

### **CITY OF HAMILTON**

### CITY MANAGER'S OFFICE Audit Services Division

TO: Chair and Members Audit, Finance and Administration Committee	WARD(S) AFFECTED: CITY WIDE
COMMITTEE DATE: March 25, 2013	
SUBJECT/REPORT NO: Follow Up of Audit Report 2010-13 - Domicil	liary Hostels (AUD13008) (City Wide)
SUBMITTED BY: Ann Pekaruk Director, Audit Services City Manager's Office	PREPARED BY: Ann Pekaruk 905-546-2424 x4469
SIGNATURE:	

### **RECOMMENDATION**

That Report AUD13008, respecting the follow up of Audit Report 2010-13, Domiciliary Hostels, be received.

#### **EXECUTIVE SUMMARY**

Audit Report 2010-13, Domiciliary Hostels, was originally issued in June, 2011 and management action plans with implementation timelines were included in the Report. In January, 2013, Internal Audit conducted a follow up exercise to determine if appropriate and timely actions had been taken. Of the 16 recommendations that management agreed to in the original Report and Addendum, four have been completed, five are in progress, two are initiated and five remain incomplete.

Alternatives for Consideration - Not Applicable

### FINANCIAL / STAFFING / LEGAL IMPLICATIONS (for Recommendation(s) only)

**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)

Audit Report 2010-13, Domiciliary Hostels, was originally issued in June, 2011. The Report and Addendum provided 16 recommendations identifying areas to strengthen processes and detailing opportunities for administrative improvements.

It is normal practice for Internal Audit to conduct follow up reviews within a 12-18 month period following issuance of the original report in order to determine whether action plans committed to by department management have been implemented.

#### POLICY IMPLICATIONS/LEGISLATED REQUIREMENTS

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

#### **RELEVANT CONSULTATION**

The results of the follow up were provided to management responsible for the administration of the City's domiciliary hostel system in Community Services.

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#### **ANALYSIS / RATIONALE FOR RECOMMENDATION**

(include Performance Measurement/Benchmarking Data, if applicable)

The report attached as Appendix "A" to Report AUD13008 contains the first three columns as originally reported in Report 2010-13 along with an added fourth column indicating Internal Audit's comments as a result of the follow up work. The original Addendum section containing four recommendations also now contains follow up comments.

Four of the 16 recommendations have been fully implemented. These are: providing 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 resulting listing on a regular basis; and ensuring operators are not receiving a subsidy for the client's discharge date.

Two recommendations that have been initiated are: updating client files and the Residential Care Facilities (RCF) database with current income information at least every 12 months; and documenting the reasons for Domiciliary Hostel Program (DHP) clients receiving the transportation amounts that they are being provided.

There are five recommendations whose implementations are in progress. They include: written procedures detailing the various appeal processes; a business procedure for funds required to be included in the 'total income' calculation; the review of all procedures annually; the execution and enforcement of the subsidy agreement contracts; and the collection and protection of client consent forms.

Among the five incomplete recommendations are: recording transportation costs in the client files and ensuring there is no duplication of payments; changing passwords for RCF database access regularly; creating reports to better support program workflows; using the RCF database billings module as a part of the monthly billings process workflow; and determining the need for the *Subsidy Referral Form*.

#### ALTERNATIVES FOR CONSIDERATION

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

Not applicable.

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#### **ALIGNMENT TO THE 2012 – 2015 STRATEGIC PLAN:**

### Strategic Priority #2

Valued & Sustainable Services

WE deliver high quality services that meet citizen needs and expectations, in a cost effective and responsible manner.

### **Strategic Objective**

2.1 Implement processes to improve services, leverage technology and validate cost effectiveness and efficiencies across the Corporation.

#### Strategic Priority #3

Leadership & Governance

WE work together to ensure we are a government that is respectful towards each other and that the community has confidence and trust in.

### **Strategic Objective**

3.4 Enhance opportunities for administrative and operational efficiencies.

#### **APPENDICES / SCHEDULES**

Appendix "A" to Report AUD13008.

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## CITY OF HAMILTON INTERNAL AUDIT REPORT 2010-13 COMMUNITY SERVICES – DOMICILIARY HOSTEL PROGRAM FOLLOW UP

#	OBSERVATION OF EXISTING SYSTEM	RECOMMENDATION FOR STRENGTHENING SYSTEM	MANAGEMENT ACTION PLAN	FOLLOW UP (JANUARY 2013)
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.	In Progress. Draft procedures have been developed to help guide the Residential Care Facility (RCF) application process and the RCF tenant

#	OBSERVATION OF EXISTING SYSTEM	RECOMMENDATION FOR STRENGTHENING SYSTEM	MANAGEMENT ACTION PLAN	FOLLOW UP (JANUARY 2013)
2.	Procedures (Cont'd.) 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)		In Progress. A sample of five selected DHP procedures have been reviewed by the Supervisor within the past year. However, there is no evidence that these procedures have been

#	OBSERVATION OF EXISTING SYSTEM	RECOMMENDATION FOR STRENGTHENING SYSTEM	MANAGEMENT ACTION PLAN	FOLLOW UP (JANUARY 2013)
3.	Client Files and Database 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.  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.  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.	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.	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 Sept. 30, 2011.	,

#	OBSERVATION OF EXISTING SYSTEM	RECOMMENDATION FOR STRENGTHENING SYSTEM	MANAGEMENT ACTION PLAN	FOLLOW UP (JANUARY 2013)
4.	Client 'Total Income' 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.			In Progress. A business procedure document has been developed that specifies the type of funds that are to be included in the calculation of a resident's 'total income'. The procedure has not been approved by the Director. The recommendation is expected to be completed before the end of Q1, 2013.

щ	OBSERVATION OF	RECOMMENDATION FOR	MANAGEMENT	FOLLOW UP
#	EXISTING SYSTEM	STRENGTHENING SYSTEM	ACTION PLAN	(JANUARY 2013)
5.	<ul> <li>Contract Administration</li> <li>In a review of ten (10) operator files selected at random, the following deficiencies were noted:</li> <li>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.</li> <li>6 of the 10 files did not contain current business licenses specific for running a domiciliary hostel.</li> <li>7 of the 10 operators did not submit proof of insurance by the timeline specified in the terms of the standard contract.</li> <li>2 of the 10 files did not contain current proof of insurance.</li> <li>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.</li> </ul>	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.	updated to list outstanding documentation for each RCF operator including expiry dates for	In Progress. A spreadsheet has been developed to assist with tracking any outstanding documentation for each operator. A review of the spreadsheet identified that there are several instances of subsidy agreement contracts, insurance certificates and business licenses that are not current. Anticipated completion date is Q2, 2013.
		Dogo		

EXISTING SYSTEM PHIPA Compliance The DHP does not consider tself to be a Health Information Custodian (HIC) as defined by PHIPA. However, during the	(PHIPA requirement) be obtained from subsidy clients		containing PHI are stored in
The DHP does not consider tself to be a Health Information Custodian (HIC) as defined by PHIPA. However, during the	(PHIPA requirement) be obtained from subsidy clients	Training and Program Review Unit	containing PHI are stored in
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	. 0	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	forms have not been obtained for the collection of Personal Health Information (PHI) from clients. Management expects the recommendation to be
il n il al	es contained Personal Health formation (PHI). These client es are stored in filing abinets that are not locked at I times.	es contained Personal Health formation (PHI). These client es are stored in filing abinets that are not locked at I times.  urther, none of the files camined contained client onsent forms for collection of	formation (PHI). These client es are stored in filing abinets that are not locked at I times.  Locks for the filing cabinets will be ordered and installed to ensure the safe storage of private information by May 15, 2011.

#	OBSERVATION OF EXISTING SYSTEM	RECOMMENDATION FOR STRENGTHENING SYSTEM	MANAGEMENT ACTION PLAN	FOLLOW UP (JANUARY 2013)
7.	Billing Adjustments & Corrections 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.	required for all corrections that are made by Case Managers on the monthly billings	written explanation for all adjustments and overpayments is	Completed. Written explanations are noted by the Case Managers on the monthly billings spreadsheets and operators' billings statements. A tracking sheet listing all adjustments and
	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.			overpayments is also maintained by the Case Managers.

#	OBSERVATION OF EXISTING SYSTEM	RECOMMENDATION FOR STRENGTHENING SYSTEM	MANAGEMENT ACTION PLAN	FOLLOW UP (JANUARY 2013)
8.	Billing Adjustments & Corrections (Cont'd.) 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.	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.	now in use. Reviews are completed by the Manager on a	Completed. The Program Manager is authorizing monthly billings packages with written explanations and supporting documentation for adjustments and overpayments.
9.	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.	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.	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	are reported to the Program Manager. The tracking sheet listing all overpayments is maintained and reviewed on a monthly basis. Overpayments are recovered

#	OBSERVATION OF EXISTING SYSTEM	RECOMMENDATION FOR STRENGTHENING SYSTEM	MANAGEMENT ACTION PLAN	FOLLOW UP (JANUARY 2013)
10.	Discharged Clients 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.	That the Case Managers ensure the discharge dates (especially those occurring at month end) are properly recorded on the billings statements. The Case Managers should ensure operators are not receiving a subsidy for the client's discharge date.	reminded to document the discharge date on appropriate billings. A business procedure concerning discharged clients will be completed and implemented by	Completed. Case Managers are ensuring that discharge dates are properly recorded on the billings statements. Operators are not receiving a subsidy for the client's discharge date.
	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.			

#	OBSERVATION OF EXISTING SYSTEM	RECOMMENDATION FOR STRENGTHENING SYSTEM	MANAGEMENT ACTION PLAN	FOLLOW UP (JANUARY 2013)
11.	Transportation Costs		Agreed. File reviews are currently being conducted on all residents receiving transportation allowance to ensure documentation is recorded properly. There are 440	Initiated. The reasons DHP clients are receiving the transportation amounts are not always provided. There is no evidence that these details are updated every 12 months or as client circumstances change. Management expects the recommendation to be

	OBSERVATION OF	RECOMMENDATION FOR	MANAGEMENT	FOLLOW UP
#	EXISTING SYSTEM	STRENGTHENING SYSTEM	ACTION PLAN	(JANUARY 2013)
	Transportation Costs (Cont'd.)			
11.	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.			

#	OBSERVATION OF EXISTING SYSTEM	RECOMMENDATION FOR STRENGTHENING SYSTEM	MANAGEMENT ACTION PLAN	FOLLOW UP (JANUARY 2013)
12.	Transportation Costs (Cont'd.) Transportation provided through the Mandatory Special Needs (MSN) transportation 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 transportation costs are not duplicated between the MSN program and the Special Supports group.	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	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	recorded in the client files and the Master

# CITY OF HAMILTON INTERNAL AUDIT REPORT 2010-13 COMMUNITY SERVICES – DOMICILIARY HOSTEL PROGRAM FOLLOW UP 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

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.

### Follow Up Comment (January 2013):

Not completed. Passwords are not changed regularly by staff accessing the RCF database. The configuration of these passwords has not changed. Management will endeavor to work with Information Services to implement this recommendation by the end of Q3, 2013.

#### 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 that 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.

### Follow Up Comment (January 2013):

Not completed. The DHP has not created the Client Update Report and the Client Turns 65 Report. However, Management expects that the above two reports will be in place by the end of Q3, 2013.

### **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.

#### Follow Up Comment (January 2013):

Not Completed. The RCF Database billings module is not used by the Case Managers as part of the monthly billings process. Management will work with Information Services to implement this module by the end of Q3, 2013.

### 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.

### Follow Up Comment (January 2013):

Not Completed. Management will clarify the use of the form in new business procedures. These will be completed by the end of Q1, 2013.