

Deputy Minister's Office

Bureau du Sous-ministre

438 University Avenue
7th Floor
Toronto, Ontario M7A 1N3
Telephone: 416 325-5225
Fax: 416 325-5240

438, avenue University
7^e étage
Toronto, Ontario M7A 1N3
Tél. : 416 325-5225
Téléc. : 416 325-5240

March 25, 2020

Memorandum to: **Christopher Tyrell**
Clerk of SCOPA

From: **Janet Menard**
Deputy Minister

Subject: **ODSP Value-for-Money (VFM) Audit – Standing
Committee on Public Accounts (SCOPA) Summary Table**

Please find attached, as requested, the Summary Table of actions taken and planned by the Ministry of Children, Community and Social Services (MCCSS) to address the recommendations from the Auditor General's ODSP Value-for-Money Audit in 2019.

I am confident that the action plan MCCSS has developed in response to the Auditor General's report, along with the ministry's overall social assistance transformation plan, will make our programs more efficient and effective for people while improving the integrity of social assistance.

Thank you,



Janet Menard

Attachment

c. Susan Erwin, Assistant Deputy Minister, Social Assistance Programs Division

Summary Status Table in Response to the Report of the Auditor General of Ontario

Ontario Disability Support Program

Section 3.09, Volume 1 of the 2019 Annual Report of the Office of the Auditor General of Ontario

Ministry of Children, Community and Social Services

Rec #	OAGO's Recommendation	MCCSS Completed Undertaking	MCCSS Outstanding Undertaking (including timeline)
1	We recommend that the Ministry of Children, Community and Social Services investigate and identify the extent that either its policies and procedures to administer and deliver the Ontario Disability Support Program and/or its non-compliance with these policies and procedures have contributed to caseload growth, and take corrective action so that only individuals who are eligible for ODSP receive benefits from the program.	The ministry continues to examine drivers of caseload increases: • Early February 2020, ministry staff across several branches participated in two meetings to discuss the scope of the caseload review and the factors of caseload growth that should be included in the analysis. • Senior program policy staff reviewed policy changes over the past 10+ years and identified areas that should be included in the analysis. • A research outline has been drafted.	• Research outline to be finalized by March 2020. • Research is on track for completion by March 2021.
2	To better identify and prevent applicants who are not financially eligible for the Ontario Disability Support Program (ODSP) from receiving benefits, we recommend that the Ministry of Children, Community and Social Services (Ministry): A. implement a process to monitor and to take corrective action in instances where local ODSP	The ministry has started to improve the use of third-party information: • Training course on CRA 3rd Party Information is available for staff on LearnON - the Ontario Public Service Online learning platform: SAMS Access to Canada Revenue Agency Information. • A benefit income data exchange report has been designed and tested with Service Canada. The report is planned to be in production by March 2020	Future activities to improve the use of third-party information include: • A broad strategy to create a new Social Assistance Digital Application, currently in Phase 1. Automating 3rd party checks is included in Phase 2 of this work which is anticipated to be completed and in production by March 2022.

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	offices and their caseworkers are not complying with the requirement to verify the accuracy and completeness of each applicant's declared income and assets using the third-party information sharing agreements the Ministry has in place; B. provide mandatory, relevant and comprehensive training for caseworkers on how to interpret the results of third-party checks, and to identify and investigate discrepancies between the information applicants have declared and the information obtained from third-party checks; and C. review the information held in the Social Assistance Management System to identify and collect all missing information, such as a Social Insurance Number, required to carry out third-party checks.	- Ministry data on cases without SINs is being prepared for further review and follow-up with clients. - Engagement with Service Canada conducted to explore the deployment of SIN clinics, to support clients obtaining a new SIN at local offices.	- Completion of third-party checks to be included as a measure in the Social Assistance September 2021 interim performance monitoring reports. - Exploring options for providing training on other third parties data sources: Equifax, OSAP, EI, MTO, NCBS on the NET and others by March 2021. - Sorting SIN data to develop reports of clients without SINs for each local office. Clients without a SIN will be sent communications to attend (local office or regionally administered) SIN workshops by March 2021.
3	To prevent financially ineligible Ontario Works recipients from transferring to the Ontario Disability Support Program (ODSP) and receiving income support that they are not entitled to, we	The ministry has established a working group to address the transfer of ineligible Ontario Works recipients to ODSP. The ministry has reinforced the requirement that Ontario Works service delivery partners undertake third party checks	By September March 2021 the ministry will: Implement SAMS enhancements to ensure that mandatory third-party checks are captured in the system as “evidence”.

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	recommend that the Ministry of Children, Community and Social Services: A. update its directives, policies and business procedures to clearly define and communicate Ontario Works responsibilities for performing third-party checks prior to transferring recipients to ODSP, and ODSP caseworker responsibilities in instances where these checks have not been performed; B. implement a process to monitor compliance with these requirements; and C. put in place mechanisms to hold Ontario Works service managers accountable in instances of non-compliance with ODSP requirements.	on cases transferring to ODSP as part of its 2020/21 service planning priorities.	• Amend business processes, directives and job aids to show third party checks as mandatory before grant and before transfers. • Review learning curriculum to incorporate capturing third party checks and develop curriculum on understanding third party information reports). • Develop a performance monitoring plan and reporting process to track performance against service planning priorities By June 2020 the ministry will: • Implement levers to promote sustained and continuous improvement of program requirements as part of the transformed accountability model for social assistance. By December 2022 the ministry will: • Monitor performance against the established expectation as a part of the overall Service Planning priorities monitoring.
4	So that all applicants who meet the Ontario Disability Support Program's definition of a disabled individual receive benefits, we recommend that the	A ministry working group held several meetings between January and February 2020 to brainstorm, plan activities, identify responsibilities and create workplans on the following topics:	By March 2020 the ministry will: • Strengthen the adjudication quality assurance framework.

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	Ministry of Children, Community and Social Services: A. review the reasonableness of its targets and expectations for the number of disability applications it expects its triage adjudicators to complete and to update its targets accordingly; B. implement a formal process to regularly review the appropriateness of decisions to approve and reject applicants as disabled; and C. monitor and investigate significant differences in the rates that adjudicators approve applicants as disabled and take steps to facilitate corrective actions where differences are determined to be unreasonable.	• Triage improvements • Quality Assurance Framework • Approval rates	By December 2020 the ministry will: • Review the number of disability applications expected by triage adjudicators to complete, then update targets accordingly. • Implement a process to monitor and investigate differences in adjudicator approval rates then take corrective action.
5	So that only applicants who meet the Ontario Disability Support Program's definition of a disabled individual receive benefits, we recommend that the Ministry of Children, Community and Social Services update the Adjudication Unit's handbook and triage guidelines to reflect advancements in treatment associated with medical conditions where there have been significant	A ministry working group held several meetings between January and February 2020 to review the Adjudication Handbook and identify the content to be updated or researched further.	By December 2020 the ministry will update the Adjudication Handbook and Triage Guidelines.

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	changes that may no longer render individuals disabled, or permanently disabled.		
6	So that only applicants who meet the Ontario Disability Support Program's (ODSP) definition of a disabled individual receive benefits, we recommend that the Ministry of Children, Community and Social Services: A. record the name and address of health-care professionals who complete disability applications, as well as any concerns about these applications identified by adjudicators in its information system, to analyze and identify trends, and take corrective action where needed; and B. review and assess the appropriateness of applications completed by physicians that complete a disproportionately high number of disability applications.	A ministry working group held several meetings between January and February 2020 to brainstorm and plan for activities related to Health Care Practitioners accountability.	By September 2020 the ministry will: • Explore options to collect health-care professional data and perform trend analysis, then take action if required. • Evaluate the completion of Disability Determination Packages by Health Care Providers and develop a plan to address any problem found.
7	So that only applicants who meet the Ontario Disability Support Program's definition of a disabled individual receive benefits, we recommend that the Ministry of Children, Community and	A ministry working group held several meetings between January and February 2020 to plan activities, identify responsibilities and workplans of various sub-groups including:	By June 2020 the ministry will: • Finalize the review of the ODSP Adjudication Framework and implement the changes required. • Assess increase in decisions with no medical

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	Social Services: A. analyze by disability type the increase in the proportion of cases that it does not assign a medical review, and assess whether these increases are reasonable; B. revisit the actions taken since 2015/16 that contributed to the increase in cases it does not assign a medical review, and take corrective measures where these actions have led to decisions that are not consistent with the ODSP Act; C. review and implement changes to the Adjudication Unit's policies and guidelines where they are not consistent with the principles of the Ontario Disability Support Program Act 1997; and D. review and update its requirements for both obtaining evidence in support of medical review decisions and documenting the rationale for such decisions so that they are clearly supported and consistent with the requirements of the ODSP Act.	- Medical Review working group completed an initial brainstorming session - Adjudicative practices sub-group completed an initial brainstorming session The ministry has also reviewed the ODSP Adjudication Framework. Edits were made to make it align with the ODSP regulation which requires adjudicators to set a medical review date unless the adjudicator is satisfied that the person's condition, impairment and restrictions are not likely to improve. The updated draft Framework is currently being reviewed prior to finalization.	review assignment, then make corrections as required. By September 2020 the ministry will: - Review adjudicative practices, including requirements for obtaining evidence to support medical review decisions and documenting the rationale By March 2021 the ministry will: - Analyze if disability type assignments are reasonable where a medical review is not assigned - Implement a DAU file review process based on the outcome of the analysis of disability type assignments where a medical review is not assigned

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8	N/A		
9	So that only eligible individuals are provided with Ontario Disability Support Program income support, we recommend that the Ministry of Children, Community and Social Services (Ministry): A. review the impact of Ministry attendance on the outcome of Tribunal hearings, to determine whether officers should attend all hearings, or if not, the optimal number of hearings to attend to minimize overall program costs, and to ensure that the Ministry's position is effectively explained and supported at hearings; and B. select Tribunal hearings to attend based on the risk of the Ministry's decision being overturned in the Ministry's absence.	A ministry working group held several meetings between January and February 2020 to plan activities, identify responsibilities and create a workplan for activities related to Case Presenting Officers representation at Tribunal Hearing.	By December 2020 the ministry will assess the practices of Case Presenting Officer representation at Disability Adjudication Unit Tribunal hearings, then make adjustments accordingly.
10	So that only eligible individuals are provided with Ontario Disability Support Program (ODSP) income support, we recommend that the Ministry of Children, Community and Social Services (Ministry):	A ministry working group met to discuss next steps on reviewing the high overturn rate of MCCSS decisions at SBT. Since the audit the ministry has been completed: • development of a detailed workplan • comprehensive review of provincial, federal and select international appeals frameworks	By June 2021 the ministry will complete a review to determine whether the high overturn rate of the Ministry's decisions at the Social Benefits Tribunal has affected the Ministry's ability to reach disability

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	A. review whether the high overturn rate of the Ministry's decisions at the Social Benefits Tribunal has affected the Ministry's ability to reach disability decisions that are consistent with the ODSP Act; B. assess the suitability for ODSP of models for appeals in other jurisdictions and propose alternatives to the Ontario government for an appeals framework that enhances the consistency of disability decisions between the Ministry and the appeals body with the ODSP Act	• ask out to select provinces for additional information • development of jurisdictional scan and jurisdictional placement • regularly scheduled meetings of inter-ministerial working group with Ministry of the Attorney General • regularly scheduled meetings of MCCSS working group • briefings and development of related briefing material for Minister's Office and Premier's Office • initial drafting and costing of potential model enhancements.	By March 2021, the ministry will complete the work with Ministry of the Attorney General regarding the proposal of enhancements to the appeals framework.
11	So that only eligible recipients continue to receive Ontario Disability Support Program (ODSP) benefits, we recommend that the Ministry of Children, Community and Social Services (Ministry): A. establish a risk-based timeframe for ODSP caseworkers to periodically review the eligibility of all ODSP recipients; B. implement a process to identify deceased ODSP recipients on a timely basis to prevent overpayments;	The ministry will be undertaking a death data match on a bi-annual basis (June and December). A data match was run in December 2019, with next targeted for June 2020. The ministry has launched an end-to-end review of the Eligibility Verification Process (EVP) to identify opportunities to streamline the review process and complete more reviews. In addition, the ministry has refreshed the EVP case prioritization model to improve the model's performance in identifying high-risk cases for review.	The ministry will develop expectations for staff to make contact with their caseload on a periodic basis, and update and assess eligibility related information according to timeframes that the ministry will set based on the risk characteristics of cases. By June 2020, the ministry and its delivery partners will complete the review of the December 2019 death data match results. By December 2020, following the end-to-end EVP review and a couple of cycles of the new refreshed case prioritization model, the ministry will assess the optimal number of reviews to be completed.

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	C. review the backlog of cases that ODSP directives required to be subject to an eligibility verification review over the past four fiscal years, and design and execute a plan to identify and carry out reviews on these cases based on their relative risk; D. review the results of the eligibility verification reviews and carry out a cost-benefit analysis to determine the optimal percentage of eligibility verification reviews the Ministry should complete on an annual basis to maximize savings to the program; and E. put in place a plan to complete the number of eligibility verification reviews determined to be optimal to maximize savings to the program.		
12	To maximize the benefits of the eligibility verification process, we recommend that the Ministry of Children, Community and Social Services: A. enhance its systems and processes to record and analyze the causes that led to undetected changes in recipients' financial eligibility;		By September 2020, the ministry will assess improving its interface to Equifax and its business processes to help identify and measure eligibility changes of recipients. By March 2021, the ministry will: analyze information on the causes that led to undetected changes, trends and patterns, and communicate findings to staff

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	B. clearly communicate where such instances are occurring for review by caseworkers; and C. take action to address these causes to minimize their occurrence		look for opportunities to enhance third-party information/data matching
13	So that only eligible individuals receive Ontario Disability Support Program (ODSP) benefits, and that overpayments to recipients are identified and minimized, we recommend that the Ministry of Children, Community and Social Services take steps to: A. provide training to caseworkers on how to assess and investigate allegations of fraud; B. conduct a review of its process for assessing and investigating allegations of disability fraud and clearly communicate roles and responsibilities; and C. implement a process to monitor whether allegations of fraud have been reviewed and investigated within required time frames and take corrective action where these time frames have not been met.	The ministry has launched an end-to-end review of the fraud complaint process to identify areas of improvement related to Learning and Development, roles and responsibilities, and mechanisms to increase oversight and monitoring. The ministry has also undertaken a clean-up of aged allegations and actioned outstanding allegations to local social assistance offices for priority review based on analysis of open fraud allegations in the system.	The ministry expects recommendations from the end-to-end fraud complaint process by March 2020.

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14	To reduce the number and size of overpayments to recipients, we recommend that the Ministry of Children, Community and Social Services enhance its systems and processes to determine and record the cause of overpayments, to analyze the root causes and take action to reduce the length of time to identify them, and minimize their occurrence.	The ministry has launched as part of regular program oversight activities two new data matching activities associated with employment income and deceased individuals. These data matches will run quarterly and biannually respectively.	By June 2020, the ministry will pilot a new data matching opportunity to identify cases that may be operating home-based businesses and not reporting their income. As part of a transformed social assistance accountability model, the ministry will be developing a loss prevention program that integrates the various third-party data matching activities along with internal data analytics to identify high-risk cases. The ministry is targeting June 2021.
15	So that the Ministry of Children, Community and Social Services (Ministry) only provides Ontario Disability Support Program (ODSP) payments to eligible recipients, and overpayments to ineligible individuals are minimized, we recommend that the Ministry carry out medical reviews on a timely basis in accordance with its requirements to determine whether recipients continue to have disabilities that meet the eligibility requirements for ODSP.	A ministry working group held several meetings between January and February 2020 to plan activities, identify responsibilities and plan for activities related to Medical Reviews. The ministry continues to conduct medical reviews on a monthly basis.	By March 2022, the ministry will complete the backlog of medical reviews.
16	To improve the employment outcomes of non-disabled adults on the Ontario Disability Support Program (ODSP), we recommend that the Ministry of Children, Community and Social Services: A. review and update its process for referrals to Ontario Works	The ministry has reinforced the requirement that Ontario Works service delivery partners develop strategies to increase the number of ODSP non-disabled adults participating in Ontario Works employment assistance activities.	By September 2020, reports of non-disabled adults not referred to Ontario Works will be sent to local offices for review and action. In addition, opportunities to update learning and development materials will be reviewed and curriculum will be updated as identified.

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	employment assistance to ensure that all referrals are identified and acted upon on a timely basis; B. implement a process to monitor whether all non-disabled adults have been referred to Ontario Works employment assistance or have a valid waiver in place; C. take corrective action in instances where ODSP offices and their caseworkers are not complying with the requirement to refer non-disabled adults to Ontario Works employment assistance, or ensure that valid waivers are in place; and D. put in place mechanisms to hold Ontario Works service managers accountable in the instances of non-compliance with responsibilities in relation to participation for non-disabled adults on ODSP.		By June 2021, the ministry will develop a performance monitoring plan and reporting process to track performance against service planning priorities.
17	So that Ontario Disability Support Program caseworkers can effectively carry out their responsibilities designed to achieve program expectations and requirements, we recommend that the Ministry of Children, Community and Social Services:	The ministry's roadmap of actions will improve the ability of ODSP caseworkers to effectively carry out their responsibilities, including supporting clients with their employment goals, is built into the implementation of Employment Services Transformation (EST) in three prototype areas beginning in April 2020. Ministry actions as part of this implementation, including workload reduction measures, will support caseworkers in	Between April 2020 and fall/winter 2020-21, the ministry will gradually roll out the following activities to nine ODSP offices within the prototype areas: • Expanding Electronic Document Management, which streamlines filing and document retention. • Extending the Service Ontario client contact centre pilot

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	A. assess workloads and processes to establish a roadmap that clearly identifies the Ministry's intermediate and longer-term actions to improve the ability of caseworkers to handle ODSP cases; and B. implement the actions identified in the roadmap so that program requirements can be met.	shifting work efforts away from a transactional focus on administering benefits and toward higher-impact case management supports to improve long-term outcomes for clients and life stabilization. Caseworkers will also continue to provide income support while they carry out their responsibilities related to program accountability and integrity such as monitoring eligibility.	- Centralizing the administration of benefits with the ministry's existing SWAT teams that were introduced to address caseload ratios imbalances across the province - Introducing a new evidence-based service delivery model by rapidly testing a variety of promising methods, such as caseload segmentation or specialized caseloads. Starting in fall/winter 2021-22 the ministry will undertake a follow-up time study in the nine ODSP offices within the prototype areas, including other KPI measurement to assess the impact of the changes in comparison to the baseline results of the time study in July 2018. Lessons learned from the prototype regions may be applied and rolled out across the province in the years ahead.
18	To better help Ontario Disability Support Program (ODSP) recipients to increase their economic independence, we recommend that the Ministry of Children, Community and Social Services: A. periodically provide information on employment supports to all ODSP recipients who can benefit from them; B. assess the disabilities of recipients on the ODSP caseload to determine the proportion and		The Common Assessment will be launched as an optional tool for two ODSP offices as of April 2020. The remaining seven ODSP offices in the prototype areas will gain access to tool effective June 2020. By October 2020, the ministry will co-design the use and application of the tool to inform the mandatory use of the tool. The ministry will also complete a new Individual Action Plan model and technology. An Employment Service Transformation (EST) evaluation framework is being developed which will observe the success of the prototype areas and

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	number of recipients who can benefit from participating in employment supports; C. explore options to increase the number of ODSP recipients referred to employment supports to help increase the proportion of recipients who become more economically independent; D. track additional information from employment support service providers on employment outcomes, monitor whether recipients obtain long-term employment and earn sufficient income to exit from ODSP, and take corrective action where outcomes do not meet Ministry expectations; E. review the services provided by employment support service providers to determine whether they are meeting recipients' needs and assess and take steps to ensure they provide value for money; F. obtain data from the Ministry of Training, Colleges and Universities to identify individuals who have been provided similar employment support services by		allows the ministry to respond and adjust. Impact evaluation will be completed by June 2022. A life stabilization framework is currently being co-designed by MCCSS, MLTSD, Ontario Works Delivery Partners, and ODSP staff. Once the framework is in place, targets will be established related to the successful service delivery of the life stabilization services and supports by December 2020.

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	both Employment Ontario service providers and ODSP service providers, and take action to recover payments where two service providers have been paid for the same job placement; and work with the Ministry of Training, Colleges and Universities to put in place processes that prevent payment to two different service providers for the same employment outcomes.		
19	To measure and improve the efficiency and effectiveness of the Ontario Disability Support Program (ODSP) for those using its supports and services, and to increase accountability of the program to Ontario taxpayers, we recommend that the Ministry of Children, Community and Social Services: A. design and implement performance indicators and related targets for intended program and recipient outcomes; B. implement a process to monitor the performance of the program against these indicators and targets and take corrective action where targets are not being met; and		The ministry will implement an outcomes framework that establishes clear expectations and targets for Ontario Works and ODSP recipients by March 2022. By March 2023, the ministry will begin monitoring program performance and the outcome framework targets, and will take action where targets are not met. The ministry will also establish a timeline and process to begin public reporting on the effectiveness of the ODSP program.

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	C. report publicly on the effectiveness of ODSP.		