

MCCSS: Value for Money Audit of Supportive Services for Adults with Developmental Disabilities – March 31, 2021 Reporting

Rec#	Recommendation and Action item	Ministry Response	Estimated Timeframe for Implementation	Implementation Status (as of March 31, 2021)
1a	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; and	The Ministry agrees with the recommendation to strengthen the integrity of the eligibility process. The Ministry will make changes to the information system used by DSOs to include identifying information about the psychologist or psychological associate who has completed an applicant's psychological assessment.	Q4 2021/22	Action plan under development
1b	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.	The Ministry will develop appropriate mechanisms and business processes to include verification that psychologists and psychological associates are registered and in good standing with the College of Psychologists of Ontario.	Q4 2021/22	Action plan under development
2a	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;	The Ministry agrees with the recommendation and recognizes the need to improve the management of wait times for needs assessments. The Ministry will work with DSOs to improve the assessment process and associated wait times, including addressing large differences in wait times between DSO offices. The Ministry will work with DSOs to conduct a comprehensive business process review over the 2021/22 fiscal year. The review will look to evaluate DSO functions to determine if they align with current sector needs. Based on the findings of the review, the Ministry will aim to implement the following by 2022/23:	Q3 2022/23	Action plan under development
2b	review and analyze the large differences in wait times for needs assessments between DSO offices,		Q3 2022/23	Action plan under development

MCCSS: Value for Money Audit of Supportive Services for Adults with Developmental Disabilities – March 31, 2021 Reporting

	and take steps to minimize these differences;	- Revising service expectations (including targets); - Modifying funding mechanisms; and - Establishing performance measures. The Ministry will provide training opportunities based on the new complement of Ministry assessor trainers that will be more responsive to the operational needs of the DSOs.		
2c	study the reasonableness of the targeted number of needs assessments to be completed by DSO offices and assessors, to revise targets accordingly;		Q3 2022/23	Action plan under development
2d	compare the number of needs assessments completed by DSO offices to their targets to take corrective action when targets are not met; and		Q3 2022/23	Action plan under development
2e	provide sufficient training opportunities so that DSO offices can fill assessor vacancies on a timely basis.		Q3 2021/22	Action plan under development
3a	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;	The Ministry agrees with the recommendation to periodically track and compare wait times, and to take corrective action where differences in wait times are not reasonable. The Ministry continues to enhance the DSO information system. Currently the system includes fields to collect information on when people request a service and when they receive that service; it will be used to track and compare wait times between DSO offices going forward. In addition, the Ministry is consulting with individuals, families and sector stakeholders on a longer-term reform of developmental services, including ways to create a funding approach that can improve consistency, fairness, equity and transparency, and supports more equitable distribution of resources across the province. This advice will assist in addressing differences in wait times in the longer term.	Q3 2022/23	Action plan under development
3b	periodically compare these wait times to assess the reasonableness of differences; and		Q3 2022/23	Action plan under development
3c	take corrective action to minimize differences and reduce wait times.		<i>Implementation begins: Q2 2023/24</i>	Action plan under development
4a	To provide equitable levels of supports at a reasonable cost across the province, we recommend the Ministry of Children, Community and Social Services:	The Ministry agrees with the recommendation. There is a need to develop a funding approach that is guided by the principles of equity, stability and sustainability. Consistent with leading jurisdictional practices in	<i>Policy work (4a-c) complete: Q2 2023/24 Implementation (4d) begins: Q2 2023/24</i>	Action plan under development

MCCSS: Value for Money Audit of Supportive Services for Adults with Developmental Disabilities – March 31, 2021 Reporting

	collect sufficient and comparable information on the extent of services provided by agencies and their related costs;	funding, the Ministry is considering developing an individualized needs-based model with funding amounts based on established benchmarks for the cost of services. This funding approach and established benchmarks would be built on a clear and consistent definition of services, and an established range of the cost of agency services across the province. It would also include taking corrective action when benchmarks are not met. It is anticipated that a future-state approach would be implemented following engagements on developmental services reform (including on a needs-based funding approach) that will take place in November/December of 2020. Following the outcomes of public engagement, the Ministry would, over the following 18 months, seek approvals, and then plan and execute next steps including key data collection and analysis to inform a potential model.		
4b	study the level of support and cost per client of agency services across the province;			
4c	create benchmarks for support levels and cost per client, and evaluate regions and agencies against these benchmarks; and			
4d	take corrective action where regions and agencies do not meet these benchmarks.			
5a	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; and	The Ministry agrees with the recommendation. In 2020/21 Q4, the Ministry will reinforce requirements for service agencies and branch/ regional staff to comply with existing policies, guidelines, and business processes for: a) agencies to provide explanations for all variances greater than the Ministry's established threshold; and b) Ministry staff to perform variance analyses. For 2021/22, the Ministry will review its policies, guidelines and business processes regarding variance reporting and analysis, and update them as appropriate to strengthen how we monitor and document: a) the details an agency provides in variance explanations; and b) the facilitation of corrective action by the Ministry when variances are not reasonable. In addition, the Ministry will reinforce expectations through leveraging existing quarterly/biannual transfer payments communications and information sessions with both service agencies and Ministry staff.	Q3 2022/23	Action plan under development
5b	perform variance analyses to evaluate whether these explanations are reasonable, and facilitate corrective action where they are not.		Q3 2022/23	Action plan under development

MCCSS: Value for Money Audit of Supportive Services for Adults with Developmental Disabilities – March 31, 2021 Reporting

6a	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;	The Ministry agrees with the recommendation, as it is important to ensure that services are provided in accordance with program expectations, and to the people who are matched to services through established processes. The Ministry will determine how to adopt the recommendation while respecting the privacy of the individuals supported by service agencies, under applicable legislation. The Ministry will explore appropriate business processes and begin implementation for the 2021/22 contract year.	Q3 2022/23	Action plan under development
6b	perform spot audits on Service Agencies to validate the information provided in the quarterly reports; and	The Ministry will also improve processes to validate reporting by agencies. The Ministry will develop options to integrate agency service information validation into the 2020/21 yearend reporting process.	Q3 2022/23	Action plan under development
6c	take corrective action where actual results achieved by Service Agencies fall short of the results they have reported.	The Ministry also recognizes there are opportunities to strengthen the existing Corrective Action policy to provide further guidance on corrective actions related to actual service results that fall short of service results reported. The Ministry will review this policy and update it as appropriate by 2021/22 Q1. The Ministry will take corrective action in accordance with its revised policy thereafter.	Q3 2022/23	Action plan under development
7a	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	The Ministry agrees with the recommendation. The Ministry recognizes the importance of outcome-based performance measurement to enhance service delivery and system accountability. The Ministry is currently developing a long-term reform plan and the performance measurement framework will be refined and operationalized as part of that work. In 2021/22, the Ministry will seek opportunities to expedite the framework's implementation through a phased approach, which may include piloting select client outcomes and quality of life indicators with a subset of agencies across the province.	Q3 2022/23	Action plan under development

MCCSS: Value for Money Audit of Supportive Services for Adults with Developmental Disabilities – March 31, 2021 Reporting

7b	publicly report the results of client outcome measures from the framework.	The Ministry will report publicly on client outcome measures once indicators in the performance measurement framework have been piloted, refined and implemented provincially (anticipated by fall/winter 2023).	Q3 2023/24	Action plan under development
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.	The Ministry agrees with the recommendation. The Ministry recently upgraded the application used for tracking and reporting inspection results which will allow for earlier and more detailed analysis of non-compliance trends at both agency and program levels. With this information, the Ministry recognizes the opportunity for improvement and will be better equipped to address recurring non-compliance at the time of inspection, and to hold agencies accountable for maintaining compliance. Over the next six months, the Ministry will use this data to support the development of additional strategies to address repeat instances of non-compliance.	Q1 2021/22	Action plan under development
9a	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	The Ministry agrees it is important to assess the effectiveness of the Passport \$5k program in achieving its overall objective of mitigating crisis and urgent admissions without unreasonably impacting equitable and timely access to funding. The Ministry introduced the program change with the objective of proactively giving people, in general, the minimum of what they would likely be eligible to receive, within a shorter time frame or with no delay, and reducing the need to conduct some assessments, while having a minimal impact on high priority persons.	Q3 2021/22	Action plan under development
9b	make adjustments to its funding allocation method based on this assessment.	To assess the impact of the program on meeting these objectives, the Ministry will apply a structured approach to determine: - the effectiveness of the \$5,000 at addressing crisis and urgent admissions - the impact of the program on service demands and		

MCCSS: Value for Money Audit of Supportive Services for Adults with Developmental Disabilities – March 31, 2021 Reporting

		the gap between \$5,000 and the full assessed amount of Passport funding for people of various needs levels. This will be completed by December 31, 2021. The Ministry will consider evidence-based changes to the Passport program following the assessment.		
10a	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;	The Ministry agrees with the recommendation to improve information on purchasing supportive service options. Better guidance and direction can help support Passport recipients to purchase services. The Ministry will engage with Passport Agencies and other sector partners to identify and assess options to improve information. The Ministry will also support sector partners to develop tools and different mechanisms, as well as leverage existing platforms and initiatives to support recipients to develop budgets and support options that are appropriate to their needs. This will be done by March 31, 2021.	The Ministry has revised the estimated implementation date provided in the report to Q1 2021-22.	The Ministry continues to work with partners to promote education and guidance for Passport recipients, for example training workshops hosted by Partners 4 Planning (P4P) for Passport Funding Overview, March 12, 2021. Further guidance and tools will be communicated in 2021/2022.
10b	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; and	The Ministry recognizes the importance of ensuring adherence to the Passport program guidelines. The Ministry will work with Passport Agencies to clearly communicate the restrictions regarding who is eligible to be reimbursed as a support worker.	Fully Implemented	The Ministry has assessed the recommendation was Fully Implemented as of Q4 2020/2021. The Ministry is working with Passport Agencies to clearly communicate the restrictions regarding who is eligible to be reimbursed as a support worker and has implemented a process to prevent any person from being identified as both a person

MCCSS: Value for Money Audit of Supportive Services for Adults with Developmental Disabilities – March 31, 2021 Reporting

				managing funds (PMF) and a support worker
10c	implement controls, in co-ordination with PassportONE, that prevent persons managing Passport funding on a client's behalf from charging for services.	In addition, the Ministry will take steps aimed at enhancing the checks within PassportONE's administrative processes by introducing targeted post-payment reviews of client invoices by PassportONE to enhance compliance with these rules by March 31, 2021. Persons Managing Funding are not eligible to be compensated for providing supportive services to the client for whom they manage funds. The Ministry will introduce targeted post payment reviews of client invoices by PassportONE to enhance compliance with these rules by March 31, 2021. Where there is a case of misuse of funding, PassportONE and Passport Agencies have processes in place to suspend or terminate funding and/or pursue law enforcement or legal action, where recipients or the person managing funds does not comply with the terms and conditions set out in the Passport Guidelines or Service Agreement. The Ministry will reinforce the existence of these sanctions to Passport Agencies and to Passport recipients through updates to Passport program guidelines.	Fully Implemented	The Ministry has assessed the recommendation was Fully Implemented as of Q4 2020/2021. The Ministry is working with Passport Agencies to clearly communicate the restrictions regarding who is eligible to be reimbursed as a support worker and has implemented a process to prevent any person from being identified as both a person managing funds (PMF) and a support worker. The updated Passport Guidelines, being released in 2021/2022 will provide additional clarification of this requirement.
11a	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;	The Ministry agrees with the recommendation. The Ministry is developing a long-term reform plan for developmental services to build a system that is more responsive to individual needs and supports greater choice and flexibility for people across the course of their lives. A significant aspect of the Ministry's reform efforts includes modernizing how and where services are delivered so that resources are directed where they are most needed and most effective. This includes a review of the Passport program and the reasonable uses and objectives of direct funding.	Q1 2021/2022	Action plan under development

MCCSS: Value for Money Audit of Supportive Services for Adults with Developmental Disabilities – March 31, 2021 Reporting

11b	work with PassportONE to update its claim form to capture relevant details about activities and events, including concerts and sports tickets claimed; and	In the interim, the Ministry will develop a standard for reasonable expenditures to guide recipients on the use of their funds. The Ministry will review the PassportONE Service Invoice Form and make necessary changes to align it to the introduction of a reasonableness standard in order to support the claim process. Modifications to PassportONE information systems and business processes will be made to support the standard. This work will be completed no later than March 31, 2021.	Q1 2021/2022	Action plan under development
11c	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.	Passport Agencies will follow up with clients who submit claims that surpass the standard.	Q1 2021/2022	Action plan under development
12a	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; and	The Ministry agrees it is important to ensure that Service Agency expenses are reasonable and made in accordance with the Ministry's policy and program requirements. The Ministry has already collected some information on service closures through its Serious Occurrences Reporting system. The Ministry will require Service Agencies to report changes to the availability of supportive services stemming from the COVID-19 pandemic through forthcoming interim and year-end reports, including continuing to offer services through virtual means, for example.	Q3 2022/23	Action plan under development
12b	use this information to assess the reasonability of expenditures reported by Service Agencies.	The Ministry will use this information to assess the reasonableness of actual expenditures for Developmental Supportive Services reported by Service Agencies, including the use of flexible Developmental Supportive Services funding to address COVID-19 related Ministry program pressures. As per the Ministry's COVID-19 Financial Flexibility, agencies are able to shift funding within an organization and across		

MCCSS: Value for Money Audit of Supportive Services for Adults with Developmental Disabilities – March 31, 2021 Reporting

		program areas to focus on critical services and needs in relation to COVID-19.		
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