

Active monitoring of CBO performance helps the Ministry assess whether the services delivered achieve the results the Ministry intended.

2.0 INTRODUCTION

Our *2012 Report – Volume 1*, Chapter 22, concluded that the Ministry had effective processes to plan for, contract with, and monitor CBOs providing services to people with intellectual disabilities other than the areas identified in our eight recommendations. By August 2019, the Ministry implemented five of the eight recommendations.¹ This chapter describes our fourth follow-up audit of management's actions on the three outstanding recommendations.

To conduct this audit engagement, we followed the standards for assurance engagements published in the *CPA Canada Handbook—Assurance* (CSAE 3001). To evaluate the Ministry's progress toward meeting our recommendations, we used the relevant criteria from the original audit. The Ministry's management agreed with the criteria in the original audit.

¹ See our *2014 Report – Volume 2*, Chapter 55, pp. 399–404; our *2017 Report – Volume 1*, Chapter 33, pp. 281–284; and our *2019 Report – Volume 2*, Chapter 46, pp. 329–331.



To perform our follow-up audit, we discussed actions taken with management, reviewed relevant documentation (e.g., policy and procedures manuals, information showing CBO reviews occurred), and tested a sample of CBO agreements.

At March 31, 2021, the Ministry held agreements with 78 CBOs for providing services to intellectually disabled people. In 2020–21, the Ministry paid these CBOs about \$196.5 million.

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 August 31, 2021, and the Ministry's actions up to that date.

3.1 Work to Determine Outcome Performance Measures Continues

We recommended the Ministry of Social Services work with community-based organizations to establish program objectives, and outcome performance measures and targets to be used to monitor and evaluate the services community-based organizations deliver to intellectually disabled people and their families. (2012 Report – Volume 1, p. 192, Recommendation 1; Public Accounts Committee agreement June 17, 2014)

Status—Partially Implemented

At August 31, 2021, the Ministry of Social Services had not yet established outcome-based measures and targets for services delivered by community-based organizations (CBOs) to intellectually disabled clients.

The current agreements with CBOs continue to set out performance measures and targets related to the creation of person-centred plans for clients living in CBO homes (e.g., 100% of clients have completed plans). However, agreements do not include any measures around whether person-centred plans are monitored and achieved, which would help measure whether a client's quality of life is enhanced.² The current agreements also do not set performance measures and targets for evaluating service outcomes of other key programs that CBOs deliver. For example, no measures or targets relate to day programs provided by CBOs.

In May 2021, the Ministry hired a contractor to develop outcomes for CBOs, a performance management framework, and related tools. The contractor facilitates collaboration between the Ministry and the disability services sector. The ultimate goal of the project is to implement outcome-based contracts for all CBOs.

Including appropriate outcome-based performance measures and targets in CBO agreements would allow the Ministry to better evaluate CBO performance, and assess whether the delivered services achieve the results the Ministry intended.

² The Ministry's *Comprehensive Personal Planning and Support Policy* refers to person-centred plans as the planning of coordinated supports assisting a participant to realize his/her goals, dreams and aspirations to enhance his/her development and quality of life.

Management told us the Ministry plans to transition to new, outcome-based reporting requirements by 2024–25.

3.2 Monitoring Procedures Inconsistently Followed

We recommended 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, p. 196, Recommendation 6; Public Accounts Committee agreement June 17, 2014)

Status—Partially Implemented

The Ministry of Social Services inconsistently completes reviews of CBOs' basic policies and procedures within expected timeframes.

The Ministry is to conduct a basic standards review every two years. These reviews include: assessing whether the CBOs' policies align with the Ministry's *Comprehensive Personal Planning and Support Policy*; conducting interviews to determine whether policies are followed in practice; and creating action plans for improving areas of non-compliance.³

The Ministry tracks when it last reviewed each CBO, but does not centrally track the results of these reviews. Based on Ministry tracking, as of March 31, 2021, staff had not completed the basic standards review steps for 29% of the 78 CBOs (23 out of 78) within the last two years (at the time of the previous follow-up: 32%). Management indicated delays occurred in completing reviews due to transitions in senior leadership positions at CBOs and COVID-19 priorities.

We tested a sample of nine CBOs for a basic standards review and found, similar to the Ministry's records, that three reviews (33%) were not completed within the expected timeframe. As of July 2021, two of the CBOs' basic standards reviews had not been completed 14 months after the May 2020 due dates and the third CBO's basic standards review had not been completed 30 months after its January 2018 due date.

Lack of timely monitoring increases the risk that CBOs may not use and follow appropriate policies to support individuals with intellectual disabilities as they work to build better lives for themselves.

3.3 Risk Assessment Implementation Ongoing

We recommended 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, p. 194, Recommendation 3; Public Accounts Committee agreement June 17, 2014)

Status—Partially Implemented

³ *Comprehensive Personal Planning and Support Policy* establishes province-wide policies that Ministry and CBO staff are expected to follow in the provision of effective and ethical supports to individuals with intellectual disabilities.



The Ministry of Social Services has not yet implemented several key policies (e.g., assessing preliminary risk, risk management) relating to CBO risk assessments.

Currently, the Ministry completes annual compliance assessments on each CBO to determine whether the CBO met: the licensing requirements; had and maintained certain key policies (e.g., Board expenditures, criminal record checks, conflict of interest); and provided the Ministry with key information throughout the year (e.g., minutes, annual reports, insurance). If the CBO is non-compliant, the Ministry creates a mitigation plan and works with the CBO to put it in place.

The Ministry is currently piloting a framework to assess, monitor, and manage risk inherent in third-party service contracts, including CBOs. The Ministry expects the piloted framework to assess and identify risks that would hinder a CBO from providing uninterrupted service in a proactive manner. The Ministry expects the new process to focus its review of compliance, and performance information provided by third-party organizations to measure the level of risk in areas such as the inability to meet financial obligations; inability to recruit and retain adequate staff; and inadequate assessment, monitoring, or response to health and safety concerns of clients. It set a Ministry-wide, project implementation date for 2022–23.

Without a comprehensive risk assessment, it is more difficult to communicate expectations to staff and hold CBOs accountable. Having an established risk framework should support staff in completing consistent CBO risk assessments and addressing key risks that will impact the CBOs' ability to deliver uninterrupted service.