

Chapter 1

Section 1.07

Ministry of Children, Community and Social Services

Follow-Up on 2020 Value-for-Money Audit:

Supportive Services for Adults with Developmental Disabilities

RECOMMENDATION STATUS OVERVIEW

	# of Actions Recommended	Status of Actions Recommended				
		Fully Implemented	In the Process of Being Implemented	Little or No Progress	Will Not Be Implemented	No Longer Applicable
Recommendation 1	2	2				
Recommendation 2	5		1	4		
Recommendation 3	3			3		
Recommendation 4	4			4		
Recommendation 5	2	1	1			
Recommendation 6	3			3		
Recommendation 7	2			2		
Recommendation 8	1		1			
Recommendation 9	2			2		
Recommendation 10	3	2		1		
Recommendation 11	3	3				
Recommendation 12	2			2		
Total	32	8	3	21	0	0
%	100	25	9	66	0	0

Overall Conclusion

The Ministry of Children, Community and Social Services (Ministry), as of July 28, 2022, has fully implemented 25% of the actions we recommended in our *2020 Annual Report*. The Ministry has made progress in implementing an additional 9% of the recommendations.

The Ministry funds supportive services to help adults with developmental disabilities—approximately 1% of Ontarians. As of March 2022, the Ministry funds 325 transfer payment agencies (Service Agencies) to provide supportive services across the province. Eleven

of these Service Agencies also administer the Ministry's Passport program which provides funding directly to adults with developmental disabilities to purchase their own supportive services on a reimbursement basis. In addition, nine Service Agencies are designated as Developmental Services Ontario (DSO) offices responsible for the intake of applicants for supportive services, which includes confirming the applicant's eligibility and assessing support needs. In 2021/22, Ministry transfer payments to fund supportive services for adults with developmental disabilities totalled \$875.8 million.

The Ministry has fully implemented recommendations such as requiring that DSO staff verify that

psychologists and psychological associates who complete psychological assessments are registered and in good standing with the College of Psychologists of Ontario. In addition, the Ministry made changes to its information system, and introduced a requirement for DSO staff to record identifying information about the psychologists and psychological associates that complete psychological assessments in its information system.

So that Passport funding is more effectively used to meet the needs of clients, and the amounts reimbursed for support workers are reasonable, PassportONE's information system was updated so that persons managing Passport funding cannot be registered as a support worker in the system, and thus cannot be reimbursed as support workers. In addition, the Ministry implemented controls so that it is not possible for a parent, step-parent, spouse or primary caregiver to be registered as a support worker in PassportONE's information system. The Ministry also updated its Passport program guidelines to introduce a new reasonableness standard for live ticket events, including a limit of \$150 per event ticket, and a maximum of two tickets per event.

The Ministry has also made progress in increasing the availability of assessor training in the province. To increase the number of trained assessors at each DSO, the Ministry hired additional assessor trainers, bringing the total complement up to three. These three trainers now offer three training sessions per year.

To improve Service Agency compliance with regulatory requirements for services provided to adults with developmental disabilities, the Ministry was in the process of implementing improvements to its compliance inspection process, including increasing the risk ratings applied to recurring compliance violations (and reducing the time that an agency has to correct them), and obtaining written attestations from an Executive Director or Chief Executive Officer, that identified violations are addressed throughout the agency.

However, the Ministry has made little progress on 66% of the recommendations. The Ministry has not set a target time frame for DSO offices to complete needs assessments, nor has it reviewed and analyzed

large differences in wait times for needs assessments between DSO offices, and taken steps to minimize them. In addition, the Ministry has not compared the number of needs assessments completed by DSO offices to their targets to take corrective action when targets are not met. Furthermore, the Ministry has not taken sufficient steps to track how long clients wait for agency supportive services by DSO office, to compare and assess the reasonableness of differences, and to take corrective action to minimize differences and reduce wait times.

The Ministry has also made limited progress in collecting sufficient and comparable information on the services provided by agencies and their related costs, to study the level of support and cost per client across the province. In addition, the Ministry has not taken steps to perform spot checks on Service Agencies to validate the number of individuals they serve.

As well, the Ministry has not yet assessed the \$5,000 minimum amount of Passport funding it provides, including its impact on the equitability of funding, program demand, and wait times for additional funding for people with higher needs. In addition, the Ministry has yet to implement a performance measurement framework with indicators on client outcomes and quality of life measures.

The status of actions taken on each of our recommendations is described in this report.

Background

Approximately 1% of Ontarians have a developmental disability—a lifelong condition that affects a person's intellectual, social, and/or behavioural development. The Ministry of Children, Community and Social Services (Ministry) funds a variety of supportive services to help adults with developmental disabilities live at home, work and attend school in their communities, and participate in a wide range of activities.

As of March 2022, the Ministry funded 325 (316 in 2019) transfer payment agencies (Service Agencies) to provide supportive services across the province to adults with developmental disabilities. Eleven of

these Service Agencies also administer the Ministry's Passport program, which provides funding directly to adults with developmental disabilities to purchase their own supportive services on a reimbursement basis. In addition, nine Service Agencies are designated as Developmental Services Ontario (DSO) offices responsible for the intake of applicants for supportive services, which includes confirming the applicant's eligibility and assessing support needs.

The Ministry's funding of developmental supportive services programs was \$875.8 million in 2021/22 (\$859.4 million in 2019/20). We found in our audit that funding increased by 49% from \$578.7 million in 2015/16 to \$859.4 million in 2019/20. However, due to limited funding, not all people received all the supports they were eligible for.

The following were some of our specific concerns:

- Although Developmental Services Ontario (DSO) relied on psychological assessments to establish eligibility for supportive services, DSO staff were not required to verify that the psychologists or psychological associates completing the assessments were qualified. We found that in 6% of the application files we reviewed, the psychological assessment was either missing, or the qualifications of the psychologist or psychological associate could not be verified with the College of Psychologists of Ontario.
- DSO offices did not have a targeted time frame to complete client needs assessments, and wait times across the province for these assessments were very long. The average wait time for adults in Ontario to receive a needs assessment was 8.1 months in 2019/20, and ranged from 8.1 months to 10.8 months in the previous five years. Wait times for needs assessments also varied significantly among the province's nine regional DSO offices. While clients waited an average of 13 months for their needs assessment at the Toronto DSO office in 2019/20, clients at the Northern region DSO office in Thunder Bay waited an average of just 3.1 months. How quickly a client received supports was therefore significantly influenced by where they lived.
- Across the province, the number of people waiting for agency supportive services had grown by 80% from almost 19,000 in 2015/16 to almost 34,200 in 2019/20 (as of 2021/22, 39,710 were waiting). The number of people waiting at some DSO offices had grown by more than 100% over the same five-year period—and by 147% at the South East DSO office. The Ministry did not assess the reasonableness of the growth in wait lists at DSO offices to determine whether corrective action was needed to provide equitable access to services across the province.
- Passport recipients were being reimbursed for very expensive professional sports and concert tickets. While Passport funding can be used to attend events to increase client participation in their communities, we found a number of instances where Passport clients were reimbursed for expensive and/or large numbers of tickets to professional sports and entertainment events. This was occurring while the Passport program had limited resources that could not meet the demand for the program. For example, a client spent \$2,214 on two tickets to a Toronto Raptors game and \$2,070 on two tickets for a concert just three weeks later.

We made 12 recommendations, consisting of 32 action items, to address our audit findings. We received commitment from the Ministry that it would take action to address these recommendations.

Status of Actions Taken on Recommendations

We conducted assurance work between April 2022 and October 2022. We obtained written representation from the Ministry that effective November 11, 2022, it has provided us with a complete update of the status of the recommendations we made in the original audit two years ago.

Eligibility and Needs Assessments

Recommendation 1

So that the Ministry of Children, Community and Social Services' (Ministry) limited resources for developmental supportive services are provided to eligible individuals only, we recommend that the Ministry, in co-ordination with Developmental Services Ontario (DSO):

- *record identifying information in their information system about the psychologists or psychological associates that complete each psychological assessment;*

Status: Fully implemented.

Details

In our 2020 audit, we found that Developmental Services Ontario (DSO) does not record the names of psychologists or psychological associates that complete psychological assessments in its information system. As a result, neither DSO nor the Ministry is able to generate a list of all the individuals that have completed psychological assessments to compare them with the College of Psychologists of Ontario's (College's) records. We observed that the College's website publicly discloses the following information about its members: registration status; authorized areas of practice; authorized client populations (for example, children, adults); and details of any disciplinary or other proceedings.

In our follow-up, we found that at the end of 2021, the Ministry made changes to its information system, and introduced a requirement for DSO staff to record identifying information (name and provincial registration) about psychologists and psychological associates that complete psychological assessments in its information system.

- *require that DSO staff verify that psychologists and psychological associates who complete psychological assessments are registered and in good standing with the College of Psychologists of Ontario.*

Status: Fully implemented.

Details

In our 2020 audit, we found that applicants must provide psychological assessments to the DSO office to support that they have disabilities that meet the definition of a developmental disability under the *Services and Supports to Promote the Social Inclusion of Persons with Developmental Disabilities Act* (Act) and its regulations. These assessments must be completed by a psychologist or psychological associate in good standing with the College of Psychologists of Ontario (College). Although DSO relies on psychological assessments to establish applicants' eligibility for supportive services, DSO staff are not required to verify that those completing the assessments are qualified psychologists or psychological associates who are in good standing with the College.

In our follow-up, we found that at the end of 2021, the Ministry introduced a requirement for DSO staff to verify that psychologists and psychological associates are registered and in good standing with the College, or other equivalent extra-provincial body. Specifically, in December 2021, the Ministry implemented a directive which outlines the procedure for confirming that a psychologist or psychological associate is registered and in good standing with the College at the time they completed the psychological assessment. The Ministry communicated this new directive and procedures to DSO staff through webinar training in December 2021.

Recommendation 2

So that individuals with developmental disabilities have access to timely and consistent services across the province, we recommend that the Ministry of Children, Community and Social Services:

- *set a target time frame for Developmental Services Ontario (DSO) offices to complete needs assessments;*
- *review and analyze the large differences in wait times for needs assessments between DSO offices, and take steps to minimize these differences;*
- *study the reasonableness of the targeted number of needs assessments to be completed by DSO offices and assessors, to revise targets accordingly;*

- *compare the number of needs assessments completed by DSO offices to their targets to take corrective action when targets are not met;*

Status: Little or no progress.

Details

In our 2020 audit, we noted that once an applicant has been confirmed to be eligible for developmental supportive services, the individual must have their support needs assessed by a DSO assessor before they receive agency supports or additional Passport funding above the \$5,000 minimum. We found that the DSO offices did not have a targeted time frame to complete needs assessments, and wait times across the province for these assessments were very long, ranging from 8.1 months to 10.8 months over the last five years.

We also found that wait times for needs assessments vary significantly between the province's nine DSO offices. We noted that while adults waited an average of 13 months in 2019/20 for their needs assessments at the Toronto DSO office, at the Northern region DSO office in Thunder Bay they waited an average of just 3.1 months. How quickly a client receives supports is therefore significantly influenced by where the client lives.

In our 2020 audit, we noted that although the Ministry sets targets for the number of needs assessments it expects DSO offices to complete each year, we found that such targets were seldom met. We found that collectively, DSO offices have missed the Ministry's annual needs assessment targets in each of the last five years. In addition, based on the Ministry's expectations, most DSO offices are not funded for enough full-time assessors to meet the Ministry's yearly target for assessments. Across the province, based on Ministry funding for assessors, DSO offices are likely to complete 562 fewer assessments annually than the Ministry's target. The shortfall in funding is also a contributing factor in the long waits for assessments.

We also found that the Ministry could not demonstrate that it reviews the actual results of DSO offices on needs assessments to determine why they missed their targets and to take corrective action so that Ministry targets are met. The Ministry funds each DSO office for a certain number of full-time-equivalent

assessors. As well, the Ministry set an expectation, based on previous results, that an experienced assessor should complete 75 assessments annually, and an assessor in the first year of employment should complete 60 assessments. However, we found that the number of assessors funded by the Ministry did not align with the targeted number of assessments the Ministry expected DSO offices to complete.

In our follow-up, we noted that the Ministry has not yet taken steps to directly address these recommendations. The Ministry noted that it undertook a review between May 2021 and February 2022 of DSO operations and business processes. The review process engaged DSO offices to examine areas such as training, staffing, and assessments. Based on this review, the Ministry indicated that it plans to update its information system's functionality by the end of 2022/23, to allow it to track individuals who do not want to complete a needs assessment (only individuals seeking agency supports or additional Passport funding above the \$5,000 minimum require a needs assessment). According to the Ministry, this will allow for more accurate reporting on wait times. Thereafter, the Ministry noted that it plans to analyze differences in wait times across the province and take corrective action to minimize differences. The Ministry also indicated that in the 2022/23 fiscal year, it plans to establish a working group to review current needs assessment targets; introduce a reporting mechanism that identifies DSO offices that do not meet their needs assessment targets; and to schedule quarterly meetings with DSO staff to review productivity.

- *provide sufficient training opportunities so that DSO offices can fill assessor vacancies on a timely basis.*

Status: In the process of being implemented by March 2024.

Details

In our 2020 audit, we noted that both the Ministry and the majority of DSO offices indicated that assessor vacancies are due to a lack of trained assessors available to fill open positions in the province. DSO offices hire assessors, who then receive training from the

Ministry. However, some DSO offices indicated training was not offered often enough by the Ministry to fill assessor vacancies. We noted that the Ministry has had one trainer qualified to deliver assessor training in the previous five years who typically offered training for new assessors semi-annually. Some DSO offices told us that despite having funding to hire assessors, training sessions were often full or cancelled, limiting their ability to fill positions.

In our follow-up, we noted that in April 2021 the Ministry hired an additional trainer to deliver assessor training, increasing the Ministry's total complement of trainers to three. In addition, the Ministry advised us that beginning in November 2021, it expanded the number of training sessions for new assessors from two to three per year (January, April and September). However, the Ministry has not analyzed whether holding three training sessions for new assessors provides sufficient training opportunities so that DSO offices can fill assessor vacancies on a timely basis. We noted that since the time of our audit, the number of full-time-equivalent assessors had increased by just one, from 87.55 in 2019/20 to 88.55 at the end of March 2022, relative to 114.44 total funded positions. According to the Ministry, the unfilled positions include 13 leaves and 12.89 vacancies. The Ministry indicated the COVID-19 pandemic had impacted the ability of DSO offices to hire assessors and get them trained. The Ministry expects that by the end of the 2023/24 fiscal year, it will review whether there is a continued need to provide three training sessions a year for new assessors based on the number of assessor vacancies at the time.

Service Agency Supports

Recommendation 3

So that clients waiting for services are prioritized consistently across the province, we recommend that the Ministry of Children, Community and Social Services:

- track the length of time clients wait for agency supportive services by DSO office;
- periodically compare these wait times to assess the reasonableness of differences; and

- take corrective action to minimize differences and reduce wait times.

Status: Little or no progress.

Details

In our 2020 audit, we found that across the province, the number of people waiting for agency supportive services had grown by 80% in the last five years, from almost 19,000 in 2015/16 to almost 34,200 in 2019/20. In addition, the increase at individual DSO offices ranged from as low as 51% at the Central West DSO office to as high as 147% at the South East DSO office. However, we found that the Ministry does not assess the reasonableness of the growth in wait lists at DSO offices to determine if corrective action is needed to ensure equitable access to services across the province.

In our 2020 audit, we also found that the Ministry does not calculate wait times for agency supportive services. However, in April 2017, in addition to tracking when individual clients requested agency services, the Ministry began tracking when they were placed in those services, and at what agency. Approximately 14,300 requests made for agency supportive services were made in 2017/18, and as of March 31, 2020, only about 1,200 individuals that requested these services had been placed, and approximately 13,000 were still waiting. The Ministry does not track these wait times and does not assess whether they are reasonable, or whether corrective action is necessary.

In our follow-up, we found that the Ministry has not yet improved its tracking and assessment of the time clients wait for agency supportive services at individual DSO offices. The Ministry indicated that in spring 2022, it began to explore the feasibility of calculating service wait times based on data currently available. The Ministry also plans to determine if it needs to capture additional data in its information system to enable it to accurately calculate service wait times, and to make the necessary updates to its information system to do so if required. The Ministry expects to complete an initial analysis of service wait times, including the feasibility of calculating service wait times based on available data by September 2022. Once the necessary data collection requirements are

in place, the Ministry will define reasonable wait times for all DSOs and periodically compare DSO wait times to assess the reasonableness of differences. Thereafter, the Ministry will take steps to minimize these differences and reduce wait times.

Recommendation 4

To provide equitable levels of supports at a reasonable cost across the province, we recommend the Ministry of Children, Community and Social Services:

- *collect sufficient and comparable information on the extent of services provided by agencies and their related costs;*
- *study the level of support and cost per client of agency services across the province;*
- *create benchmarks for support levels and cost per client, and evaluate regions and agencies against these benchmarks; and*
- *take corrective action where regions and agencies do not meet these benchmarks.*

Status: Little or no progress.

Details

In our 2020 audit, we found significant differences between the Ministry's five regions in the level of supportive services individuals with developmental disabilities received from Service Agencies, and the cost of these services to the Ministry. For example, we found that while clients in the Toronto region received an average of 179 support days for community participation, clients in the East region only received 94 days of support. In addition, the cost per client served was almost \$7,000 higher in Toronto. However, we found that the Ministry did not review these differences to assess their reasonableness, and to take corrective action where needed to ensure people with developmental disabilities received appropriate supports, and that the services provided by Service Agencies represented value-for-money.

In our 2020 audit, we noted that for 2019/20, the Ministry reduced Service Agencies' reporting requirements about the clients they served. The Ministry explained it made the change to reduce the administrative burden for Service Agencies. However, the change

limits the Ministry's ability to compare support levels or client costs between agencies and regions. For example, for caregiver respite, the Ministry no longer requires Service Agencies to report the number of hours of respite provided, and for employment and community participation supports, it no longer requires Service Agencies to report the number of days of service provided.

In our follow-up, we found that the Ministry had made limited progress toward implementing these recommendations. The Ministry identified that in May 2021, the Ontario government released Journey to Belonging: Choice and Inclusion, outlining key commitments to developmental service reform. As part of this reform, by 2023, the Ministry will begin to develop a needs-based funding model. To begin this process, the Ministry contracted a vendor in November 2021 to complete a study to obtain a better understanding of service and service delivery unit costs. The Ministry advised us that the vendor began collecting data to undertake the study in May 2022. Using the results of the vendor's study, the Ministry expects to gain a full understanding of the costs of service delivery that it will later use to establish a funding model and to make decisions related to the services that will be funded and the prices for those services. The Ministry indicated that it plans to use the new funding model to create benchmarks for support levels and cost per client, and evaluate regions and agencies against these benchmarks, and to take corrective action where necessary.

Recommendation 5

So that Service Agencies provide the supportive services they are contracted to provide, and the funding provided to them is commensurate with the value of the services they provide, we recommend that the Ministry of Children, Community and Social Services:

- *require Service Agencies to submit written, detailed explanations for all variances greater than the Ministry's established threshold;*

Status: Fully implemented.

Details

In our 2020 audit, we noted that the Ministry's contracts with Service Agencies include agreed-upon service targets, and agencies report their results against these targets quarterly. Ministry policy directives state that agencies must provide explanations when actual service volumes fall short of targets by 10% or more. These explanations include a description of the impact on service delivery and staffing, and action plans for improving. We found that in 2018/19, almost 50% of agency programs reported at least one service measure that was 10% or more below the target for the year. We reviewed a sample of reports for these instances and found that the majority contained no explanation for the variance from the target, or the included comments did not explain the variance. For example, one agency that fell 20% short of its target for the number of support days provided for caregiver respite simply commented "less than anticipated" as its explanation to the Ministry.

In our follow-up, we found that the Ministry had fully implemented this action item. In May 2021, the Ministry implemented a template for use by Service Agencies, which included the requirement for written and detailed explanations for all variances greater than the Ministry's established threshold of 10%. To support the template's implementation, the Ministry also provided voluntary, remote training to agency staff in May 2021. Once data is received from Services Agencies, Ministry staff are required to follow up with agencies that have not provided a satisfactory explanation for significant variances and may also request action plans to address the variances.

- *perform variance analyses to evaluate whether these explanations are reasonable, and facilitate corrective action where they are not.*

Status: In the process of being implemented by March 2023.

Details

In our 2020 audit, we found that the Ministry did not always perform the required analyses when agencies reported that their services fell significantly short of their targets. In 2018/19, almost 50% of agency

programs reported at least one service measure that was 10% or more below the target for the year. We reviewed a sample of reports for these instances, and found that the majority contained no explanation for the variance from the target, or the included comments did not explain the variance. There was no indication in these cases that the Ministry followed up to assess if the shortfall from the target was reasonable.

In our follow-up, we found that the Ministry had made progress in implementing this recommendation. The Ministry's Program Data Analytics (PDA) Unit reviewed Service Agencies for the 2020/21 fiscal year, and flagged variances +/- 10% where an explanation was missing or was unclear. In December 2021, the PDA Unit communicated these cases, where a variance explanation was missing, to the applicable regional offices to facilitate follow up in order to obtain satisfactory explanations for the variances and where applicable, proposed action plans to address them. The Ministry advised us that as of June 2022, it had reviewed and followed up with Service Agencies to obtain a satisfactory explanation and applicable action plans for about 70% of the cases flagged by the PDA Unit for the 2020/21 final reports. The Ministry advised us that it expects to complete the remaining cases by March 2023.

The Ministry advised us that for the 2020/21 fiscal year, it had communicated to Service Agencies that due to the COVID-19 pandemic, they were not required to meet pre-COVID-19 targets and to provide explanations for variances relative to those targets. Nevertheless, the Ministry advised us that requirements to perform variance analysis resumed in the 2021/22 fiscal year, and final reports from Service Agencies, including explanations and action plans for variances, were due to the Ministry in June 2022. Once the Ministry receives these reports from Services Agencies, Ministry staff are required to follow up with agencies that have not provided a satisfactory explanation for significant variances, and where applicable, proposed action plans to address them. At the time of our follow-up, the Ministry had received 87% of all final reports for the 2021/22 fiscal year and expected to complete its review of these reports by March 2023.

Recommendation 6

To improve the accuracy of reporting by Service Agencies of supports, and to improve accountability within the supportive services program, we recommend that the Ministry of Children, Community and Social Services:

- *require Service Agencies to submit client lists that support the individuals they have reported providing service to, and link these lists to the Ministry's database of eligible clients for verification;*

Status: Little or no progress.

Details

In our 2020 audit, we found that although the Ministry collects output data from Service Agencies, such as on the number of clients they serve by type of supportive service, the Ministry does not validate the accuracy of the information reported by Service Agencies. We found several instances where Service Agencies claimed that they provided services to more individuals than they actually did. We noted that the Ministry requires DSO offices to maintain a list of all clients eligible for supportive services at agencies in its information systems. However, it does not require agencies to submit a list of their clients when reporting the number of individuals served to enable the Ministry to match the list against its records.

In our follow-up, we found that the Ministry had not yet made progress on this recommendation. The Ministry indicated that changes to its information systems will be required to allow Service Agencies to manage their service records for more efficient reporting. The Ministry noted that it has begun discussions internally to evaluate options to validate agencies' reporting using client lists and its information systems.

- *perform spot audits on Service Agencies to validate the information provided in the quarterly reports; and*
- *take corrective action where actual results achieved by Service Agencies fall short of the results they have reported.*

Status: Little or no progress.

Details

During our audit in 2020, we noted that the Ministry's contracts with Service Agencies include agreed-upon service measures with targets. Agencies report results against these targets quarterly. We selected a sample of agencies, including the four Service Agencies we visited during our audit, that reported meeting their targets exactly for the number of individuals served in 2018/19. We found that 73% of the agencies did not have client records that supported the number of individuals served they had reported to the Ministry. This included three agencies that had over-reported the number of individuals they served in one or more of their programs by between 13% and 120%.

In our follow-up, we found that the Ministry had not yet made progress on these recommendations. Nevertheless, the Ministry indicated it plans to create a work plan to address these recommendations.

Recommendation 7

To ensure that services are appropriate, high quality, and represent value for money, we recommend the Ministry:

- *expedite the implementation of a performance measurement framework that includes indicators on client outcomes and quality of life measures; and*
- *publicly report the results of client outcome measures from the framework.*

Status: Little or no progress.

Details

In our 2020 audit, we found that the Ministry does not have performance indicators in place to measure the effectiveness of the developmental supportive services it funds, or the outcomes of clients who receive those services. We found that in spring 2017, the Ministry developed an outcomes-based Performance Measurement Framework (framework) for developmental supportive services to measure the effectiveness of the supportive services it funds and the outcomes of those receiving supportive services. However, at the time of our audit three years later, the Ministry had yet to implement this framework and did not have a timetable for doing so. As a result, the Ministry cannot assess whether the agencies it funds provided the right

services according to their clients' needs, or identify whether it is funding poor-performing agencies.

In our follow-up, we found that the Ministry had not yet implemented a performance measurement framework with indicators on client outcomes and quality of life measures. The Ministry informed us that it is taking a staged approach to developing a performance measurement framework beginning with performance indicators related to the application process. The Ministry advised us that it has begun internal discussions to identify desired outcomes for the application process, potential performance indicators to measure those outcomes using existing data, and an implementation plan. The Ministry expects to complete this work, implement indicators related to the application process, and publicly report the results by December 2022. Thereafter, the Ministry plans to build upon lessons learned in developing performance indicators on the application process to develop a performance measurement framework across other areas of client service, such as accessing and receiving services.

Recommendation 8

To improve Service Agency compliance with regulatory requirements for services provided to adults with developmental disabilities, we recommend that the Ministry of Children, Community and Social Services take enforcement action against Service Agencies where its inspections identify significant recurring issues.

Status: In the process of being implemented by December 2023.

Details

In our 2020 audit, we found that the Ministry identified recurring compliance issues during its inspections of Service Agencies that provide supportive services. However, we noted that the Ministry did not take any enforcement action to deter repeated non-compliance by these agencies—even in instances involving significant issues. The purpose of inspections is to check for and enforce compliance with the 236 quality assurance standards related to supportive services. When non-compliance issues are found, Service Agencies are required to report to the inspector how they have addressed the issue, and certify that the issue has been

resolved. We selected a sample of agencies inspected multiple times between 2016/17 and 2019/20, and reviewed year-over-year inspection results. Despite Service Agencies certifying that non-compliance issues in the original inspection had been resolved, we found that nine out of the 10, or 90% of the agencies in our sample had non-compliance issues identified in inspections show up again in subsequent inspections. In total, we found that 34 non-compliance issues identified across the agencies in our sample were identified again in subsequent inspections. None of the Service Agencies in our sample were disciplined for any of the issues that were identified again during subsequent inspections.

In our follow-up, we noted that in June 2021, the Ministry approved enhancements to its existing compliance inspection process aimed at addressing this recommendation. These enhancements include increasing the risk ratings applied to recurring non-compliances (and reducing the time that an agency has to correct them), and obtaining written attestations from an Executive Director or Chief Executive Officer, that identified compliance violations are addressed systemically throughout the agency. In September 2021, these enhancements were implemented and notification of the changes to the compliance process were communicated to all transfer payment recipient agencies. Between September 2021 and March 2022, the Ministry noted that it conducted 81 inspections of Service Agencies and identified recurring compliance violations in 17 of them. According to the Ministry, all agencies attested that they addressed the non-compliances. The Ministry indicated that since it implemented these changes to its compliance inspection process, Service Agencies have met its requirements and as such, it has not deemed it necessary to take enforcement action. However, we noted that the Ministry has not yet conducted a follow-up inspection of the 17 agencies found to have recurring compliance violations to ensure that they remain in compliance after submitting written attestations indicating that they have addressed the non-compliances throughout the organization. The Ministry expects to have completed follow-up inspections by the end of 2023.

Passport

Recommendation 9

So that Passport funding is allocated equitably, we recommend that the Ministry of Children, Community and Social Services:

- *assess the \$5,000 minimum funding amount, including its impact on the equitability of funding, wait times for additional funding for people with higher needs, and program demand; and*
- *make adjustments to its funding allocation method based on this assessment.*

Status: Little or no progress.

Details

In our 2020 audit, we noted that clients eligible for supportive services receive \$5,000 in Passport funding before they complete their needs assessment. This allows clients to purchase some supports while they wait for their needs assessment. Annual Passport funding is not reduced below \$5,000, even if a client's needs are assessed below this level. By not reducing funding in subsequent years when a client's needs are assessed below the \$5,000 minimum, we found that clients with higher needs were waiting longer for much-needed additional funding. The wait list for Passport funding increased significantly from 2015/16 to 2019/20, with almost 19,500 individuals waiting in 2019/20. Based on Passport agency-provided data, there were 5,239 individuals assessed with needs which entitled them to less than the \$5,000 requirement. We calculated that these 5,239 Passport recipients, on average, would have been assessed for annual Passport funding of \$3,390—or \$1,610 less than the \$5,000 minimum allocation. The \$1,610 in additional funding allocated to these clients represents, on average, \$8.4 million dollars in annualized funding that could be allocated to individuals with higher needs waiting for additional funding.

In our follow-up, we noted that the Ministry has not yet assessed the \$5,000 minimum funding amount nor adjusted the funding allocation. In November 2021, the Ministry began working with Family Services Toronto, the agency that administers the PassportONE funding

program, to establish data transfer processes to obtain the data needed for the Ministry to assess the impact of the \$5,000 minimum funding. The Ministry advised us that it began its review of this data in February 2022. The Ministry expects to complete its assessment and determine a recommended course of action regarding any possible adjustments to the funding allocation method by the end of 2022. Thereafter, the Ministry will determine a timeline for any adjustments to the funding allocation method.

Recommendation 10

So that Passport funding is more effectively used to meet the needs of clients, and that amounts reimbursed for support workers are reasonable, we recommend the Ministry of Children, Community and Social Services:

- *identify and assess options for providing Passport recipients with sufficient guidance for purchasing supportive services that are appropriate to their needs;*

Status: Little or no progress.

Details

In our 2020 audit, we found that many Passport program clients spend the vast majority of their funding allocation to pay family members for support work. While using Passport funding for this purpose is within the rules of the program, we found it was often not aligned with the individual's needs as identified by the Supports Intensity Scale. We reviewed needs assessments for a sample of 15 Passport clients who spent 100% of their annual funding allocation on support workers who were relatives in 2019/20. In the majority of assessments reviewed, we found that family support work did not align with the client's support needs as determined by their Supports Intensity Scale results. For example, one client spent \$17,107, 100% of their funding, on a relative support worker to provide caregiver respite. However, their greatest need, as identified by the Supports Intensity Scale, was for lifelong learning, such as problem solving, and functional academics like reading signs and counting change.

In our follow-up, we found that the Ministry has not made significant progress toward implementing this

recommendation. We noted that the Ministry has taken steps to begin to develop options for providing Passport recipients with sufficient guidance for purchasing supportive services that are most appropriate to their needs. In fall 2021, the Ministry provided funding to a Passport Agency through the Ontario Passport Agency Network (OPAN) to hire a project manager, and to create a working group to identify ways to better support clients. Through this process, the Ministry plans to implement a new Passport program website by the end of March 2023, to share information with clients, and to share best practices for providing guidance to clients between Passport Agencies. The Ministry also advised us that education materials will be developed to facilitate the appropriate utilization of funds by Passport Program funding recipients and the individuals managing their funds.

The Ministry also advised us that it is working with an organization called Partners 4 Planning to provide additional resources for the Passport program, including a digital library of resources for clients, such as videos and webcasts to help clients navigate the use of their Passport funding independently and in compliance with Passport program guidelines. Resources will also address topics such as financial literacy and budgeting basics, and tips on how to improve claim submissions. The Ministry expects these resources to be developed by March 2023.

- *require Passport Agencies to perform thorough checks of all support workers to ensure they are not parents, step-parents, children, or the spouses of clients;*

Status: Fully implemented.

Details

In our 2020 audit, we analyzed PassportONE's information systems and found that 23% of all Passport clients had registered at least one family member as a support worker. In addition, we found that \$61.8 million of \$197 million, or 31% of funds reimbursed to Passport clients for support workers in 2019/20, was related to paying family members for support work.

Under the Passport program, anyone over the age of 18 can provide Passport clients with support work,

including family members except a client's child, spouse, parent or primary caregiver. However, our review of a sample of 15 Passport clients who spent 100% of their annual funding allocation on support workers who were relatives identified limited controls for PassportONE approval of support work provided by family members. For example, \$22,600 was reimbursed for support work by a client's family member between July 2018 and June 2020. While reviewing this claim, we discovered that the support worker was the client's step-parent—a fact that was not disclosed in PassportONE's information system. Support work provided by step-parents is not eligible for reimbursement.

In our follow-up, we found that in April 2021, PassportONE's information system was updated so that Persons Managing Passport Funding cannot be registered as a support worker in the system and thus cannot be reimbursed as support workers. In addition, the Ministry advised us that it implemented controls in PassportONE's information system to restrict who can become a support worker and be reimbursed as such. The Ministry advised that it is not possible for a parent, step-parent, spouse or primary caregiver to be registered as a support worker in PassportONE's information system. The Ministry also reflected these restrictions in its updated Support Worker Information form, which was revised in August 2021.

- *implement controls, in co-ordination with PassportONE, that prevent persons managing Passport funding on a client's behalf from charging for services.*

Status: Fully implemented.

Details

In our 2020 audit, we identified limited controls for PassportONE approval of support work provided by family members. For example, \$17,250 was reimbursed for support work provided by a client's sibling between May 2018 and April 2020. This represented 100% of the client's reimbursed Passport expenses during this period. A flat rate was being charged each month for support work, with no indication of how many hours of support were being provided, on what days, or at

what rate. In addition, the Passport Agency serving the client listed the support worker sibling as the person managing the client's Passport funds, a clear conflict of interest, as the sibling could approve and submit their own account of services provided for reimbursement. By approving support work claims for family members without information such as dates, hours provided, and locations and distances travelled, though these claims may be within the program guidelines, PassportONE cannot assess whether services were provided, the reasonableness of the amounts claimed, or whether they provide value for money for the person with a developmental disability.

In our follow-up, we found that in April 2021, PassportONE's information system was updated so that Persons Managing Passport Funding cannot be registered as a support worker in the system and thus cannot be reimbursed as support workers. Support worker registration and information forms, as well as Passport guidelines were also revised in summer 2021 to incorporate these changes. In addition, the Ministry advised us that it worked with PassportONE and Passport agencies to flag and address existing cases where the person managing a client's Passport funding was identified as a support worker in PassportONE's information system, so that these individuals now only hold one role or the other—not both. The Ministry advised us that all identified cases were rectified by March 31, 2021.

Recommendation 11

So that the Passport program's limited funds can provide benefits for more people, we recommend that the Ministry of Children, Community and Social Services:

- *establish reasonable restrictions on the cost, number, and location of events for tickets purchased for sports, concerts, and other activities and events that can be claimed for reimbursement;*

Status: Fully implemented.

Details

In our 2020 audit, we found many instances where Passport clients were reimbursed for expensive and/or large numbers of tickets to professional sports

and entertainment events which do not represent value-for-money, particularly given the Passport program's limited resources and the unmet demand for the program. We noted that professional sports and entertainment events were considered eligible expenses under the category of Community Participation.

However, we found that the Ministry's program guidelines do not include any restrictions on purchases for these events such as the cost, number of events, location of events, or percentage of a client's total Passport program funding. For instance, we noted that a client spent \$2,214 on two tickets to a Toronto Raptors game, which PassportONE subsequently approved.

In our follow-up, we found that the Ministry had fully implemented this recommendation. The Ministry advised us that it updated its Passport program guidelines effective September 2021, to introduce a new reasonableness standard for live ticket events, including a limit of \$150 per event per ticket, and a maximum of two tickets per event (i.e., a client and their support worker). The Ministry also advised us that these limits were hard-coded into the PassportONE information system that will automatically flag and/or reduce claims that exceed the maximum allowable limit. The Ministry communicated these changes to all Passport recipients by mail or email in a package sent out in August 2021. The Ministry now also tracks whether or not the claim is related to expenses incurred in Ontario.

- *work with PassportONE to update its claim form to capture relevant details about activities and events, including concerts and sports tickets claimed;*

Status: Fully implemented.

Details

In our 2020 audit, we noted that PassportONE staff responsible for reviewing individual claims submitted by clients can review all relevant supporting documents related to a claim. However, the claim form, and as a result PassportONE's information system, is missing key details required to analyze trends or identify systemic issues in claims reimbursed by PassportONE. For example, we found the claim form does not include a field for a description of the services purchased (for example, hockey tickets). In addition, while the claim

form includes a field to identify the service provider, we found it often included only a vague description such as “event ticket” or “activity.”

In our follow-up, we found that as part of its update to the Passport program guidelines (as discussed in the first action item in **Recommendation 11**) in September 2021, the Ministry also updated its claim form to reflect the changes related to the live ticket events requirements. The updated form now includes a new expense category for live events and collects additional information on these events, such as the date, number of tickets (to a maximum of two), ticket cost and reimbursement amount.

- *require that PassportONE periodically analyze reimbursed claims for sports and concert tickets to ensure the cost, number, and location of events claimed are reasonable, and take corrective action where they are not.*

Status: Fully implemented.

Details

In our 2020 audit, PassportONE informed us that it had made the decision to use generic service providers for events and activities such as “event ticket” rather than inputting the actual service provider, to allow for easier review. However, we noted that without information such as a description of the event, the service provider holding the event, or the number of events included in the purchase, a complete analysis of how much was spent on concert or professional sports tickets is not possible. In addition, since such claims cannot be readily identified, it is also not possible to perform a targeted review of such expenditures for reasonableness.

In our follow-up, we found that the Ministry updated its Passport program guidelines effective September 2021, to introduce a new reasonableness standard for live ticket events, including a limit of \$150 per event per ticket, and a maximum of two tickets per event (i.e., a client and their support worker). For season ticket packages, which we noted were a concern in our 2020 audit, the maximum ticket amount of \$150 is applied but for each ticket in a season ticket package. In addition, the Ministry updated its claim form to

reflect these changes related to live ticket events. The Ministry also advised us that these limits were hard-coded into the PassportONE information system that will automatically flag and/or reduce claims that exceed the maximum allowable limit. As a result of these changes, the Ministry noted that unreasonable amounts for sports and concert tickets can no longer be claimed and reimbursed. To ensure that these changes are effective, the Ministry has committed to collect data on live event tickets and to monitor it quarterly to ensure the system and controls are functioning properly. We reviewed the Ministry’s monitoring reports related to live ticket event claims between September 1, 2021 and March 31, 2022. The Ministry found that as a result of the new changes, the reimbursement of 406 tickets was lowered to the cap of \$150, leading to Passport program savings of over \$40,000.

Response to COVID-19

Recommendation 12

So that it has the necessary information to understand the impact on the developmental supportive services it funds, and maintains accountability for the transfer payments it provides, we recommend that the Ministry of Children, Community and Social Services (Ministry):

- *require Service Agencies to report to the Ministry any changes on the availability of their supportive services during the COVID-19 pandemic, including whether their physical locations are open;*

Status: Little or no progress.

Details

In our 2020 audit, we found that in response to the declaration of the COVID-19 pandemic, the Ministry made several changes to funding, oversight and reporting requirements related to supportive services provided by Services Agencies to provide agencies with the flexibility to respond to the outbreak. The Ministry advised Service Agencies to self-report through the Ministry’s Serious Occurrence Reporting System if they were closing their physical locations. The Ministry speculated that most Service Agencies stopped providing in-person supportive services after the

emergency declaration. However, at the conclusion of our fieldwork six months after the Province's emergency declaration, we found that the Ministry still did not have a summary of how many agencies had closed, how long they had closed for, and the degree to which the services they provide and the individuals they provide them to were affected.

In our follow-up, we noted that in February 2021, the Ministry released an addendum to its Serious Occurrence Reporting Guide for COVID-19-related serious occurrences, which described COVID-19-specific reporting requirements, including a requirement to report as a serious occurrence cases where a program or site closed due to COVID-19-related precautions or an outbreak. However, the Ministry advised us that it does not otherwise require Service Agencies to report the impact of COVID-19 on the availability of services, such as converting services from in-person to virtual or changes in an Agency's ability to service the same number of clients.

- *use this information to assess the reasonability of expenditures reported by Service Agencies.*

Status: Little or no progress.

Details

In our 2020 audit, the Ministry indicated that with the onset of COVID-19, it expected agency service delivery costs to increase due to additional costs to adhere to public health guidelines for the health and safety of their clients and staff through physical distancing

and other COVID-19 safety measures. In response, the Ministry also made several changes related to Service Agencies' use of Ministry funding, oversight and reporting requirements, including the Ministry advising us that Service Agencies were to be provided with full funding allocations for the 2020/21 fiscal year, and that they told Service Agencies they would not be held accountable to meet service targets, such as the number of individuals served. At the conclusion of our fieldwork, the Ministry could not say whether, as a result of the COVID-19 pandemic, it expected Service Agencies would report having unspent supportive services funding in the 2020/21 fiscal year. However, it advised us that, as in prior years, it would recover any unspent funds.

In our follow-up, we noted that the Ministry had begun assessing the reasonability of expenditures reported by Service Agencies for the 2020/21 fiscal year. The Ministry advised us that this includes taking into consideration service disruptions reported during the COVID-19 pandemic. However, although the Ministry required Service Agencies to report as a serious occurrence cases where a program or site closed due to COVID-19-related precautions or an outbreak, the Ministry does not otherwise require Service Agencies to report the impact of COVID-19 on the availability of services, such as converting services from in-person to virtual or changes in an Agency's ability to service the same number of clients.