

Children's Aid Societies

Background

Under provisions of the *Child and Family Services Act* (Act), the Ministry of Children and Youth Services (Ministry) contracts with 53 local not-for-profit Children's Aid Societies (Societies) for delivery of legislated Child Welfare Services in their respective jurisdictions. The Ministry provides 100% of the required funding for these services. Each Society operates at arm's length from the Ministry and is governed by an independent volunteer Board of Directors. Under their agreement with the Ministry, Societies are required to:

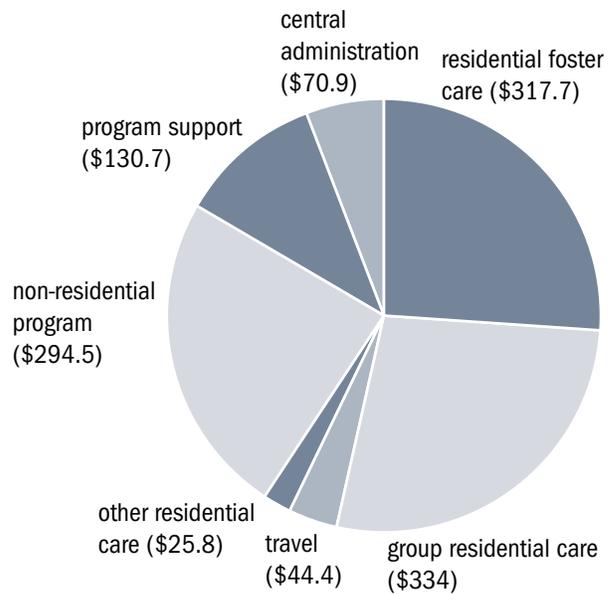
- investigate allegations and/or evidence that children under the age of 16 may be in need of protection;
- where necessary, protect children under the age of 16, by providing the required assistance, care, and supervision in either residential or non-residential settings (services will continue until age 18 unless the child opts out);
- work with families to provide guidance, counselling, and other services where children have suffered from abuse or neglect, or are otherwise at risk; and
- place children for adoption.

Unlike most other Ministry programs, where provision of services is subject to availability of

funding, the Child Welfare Services Program requires each Society to provide all of the mandatory services to all identified eligible children. In other words, there is no such thing as a waiting list for Child Welfare Services. Ministry transfer payments to Children's Aid Societies to fund expenditures were \$1.24 billion in the 2005/06 fiscal year. Just over half of annual transfer payments go towards residential foster care and group residential care, as illustrated in Figure 1.

Figure 1: Program Expenditures by Category, 2004/05 (\$ million)

Source of data: Ontario Association of Children's Aid Societies



Note: Program expenditures by category were not available for the 2005/06 fiscal year.

All but one of the 53 Societies belong to the Ontario Association of Children's Aid Societies, which aims to provide leadership in the protection of children and the promotion of their well-being. The Association's services include advocacy and facilitating the sharing of information and best practices between Societies.

Audit Objectives and Scope

This was the first value-for-money (VFM) audit conducted of Children's Aid Societies, enabled by an expansion of the mandate of the Office of the Auditor General of Ontario, effective April 1, 2005. The expansion allows us to conduct VFM audits of institutions in the broader public sector such as children's aid societies, community colleges (see Section 3.03), hospitals (see sections 3.05 and 3.06), and school boards (see Section 3.11).

Our audit objectives were to assess whether Children's Aid Societies ensured that:

- funding provided by the Ministry was spent prudently with due regard for economy and efficiency; and
- children in need received appropriate care and protection in a timely manner, in accordance with legislation and policies.

The scope of our audit included a review and analysis of relevant files and administrative procedures, as well as interviews with appropriate staff, during visits to four Societies in Toronto, York, Peel, and Thunder Bay. These four Societies between them accounted for almost 25% of total expenditures by all Children's Aid Societies in Ontario. We also sent questionnaires to another 48 Societies and received responses from 42 of them.

In addition, we met with senior staff at the Ontario Association of Children's Aid Societies to obtain summary information and to gain a better

understanding of issues in the Child Welfare Services sector.

Prior to commencing our work, we identified the audit criteria we would use to address our audit objectives. These were reviewed and agreed to by board member representatives and senior management of the four Societies we visited.

We completed the bulk of our audit work by mid-May 2006. Our audit was performed in accordance with standards for assurance engagements, encompassing value for money spent and compliance, established by the Canadian Institute of Chartered Accountants, and accordingly included such tests and other procedures as we considered necessary in the circumstances.

We also reviewed the most recent audit reports issued by the Ministry's Internal Audit Services in 2003. Although the reports were helpful in planning our audits, we were unable to reduce the extent of our audit because their work was completed more than three years ago.

Summary

Total society expenditures net of society-generated funds more than doubled between the 1998/99 and 2004/05 fiscal years, rising from \$541.7 million to \$1.173 billion, while key service volumes, including the number of families served, increased by only about 40% over the same period. In light of the fact that expenditures by Children's Aid Societies have increased at a substantially higher rate than the underlying service volumes over the past six years, Societies need to be more vigilant to ensure that they receive—and can demonstrate that they receive—value for money spent.

Among our findings:

- Societies need to formally establish and follow prudent purchasing policies and procedures for the acquisition of goods and services.

- Controls over acquisition of, and payment for, professional services should be strengthened by, for example, ensuring that invoices contain sufficient detail to assess the appropriateness and reasonableness of the amounts billed. For example, one Society paid an annual retainer of \$160,000 to a law firm without adequate documentation regarding the amount of service actually being provided each year.
- Societies should tighten controls on reimbursements to staff for use of personal vehicles at work, and on amounts billed to corporate credit cards, by ensuring that all charges are for valid business purposes only, and are reasonable in the circumstances.
- Societies should acquire vehicles only when it is necessary and economical to do so. One Society operated a fleet of 50 vehicles but logged fewer than 10,000 kilometres a year on half of them, suggesting such a large fleet was unnecessary.
- Societies should draft policies regarding international travel by staff and children in care. For example, we found instances of travel to international conferences and trips by staff and children to visit biological families in the Caribbean that, in our view, were questionable.
- Societies need to do more to obtain and document information about residential care services provided by outside institutions, and document the factors considered to ensure that children are appropriately and economically placed in residential care.
- Only when necessary should Societies enter into Special Rate Agreements, which require payments to private residential care providers over and above those prescribed by the Ministry, and they should ensure that services contracted for are reasonably priced and actually received.

With respect to the provision of child welfare services, Societies need to adhere better to legislative requirements and established policies and procedures to ensure children receive the appropriate care and protection. We found that:

- Requirements for completing the required Intake/Investigation Process following referrals were, in many cases, not met in a timely manner or, in some cases, not at all. For example, in one-third of instances where a child should have been seen by a caseworker within either 12 hours or seven days (with most of the instances pertaining to the seven-day requirement), visits were late by an average of 21 days.
- Initial plans of service or care for children receiving protection services, along with the required assessments and plan updates, were often not completed in a timely manner. For example, we noted that in 90% of cases reviewed, plans of service were not completed as required and there were some instances of plans being late by more than 300 days, making it difficult for Societies to demonstrate that children were getting appropriate care.
- In many cases, Societies performed inadequate monitoring of former Crown wards who receive assistance under a program designed to help youths between the ages of 18 and 21 successfully make the transition to independent living.
- A sampling of foster-parent files we reviewed showed that, in most instances, Societies were meeting and documenting specific requirements to ensure that foster parents have the necessary skills and resources to provide quality care to children entrusted to them.
- Our review of personnel files at the Societies we visited indicated that, generally, there was compliance with internal policies regarding procedures to be completed for hiring new staff and ongoing performance management.

Detailed Audit Observations

DUE REGARD FOR ECONOMY AND EFFICIENCY

As detailed in Figure 2, net expenditures by Children's Aid Societies have increased substantially over the past seven years—and much faster than caseloads have increased. We were advised that a number of factors contributed to this situation, including increased diversity and complexity of cases, as well as general cost increases. We also understand that a number of factors have contributed to increased caseloads, including a new standardized risk-assessment model, legislated changes that expanded the definition of a child in need to include neglect and family violence, and mandatory reporting by professionals, such as doctors, teachers, and police, of suspected abuse.

Despite these significant increases in both expenditures and caseloads, the Ministry of Children and Youth Services deliberately does not involve itself in the management of Children's Aid Societies. This approach evolved over time as the Ministry sought to balance the requirement for Societies to be accountable to it, with their need for operational autonomy and flexibility.

The Ministry currently has three principal accountability mechanisms to help ensure that it receives value for money spent by the Children's Aid Societies:

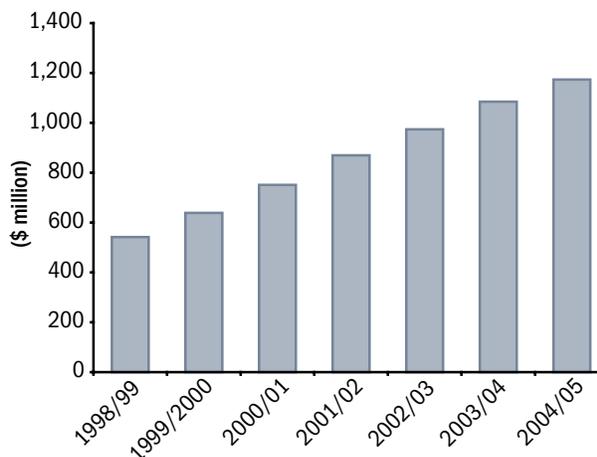
- the annual funding mechanism;
- the in-year quarterly reporting process; and
- the year-end Annual Program Expenditure Reconciliation.

However, our review of these mechanisms in our audit of the Ministry's Child Welfare Services Program found them to be generally ineffective because:

- The Ministry continued to fund the annual year-end expenditure deficits of Societies

Figure 2: Net Expenditures by Children's Aid Societies, 1998/99–2004/05

Source of data: Ontario Association of Children's Aid Societies



regardless of their entitlement under the funding framework. This contributed to significant differences in funding growth between Societies, and significantly higher overall program costs.

- In most cases, quarterly reports did not provide sufficient detail to identify the reasons for variances in planned versus actual results, or to propose plans for corrective action. In addition, there was no evidence in most cases that Ministry staff even reviewed these reports or followed them up with Society staff to ensure the necessary corrective actions were taken.
- The Annual Program Expenditure Reconciliation process did not consistently ensure that Ministry funding was spent for eligible purposes. Nor did it confirm the accuracy of the reported year-end funding surplus or deficit.

Given these deficiencies, it is all the more critical for Children's Aid Societies themselves to have strong controls and practices in place to ensure that they operate prudently and deliver quality services in a cost-effective manner. Our detailed audit observations focus first on concerns about Societies' spending practices and second on issues regarding the care and protection of children.

Purchasing Policies and Procedures

Most larger private- and public-sector organizations have policies and procedures requiring that goods and services be acquired through a competitive process that seeks to achieve the best value for money spent, meets specific needs, and promotes fair dealing and equitable relationships with vendors.

For example, the government of Ontario has detailed directives outlining the obligations of its ministries in these areas. With respect to obtaining competitive quotations or bids, ministries must comply with the following purchasing thresholds:

- Up to \$5,000—one telephone quote;
- \$5,000 to \$24,999—three telephone quotes;
- \$25,000 to \$99,000
 - goods—advertisement for bids, no minimum number of bids; and
 - services—invitation to tender or proposal, minimum three bids.
- Over \$100,000—advertisement tender/proposal on MERX, the national electronic-tendering service.

We found that one of the four Societies we visited had no purchasing policies or procedures at all, while the remaining three operated under a variety of policies, as noted in Figure 3.

We also found that, for most of the Society purchases we reviewed, including several significant-dollar purchases, Societies did not comply with their own purchasing policies and procedures. In one instance, the same Society spent over \$100,000 on computer leases and another approximately

\$100,000 on building renovations, without there being any evidence that the Society had solicited requests for proposals or followed any other competitive process. As a result, there was no assurance that these expenditures represented the best value for money spent or that all vendors were treated equitably.

RECOMMENDATION 1

To help ensure that expenditures represent value for money spent while promoting fair dealings with vendors, Children's Aid Societies should:

- establish prudent requirements for the competitive acquisition of goods and services; and
- adhere to those requirements, unless they can document adequate reasons for doing otherwise.

Professional Services

Societies generally acquire services of professionals, including lawyers, psychologists, psychiatrists, and interpreters, from selected individuals or firms. Our review of these arrangements found that in the vast majority of cases:

- there was no indication as to how a particular individual or firm was selected;
- there was no attempt to establish or periodically evaluate the qualifications of individuals or firms providing services; and

Figure 3: Purchasing Policies at Three Children's Aid Societies

Source of data: Individual Children's Aid Societies

Society #1	Society #2	Society #3
under \$5,000—no quotes	under \$1,500—no quotes	any purchase of supplies—three verbal quotes
\$5,000 to \$25,000—three written quotes	\$1,500 to \$7,500—two verbal quotes \$7,500 to \$15,000—three verbal quotes	equipment, furniture & any vehicle purchases—three written quotes
over \$25,000—request for tenders	over \$15,000—three written quotes	any purchase of services—open tender

- there was no written agreement detailing either the condition under which services were to be provided or the determination of amounts to be billed and paid.

We also reviewed a number of invoices for professional services and found that they lacked sufficient detail to ensure that billings were reasonable and appropriate, or even that services had actually been delivered. In many cases, for example, the amounts billed consisted of a monthly total, without any detail about the cases on which the vendor worked or the number of hours billed. We noted one instance where a legal firm received an annual retainer of \$160,000 without providing an indication of the amount of service actually being provided each year, which makes it difficult to periodically assess the reasonableness of the annual retainer.

RECOMMENDATION 2

In order to promote value for money spent in the purchase of professional services, Children's Aid Societies should:

- document the basis on which professional firms or individuals were selected and why the fees were commensurate with the qualifications of those firms or individuals;
- enter into formal written agreements detailing the conditions under which services are to be provided and paid for, and periodically evaluate results achieved; and
- ensure that invoices contain sufficient detail to assess the appropriateness and reasonableness of amounts billed.

Travel Expenses

Vehicles Leased or Owned by Societies

Although three of the four Societies we visited had only a few owned or leased vehicles, the fourth had an extensive fleet of approximately 50 vehicles. A

few were assigned to senior management staff for their exclusive use, some were available to staff of Society-owned group homes and property-management personnel, and others were in a pool shared by front-line workers.

Our comments and concerns with respect to the use of these vehicles are as follows:

- Senior management staff received high-end luxury vehicles, including two SUVs worth \$53,000 and \$59,000. The cost of these vehicles was significantly higher than, for example, the maximum allowance of \$30,000 set by the Province of Ontario for Deputy Ministers' vehicles.
- With few exceptions, no travel logs were maintained for any vehicles, making it impossible for the Society to effectively monitor and control their use, or for us to assess the purpose and extent of use.
- Our review of expenditures incurred on individual gasoline cards assigned to each vehicle found that, based on fuel purchases, almost half the vehicles logged fewer than 10,000 kilometres per year, with some below 4,000 kilometres per year. This level of usage is significantly lower than the Ministry of Transportation's threshold of 22,000 kilometres per year, below which it is not economical for a government ministry to lease or own a vehicle.
- In one instance, an individual had a Society-owned vehicle while at the same time receiving a tax-free vehicle allowance of \$600 per month from the Society for use of his personal vehicle.

We also noted that the Society performed no review or analysis to determine the number of vehicles it actually needs, or the cost-effectiveness of other forms of transportation.

RECOMMENDATION 3

In order to help ensure that vehicles are owned or leased only when necessary, and that trans-

portation requirements are acquired economically, those Children's Aid Societies that have vehicles should:

- analyze their transportation requirements and ensure that the number of vehicles they own or lease is justified based on those requirements;
- reassess the appropriateness of acquiring high-end luxury vehicles; and
- maintain logs for all vehicles to effectively control and monitor their use.

Use of Society Credit Cards

In general, corporate credit cards at the four Societies we visited were held by senior management staff while gasoline credit cards were assigned to individual vehicles. Card issuers billed Societies monthly, and Societies paid them directly.

In order to ensure that items billed and paid for are legitimate, and that amounts paid are accurate and in compliance with their spending limits, Societies would be expected to review and reconcile monthly billings with detailed supporting receipts before making payments.

Our review of a sample of payments to credit-card companies found that at three of the four Societies we visited, most of the detailed supporting receipts were appropriately attached to the monthly statements and supported the amounts paid. Our review of the detailed receipts found no unusual items (other than those noted below relating to international travel).

At the fourth Society, however, detailed receipts were missing in the majority of cases, and in almost all cases for meals and entertainment expenses. Our review of a sample of items billed and paid for noted some that seemed excessive or otherwise questionable, in the absence of adequate documentation. For example:

- Numerous expenditures of hundreds of dollars at a time were made at high-end restaurants, but the purpose and reasonableness of these could not be determined. We understand that many of these meals were for Society staff only and significantly exceeded the established meal allowance.
- A number of substantial payments were made for vehicle maintenance and repairs, but with no indication as to which vehicles were serviced or what service they received.
- The Society paid on behalf of a senior executive for an annual gym membership worth \$2,000, along with quarterly personal trainer fees of \$650. Neither expense was recorded as a taxable benefit to the employee.
- Several car washes were purchased at \$150 each.

We also found that there is no policy regarding international travel, or the supervisory level at which such travel must be approved. In the absence of a clear policy, we noted a number of instances where Societies paid for international travel that in our view was questionable. For example, a senior staff member of one Society attended an international conference in Beijing, China, that was unrelated to his duties or society business. At the same Society, an Executive Assistant travelled with the Executive Director to a conference in Buenos Aires, Argentina.

We also found a number of instances at three of the four Societies we visited where payments were made to fly children and, occasionally, an accompanying caseworker, for visits or repatriation with their biological families. While the circumstances may justify this in some instances, more formal guidance is needed in this area. For example, we noted a number of instances where Societies bought return tickets for children to visit family in the Caribbean. In other examples, a Society paid \$1,700 for a seven-day all-inclusive trip to a resort in St. Martin and \$4,000 for a one-week trip

to St. Lucia for a caseworker to accompany a child who was returning to its biological family.

RECOMMENDATION 4

In order to ensure that payments made for credit-card purchases are legitimate and reasonable in the circumstances, Children's Aid Societies should:

- obtain sufficiently detailed receipts necessary to establish the appropriateness and reasonableness of items purchased, and the amounts billed and to be paid, and reconcile these receipts with the credit-card companies' monthly statements;
- ensure that all amounts paid are reasonable and for valid business purposes; and
- develop a policy regarding out-of-country travel that clearly indicates under which circumstances such travel is permissible, and sets out reasonable fare guidelines.

Reimbursements for Use of Personal Vehicles

Society employees, volunteers, and foster parents usually get monthly reimbursements for the use of personal vehicles for such work-related purposes as investigations, home visits, and travel to various appointments. At the four Societies we visited, the reimbursement rate varied between \$0.30 and \$0.40 per kilometre. Our review of a sample of monthly claims paid out by Societies noted the following:

- The reason for mileage claims was often not documented, making it impossible to determine whether the kilometres claimed were actually work-related.
- Travel-claim forms often contained no start or end points for the trips claimed, making it impossible for supervisors approving the claim to determine the reasonableness of the number of kilometres claimed.

- In cases where start and end points were provided, the number of kilometres claimed often varied significantly for the same trip, or were vastly different from distances indicated on Internet mapping programs. For example:
 - In one case, claims for travel between the same identified locations varied between 17 kilometres and 89 kilometres.
 - The amount claimed for one trip was 438 kilometres while an Internet mapping program put the actual mileage at 346 kilometres.

RECOMMENDATION 5

In order to help ensure that amounts reimbursed for the use of personal vehicles are reasonable and work-related, Children's Aid Societies should:

- require the purpose of each trip be documented, and ensure that all claim forms indicate start and end points for the trips claimed; and
- ensure that kilometres claimed for longer trips are reasonable relative to distances indicated by Internet mapping programs, unless otherwise explained.

Residential Care Costs

Societies pay *per diems* for various types of residential care, including:

- care provided by Outside Purchased Institutions (OPIs), which are private organizations that negotiate with the Ministry as to what services they will provide and what the *per diem* rate for those services will be;
- care provided by society-operated group homes; and
- care provided by society-operated foster-family homes.

Societies receive funding from the Ministry to pay these *per diem* costs, which cover basic residential costs along with any necessary additional services. As mentioned above, the *per diem* rate for OPI residential care is negotiated by the Ministry and the OPI; in contrast, *per diem* amounts for society-operated group homes and foster-family homes are established by the Societies themselves.

In the 2004/05 fiscal year, residential-care costs, including society-operated facilities and services, totalled approximately \$652 million, or 54% of total society expenditures. The cost of placing children in the various types of residential care varied significantly between the Societies we visited, as shown in Figure 4. As well, the type of care provided varied, depending on the placement option selected. Placements ranged, for example, from basic residential to highly specialized care, depending on a child's need.

Placement Decisions

Given the significant differences in services and costs for the various placement options, it is essential that Societies assess and document the needs of each child and the appropriateness of each placement. However, our review of any available documentation supporting a sample of placements at the Societies we visited found that the documentation was insufficient to enable an assessment of the appropriateness and reasonableness of those placements for several reasons.

First, when the Ministry enters into service agreements with OPIs, the only details about these agreements it provides to Societies are the number of spaces available and the *per diem* rates. The Ministry cannot provide additional details because, as noted in our audit of the Child Welfare Services Program (see Section 3.01), these agreements are usually negotiated verbally at face-to-face meetings and later set out in brief letters of confirmation that do not provide sufficient detail and are not provided to Societies.

Figure 4: *Per Diem* Rates for Residential Care

Source of data: Individual Children's Aid Societies

Type of Care	Low (\$)	High (\$)
foster care—regular	26	41
foster care—specialized	29	53
foster care—treatment	40	70
Society-operated group home	180	416
Outside Purchased Institution—foster care	72	449
Outside Purchased Institution—group home	82	739

In addition, processes for making placement decisions varied significantly across the Societies we visited. Some were made on the recommendation of a placement committee and others on the recommendation of the child's caseworker. In neither case was any documentation maintained to support the decisions.

We also noted that under the Ministry's current funding model for Children's Aid Societies, there is no incentive for Societies to place children in a setting that will most economically meet their needs. For example, we noted one case where a Society placed an infant with no special needs in an OPI foster home at the rate of \$120 per day—and kept the child there for four years at a cost of \$44,000 a year—without periodically assessing the cost-effectiveness of the placement against the specific needs of the child.

RECOMMENDATION 6

In order to help ensure that children are appropriately and economically placed, Children's Aid Societies should:

- obtain from the Ministry of Children and Youth Services detailed information on the specific services covered by the *per diem* rates in the contracts with outside purchased institutions and on whether any other services are available; and

- formally document the basis and factors on which placement decisions are made.

Special Rate Agreements

In many cases, Societies are asked by Outside Purchased Institutions to enter into Special Rate Agreements for additional services beyond those included in the basic *per diem* rates negotiated with the Ministry. In most cases, these agreements cover the cost of providing one-on-one personal services at prices that typically average several hundred dollars per day.

Our concerns with respect to these agreements are as follows:

- At two of the four Societies we visited, there were no written agreements in place detailing the additional services to be provided in return for the Special Rate Agreements, or any documented assessment of why the additional services were deemed necessary.
- There were no written procedures in place requiring periodic visits to the institution to verify and document that the agreed-upon additional services were being received. Some society staff acknowledged our concern that, without any such follow-up, it was difficult to ensure whether these services were actually delivered. One Society told us of an instance where a visit to an Outside Purchased Institution revealed fewer care providers on the job than the contracted-for number. The Society subsequently stopped using that institution.

RECOMMENDATION 7

In order to ensure that Children's Aid Societies enter into Special Rate Agreements only when necessary, and that contracted-for services are reasonably priced and actually received, Children's Aid Societies should:

- periodically assess and document the need for additional services over and above those provided for under the Ministry-negotiated *per diem* rate;
- enter into written agreements spelling out what additional services are to be provided, and at what cost; and
- periodically visit the institution providing the services to verify and document that they actually receive the additional services for which they pay.

CASE MANAGEMENT AND QUALITY OF SERVICE

Although all front-line Child Welfare Services are provided by Children's Aid Societies, the Ministry continues to be responsible under the *Child and Family Services Act* for establishing minimum service standards and for program service delivery.

Many of the Ministry's current standards for Child Welfare Services are either legislated or have been incorporated into the Ontario Risk Assessment Model (ORAM), first published by the Ministry in 1998, and revised and implemented in 2000. ORAM, which Societies must use, prescribes a number of mandatory service requirements with respect to both the Intake/Investigation Process, and the Ongoing Service Delivery.

Intake/Investigation Process

Within 24 hours of receiving a referral for a child potentially in need of protection, a Society must complete the Eligibility Spectrum, a component of ORAM based on information provided in the referral. The Eligibility Spectrum consists of five sections and related assessment scales, as detailed in Figure 5.

Also within 24 hours of referral, the Society must check for any previous referrals involving that

family by verifying its own records and consulting the province's Fast Track database of all Children's Aid Society records. If it deems it necessary, the Society must also check the Ontario Child Abuse Register within three days for any previous history with the involved parties. This is important because previous referrals, as opposed to first-time referrals, are one factor taken into consideration in assessing the level of severity of the referral.

Based on the above requirements, a referral whose level of severity is assessed as "minimal" or "not severe" is ineligible for service and the file is closed.

Referrals assessed as "moderately severe" require the child be seen within seven days. The Society must also at that time conduct an assessment of the child's immediate safety, and document that assessment within 24 hours. In most cases, the full investigation, including a risk assessment regarding the likelihood of future abuse or neglect requiring ongoing protective services, must be completed within 30 days of the original referral.

Referrals assessed as "extremely severe" require the child be seen within 12 hours of the assessment. At the caseworker's discretion, the child may be taken into care immediately or follow the Intake/Investigation Process for "moderately severe" cases.

Our review of a sample of case files at the four Societies we visited found frequent instances of non-compliance with requirements of the Intake/Investigation Process, as detailed below:

- In approximately one of every 10 files reviewed, the Eligibility Spectrum was completed an average of 17 days later than the required 24 hours from the time of referral. We noted one instance where the review was completed 127 days late, and a couple of cases where there was no evidence that the Eligibility Spectrum was completed at all.
- In approximately one-quarter of the files reviewed, the check of the Fast Track database was not completed within the required 24 hours. There was no evidence in half these cases that the required checks were ever

Figure 5: Eligibility Spectrum

Source of data: Ontario Risk Assessment Model, Ministry of Children and Youth Services

Section	Scale
1. physical/sexual harm by commission	1. physical force and/or maltreatment 2. cruel/inappropriate treatment 3. abusive sexual activity 4. threat of harm
2. harm by omission	1. inadequate supervision 2. neglect of child's basic physical needs 3. caregiver response to child's physical health 4. caregiver response to child's mental, emotional developmental condition 5. caregiver response to child under 12 who has committed a serious act
3. emotional harm	1. caregiver causes and/or caregiver response to child's emotional harm or risk of emotional harm 2. adult conflict
4. abandonment/separation	1. orphaned/abandoned child 2. caregiver-child conflict/child behaviour
5. caregiver capacity	1. caregiver has history of abusing/neglecting 2. caregiver inability to protect 3. caregiver with problem 4. caregiving skills

made, while the remainder ran an average of three weeks late. One missed the deadline by 160 days.

- In approximately one-third of the files reviewed, children were not seen within the required 12 hours or seven days (with most of the files pertaining to the seven-day requirement). Caseworker visits were an average of three weeks late, with one being 165 days late. Other specific examples of deficiencies included:
 - one visit that was never made because the worker called 19 days after the referral and the family had by then moved away (the caseworker subsequently notified the Society in the child's new city of residence);
 - a child who was not seen until his aunt and school principal called again, 12 days after the original seven-day requirement to visit had passed, to inform the Society that the child had been beaten by his mother; and
 - one child who was never seen even though the case was rated above the threshold for intervention because the caseworker was unable to reach the family during several attempts over a five-month period. When the caseworker finally did reach the child's mother, she said everything was fine and the file was closed on that basis.
- In approximately one of five files reviewed, Safety Assessments were late by an average of 15 days, or were never even completed.
- In about half the files reviewed, the full investigation was not completed within the required 30 days of referral. Investigations were completed an average of five weeks late and, in one case, seven months after the due date.
- In about half the files reviewed, risk assessments were not completed within the required 30 days of referral. In some cases, risk assessments were never completed, while in others,

they were an average of 40 days late—and, in one case, 222 days late.

As a result, there is little assurance that all referrals are appropriately assessed and, if necessary, investigated in a timely manner to ensure children receive the service they require.

RECOMMENDATION 8

To ensure that all referrals of children potentially in need are appropriately assessed and investigated on a timely basis, and that Children's Aid Societies can demonstrate that they have done so, Societies should conduct and adequately document the Intake/Investigation Process required under the Ontario Risk Assessment Model, within the required time frames, for all referrals.

Ongoing Protection Services

Children assessed at risk of future abuse or neglect, and therefore in need of protection, may receive services in one of two ways:

- different non-residential protective services varying with the type and degree of assessed risk, while the child continues to stay with its biological family under the supervision of a society caseworker; or
- placement with a foster family or in a group home, in many cases supplemented by various types of protective services, again under the supervision of a society caseworker.

The Ministry's Ontario Risk Assessment Model establishes certain requirements that Societies must adhere to with respect to protection services. For example, children requiring such services while still living with their biological family must have a first Plan of Service completed by a caseworker and approved by a supervisor within 60 days of the initial referral. Eligibility reviews must then be completed by a caseworker and approved by a

supervisor every 90 days after the initial Plan of Service to assess the need for continued service. For as long as it is determined that the child requires ongoing protection, a comprehensive risk assessment must also be completed, and the Plan of Service must be updated accordingly every 180 days, and must be approved by a supervisor.

Children taken into care and placed with a foster family or in a group home must have a detailed needs assessment completed within 21 days. They also require a Plan of Care completed by a caseworker and approved by a supervisor within 30 days of coming into care. The caseworker must visit the child at his or her placement within seven days, and then again within 30 days of the original placement. Every 90 days after the original Plan of Care has been approved, the caseworker must visit the child, and the Plan of Care must be reviewed and updated accordingly.

Our review of a sample of case files at the four Societies we visited noted a number of instances where the requirements for ongoing protection services were not followed:

- Initial Plans of Service must be completed and approved within 60 days of referral, and subsequent plans must be drafted within 180 days. We noted that 90% of cases reviewed were not in compliance with the requirements for either the initial or ongoing Plans of Service and were late an average of 88 days. In a couple of instances, we noted Plans of Service were late by more than 400 days.
- Eighty-seven per cent of the 90-day Eligibility reviews were not completed and approved on time, and were an average of 72 days late.
- The comprehensive risk assessment, required every 180 days, was not completed on time in 73% of files reviewed, and was an average of 77 days late. At one Society, we noted an example where the last assessment on file was done almost two years prior to our visit.

- Initial and ongoing Plans of Care for children taken into the care of a Society must be done within 30 days of admission, and every 90 days thereafter. In 94% of the files reviewed, however, requirements for either the initial or ongoing Plans of Care were not met and Plans were done an average of 23 days late. We also noted one instance where three Plans of Care for one child were completed on the same day, 192 days after the first one was due.
- The requirement to visit a child in care every 90 days was not met in 60% of the cases reviewed, and the visits were an average of 19 days late.

RECOMMENDATION 9

To ensure that all children and families get the services they require on a timely basis, and to ensure that Children's Aid Societies can demonstrate that they are properly monitoring cases, all Societies should conduct and adequately document the ongoing protection services procedures required under legislation and the Ontario Risk Assessment Model.

Quality Assurance over Case Files

The Ministry's Ontario Risk Assessment Model also requires Societies to perform quarterly supervisory reviews on 10% of the cases deemed ineligible for service, but only two of the four Societies carried out these reviews.

One Society we visited did perform quality assurance reviews of specific case-management requirements under its annual Quality Assurance Work Plan. For example, the most current work plan included a review of all initial service-plan documents and of the timeliness of in-care visits. The other three Societies did not have this best practice in place and did little to review case files.

RECOMMENDATION 10

Children's Aid Societies should implement periodic quality assurance reviews of referrals deemed ineligible for service, as well as of open case files, to ensure compliance with Ontario Risk Assessment Model requirements and to assess the appropriateness of decisions being made by front-line caseworker staff.

Extended Care and Maintenance Agreements

Under the *Child and Family Services Act*, a child ceases to be a Crown ward when he or she reaches the age of 18 or marries. However, Children's Aid Societies may provide access to ongoing services, including financial support up to \$663 per month (about \$8,000 a year), to all former Crown wards until they reach the age of 21. This ongoing support is intended to help the young person work towards specified individual goals that aid in the transition to independent living.

To be eligible for Extended Care and Maintenance Assistance, a former Crown ward must:

- sign an annual written agreement with a Children's Aid Society;
- work towards achieving goals specified in the agreement, such as completion of secondary or postsecondary education or vocational programs, and towards meeting personal development/improvement targets;
- maintain contact with a caseworker at intervals specified in the agreement;
- have earnings from part-time employment of less than \$492 a month (youths working full-time are ineligible), with financial assistance reduced accordingly when earnings exceed that amount; and

- receive no benefits under either the *Family Benefits Act* or the *General Welfare Assistance Act*.

Our review of a sample of Extended Care and Maintenance Agreements noted that Children's Aid Societies were not adequately monitoring youths that had entered into these agreements to ensure the goals of the program were met. We found that:

- Although annual written agreements were completed in most cases, deficiencies included instances of:
 - no signatures of youths to indicate they agreed to abide by the agreement;
 - missing information, such as a youth's individual goals or the required frequency of contacts with the Society;
 - significant gaps in time between renewals of agreements, even though assistance continued uninterrupted; and
 - no signed approvals of society Executive Directors or designates.
- In over half the files reviewed, we found youths not in compliance with requirements to attend school or work part-time.
- Required monitoring or contacts between youths and caseworkers as outlined in agreements went unmet in half the files reviewed.
- In most cases where youths were employed, Societies did not ensure that monthly employment earnings were less than \$492, beyond which financial assistance should have been reduced. We noted that one Society required some of its youths with Extended Care and Maintenance Agreements to be employed full-time, making them ineligible for assistance.

At the time of our last audit of the ministry Child Welfare Services Program in 2000, we had similar concerns regarding the lack of monitoring of youths who had entered into Extended Care and Maintenance Agreements.

RECOMMENDATION 11

To comply with the intent of Extended Care and Maintenance Agreements, Children's Aid Societies should ensure that:

- agreements are properly completed and signed by all required parties, and include all ministry-required goals and conditions; and
- youth are adequately monitored and assessed for compliance with the terms of their agreement.

Society-operated Foster Care

Children's Aid Societies are responsible for recruiting, approving, training, and monitoring all foster parents other than those contracted through an external agency. The *Child and Family Services Act* contains some specific requirements for the recruiting, approving, training, and monitoring of foster parents. Individual Societies can also implement other requirements contained in their internal policies and procedures.

All foster-care requirements exist to ensure that foster parents have, and continue to have, the necessary skills and resources to provide quality care to the children entrusted to them. Our review of a sample of foster-parent files found that in most cases, specific requirements for recruiting, approving, and monitoring were met and documented.

However, we did find instances where:

- there was no required police check on file;
- no assessments were made of the financial stability, and hence the suitability, of foster parents;
- the required agreement between the foster parents and the Society could not be found, or was not signed;
- the required annual evaluation of the foster home and parents was not completed;
- required visits by resource workers to foster homes were not made; and

- foster parents did not receive the required training.

RECOMMENDATION 12

To help ensure that foster parents have the necessary skills and resources to provide quality care to the children entrusted to them, Children's Aid Societies should verify and document adherence to the requirements for the recruiting, approving, training, and monitoring of foster parents.

Outside Purchased Institutions

As noted previously, the Ministry negotiates service agreements with all Outside Purchased Institutions (OPIs), and is responsible for licensing them initially and on an annual basis. Once licensed, OPIs are available to Children's Aid Societies requiring residential care for children.

Societies are in turn responsible for ensuring that children they have placed in OPIs receive an appropriate level of care. As outlined earlier, society requirements in this regard involve visits, assessments, and completing Plans of Care for children. Societies may also have other internal requirements regarding the OPIs they use.

For example, three of the four Societies we visited had an internal requirement to perform annual evaluations of the OPIs they used. However:

- Two of the three Societies with this policy did not perform the required annual reviews.
- Although the third Society did carry out reviews, they were often documented six to seven months after the fact.

In light of our review of the Ministry's OPI licensing process, noted in our audit of the Child Welfare Services Program (see Section 3.01), society evaluations of OPIs would be a valuable component of the Ministry's annual licensing and contracting process.

RECOMMENDATION 13

To help ensure that children are placed in Outside Purchased Institutions that provide quality care and services, Children's Aid Societies should have policies and procedures requiring them to perform annual evaluations of the Institutions used, and they should comply with these policies. In addition, Societies should provide the Ministry with copies of the annual evaluations for consideration during the licensing and contracting process.

Human Resources Management

With regards to human resources and staffing, Children's Aid Societies have developed internal policies and procedures that specify operational requirements. We reviewed the following areas for compliance with Ministry expectations and internal society policies and procedures:

Caseloads

Ministry funding to Children's Aid Societies is no longer based on ministry-established caseworker/caseload benchmarks, as was the case prior to April 1, 2003. However, these earlier benchmarks are currently the only information available to help Societies assess the workload of their caseworkers. The Ministry's previous caseload benchmarks are as illustrated in Figure 6.

We found that, in general, the Societies we visited tracked caseworker caseloads and, in most

Figure 6: Caseload Benchmarks

Source of data: Ministry of Children and Youth Services

Case Type	Cases Per Month
intake services	7.4
family services	17
child in care services	21
foster homes	30

cases, were meeting, or were close to meeting, the old ministry benchmarks. However, one Society tracked caseloads only on an overall basis rather than by the case types outlined above. As a result, the wide variations in the ministry benchmarks make it difficult to determine whether this Society has reasonable caseloads based on the information it is currently collecting. We also note that, given the increasing complexity of caseloads, the previous ministry benchmarks may no longer be appropriate.

RECOMMENDATION 14

Children's Aid Societies should:

- establish reasonable caseload benchmarks for their caseworkers; and
- collect information on caseworker caseloads in a format that allows comparison to established benchmarks in order to determine whether current Society caseloads are appropriate.

Time Accounting

Approximately 40% of Societies' expenditures are for staff salaries and related benefits. Society staff provide residential care and services at society-operated facilities, non-residential programming and support, and administrative services. Many staff are caseworkers operating independently, sometimes after normal business hours and frequently away from the Societies' main offices.

Given the nature of the work performed by many Society staff, it is our view that an adequate time-accounting system is essential to properly monitor and manage caseworker time. For example, information about time spent on direct-service delivery and the client served, travel, training, and administration is essential to assess the adequacy of staffing levels and the effectiveness of staff deployment relative to caseloads.

None of the four Societies we visited had a time-accounting system in place for their caseworkers. Time reporting was limited either to logging daily absences or to reporting whether staff were on the job or away. As a result, Societies were unable to monitor, for example, the time their caseworkers spent on direct-service delivery, which may have contributed to the service-delivery deficiencies noted earlier in this report.

RECOMMENDATION 15

In order to ensure that staff time is properly monitored and accounted for, Children's Aid Societies should institute a time-accounting system to track how their caseworkers use their time.

After-hours Program

The need for Child Welfare Services may occur at any time during the day or night, so most Children's Aid Societies have established after-hours programs to deal with requests for service after normal business hours. In general, Societies either put their own daytime staff on after-hours shifts, or they hire contract staff for caseworker and supervisory positions. Staff is assigned on an on-call basis for the duration of the after-hours shift, which usually covers the periods from 5:00 p.m. to 9:00 a.m. Monday to Friday, and 24 hours on weekends.

We noted the following concerns regarding the after-hours programs at the Societies we visited:

- At three of the four Societies, there was insufficient documentation of activities for this program. Societies did not track the number of hours worked by staff or the volume of calls per shift, and thus did not have an accurate picture of utilization of on-call staff.
- One Society launched a review of the utilization of after-hours staff. Our analysis of that data revealed that after-hours staff was under-

utilized. After-hours staff were paid based on a minimum number of hours, whether they actually worked those hours or not, and they got overtime pay for any hours above the minimum. We found that for 70% of the after-hours work periods reviewed during a four-month period, some employees worked less than the minimum number of hours for which they were paid, while others incurred overtime—all on the same shift.

- Scheduling of after-hours staff was not based on any documented analysis of need or specific call volumes at any of the Societies we visited. This analysis is necessary to ensure that staff are efficiently deployed and that there is adequate staffing coverage for the program. In one Society, our review of incoming calls over a three-month period indicated that the highest volume was received on Tuesdays but staffing was highest on Fridays and Saturdays.

RECOMMENDATION 16

In order to properly allocate after-hours staff based on call volume, and to determine optimal staffing levels, Children's Aid Societies should have systems in place to monitor and analyze after-hours call volumes and the utilization of staff, and then assign staff accordingly.

Staff Qualifications and Requirements

Most Societies have internal policies with specific requirements regarding the suitability of candidates being considered for vacant positions. These requirements include reference and qualification checks, verification of résumés, and police or criminal record checks. In addition, after a candidate has been hired, there are other internal requirements to check the new employee's performance on a periodic basis through performance evaluations.

In general, our review of personnel files at the Societies we visited found compliance with internal policies regarding procedures to be completed for hiring new staff and ongoing performance management, with the following exceptions:

- In 20% of the files reviewed there was no evidence that the required reference checks were conducted.
- Twelve per cent of personnel files were missing documentation to establish that qualifications of the individual had been verified.
- In 15% of files, there was no evidence that the required performance appraisals had been completed.

RECOMMENDATION 17

Children's Aid Societies should have supervisory personnel perform spot checks to ensure compliance with internal policies regarding hiring practices and the ongoing management of employee performance.

Other Human Resource Issues

Our review of the human resource area uncovered the following additional issues at the Societies we visited:

- One Society paid bonuses to two senior staff members for each of the years we reviewed without any contracts or policies in place to allow these payments. One bonus amounted to 5% of salary and the other about 8%.
- At another Society, a caseworker who fell behind on her paperwork, in part because of her questionable competency and a lack of supervision, was allowed to catch up by working 800 hours of overtime in a six-month period, collecting \$21,000 over and above her regular pay.
- At one Society, a senior staff member was paid more than \$12,000 for unused vacation days.

Society policy does not allow for this type of payout unless the person leaves the Society.

- The same Society's management team of eight people was paid more than \$14,000 for contract negotiations with its union, without any documentation to support how that amount was determined.

RECOMMENDATION 18

Children's Aid Societies should ensure that additional remuneration paid to employees over and above their regular salary is in compliance with established policies and approved by senior management and the Board of Directors as appropriate.

Complaints

Under the *Child and Family Services Act*, Children's Aid Societies are required to establish written procedures for hearing, and dealing with, complaints from anyone who has sought or received services from the Society. These procedures must include an opportunity for the complainant to be heard at appropriate levels of society management up to the Board of Directors. In the event the complainant is dissatisfied with the Board's response, the complainant can have the matter reviewed by the Ministry. Other specific aspects of the procedures and time requirements vary from Society to Society.

During a review of the complaints policies and procedures at the Societies we visited, and the review of specific complaints received, we noted the following concerns:

- More than 60% of the files were missing the documentation required to complete the complaints process. In many instances, we were unable to determine whether society policy was followed or whether specific timelines were met due to the missing information.

- In more than 35% of the files reviewed, the specific timelines in society policies regarding the complaints process were not met. Examples of areas where specified timelines were not met were as follows:
 - Complaints were not responded to within the time specified.
 - Investigations into complaints were either not initiated or completed on time.
 - Outcome letters with responses were not sent as required to the complainants.
- In addition, although timelines for holding meetings requested with Directors or Executive Directors during the complaints process were not specified in policies, in our opinion such meetings were not held in a reasonable time frame in over 10% of the cases reviewed. They were held on average 33 days after being requested, and, in a few instances, the requested meetings were not held at all. The lack of a time requirement in this area can substantially lengthen the complaints process.

Also, two of the Societies we visited did not have a tracking system in place to record complaints received so we were unable to determine whether the information provided to us was complete. As such, we could only examine the information that they provided us regarding complaints received.

RECOMMENDATION 19

In order to help ensure that complaints get timely and appropriate attention and resolution as required under the Child and Family Services Act, Children's Aid Societies should:

- ensure that internal policies and time requirements are adequate and complied with; and
- maintain adequate records in order to properly track all complaints received, along with their resolution.

Serious Occurrences

All Child Welfare Service providers are required by Ministry policy to report any serious occurrences involving children in their care to the Ministry within 24 hours of the incident, with a written follow-up within seven days of the occurrence detailing corrective action taken. Examples of serious occurrences that would require this reporting are:

- death, serious injury, or allegations of mistreatment of a child in care;
- complaints made by or about a client that are considered serious in nature;
- disasters such as fire on the premises where a service is provided; and
- situations where a client is missing.

We examined the Serious Occurrence reporting process at the Societies we visited and found that 75% of the files we reviewed were not in compliance with the required Ministry policy and procedures. Issues included failure to meet timing requirements and a lack of documentation on the follow-up action taken as a result of the incident.

We noted similar concerns in our 2000 audit of the ministry Child Welfare Services Program.

RECOMMENDATION 20

All Children's Aid Societies should:

- comply with ministry requirements to ensure all serious occurrences are reported to the Ministry in a timely fashion; and
- ensure the required follow-up action is taken and documented for the protection of all parties involved.

SUMMARY OF RESPONSES BY CHILDREN'S AID SOCIETIES

The audit examined practices at four of Ontario's 53 Children's Aid Societies. This response consolidates their views and those of the Ontario Association of Children's Aid Societies (OACAS).

The Children's Aid Societies welcome the Auditor's recommendations with respect to both financial- and human-resource management practices at the four Societies in question, and policies and procedures relating to case management and the quality of service. The Societies will have acted or begun to act on the issues raised in the audit by year-end.

While it is reasonable to add new policies and procedures to ensure greater value for money, it is important to understand that the child welfare sector is already both highly regulated and severely stretched for resources. Accordingly, adding new requirements without appropriate flexibility and eventual streamlining of the regulatory burden can have a very real cost in terms of service to the vulnerable populations that we serve. Although recent increases in ministry funding have enabled critical investments in the long-term capacity of the sector, a direct correlation between new resources and the number of families served should not be expected.

Since the care of children is the top management priority of every Society, we are pleased to note the Auditor's finding that, in most instances, Societies were meeting and documenting specific requirements to ensure that foster parents have the necessary skills and resources to provide quality care for children. We are also pleased that the Auditor's review of personnel files indicated that the Societies were generally complying with established procedures for hiring new staff and managing their performance.

The Auditor also made recommendations to address a number of concerns noted in the audit. Before outlining our response to each recommendation, we note by way of context that the child welfare system, despite significant expansion and increase in resources, still struggles to:

- keep up with its caseload;
- recruit and retain skilled staff (including senior managers, who are usually compensated less than they would be by other potential employers);
- improve its financial- and human-resource management practices; and
- strike the right balance between the lowest-cost solution and the most effective solution while caring for vulnerable children.

In short, while the four Societies in question—and the OACAS—are committed to acting on the issues raised in the audit, it is important to recognize that some of the identified challenges are systemic and cannot be remedied fully by more effort on the part of the Societies. For instance, fully addressing several of the recommendations would require investment in up-to-date, integrated technology that is common to all Societies and accessible by workers when they are out of the office.

With continued improvement in both resources and management systems and policies, Ontario's Children's Aid Societies can continue to become more effective in protecting the province's most vulnerable children.

Recommendation 1

The Societies agree with this recommendation and have begun the process of developing and updating procurement policies. They note, however, that, while the Auditor General used ministry policies and procedures for procurement as benchmarks in some areas, Societies have not

received a directive to use these policies. If Societies and other transfer-payment agencies in all ministries are required to adhere to public-sector procurement policies, a directive should be issued by government to ensure standardized practice.

Recommendation 2

The Societies agree with this recommendation. They have taken steps to ensure that suppliers provide sufficient detail in invoices so that services billed can be reconciled with services received. This applies to lawyers, translators, doctors, and psychological and capacity assessors/counsellors.

Recommendation 3

The Societies agree and are developing logging systems. One Society is reviewing the size of its fleet and is making changes given that office consolidation has changed the requirements of fleet size.

Recommendation 4

The Societies agree. They have taken steps to ensure that hard-copy documents such as original receipts accompany explanatory emails regarding credit-card expenses (auditors would not accept email documentation). One Society is creating additional policy for business lunches and dinners and hospitality costs. Policies for international travel to repatriate children or to facilitate family visits are under review. Societies will ensure that costs are assessed on a case-by-case basis and have processes in place where senior staff will approve out-of-country travel in these situations. Policies for international travel to attend conferences and other professional development events are under development.

Recommendation 5

The Societies agree. They are changing policies to require more detail on mileage claims, such as exact travel destinations. Some Societies have

implemented policies for spot audits of mileage claims and reconciliation with Internet mapping systems, while other Societies are looking at different solutions that fit their local needs.

Recommendation 6

The Societies agree and look forward to receiving detailed information from the Ministry of Children and Youth Services. Societies are also working on a Shared Service/Supply Chain management proposal that would ensure that standards are adhered to by approved *per diem* providers.

An important caveat is that Societies must sometimes place children into expensive *per diem* facilities when there is no society-operated foster home available. Placement decisions are complex, and a Society often must choose a more costly placement that will serve the child better. And while a more cost-effective solution may present itself later, any change must be weighed carefully in light of the potential trauma involved in moving the child.

Recommendation 7

The Societies agree. One Society has already implemented new requirements that *per diem* facilities provide the name of the worker and the hours worked during the Special Rate Agreement. Society workers do visit children in *per diem* facilities at a minimum of once every three months. One Society has a dedicated worker whose job is to be the liaison/quality assurance monitor of external placements. A shared services model of monitoring *per diem* providers would provide standardized business practices for agreements and monitoring.

Recommendation 8

The Societies agree. Timely responses are required if children are to be protected. Sometimes this is impossible because the volume of calls is in excess of available resources, and

naturally the urgent calls requiring 12-hour responses take precedence. At other times, investigations cannot be completed because the family cannot be located. The OACAS has consistently recommended that 60 days are required for completion of most investigation requirements.

Recommendation 9

The Societies agree. This is a resource issue, and these are documentation gaps rather than service gaps in our view. One challenge in implementing this recommendation is adhering to documentation requirements, which are often a lower priority than service requirements.

Recommendation 10

More consultation and discussion are required. All Societies that were reviewed indicated that ministry regional offices had instructed them to stop quality assurance reviews. Societies, in consultation with the Ministry, will consider how to implement spot checks and other processes to ensure compliance.

Recommendation 11

The Societies agree and are reviewing supports to youth on Extended Care and Maintenance Agreements and youth leaving care. Ministry policies relating to these agreements also need to be reviewed and updated.

Recommendation 12

The Societies agree and will review practices and update policies to ensure that all requirements are met. The Societies have already implemented the requirement for police checks on new foster parents.

Recommendation 13

The Societies agree. Many Outside Purchased Institutions provide excellent service. The four Societies audited would prefer that annual evaluations be shared across all Societies so that

operators who do not adhere to established standards are not used for placements by any Society. Societies are currently developing a business model for a Shared Services/Supply-chain-management approach that could assist with this process. The Ministry has conducted a review of residential services. Results of this residential review are not yet available.

Recommendation 14

The Societies agree. Human-resource management has been a key area of advocacy for the OACAS, because previous workload studies have shown that caseload funding benchmarks were inadequate.

Recommendation 15

This recommendation will be considered carefully. Time-accounting systems are generally not part of best practices in social work. The Societies maintain that workers do not work independently; they may work alone, but never independently of supervision. Sign-out systems are used extensively. Other systems to track time will be explored.

Recommendation 16

The Societies indicated that after-hours services have been reviewed and adjustments to schedules are now made regularly to respond to demand.

Recommendation 17

The Societies agree. Society policies are under review and compliance monitoring of staff qualifications has been implemented.

Recommendation 18

The Societies agree. The incidents reported in this section are rare because most Societies are highly unionized and therefore have rigid salary policies. Policies have been developed for board approval of bonuses based on performance. The

Societies have also reviewed their policies for monitoring overtime and recording of overtime.

Recommendation 19

The Societies agree. Practices for handling client complaints have varied. New proposed provincial legislation includes extensive amendments dealing with client complaints. In the future, the Child and Family Services Review Board will have final jurisdiction over client complaints. There will be provincial regulations and directives to deal with time frames. At this writing, these regulations were due for release in fall 2006.

Recommendation 20

The Societies agree. See our comments under Recommendation 19.