TO: Chair and Members
Audit, Finance and Administration Committee

WARD(S) AFFECTED: CITY WIDE

COMMITTEE DATE: June 22, 2011

SUBJECT/REPORT NO:
Audit Report 2010-13 - Domiciliary Hostels (AUD11017) (City Wide)

SUBMITTED BY:
Ann Pekaruk
Director, Audit Services
City Manager's Office

PREPARED BY:
Ann Pekaruk 905-546-2424 x4469

SIGNATURE:

RECOMMENDATION

(a) That Report AUD11017 respecting Audit Report 2010-13, Domiciliary Hostels, be received;

(b) That the Management Action Plans as detailed in Appendix “A” of Report AUD11017 be approved; and,

(c) That the General Manager of Community Services be directed to instruct the appropriate staff to have the Management Action Plans (attached as Appendix “A” to Report AUD11017) implemented.

EXECUTIVE SUMMARY

The 2010 Internal Audit work plan approved by Council included an audit to assess the administration of the City’s domiciliary hostel system in providing shelter and care services with a view to identifying opportunities for operational efficiencies, improved controls and potential cost savings. Recommendations were made to strengthen processes and identify opportunities for administrative improvements.
The results of the audit are presented in a formal Audit Report (2010-13) containing observations, recommendations and management responses. In addition, an Addendum which identifies issues, risks or inefficiencies (not necessarily control deficiencies which appear in Report AUD11017) is included and management has been asked to address these points also. The Report 2010-13 and Addendum are attached as Appendix “A” to Report AUD11017.

**Alternatives for Consideration – Not Applicable**

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<th>FINANCIAL / STAFFING / LEGAL IMPLICATIONS (for Recommendation(s) only)</th>
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**Financial:** A clear definition of ‘total income’ for client subsidy calculations mitigates the potential for inaccurate subsidy payments. Inadequate controls over the distribution of bus passes and tickets may potentially result in unnecessary costs. Incorrect billing may result in overpayments to operators.

**Staffing:** None.

**Legal:** Signed contracts, copies of operator’s insurance and licences reduce the City’s exposure and risk of liability. By virtue of the collection of Personal Health Information for client files, consent forms are required to comply with PHIPA legislation.

**HISTORICAL BACKGROUND** (Chronology of events)

The Housing and Homelessness Division works with the community to provide a continuum of affordable housing options to the residents of Hamilton. The Domiciliary Hostel Program is administered as a discretionary program and is cost-shared (80/20) with the Ministry of Community and Social Services (MCSS). The 2010 budgeted amount to administer the Domiciliary Hostel Program in Hamilton for subsidy payments and administration was $7.5 million.

The audit was scheduled as part of the 2010 Internal Audit work plan approved by Council. The audit fieldwork was completed in January 2011. The results of this audit are attached as Appendix “A” of Report AUD11017.

The Audit, Finance and Administration Committee receives and approves final audit and review reports as part of its responsibilities for the oversight of governance and control.
POLICY IMPLICATIONS

- Medical Officer of Health’s Residential Care Facilities Guidelines Schedule 20
- City of Hamilton By-law: 07-170

RELEVANT CONSULTATION

Appendix “A” to Report AUD11017 includes management action plans which reflect the responses of management and staff responsible for the administration of the City’s domiciliary hostel system – Community Services.

ANALYSIS / RATIONALE FOR RECOMMENDATION

(include Performance Measurement/Benchmarking Data, if applicable)

The 2010 domiciliary hostel program costs were budgeted at $7.5 million, cost shared 80/20 with the Province. A portion of this total amount is spent on administration costs (up to 10%) and the balance is for per diems to the operators. The audit assessed the administration of the City’s domiciliary hostel system in providing shelter and care services with a view to identifying opportunities for operational efficiencies, improved controls and potential cost savings.

A formal Audit Report (2010-13) containing observations, recommendations and resulting management action plans was issued. The implementation of the sixteen (16) recommendations included in the Audit Report 2010-13 and Addendum (attached as Appendix “A” of Report AUD11017) will strengthen and improve operating controls. Among them are:

- Obtaining signed subsidy agreement contracts, operator business licenses for running a domiciliary hostel and operators’ proofs of insurance.
- Documenting specific details for the clients receiving transportation and Medical Special Needs Transportation amounts to ensure entitlement that is reviewed and updated annually.
- Developing formalized written procedures detailing the various appeal processes for distribution to staff, operators and clients.
- Acquiring supporting documentation or written explanations to support corrections/adjustments on the monthly billings.
- Reporting overpayments by Case Managers to the Program Manager and maintaining and reviewing the listing on a regular basis.
• Defining, in a business procedures document, the funds required to be included in the ‘total income’ calculation for the resident contribution.

Staff have agreed with all the recommendations and their management action plans are included in Appendix “A” to Report AUD11017.

**ALTERNATIVES FOR CONSIDERATION**

(include Financial, Staffing, Legal and Policy Implications and pros and cons for each alternative)

Not applicable.

**CORPORATE STRATEGIC PLAN** (Linkage to Desired End Results)


**Financial Sustainability**

• Delivery of municipal services and management of capital assets/liabilities in a sustainable, innovative and cost effective manner.

**Social Development**

• Residents in need have access to adequate support services.

**Healthy Community**

• Adequate access to food, water, shelter and income, safety, work, recreation and support for all (Human Services).

**APPENDICES / SCHEDULES**

Appendix “A” to Report AUD11017: Audit Report 2010-13 and Addendum

ap:tk/dt
CITY OF HAMILTON  
INTERNAL AUDIT REPORT 2010-13  
COMMUNITY SERVICES – DOMICILIARY HOSTEL PROGRAM

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| 1. | Procedures  
There are no written procedures outlining appeal processes for either an applicant operator deemed ineligible for a subsidy agreement with the City or for termination of an operator’s subsidy agreement due to non-compliance or for a client deemed ineligible for subsidy. | That procedures detailing the various appeal processes be written and distributed to staff, operators and clients. | Agreed. Business procedures for the appeal processes will be developed and distributed to staff, operators and clients. Procedures will be established for applicant operators, the termination of a subsidy agreement and for clients who are deemed ineligible for subsidy. The procedures will be completed and implemented by September 30, 2011. |
| 2. | Procedures applicable to the Domiciliary Hostel Program (DHP) do not include revision dates or the name of the individual making changes. There is no evidence of the review of the changes for accuracy. One procedure has been in draft format since July 2007.  
When there are no complete or updated written procedures to refer to, the employee currently carrying out the process relies on personal understanding and experience, which could result in incorrect, incomplete or inconsistent application. It would also be problematic and inefficient for a successor to commence his/her duties within a short period of time. | That procedures be reviewed annually by management to ensure that the documents are current. There should be evidence of this review (sign-off) from management and staff. | Agreed. All business procedures will be reviewed, updated and signed off by management annually using a standardized format. The new procedures will be reviewed with all staff annually and will be documented to support accountability. All Domiciliary Hostel Program (DHP) business procedures will be completed and implemented by September 30, 2011. |
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<td>3.</td>
<td><strong>Client Files and Database</strong>&lt;br&gt;The DHP reviews and updates client files with current information every 12 months or when a client's income level changes. The Residential Care Facility (RCF) database is also updated.&lt;br&gt;It was observed that 3 of 10 client files reviewed by Internal Audit had not been updated within the past 12 months. Also, 7 of the 10 clients' information in the RCF database did not agree to the client files and the Service Delivery Model Technology (SDMT) database maintained by the Province. As a result, the client files and the RCF database do not contain current client income information.&lt;br&gt;Without the appropriate updating, client subsidy calculations may be wrong. The outdated RCF database cannot be used to generate statistics required by the Province and they must be compiled manually.</td>
<td>That Case Managers be required (by way of a written procedure) to update client files and the RCF database with current income information at least minimally every twelve (12) months. The Manager should monitor adherence to this timeline by performing random file checks on a regular basis.</td>
<td>Agreed. A business procedure to support the annual review and updating of client files will be completed. A tracking system will be developed to ensure that all files are reviewed at least once every 12 months and that the Provincial system (if applicable) and/or the local Residential Care Facility (RCF) database are updated to ensure the accurate co-ordination of information. A business procedure and tracking tool will also be developed for regular file reviews by the manager. Both of the procedures will be completed and implemented by September 30, 2011.</td>
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<td>Most clients of domiciliary hostels receive some income from sources such as Ontario Works, ODSP, private pensions, etc. ‘Total income’ is used to determine client eligibility for subsidy as well as the resident contribution towards the monthly billing paid to the operator. Depending on this ‘total income’ figure, the subsidy rate of $47.75 per day per client paid by the City and Province is reduced by amounts payable to the operator by the client. The DHP has not defined ‘total income’ in a written procedure. It has not been determined if income sources such as additional benefits from OW or ODSP (i.e. transportation, special diet) should be included in the ‘total income’ and thus, in the calculation of the required client contribution.</td>
<td>That the funds required to be included in the ‘total income’ calculation for resident contribution purposes be defined in a business procedure document in the DHP.</td>
<td>Agreed. A business procedure will be developed for the purposes of defining ‘total income’ for DHP applications by September 30, 2011. As a point of clarification, additional benefits such as Special Diet or Transportation Allowance are not defined as ‘total income’ by the Ontario Works Act and the Ontario Disability Support Program for the purposes of determining eligibility.</td>
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## Contract Administration

In a review of ten (10) operator files selected at random, the following deficiencies were noted:

- 5 of 10 files did not contain current and signed subsidy agreement contracts. Four (4) had only copies of expired contracts and one (1) did not contain any contract. All operators continued to be paid.
- 6 of the 10 files did not contain current business licenses specific for running a domiciliary hostel.
- 7 of the 10 operators did not submit proof of insurance by the timeline specified in the terms of the standard contract.
- 2 of the 10 files did not contain current proof of insurance.

Without performing due diligence in obtaining signed contracts and ensuring operators comply with the terms of the contracts, the City is increasing its exposure and risk of liability.

### Recommendation for Strengthening System

That current subsidy agreement contracts be executed and copies placed in the appropriate operator files. Terms of the contract (such as proof of insurance, licenses, etc.) should then be enforced. Any non-compliance could result in non-payment of subsidies.

### Management Action Plan

Agreed. A spreadsheet has been updated to list outstanding documentation for each RCF operator including expiry dates for subsidy agreement contracts, proof of insurance and business licenses.

- 32 of 62 files have current subsidy agreement contracts
- 40 of 62 files have current proof of insurance
- 31 of 62 files have current business licenses

Notification will be sent to the operators regarding outstanding proof of insurance and business license documentation.

Contracts have been reviewed and revised by Corporate Legal Services and will be distributed to the operators who have outstanding contracts for a term ending May 2012.

Contracts that are due in May 2011 will be for a term of 3 years, from June 2011 to May 2014.

All contracts will be completed and on file by October 31, 2011.
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<td>6.</td>
<td>PHIPA Compliance</td>
<td>That client consent forms (PHIPA requirement) be obtained from subsidy clients and stored, along with corresponding PHI, in secure filing cabinets.</td>
<td>Agreed. The Ontario Works Training and Program Review Unit is reviewing the PHIPA requirements as they pertain to DHP applications and the requirement for additional consent forms. A business procedure for the gathering of Personal Health Information for the DHP will be completed by December 31, 2011. Locks for the filing cabinets will be ordered and installed to ensure the safe storage of private information by May 15, 2011.</td>
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<td>7.</td>
<td>Billing Adjustments &amp; Corrections</td>
<td>That written explanations be required for all corrections that are made by Case Managers on the monthly billings spreadsheets and operators’ billings statements.</td>
<td>Agreed. A tracking sheet with a written explanation for all adjustments and overpayments is now in use.</td>
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The DHP does not consider itself to be a Health Information Custodian (HIC) as defined by PHIPA. However, during the course of the audit, it was noted that many of the client files contained Personal Health Information (PHI). These client files are stored in filing cabinets that are not locked at all times.

Further, none of the files examined contained client consent forms for collection of PHI, as required under PHIPA.

A sample of billings spreadsheets with Case Managers’ line adjustments related to previous months and operators’ billings statements that required corrections were reviewed.

It was noted that all items tested (5 invoices with adjustments and 5 invoices with corrections) did not have any supporting documentation or written explanations to detail why the adjustment or correction was required.

One adjustment resulted in a double payment to the operator. The adjustment that was submitted by and paid to the operator had been already paid in the previous month.
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<td>8</td>
<td>Documenting the reason for the adjustments provides a proper paper trail to ensure the changes are valid and justified. All adjustments and corrections that were tested had been reviewed by the Program Manager. The lack of supporting documentation and/or explanations makes the Manager’s review less effective.</td>
<td>That the Program Manager require a written explanation and/or supporting documentation to be included with the monthly billings packages from Case Managers that are provided for review.</td>
<td>Agreed. A tracking sheet with a written explanation for all adjustments and overpayments is now in use. Reviews are completed by the Manager on a monthly basis.</td>
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<td>9</td>
<td>Overpayments made to operators are not tracked by Domiciliary Hostel Program Management (i.e. dollar amount of receivables). Tracking overpayments will reduce the risk of not recovering monies owed to the City by operators.</td>
<td>That overpayments be reported by Case Managers to the Program Manager and that a listing of overpayments (amounts receivable) be maintained and reviewed on a regular basis. Overpayments should be recovered from the following month’s subsidy payment to the operator.</td>
<td>Agreed. A tracking sheet with a written explanation for all adjustments and overpayments is now in use. Reviews are completed by the Manager on a monthly basis. Both the collection of overpayments and adjustments have been instituted by means of the tracking sheet. This will ensure that no duplicate payments will be made.</td>
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<td>10.</td>
<td>Discharged Clients</td>
<td>The operator is not eligible for a subsidy payment for the day of a client’s discharge, as per the contract. Two instances were noted in Internal Audit’s sampling where the operator received payment for the discharge date of the client. The discharge was not being properly tracked by either the operator or the Case Manager. Three instances were noted where a discharge occurred at the end of a month and it was not documented on the current billings statement by the operator. It was also not documented in the following month’s statement. It is difficult for a Case Manager to accurately calculate the appropriate amount of subsidy that is to be paid if the operator does not document the date of discharge on the billing statements that they submit to the DHP.</td>
<td>That the Case Managers ensure the discharge dates (especially those occurring at month end) are properly recorded on the billing statements. The Case Managers should ensure operators are not receiving a subsidy for the client’s discharge date.</td>
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11. Transportation Costs

In addition to receiving subsidy for room and board, clients may be eligible to receive transportation assistance. In 2010, transportation costs for domiciliary hostel clients amounted to over $312,000.

The Case Managers review each client’s situation and determine if they will be provided with transportation costs (i.e. bus tickets, bus passes, DARTS or taxis).

The Case Manager is supposed to update the client’s file with the transportation costs that will be provided to the client and their justification. The information is forwarded to the Special Supports group who is responsible for administering the transportation process. Special Supports maintains a Master Transportation Listing and prepares the monthly package of transportation tickets/passes for distribution to each hostel.

A sample of five clients was reviewed (for bus tickets & bus passes only) from the Master Transportation Listing. The information on the Master Listing was compared to the Case Managers’ client files. All five files did not have sufficient detail to support the quantity and reason for distributing the tickets and passes to the clients.

Without detailed documentation in the client files, the City could be distributing excess transportation tickets and bus passes to clients at the hostels and incurring unjustified costs.

That specific details be documented as to the reasons DHP clients are receiving the transportation amounts that they are being provided. These details should be reviewed and updated every 12 months at a minimum or as client circumstances change.

Agreed. File reviews are currently being conducted on all residents receiving transportation allowance to ensure documentation is recorded properly. There are 440 RCF cases currently receiving transportation. The RCF case managers are working with the Special Supports Team to identify the cases in question. It can be a lengthy process in dealing with ODSP, which are the majority of the cases. All files will be reviewed by December 31, 2011. Reviews will be conducted annually.

A business process review is underway by the Strategic Services Division of the Community Services Department with the objective of streamlining and increasing internal efficiencies in the delivery of transportation assistance to Domiciliary Hostel residents. The review and recommendations will be completed by August 31, 2011.
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<td>12.</td>
<td>Transportation provided through the Medical Special Needs Transportation (MSN) program is not always recorded in the client files and is not included in the Master Transportation list maintained by the Special Supports group. The current process does not provide assurance that duplication of payment between the MSN program and the Special Supports group.</td>
<td>That MSN transportation be recorded in the client files and that the Master Transportation List be updated accordingly. The Case Managers and Special Supports group should verify there is no duplication of transportation costs provided to the client.</td>
<td>Agreed. There are challenges to recording MSN transportation for ODSP clients. A request to the Province’s local ODSP office to notify RCF case managers when there is an approval of MSN transportation has been denied due to its own workload issues. Another request will be made in an effort to resolve this issue by September 30, 2011.</td>
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ADDENDUM

The following items were noted during the course of the audit. Although they do not present internal control deficiencies, they are indicated in this Addendum so management is aware of the issues, risks and inefficiencies and can address them appropriately.

Access Security-RCF Database

1. The RCF Database (one of the main databases utilized in the DHP), does not periodically prompt users to change their passwords. Additionally, it was noted that the password configuration is not pre-set (i.e. a password is required with a minimum number of characters, with a mix of uppercase and lowercase characters, along with numbers and special characters).

It is recommended:
That passwords be required to be changed regularly by staff. Also, the password configuration on the RCF database should be changed to require a pre-set password that contains the characteristics noted above.

Management Response:
Agreed. The City’s Information Services Division has been contacted to determine whether there is capability in the RCF database to implement this recommendation. No decision has been made at this time.

Reporting

2. Currently the database that is used in the DHP (RCF Database) provides a limited amount of management reports that can be used to support workflows in the DHP. The creation and use of the following reports would prove useful to the administration in the DHP.

   a. Client Update Report: A report that would use the “Form 1 Last Updated” field in the RCF Database to generate a list of clients whose information has not been updated within the last 12 months. This report would provide information to Case Managers about which client files require updates.

   b. Clients that turn 65: Most clients have a change in income when they turn 65. A report that lists clients that are turning 65 in the next 6 months would enable Case Managers to provide better and more timely assistance to clients completing applications for Canada Pension Plan and Old Age Security. In addition, Case Managers would be able to improve the tracking of the clients’ changing incomes.
It is recommended:
That the DHP consider creating the reports noted above in order to better support program workflows.

**Management Response:**
Agreed. A request has been made to the City’s Information Services Division to create the above two reports. No date has been established for the production of the reports.

### Billings Process

3. It was noted that there is a billings module that is contained in the current RCF Database that is currently not utilized by the DHP. This module essentially generates a standard billings spreadsheet for an individual domiciliary hostel operator. The use of a standard spreadsheet would reduce the occurrence of input errors and out of date information being used in the monthly billing process. Additionally, the use of the module could provide some relief for the current time pressures that are experienced during the monthly billings process.

**It is recommended:**
That the DHP consider using the RCF Database billings module as a part of their monthly billings process workflow.

**Management Response:**
Agreed. However, until confidence in the RCF database is restored, there is an inability to implement this recommendation. The Division is working with the City’s Information Services Division to ensure reliability in the database. No date has been established for this implementation.

### Subsidy Referral Form

4. A “Subsidy Referral Form” is completed and is sent to the Case Manager from the operator. The Case Manager assesses the client’s information to determine if he/she is eligible for a subsidy. It was noted that the “Subsidy Referral Form”, that is also listed in the DHP procedure documents, is not used on a consistent basis.

**It is recommended:**
That the DHP determine if there is a need for this form and either ensure that it is used consistently (if required) or eliminate it and change the procedure requirements accordingly.

**Management Response:**
Agreed. The Subsidy Referral Form is a tool for use by the operators and is optional. The new business procedures will clarify the use of the form and will be completed by December 31, 2011.