Office of the Auditor General of Ontario

Value-for-Money Audit

Supportive Services for Adults with Developmental Disabilities

December 2020

Ministry of Children, Community and Social Services

Supportive Services for Adults with Developmental Disabilities

1.0 Summary

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

The Ministry funds 316 transfer payment agencies (Service Agencies) to provide supportive services across the province to adults with developmental disabilities. Eleven of these Service Agencies also administer the Ministry's Passport program, which provides funding directly to adults with developmental disabilities to purchase their own supportive services on a reimbursement basis. In addition, nine Service Agencies are designated as Developmental Services Ontario (DSO) offices responsible for the intake of applicants for supportive services, which includes confirming the applicant's eligibility and assessing support needs.

The supportive services funded by the Ministry are discretionary, and the Ministry aims to provide supports to those that require them the most through a priority ranking that considers personal risk factors, rather than on a first-come-first-served

basis. The Ministry's funding of developmental supportive services programs increased by 49% in the last five years from $578.7 million in 2015/16 to $859.4 million in 2019/20. However, due to limited funding, not all people receive all the supports they are eligible for.

Despite the substantial increase in funding, there were significant wait times for supportive services. Adults who were eligible for supportive services waited, on average, 8.1 months in 2019/20 to have their needs assessed by a DSO office due, in large part, to a shortage of trained assessors. Wait times varied significantly between DSO offices, indicating that how quickly a client receives supports is significantly influenced by where they live. The number of people waiting for agency supportive services after receiving a needs assessment had grown by 80%, from almost 19,000 in 2015/16 to almost 34,200 in 2019/20. The number of people waiting for Passport funding to purchase their own supports had grown by 32%, from over 14,800 in 2015/16 to almost 19,500 in 2019/20.

Although over 52,500 adults received Passport funding in 2019/20, and Service Agencies provided supportive services to over 25,000 adults, we found that the way funding for adults with developmental disabilities is provided is not always reasonable given program funding constraints and unmet demand for services. For instance, some Passport clients and their caregivers were reimbursed for thousands spent on professional sports and concert

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tickets, while others waited for the funding needed to purchase critical supports such as employment skills development and caregiver respite. In addition, the Ministry does not verify the number of individuals Service Agencies report serving even though nearly half of all agency programs report serving the exact number of individuals they targeted to serve at the beginning of the year. Based on our review, we found instances of Service Agencies significantly overstating the number of individuals they were serving. The Ministry therefore cannot reliably measure how many clients Service Agencies are actually serving.

We also found that the Ministry does not effectively monitor the delivery of supportive services by Service Agencies. We reviewed a sample of Service Agency inspections completed by the Ministry, and found that many of these inspections identified a number of serious recurring concerns, such as improperly storing medication and failing to provide clients and staff with required training to prevent, identify, and report abuse within required timelines. Agencies were not assigned any consequences for these recurring issues. The Ministry also does not evaluate the effectiveness of agency-delivered supportive services, or if these services are producing positive outcomes for people with developmental disabilities.

The following are some of our specific concerns about the administration and delivery of supportive services for people with developmental disabilities:

- **Credentials of psychologists and psychological associates are not verified, despite the reliance on their assessments to determine eligibility for supportive services.** Although Developmental Services Ontario (DSO) relies on psychological assessments to establish eligibility for supportive services, DSO staff are not required to verify that the psychologists or psychological associates completing the assessments are qualified. We also found that DSO does not record the names of psychologists or psychological associates that complete psychological

assessments in its information system. We found that in 6% of the application files we reviewed, the psychological assessment was either missing, or the qualifications of the psychologist or psychological associate could not be verified with the College of Psychologists of Ontario.

- **Long waits for needs assessments delay supports for people with developmental disabilities.** We found that DSO offices did not have a targeted time frame to complete client needs assessments, and wait times across the province for these assessments were very long. The average wait time for adults in Ontario to receive a needs assessment was 8.1 months in 2019/20, and ranged from 8.1 months to 10.8 months in the last five years. Wait times for needs assessments also vary significantly among the province's nine regional DSO offices. While clients waited an average of 13 months for their needs assessment at the Toronto DSO office in 2019/20, clients at the Northern DSO office in Thunder Bay waited an average of just 3.1 months. How quickly a client receives supports is therefore significantly influenced by where they live.

- **Long and increasing wait lists for supports at Service Agencies.** We found that across the province, the number of people waiting for agency supportive services had grown by 80% in the last five years, from almost 19,000 in 2015/16 to almost 34,200 in 2019/20. The number of people waiting at some DSO offices had grown by more than 100% over the same period – and by 147% at the South East DSO office. The Ministry does not assess the reasonableness of the growth in wait lists at DSO offices to determine if corrective action is needed to provide equitable access to services across the province.

- **Inconsistent levels of service provided by Service Agencies in different regions.** We found significant differences between the

Ministry's five regions in the level of supportive services individuals with developmental disabilities received from Service Agencies, as well as significant differences in the cost of those services to the Ministry. For example, on average, agencies in the West region provided 360 hours of caregiver respite per client in 2018/19, while an average client in the Central region received 140 hours. The cost per client also varied between these two regions, from $7,500 per client in the West region to $3,500 per client in the Central region. We found that the Ministry does not perform province wide analyses of support levels and costs per client served at agencies or regions. Therefore, the Ministry could not explain the significant differences among the regions, or if they were justified.

- **The Ministry does not verify the number of people that agencies reported they served to identify inaccuracies.** We found that the Ministry was not verifying the information in reports provided by Service Agencies, and we identified instances where the number of people served was overstated. We found that 73% of the agencies we sampled could not provide support for the reported number of people served in at least one of their programs, including three agencies that had overstated the individuals served in one or more of their programs by between 13% and 120%. In 2018/19, unrealistically, 45% of all agency programs reported meeting their targets exactly for the number of individuals served.

- **The Ministry does not have performance indicators to measure the effectiveness of agency-delivered supportive services, or client outcomes.** Although we have recommended in three separate reports since 1997 that the Ministry put outcome-based performance indicators in place, we found that the Ministry still only collects output data from Service Agencies, such as the number of

clients served. In the spring of 2017, the Ministry developed an outcomes-based Performance Measurement Framework to measure the effectiveness of the supportive services it funds, and the outcomes for people receiving supportive services. However, at the time of our audit three years later, the Ministry had yet to implement this framework and did not have a timetable for doing so. In contrast, we noted that British Columbia and Alberta have been using outcomes-based performance measurement for programs that serve people with developmental disabilities for almost a decade.

- **The Ministry does not take enforcement action for repeated serious issues at service agencies.** We found the Ministry identified recurring compliance issues during its inspections of Service Agencies that provide supportive services. We selected a sample of agencies inspected multiple times between 2016/17 and 2019/20, and found that, despite Service Agencies certifying that non-compliance issues in the original inspection had been resolved, nine out of 10 – or 90% of agencies in our sample had non-compliance issues recur again in a subsequent inspection. In total, we found that 34 non-compliance issues identified across the sampled agencies had been identified again in subsequent inspections. Some of these problems posed serious risks to client safety, such as improperly storing medication and failing to provide clients and staff with required training to prevent, identify, and report abuse within required timelines.

- **Minimum Passport program funding reduces available funding to higher need individuals by over $8 million.** In 2018/19, the Ministry implemented a policy change that resulted in the immediate allocation of $5,000 per year in Passport funding to all clients eligible for supportive services before completing a needs assessment.

However, after completing an assessment, a client may be entitled to less than $5,000 per year to address their needs. As a result, we determined that the Ministry annually funds clients for a total of at least $8.4 million in excess of their needs. This amount will likely continue to grow as more applicants for supportive services are approved for the minimum $5,000 in funding. By not reducing the allocated funding when a client needs are assessed below the $5,000 minimum, we found that clients with greater needs were waiting longer for additional funding.

- **Passport recipients are being reimbursed for very expensive professional sports and concert tickets.** While Passport funding can be used to attend events to increase client participation in their communities, we found a number of instances where Passport clients were reimbursed for expensive and/or large numbers of tickets to professional sports and entertainment events. This is occurring while the Passport program has limited resources that cannot currently meet the demand for the program. For example, a client spent $2,214 on two tickets to a Toronto Raptors game and $2,070 on two tickets for a concert just three weeks later. The $4,284 spent on these two events represented over 55% of the client's annual Passport funding. We found that because not enough information about each claim is recorded in the PassportONE information system, we could not determine how many concert and professional sports tickets had been purchased by Passport clients.

Overall Conclusion

Our audit concluded that the Ministry of Children, Community and Social Services, together with contracted developmental Service Agencies, does not have effective systems and processes in place to consistently provide eligible individuals with developmental disabilities with direct funding and supportive services that are timely, appropriate to their needs, and cost-effectively delivered according to applicable legislation and Ministry requirements.

We found that supportive services are not always provided on a timely basis. We identified that those eligible for supportive services faced lengthy wait times to have their needs assessed before they could receive all the supports they were eligible for, and that wait times for these assessments were affected by where in Ontario they lived. In addition, after having their needs assessed, we found clients that need services faced increasingly long wait times before receiving supports from Service Agencies.

We also found that client use of Passport funding was not always aligned with the support needs identified by their needs assessments, and in many cases included reimbursement for very expensive or large numbers of tickets to professional sports and entertainment events. This is occurring while the Passport program has limited resources that cannot meet the demand for the program.

In addition, we identified significant differences in the cost of supportive services delivered by Service Agencies and in the level of support they provide to clients. However, the Ministry had not assessed these differences to determine if services were being delivered cost effectively and whether they were appropriate to client needs.

Our audit also concluded that the Ministry does not have effective systems and processes in place to measure, evaluate, and publicly report on the effectiveness of the developmental supportive services funded by the Ministry. We found that the Ministry does not have performance indicators to measure the effectiveness of agency-delivered supportive services, or client outcomes.

This report contains 12 recommendations, consisting of 32 action items, to address our audit findings.

OVERALL MINISTRY RESPONSE

The Ministry of Children, Community and Social Services (Ministry) values the work and recommendations of the Auditor General and welcomes input on how it can continue to improve Supportive Services for Adults with Developmental Disabilities in Ontario. These recommendations provide an important contribution to both the current and longer-term work of the Ministry towards developmental services reform.

The Ministry is committed to a vision where people with developmental disabilities are fully included in their communities as citizens, contributors and neighbours. This requires a system that is more responsive to individual needs and supports greater choice and flexibility for people across the course of their lives.

The Ministry will continue to implement improvements to the developmental services system including making ongoing enhancements to information systems to contribute to a comprehensive data system for all adult developmental services. The Ministry is also undertaking a longer-term reform of the developmental services system based on a review of leading jurisdictions and evidence-based best practices. To support this, the Ministry is initiating engagements with people with developmental disabilities and their families, service providers, partners and experts to hear their experiences and to seek their advice and input on longer-term reform to help build a more sustainable and effective developmental services system.

The Ministry is committed to addressing the Auditor General's recommendations and continuing to adopt measures that improve fiscal stewardship of the program and achieving efficiencies within our resources. This includes stronger integration of program management and financial decision-making; forecasting multi-year implications against allocation in client funding decisions; understanding correlation of service costs and support needs to inform contract negotiation; and driving to a higher degree of forecasting accuracy and consistency using evidence.

We appreciate the opportunity to respond to the Auditor General's report and recommendations to support ongoing improvements.

2.0 Background

2.1 Overview

Approximately 1% of Ontarians have a developmental disability – a lifelong condition that affects a person's intellectual, social, and/or behavioural development. Some individuals are born with disabilities related to conditions such as Down Syndrome, Fetal Alcohol Syndrome and Autism Spectrum Disorder. Others may have had an illness or an accident before turning 18 which limited their cognitive development. Generally, people with a developmental disability have limitations in their intellectual capabilities, need support with daily living, have needs that may become more complex over time, and may have additional medical conditions.

The Ministry of Children, Community and Social Services (Ministry) funds a variety of supportive services to help adults with developmental disabilities live at home, work and attend school in their communities, as well as participate in a wide range of activities. To be eligible for Ministry-funded supportive services, individuals must meet the definition of a person with a developmental disability under the *Services and Supports to Promote the Social Inclusion of Persons with Developmental Disabilities Act, 2008* (Act) and its regulations.

The Ministry funds 316 transfer payment agencies (Service Agencies) to provide supportive services to adults with developmental disabilities. The Ministry funds 11 of these Service Agencies

to administer its Passport program as well, which provides funding to adults with developmental disabilities to purchase their own supportive services and submit claims for reimbursement. Supportive services include caregiver respite, employment supports, community participation supports, and professional and specialized services such as behaviour management, and speech and language therapy.

The supportive services funded by the Ministry are discretionary, and the Ministry aims to provide supports to those that require them the most using a priority ranking that considers personal risk factors rather than first-come-first-served. Due to limited funding, not all people receive the supports they are eligible for.

In 2019/20, over 52,500 adults received direct funding to purchase their own supportive services, and over 25,000 adults received supportive services from Service Agencies funded by the Ministry. Ministry transfer payments to individuals and agencies totalled $859.4 million in 2019/20.

2.2 Roles and Responsibilities

2.2.1 Role of the Ministry

As of September 2020, approximately 340 staff within the Ministry's *Community Services Division* (Division) were involved in administering developmental supportive services, including over 230 employees at five regional offices (see **Appendix 1**). The Division's staff also support several other Ministry programs, including residential services for people with developmental disabilities, programs for women experiencing violence, and programs for people who are deaf-blind.

The Division's staff perform a number of functions in the administration of developmental supportive services. These include:

- Providing strategic direction for developmental supportive services through the development of legislation, regulations, policies, guidelines, and standards for service quality and delivery;

- Providing funding to Service Agencies as intake points for developmental supportive services, to administer and provide direct funding to eligible adults to purchase their own supportive services, and to directly provide supportive services;

- Monitoring agencies' management and delivery of supportive services according to agency contracts, legislation, regulations, directives, policies, Ministry expectations and resource allocations; and

- Measuring and reporting on the performance of developmental supportive services.

2.2.2 Service Agencies

The Ministry contracts with Service Agencies to administer and deliver developmental supportive services. **Figure 1** outlines the key roles and responsibilities of different Service Agencies.

Figure 2 illustrates the client pathway to obtaining supportive services.

2.3 Types of Supportive Services and Service Delivery

Eligible adults can receive both Passport funding to purchase their own services, and Ministry-funded, agency-provided services at the same time. The types of services that can be either purchased using Passport funding or provided by Service Agencies are listed and described in **Figure 3**.

2.4 Program Funding and Statistics

Figure 4 illustrates Ministry funding provided to Service Agencies over the last five years to administer and deliver supportive services, and to reimburse Passport clients for the supportive services they purchased on their own. It also shows the number of Passport clients, and the number of clients that accessed supportive services provided by Service Agencies.
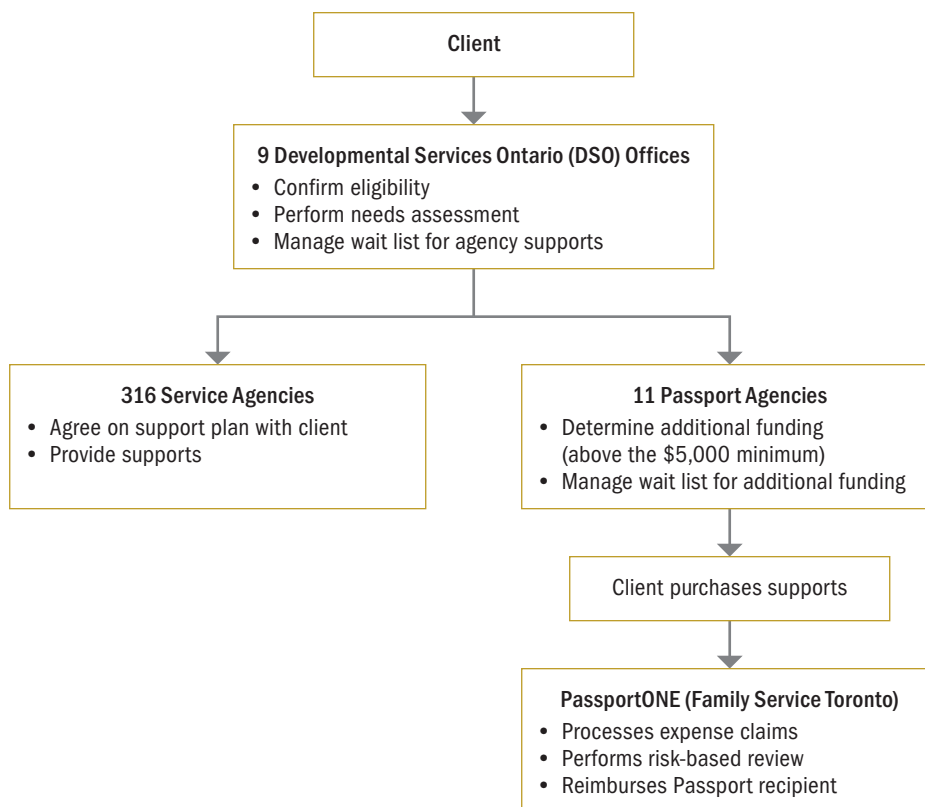
Figure 1: Roles and Responsibilities of Developmental Disabilities Transfer Payment Agencies

Source of data: Ministry of Children, Community and Social Services

Service Agencies	316 Service Agencies are on contract to the Ministry to provide developmental supportive services.
Developmental Services Ontario (DSO) Offices	9 Service Agencies are also designated as DSO offices responsible for applicant intake, including: • determining the applicant's eligibility (see **Section 2.5**); • assessing the applicant's support needs (see **Section 2.6.1**); and • managing the wait list for Service Agency supports and referring eligible individuals to agencies (see **Section 2.8.1**). For a list of the nine regional DSO offices in Ontario, and the areas they serve, see **Appendix 2**.
Passport Agencies	11 Service Agencies are also designated as Passport Agencies to administer the Passport Program on the Ministry's behalf, and are responsible for: • determining the amount of Passport funding an individual is eligible for; • managing the Passport wait list; and • assisting Passport recipients with system navigation. For a list of the 11 regional Passport Agencies in Ontario and the regions they serve, see **Appendix 2**. Family Service Toronto is one of the 11 Passport Agencies, and also operates a centralized payment processing service known as PassportONE to review and process all invoices submitted by all Passport recipients for reimbursement. For more information about Passport Agencies, and PassportONE, see **Section 2.8.2**.

Figure 2: Client Supportive Services Pathway*

Source of data: Ministry of Children, Community and Social Services

* The Ministry's five regional offices are responsible for oversight of DSO offices, Passport Agencies, PassportONE and Service Agencies.

Figure 3: Types of Supportive Services and Delivery

Source of data: Ministry of Children, Community and Social Services

Service Type	Passport Program Eligible	Service Agency Provided
Community participation provides services and supports such as personal development, basic life skills training, social and recreational activities, volunteering, and other activities that lead to community participation.	✓	✓
Caregiver respite provides temporary relief to primary caregivers of individuals with a developmental disability. Respite services can be provided for a few hours or overnight, and can be in-home or out-of-home in order to afford the regular caregiver an opportunity for a mental and physical break, including to take a vacation or to attend to short-term commitments.	✓	✓
Employment supports provide supports for persons with developmental disabilities leading to increased labour market attachment, better employment outcomes and community inclusion. This program typically provides more intensive supports compared to other employment programs to address the higher up-front and ongoing support needs of people with a developmental disability. Examples of supports include pre-employment training, skills development, and job coaching.	✓	✓
Professional and specialized services help individuals with a developmental disability who have higher support needs. Specifically, these services involve clinical assessments and the development of clinical plans, and are delivered by regulated health professionals or service providers with appropriate training and experience. Examples of professional and specialized services include speech and language therapy, behavior management, and adult protective services.		✓
Person-directed planning is planning and facilitation that enables people with developmental disabilities to direct their own lives in order to meet their personal goals. With the support of an agency or other support person, a person-directed plan helps clients find the tools needed to reach their goals. Maximum allowable expense per year is $2,500 under the Passport program.	✓	✓
Temporary supports provide temporary, time-limited support to individuals with a developmental disability in urgent need where natural, social or community supports are not available. Supports are short term and temporary in nature designed to support the individual, wherever possible, in their usual environment, to address risk factors due to unexpected circumstances.		✓
Community Networks of Specialized Care provide direct support and services for people with developmental disabilities who have high support and complex care needs because their needs exceed the available developmental services and supports, and/or require coordination with inter-ministry service providers and partners.		✓
Vocational alternative supports provide vocational training to assist individuals with disabilities to increase independence and participation in community life and to prepare and support individuals for employment settings in the community. It assists individuals with a variety of employment supports such as, but not limited to, job development, job training, job coaching, and intervention with employers to maintain employment.		✓

Over the last five years, Ministry transfer payments for developmental supportive services have increased by 49%, from $578.7 million in 2015/16 to $859.4 million in 2019/20. This increase was driven primarily by the Passport program. This program's funding increased by 135%, from $184.6 million in 2015/16 to $434.1 million in 2019/20, while its clients increased by 175%, from approximately 19,100 to 52,600 over the same period.

In 2018/19 alone, the number of Passport program clients increased by 91% (from 24,619 at the beginning of the fiscal year to 47,014 by March 31, 2019) due to a Ministry policy decision to begin authorizing all individuals eligible for Passport program supportive services to purchase and be reimbursed for a minimum of $5,000 each in supportive services, as discussed in **Section 2.8.2**.

Figure 5 provides a breakdown of Service Agency funding and the number of services provided to clients by type of service (described

Figure 4: Agency and Passport Program Client Services Provided, Clients Served and Funding, 2015/16–2019/20

Source of data: Ministry of Children, Community and Social Services

	2015/16	2016/17	2017/18	2018/19	2019/20	Total ($ million)	Change (%)
Client services provided by agencies[1]	55,566	59,009	58,323	59,826	n/a[2]	–	n/a
Clients served by agencies[3]	n/a	n/a	23,936	24,571	25,067		–	n/a
Service agency funding ($ million)	394.1	408.3	428.3	447.5	425.3	**2,103.5**	8
Passport clients	19,138	23,445	24,619	47,014[4]	52,588	–	175
Passport funding ($ million)[5]	184.6	192.9	251.2	324.0	434.1[6]	**1,386.8**	135
Total						**3,490.3**	**49**

1. Clients are counted once for each service received. Therefore, if a client receives more than one type of support (respite and community participation for example), they are counted multiple times.
2. Due to the COVID-19 pandemic, the Ministry extended reporting deadlines for Service Agencies. As a result, the number of client services provided for 2019/20 was not yet available from Service Agencies at the conclusion of our audit.
3. Unique clients served by agencies is unavailable prior to 2017/18.
4. In 2018/19, the Ministry changed its policy to allow all adults eligible for support services to be immediately enrolled in the Passport program, contributing to a 91% increase in Passport recipients that year.
5. Passport funding is primarily related to client reimbursements. It also includes funding to Passport Agencies for the administration of the Passport program. In 2019/20, administration funding totaled $16.9 million.
6. Due to the COVID-19 pandemic, the Ministry waived the original deadline for clients to submit Passport claims for 2019/20, and had yet to set a new deadline at the conclusion of our audit. Accordingly, Passport funding for 2019/20 includes the accrual of approximately $97.2 million for these expected claims.

Figure 5: Service Agency Funding and Client Services Provided by Service Type, 2018/19[1]

Source of data: Ministry of Children, Community and Social Services

Service Type	Funding		Client Services Provided	
	$ million	%	#	%
Community participation supports	254.0	56.7	21,708	36.3
Caregiver respite	26.0	5.8	4,925	8.2
Employment supports	28.5	6.4	3,774	6.3
Professional and specialized services	88.1	19.7	24,065	40.3
Other client supports[2]	23.6	5.3	5,354	8.9
Development Services Ontario offices (client intake)	19.8	4.4	n/a	n/a
Service coordination[3]	7.5	1.7	n/a	n/a
Total	**447.5**	**100.0**	**59,826**	**100.0**

1. The number of client services provided for 2019/20 was not yet available from Service Agencies at the conclusion of our audit. Service agency reporting for 2019/20 was delayed due to the COVID-19 pandemic.
2. Other client supports include Person-Directed Planning, Community Networks of Specialized Care, Temporary Supports, and Vocational Alternative Supports. See **Figure 3** for a full description of these supports.
3. Service coordination is funding to agencies that provides clients with support in navigating the supportive services system.

in **Figure 3**) for the 2018/19 fiscal year (the most recent data available at the time of our audit). Community participation supports made up the greatest portion of funding for agency services at 56.7%, but they accounted for only 36.3% of the services provided to clients.

Figure 6 provides a breakdown of Passport program reimbursements by type for the 2019/20 fiscal year. Community participation supports accounted for $211.1 million or 62% of Passport program reimbursements in 2019/20. More than 1.2 million invoices were submitted for over 350,000 claims.

Figure 6: Passport Program Reimbursements by Service Type, 2019/20

Source of data: PassportONE

Service Type	Reimbursements		Invoices	
	$ million	%	(# 000)	%
Community participation	211.1	62.1	840.9	69.5
Employment supports, education and training[1]	69.2	20.4	128.5	10.6
Respite	50.8	14.9	76.9	6.4
Person-directed planning	0.5	0.1	1.0	0.1
Administration[2]	8.4	2.5	162.3	13.4
Total	340.0[3]	100.0	1,209.6	100.0

1. The PassportONE system does not differentiate between education, training, classes provided for employment supports, and classes for daily living activities, such as personal finance.

2. The Ministry allows up to 10% of Passport funding to be allocated to administration.

3. Approved 2019/20 reimbursements as of July 2020 according to the PassportONE information system. This does not reflect total Passport reimbursement for 2019/20 because the Ministry waived the original deadline for filing such claims due to the COVID-19 pandemic, and had yet to set a new deadline at the conclusion of our audit.

2.5 Eligibility for Supportive Services

Applicants for adult developmental supportive services must apply to one of the nine Developmental Services Ontario (DSO) offices in Ontario. To be eligible, applicants must provide proof that they live in Ontario and are at least 18 years old. In addition, applicants must provide a psychological assessment completed by a psychologist or a psychological associate to support that the applicant has a disability that meets the definition of a developmental disability under the *Services and Supports to Promote the Social Inclusion of Persons with Developmental Disabilities Act, 2008* (Act) and its regulations. The Act defines a person with a developmental disability as having significant limitations in cognitive and adaptive functioning, and these limitations:

- originated before the person reached 18 years of age;
- are likely to be life-long in nature; and
- affect areas of major life activity, such as personal care, language skills, learning abilities, and the capacity to live independently as an adult.

The psychological assessment must include:

- Information about cognitive functioning – usually done as an IQ test, this information describes the ability to reason, organize, plan, make judgments, and identify consequences.
- Adaptive information – this includes information about capacity to gain independence and apply skills in everyday life, including:
  - conceptual skills, such as reading, writing, math and money skills;
  - social skills, such as getting along with others; and
  - practical skills that are used every day, such as work skills, using transportation, taking care of health and safety, and following schedules and routines.
- Age of onset – if the psychological assessment was performed after the client turned 18, the psychologist must indicate if the disability began before the age of 18, and if it is likely to continue throughout the client's life.

Applications and supporting documents are reviewed by DSO staff using Ministry approved decision-making tools to confirm whether an applicant is eligible for Ministry funded adult developmental supportive services. After the DSO reviews all the required documentation, applicants are sent a letter confirming whether they are eligible to receive supportive services. **Figure 7** provides the number of adults found eligible and ineligible between 2015/16 and 2019/20.

Figure 7: Eligibility of Applicants for Developmental Supportive Services, 2015/16–2019/20

Source of data: Ministry of Children, Community and Social Services

	Eligible		Ineligible	
	#	%	#	%
2015/16	3,934	86	646	14
2016/17	3,953	88	555	12
2017/18	4,601	87	698	13
2018/19	4,519	85	790	15
2019/20	5,130	85	901	15

2.6 Needs Assessment and Prioritization

2.6.1 Needs Assessment

Once a DSO office has confirmed an applicant is eligible for supportive services, the DSO office schedules the individual for a two-part assessment to determine their support needs. **Figure 8** provides the number of assessments completed by DSO offices from 2015/16 to 2019/20.

The needs assessment is completed by a DSO assessor who must meet the Ministry's qualification requirements for education, training and ongoing professional development. DSO assessors meet with applicants, often accompanied by their caregivers, and ask a series of pre-set questions to complete the two-part assessment.

The first part, the Application for Developmental Services and Supports, collects general client information including medical conditions, capabilities, and background. It also includes a section called "Getting to Know You," which gathers information about a person's likes and dislikes, as well as their dreams and future goals.

The second part of the application, the Supports Intensity Scale, measures the individual's support needs in personal, work-related and social activities to identify and describe the types and intensity of the supports an individual requires. The scale gathers information about a person's needs in areas such as home living, community activities, lifelong learning, employment, social activities, protection

and advocacy, as well as any medical and behavioural issues. The Supports Intensity Scale was developed by the American Association on Intellectual and Developmental Disabilities.

Support needs can vary significantly from person to person. For example, someone with low support needs may live independently without a caregiver, and require only employment or community participation supports to assist them to obtain employment and become more involved in their community. Individuals with high support needs require more intensive services. For example, an individual with high support needs may have a full-time caregiver, and may also require respite services for the caregiver. They may also require professional and specialized services like speech and language therapy, or behaviour management.

2.6.2 Prioritization to Receive Available Supports

The supportive services the Ministry funds are not mandated under the Act – instead, they are available to eligible individuals to the extent that Ministry funding is available. Since there are generally more eligible individuals requesting supports than there is available funding to support them all, the information collected by DSO offices is used to calculate a "priority score" for each individual that is used to determine when they will receive agency services and Passport funding.

A priority score is calculated using the Developmental Services Prioritization Tool, an automated tool developed by the Ministry that pulls data from the applicant's completed application and needs assessment, and uses a formula to calculate how urgently the client requires supports in comparison to other clients, in order to prioritize the allocation of services and funding. While the needs assessment is used to determine the level of support that is appropriate for an individual, the priority score is used to calculate urgency of support requirements based on an individual's risk factors such as current living situation, ability to manage personal finances and risk of exploitation.

Figure 8: Developmental Services Ontario (DSO) Needs Assessments, 2015/16–2019/20

Source of data: Ministry of Children, Community and Social Services

	2015/16	2016/17	2017/18	2018/19	2019/20
Assessments completed*	7,747	7,902	6,104	6,277	6,182

* Assessments are greater than applicants found eligible and ineligible from **Figure 7** because assessment include reassessments due to a change in needs as well as grandfathered individuals who entered the system prior to the establishment of DSO offices in 2011 receiving assessments.

Figure 9: Distribution of Supportive Services Clients* by Age Range, as of March 31, 2020 (%)

Source of data: Ministry of Children, Community and Social Services

18–29	30–44	45–59	60–74	75+	Total
41	27	19	11	2	**100**

* Includes all 63,500 individuals eligible for supportive services.

Wait lists for both available agency services and direct funding through the Passport program are determined based on priority scores. An individual's position on these wait lists is dependent on their priority score.

2.7 Client Demographics

As of March 31, 2020, there were over 63,500 individuals with developmental disabilities, 41% female and 59% male, listed as eligible for supportive services in Ontario. Though eligible, not all of these individuals were actually receiving supports. The average age of those eligible was 38, and 41% were 18 to 29 years old, as shown in **Figure 9**. Those aged 75 and over accounted for just 2% of eligible individuals.

Of the over 63,500 eligible individuals, 45,700, or 72%, had completed a needs assessment as described in **Section 2.6. Figure 10** provides a breakdown of eligible individuals by level of need as determined using the Supports Intensity Scale. As the figure shows, 40% of individuals were assessed as having needs at the lowest end of the scale. As well, 5% of assessed clients had significant medical needs in addition to their developmental disability.

The needs assessment process also collects additional information about the client. For instance,

the majority, or 57% of individuals, were living in a residence owned or rented by a relative. A further 23% were living in community residences funded by the Ministry. In addition, 55% of clients had an unpaid primary caregiver. A breakdown of the living situations of eligible individuals is provided in **Figure 11**.

The majority, or 79% of eligible individuals were also receiving Ontario Disability Support Program (ODSP) assistance. ODSP is a separate Ministry program that provides income and employment supports to Ontario residents over 18 years old with a disability. ODSP supports individuals with disabilities considered to be in financial need based on their assets and income amounts.

2.8 Accessing Supports and Services

2.8.1 Referral to Service Agencies

After a client has been assigned a priority score they are referred to a Service Agency that provides the supports they have requested. If no spaces are available at that time, they are put on a wait list.

When an agency has a program vacancy, it provides information about the support available to the DSO office. The DSO office's information system uses a matching formula to identify the most

Figure 10: Distribution of Supportive Services Clients* by Level of Need, as of March 31, 2020 (%)

Source of data: Ministry of Children, Community and Social Services

Need Level	75–100 (Highest Need)	50–74	25–49	0–24 (Lowest Need)	Total
% of clients	19	20	21	40	100

* Includes all 45,700 individuals who have had their needs assessed.

Figure 11: Distribution of Supportive Services Clients* by Living Situation, as of March 31, 2020 (%)

Source of data: Ministry of Children, Community and Social Services

	%
Residence owned or rented by relative	57
Ministry-funded community residence	23
Living independently	8
Non-ministry funded community residence	6
Residence owned or rented by non-relative	5
Homeless	1
Total	**100**

* Includes all 45,700 individuals who have had their needs assessed.

appropriate clients waiting for a program. The formula considers factors such as the type of support, accessibility, location, gender, and priority score to create a listing of clients that are best suited for the service. Staff at the DSO office review the list to determine which individual can be supported, and contact the agency to suggest the client. If both the agency and the individual or their caretaker agree, the two parties then create a detailed support plan for the individual.

2.8.2 Passport Program Funding

The Passport program provides direct funding to eligible individuals with developmental disabilities. Program funding provides reimbursements for supportive services that eligible individuals can purchase for themselves. Starting in 2018/19, once a DSO has confirmed an applicant for supportive services is eligible, they are immediately approved for $5,000 in Passport program funding. This minimum funding was introduced by the Ministry

to allow all eligible applicants to purchase some supports while they wait to complete their needs assessments at DSO offices, and subsequently, for agency services and additional Passport funding to become available.

The DSO refers the applicant to one of the 11 Passport Agencies to sign a funding agreement. Passport Agencies are responsible for:

- determining the amount of Passport funding an individual is eligible for based on their needs;
- managing the Passport program wait list; and
- identifying types of services that can be purchased and linking clients to potential service providers.

Once the DSO completes a support needs assessment for the applicant, the applicant can apply to their Passport Agency for additional funding. The Passport Agency uses the information from the needs assessment to determine the applicant's eligible Passport funding amount. For 2019/20, the maximum funding under the Passport program was $40,250.

Although a Passport Agency may determine that an applicant qualifies for additional Passport funding, due to the discretionary nature of the program and limited available funding, applicants may not immediately receive funding above the $5,000 minimum, and may instead be put on a wait list for additional funding.

Each year the Ministry determines a priority score cut-off based on available funding. Applicants who are above this cut-off (including those on the wait list) will receive their full Passport funding amount. Those with a score below the cut-off would be put on, or would remain on the Passport wait list and would receive only the minimum $5,000 in annual funding until additional financial resources become available.

Managing Passport Funding

Recipients of Passport funding may choose to manage their own funding, or have another individual or organization manage it for them. Managing funds involves submitting expenses and invoices for reimbursement, at a minimum. It often involves providing, or finding and scheduling the required supports as well. The Ministry allows up to 10% of Passport funding to be allocated to administration and management. The options for managing Passport funding are outlined in **Appendix 3**.

Passport funding can be spent by recipients on any of the support categories listed in **Figure 3**. Supports can be purchased from any organization or individual as long as they fall within the types of supportive services that are admissible under the program.

Passport funding recipients submit claim forms that include information on the service or support being purchased, such as the type of service, when the service was provided, and the name of the person or organization delivering the service. Claim forms and related invoices for the services purchased are submitted by email, fax, mail or electronically to PassportONE for reimbursement. PassportONE is a centralized payment processing service operated by the Family Service Toronto Passport Agency. PassportONE is responsible for centralized claim processing, review, and payment for the Passport program as a whole.

PassportONE uses an automated, risk-based review process to assess claims submitted by clients. The automated review is used to determine whether a claim is considered high risk and requires a manual review before reimbursing the client, or whether it can be immediately approved and a payment can be processed.

In 2019/20, PassportONE approved over 350,000 claims, of which 11% were manually reviewed.

2.9 Monitoring and Oversight

The Ministry's five regional offices are responsible for the oversight of Service Agencies, and the Ministry's corporate office provides support, tools and resources. Ministry processes to oversee Service Agencies include:

- **Transfer Payment Reports**
  - **Contracts.** Regional office staff negotiate the terms of service with Service Agencies, including service, financial and performance targets at the beginning of each fiscal year.
  - **Quarterly Reports.** Service Agencies are required to submit quarterly reports to the regional offices comparing actual expenditures and service volumes to targets outlined in their contracts, and include explanations for any significant variances. Regional office staff are required to review the reports and follow up with Service Agencies where concerns about service and financial targets are identified.
  - **Transfer Payment Annual Reconciliation.** At year-end, Service Agencies must submit reconciliations to the regional offices accompanied by audited financial statements. Regional office staff are required to compare expenditures

reported on the reconciliations to the audited amounts, and follow up on amounts that do not reconcile. This process includes determining whether there are any operating surpluses and inadmissible expenditures that could be recovered.

- **Compliance Inspections.** All Service Agencies must adhere to minimum quality standards laid out in regulations and policy directives made under the Act. The Ministry's compliance unit conducts inspections of Service Agencies to monitor and enforce compliance with these quality assurance standards. The Ministry has a target to inspect all supportive services programs that fall under the Act at least once every three years.

3.0 Audit Objective and Scope

Our audit objective was to assess whether the Ministry of Children, Community and Social Services (Ministry), together with contracted developmental services agencies, have effective systems and processes in place to:

- provide eligible individuals with developmental disabilities with direct funding and supportive services that are timely, appropriate to their needs, and cost-effectively delivered in accordance with applicable legislative and Ministry requirements; and
- measure, evaluate, and publicly report on the effectiveness of developmental supportive services funded by the Ministry.

In planning for our work, we identified the audit criteria (see **Appendix 4**) we would use to address our audit objective. These criteria were established based on a review of applicable legislation, policies and procedures, internal and external studies, and best practices. Senior management reviewed and agreed with the suitability of our objectives and associated criteria.

We conducted our audit between December 2019 and September 2020. We obtained written representation from Ministry management that, effective October 26, 2020, they had provided us with all the information they were aware of that could significantly affect the findings or the conclusion of this report.

Our audit work was conducted at the Ministry's Community Services Division at the Toronto head office. Due to the COVID-19 public health emergency, we were unable to conduct on-site meetings and audit work at the Ministry's regional offices, Developmental Services Ontario (DSO) offices, and Passport Agencies. However, we spoke with representatives from three regional offices, seven DSO offices, and six Passport Agencies via telephone or videoconference. We confirmed audit findings with all DSO offices and Passport Agencies where necessary. In addition, we obtained data extracts and supporting documentation from these organizations that we required to perform our audit work electronically. We also visited four Service Agencies to hold meetings and perform testing.

We also spoke with stakeholders, including the Provincial Network on Developmental Services, the Ontario Association on Developmental Disabilities, Ontario Agencies Supporting Individuals with Special Needs, and Opportunities Mississauga for 21 Plus to obtain their perspectives on supportive services for people with developmental disabilities in Ontario.

We conducted our work and reported on the results of our examination in accordance with the applicable Canadian Standards on Assurance Engagements—Direct Engagements issued by the Auditing and Assurance Standards Board of the Chartered Professional Accountants of Canada. This included obtaining a reasonable level of assurance.

The Office of the Auditor General of Ontario applies the Canadian Standards of Quality Control and, as a result, maintains a comprehensive quality control system that includes documented policies and procedures with respect to compliance with rules of professional conduct, professional

standards and applicable legal and regulatory requirements.

We have complied with the independence and other ethical requirements of the Code of Professional Conduct of the Chartered Professional Accountants of Ontario, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

4.0 Detailed Audit Observations

4.1 Eligibility and Needs Assessments

4.1.1 Credentials of Psychologists and Psychological Associates Not Verified Despite Reliance on Their Assessments to Determine Eligibility for Supportive Services

Although Developmental Services Ontario (DSO) relies on psychological assessments to establish applicants' eligibility for supportive services, DSO staff are not required to verify that those completing the assessments are qualified psychologists or psychological associates.

Applicants must provide psychological assessments to the DSO office to support that they have disabilities that meet the definition of a developmental disability under the Act and its regulations. These assessments must be completed by a psychologist or psychological associate in good standing with the College of Psychologists of Ontario, the governing body of the profession. As described in **Section 2.5**, the Act defines a person with a developmental disability as having significant limitations in cognitive and adaptive functioning. Although DSO staff are required to review these assessments, they do not, and are not required to verify that the assessments are completed by qualified psychologists or psychological associates who are in good standing with the College.

We reviewed the College's website and noted that both the credentials of psychologists and psychological associates, as well as their standing with the College can be easily verified. We observed that the College's website publicly discloses the following information about its members:

- registration status;
- authorized areas of practice;
- authorized client populations (for example, children, adults, etc.); and
- details of any disciplinary or other proceedings.

We found that DSO does not record the names of psychologists or psychological associates that complete psychological assessments in its information system. As a result, neither DSO nor the Ministry is able to generate a list of all the individuals that have completed psychological assessments to compare them with the College's records.

We selected a sample of 200 application files from all nine DSO offices for clients who were confirmed to be eligible for supportive services to assess whether the psychologist or psychological associate who completed the psychological assessment was in good standing with the College. We found that in 11 cases, or 6% of the files we reviewed, the psychological assessment was either missing, not completed or signed off by an individual registered with the College, or not completed by an individual registered with the College at the time of the assessment.

As shown in **Figure 7**, DSO offices confirmed the eligibility of over 5,000 applicants for Developmental Services in 2019/20. As of 2018/19, individuals deemed eligible for supportive services are immediately eligible to receive $5,000 in Passport funding, which they can spend on eligible supportive services for reimbursement before completing their needs assessment as described in **Section 2.8.2**. This change increases the importance of verifying that psychological assessments are completed by individuals that are in good standing with the College.

RECOMMENDATION 1

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

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

MINISTRY RESPONSE

The Ministry agrees with the recommendation to strengthen the integrity of the eligibility process. 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. 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.

4.1.2 Long Waits for Needs Assessments Delays Supports for People with Developmental Disabilities

Once an applicant has been confirmed to be eligible for developmental supportive services, the individual must have their support needs assessed by a DSO assessor (see **Section 2.6.1**) before they receive agency supports or additional Passport funding above the $5,000 minimum (described in **Section 2.8.2**). We found that the DSO offices did

Figure 12: Provincial Average Wait Times for Needs Assessment, 2015/16–2019/20 (Months)

Source of data: Ministry of Children, Community and Social Services

2015/16	2016/17	2017/18	2018/19	2019/20
10.8	9.6	9.1	9.3	8.1

Note: Wait times include only individuals who were 18 years old or older when assessed. Developmental Services Ontario offices assess 16 and 17-year-old children in advance for adult services to be received when they turn 18, but do not track wait times for these needs assessments.

not have a targeted time frame to complete these assessments, and wait times across the province for these assessments were very long, ranging from 8.1 months to 10.8 months over the last five years, as shown in **Figure 12**.

Wait Times for Needs Assessments Differ Significantly Between the Nine Developmental Services Ontario (DSO) Offices

We found that wait times for needs assessments also vary significantly between the province's nine DSO offices. **Figure 13** illustrates the wait times for each DSO office for 2019/20. While adults waited an average of 13 months for their needs assessments at the Toronto DSO office, at the Northern region DSO office in Thunder Bay they waited an average of just 3.1 months. How quickly a client receives supports is therefore significantly influenced by where the client lives.
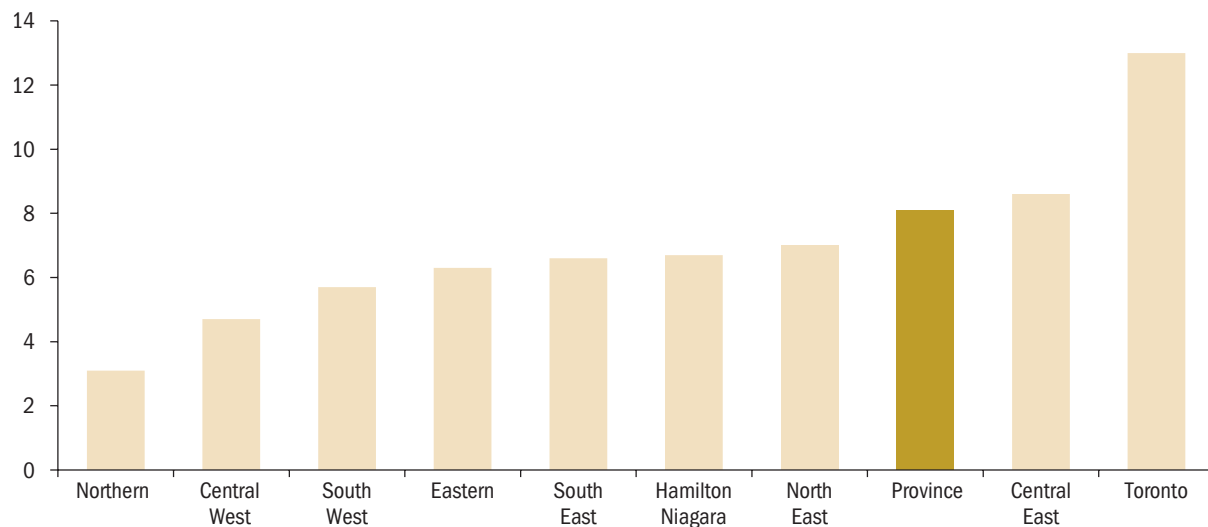
Developmental Service Ontario (DSO) Offices Not Completing Targeted Number of Needs Assessments

Although the Ministry sets targets for the number of needs assessments it expects DSO offices to complete each year, we found that such targets were seldom met. The Ministry could not demonstrate that it reviews the actual results of DSO offices on needs assessments to determine why they missed their targets and to take corrective action so that Ministry targets are met.

We found that collectively, DSO offices have missed the Ministry's annual needs assessment

Figure 13: Average Wait Time for Needs Assessment by Developmental Services Ontario Office, 2019/20 (Months)

Source of data: Ministry of Children, Community and Social Services

Note: Wait times include only individuals who were 18 years old or older when assessed. Developmental Services Ontario offices assess 16 and 17-year-old children in advance for adult services to be received when they turn 18, but do not track wait times for these needs assessments.

Figure 14: Completed Needs Assessments vs. Targets, 2015/16–2019/20

Source of data: Ministry of Children, Community and Social Services

	2015/16	2016/17	2017/18	2018/19	2019/20
Target # of needs assessments	8,194	8,664	8,664	8,664	8,664
# of needs assessments completed	7,747	7,902	6,104	6,277	6,182
# of needs assessments below target	447	762	2,560	2,387	2,482
% below target	6	9	30	28	29

targets in each of the last five years, as shown in **Figure 14**.

In addition, as shown in **Figure 14**, we found that DSO offices have missed the Ministry's provincial target by increasingly larger margins year over year. While DSO offices missed the target by just 6% in 2015/16, in each of the last three years they missed the target by between 28-30%, and no individual DSO office met its needs assessment target.

The Ministry funds each DSO office for a certain number of full-time equivalent assessors. However, we found that the number of assessors funded by the Ministry did not align with the targeted number of assessments the Ministry expected DSO offices to complete. The Ministry set an expectation, based on previous results, that an experienced assessor

should complete 75 assessments annually, and an assessor in the first year of employment should complete 60 assessments. **Figure 15** provides the annual number of full-time assessors, expected assessments based on the number of assessors, and the Ministry's total targeted number of assessments for each DSO office. All assessor funding and targets have remained the same since 2016/17.

Figure 15 shows that, based on the Ministry's expectations, most DSO offices are not funded for enough full-time assessors to meet the Ministry's yearly target for assessments. Across the province, DSO offices are likely to complete 562 fewer assessments annually than the Ministry's target, based on Ministry funding for assessors. The shortfall in funding is also a contributing factor in the long waits for assessments.

Figure 15: Expected Annual Assessments, Targets and Deficits by Developmental Services Ontario (DSO) Office
Source of data: Ministry of Children, Community and Social Services

DSO	FTE Assessors Funded (#)	A Expected Assessments (#)*	B Ministry Assessment Target (#)	A−B Assessment Deficit (#)
Toronto	14.0	1,050	1,337	(287)
Hamilton-Niagara	11.7	879	1,037	(158)
South East	6.0	450	591	(141)
Central East	17.5	1,313	1,446	(133)
Central West	14.0	1,050	1,158	(108)
North East	4.0	300	340	(40)
Northern	6.8	510	533	(23)
Eastern	15.0	1,125	965	160
South West	19.0	1,425	1,257	168
Province	**108.0**	**8,102**	**8,664**	**(562)**

*   Each experienced FTE is expected to perform 75 assessments per year. However, the 8,102 expected assessments is likely still too high, given it assumes all funded assessors are experienced. An assessor in the first year of employment should complete about 60 assessments.

Some DSO offices also indicated that these targets may still be too high, as they do not include realistic estimates for assessor vacation days, sick days and leaves of absence. In 2018, the Ministry conducted a review of needs assessment targets but has not adjusted targets based on this review.

Assessor Vacancies, Lack of Training and Differences in Productivity Contribute to Assessment Wait Times

We found that assessor vacancies, lack of training for new assessors, and differences in assessor productivity between DSO offices contributed to increasing wait times.

As shown in **Figure 16**, we found fewer assessors than the Ministry funded at seven of nine DSO offices. The Central West DSO office reported that it had only half the number of assessors it was funded for in 2019/20. In addition, as **Figure 16** shows, although assessors at eight of nine DSO offices completed at least 60 assessments as expected by the Ministry, productivity nevertheless varied significantly. The South West DSO office recorded an average of 52 per assessor, while the Central West DSO office recorded 97. However, the Ministry had not analyzed DSO offices' assessor productivity to determine the reasons for these differences, and identify opportunities to increase productivity.

Both the Ministry and the majority of DSO offices indicated that assessor vacancies are due to a lack of trained assessors available to fill open positions in the province. DSO offices hire assessors, who then receive training from the Ministry. However, some DSO offices indicated training was not offered often enough by the Ministry to fill assessor vacancies. We noted that the Ministry has had one trainer qualified to deliver assessor training in the previous five years who typically offered training for new assessors semi-annually. Some DSO offices told us that despite having funding to hire assessors, training sessions were often full or cancelled, limiting their ability to fill positions. For example:

● During 2019/20, the Central West DSO office had assessor vacancies for 50% of its funded positions. Assessor training in the spring of 2019 was cancelled by the Ministry, forcing the DSO to operate with half of their full complement of assessors for almost a full year. The DSO office completed only 59% of its assessment target for the year.

Figure 16: Assessments Completed per Assessor* by Developmental Services Ontario (DSO) Office, 2019/20
Source of data: Ministry of Children, Community and Social Services and DSO offices

DSO	Assessors Funded (#)	Avg. of Actual Assessors (#)	Assessments Completed (#)	Actual Assessments Per Assessor (#)
Central West	14.0	7.00	678	97
Central East	17.5	16.00	1,261	79
Northern	6.8	5.25	400	76
South East	6.0	5.50	400	73
Hamilton-Niagara	11.7	8.00	574	72
Ontario	**108.0**	**87.55**	**6,182**	**71**
North East	4.0	4.00	283	71
Eastern	15.0	12.30	824	67
Toronto	14.0	14.50	976	67
South West	19.0	15.00	786	52

* Assessor refers to a full-time equivalent assessor.

- During 2017/18, the South East DSO office operated with, only 71% on average of funded assessor positions for the year. Though the office made efforts to hire employees to fill the roles, it was unable to access training because the training sessions were full. Employees that were hired for these positions were forced to work on other tasks at the office until openings in assessor training sessions became available. The DSO office completed just 52% of their assessment target for the year.

At the time of our audit, the Ministry had hired one additional trainer to deliver assessor training. However, they could not tell us whether they planned to increase the number of training sessions provided.

RECOMMENDATION 2

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

- set a target time frame for Developmental Services Ontario (DSO) offices to complete needs assessments;
- review and analyze the large differences in wait times for needs assessments between DSO offices, and take steps to minimize these differences;
- study the reasonableness of the targeted number of needs assessments to be completed by DSO offices and assessors, to revise targets accordingly;
- compare the number of needs assessments completed by DSO offices to their targets to take corrective action when targets are not met; and
- provide sufficient training opportunities so that DSO offices can fill assessor vacancies on a timely basis.

MINISTRY RESPONSE

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:

- 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.

4.2 Service Agency Supports

4.2.1 Long and Increasing Wait Lists for Supports at Service Agencies

We found that across the province, the number of people waiting for agency supportive services had grown by more than 80% in the last five years. In addition, we found at some DSO offices, the number of people waiting had grown by more than 100% over the previous five years, including 147% at one office. However, the Ministry does not assess the reasonableness of the growth in wait lists at

DSO offices to determine if corrective action is needed to ensure equitable access to services across the province.

Figure 17 shows the number of people waiting for at least one agency supportive service from 2015/16 to 2019/20 in the province, and by DSO office.

Between 2015/16 and 2019/20, across the province, the number of people waiting for agency-provided supportive services increased by 80%, from almost 19,000 in 2015/16 to almost 34,200 in 2019/20. However, the increase at individual DSO offices ranged from as low as 51% at the Central West DSO office to as high as 147% at the South East DSO office.

We also noted that of the 34,159 people across the province waiting for services in 2019/20, the majority, or 20,480, were receiving no agency services at all, as shown in **Figure 18**. In contrast, fewer than 11,400 clients were receiving all the eligible services they had requested.

Ministry Does Not Track or Review Differences in Wait Times to Assess their Reasonableness and Take Corrective Action

The Ministry does not calculate wait times for agency supportive services. However, we found that in April of 2017, in addition to tracking when individual clients requested agency services, the

Figure 17: Number of Clients Waiting for At Least One Agency Service by Developmental Services Ontario (DSO) Office, 2015/16–2019/20

Source of data: Ministry of Children, Community and Social Services and DSO offices

DSO	2015/16	2016/17	2017/18	2018/19	2019/20	Change (%)
Central East	3,301	4,899	5,125	5,888	6,716	103
Central West	3,263	3,717	4,273	4,644	4,943	51
Eastern	1,791	2,237	2,927	3,374	3,822	113
Hamilton-Niagara	2,087	2,201	2,682	2,998	3,376	62
North East	710	835	943	1,065	1,276	80
Northern	1,155	1,109	1,501	1,750	1,902	65
South East	829	863	1,434	1,748	2,044	147
South West	2,803	3,196	3,794	4,323	4,719	68
Toronto	3,030	3,379	4,068	4,781	5,361	77
Ontario	**18,969**	**22,436**	**26,747**	**30,571**	**34,159**	**80**

Figure 18: Status of Clients Waiting for Agency Services, 2019/20

Source of data: Ministry of Children, Community and Social Services

Status	Clients (#)
Waiting for service	20,480
In service, waiting for one or more additional services	13,679
Waiting for at least one service	**34,159**

Ministry began tracking when they were placed in those services, and at what agency.

We found that there had been approximately 14,300 requests made for agency supportive services in 2017/18, and that as of March 31, 2020, only about 1,200 individuals that requested these services had been placed, and approximately 13,000 were still waiting.

The Ministry does not track these wait times and does not assess whether they are reasonable, or whether corrective action is necessary.

RECOMMENDATION 3

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

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

MINISTRY RESPONSE

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.

4.2.2 Inconsistent Level of Service Provided by Service Agencies in Different Regions

We found significant differences between the Ministry's five regions in the level of supportive services individuals with developmental disabilities received from Service Agencies, and the cost of these services to the Ministry. However, we found that the Ministry did not review these differences to assess their reasonableness, and to take corrective action where needed to ensure people with developmental disabilities received appropriate supports, and that the services provided by Service Agencies represented value-for-money.

We analyzed spending on supportive services and reported deliverables in 2018/19, the most recent year available at the time of our audit, by Service Agencies in each of the Ministry's five regions for three of the largest support categories: community participation, caregiver respite and employment supports. These three categories accounted for $308.5 million, or 69% of the $447.5 million in total funding provided to Service Agencies in 2018/19 (as shown in **Figure 5**).

Figure 19 shows community participation support days provided to each client served at the five Ministry regions in 2018/19, as well as the cost per client. While clients in the Toronto region received an average of 179 support days for community participation, clients in the East region only received 94 days of support. In addition, the cost per client served was almost $7,000 higher in Toronto.

Figure 19: Support Days and Cost per Client of Service Agency-Provided Community Participation Supports by Region, 2018/19

Source of data: Ministry of Children, Community and Social Services
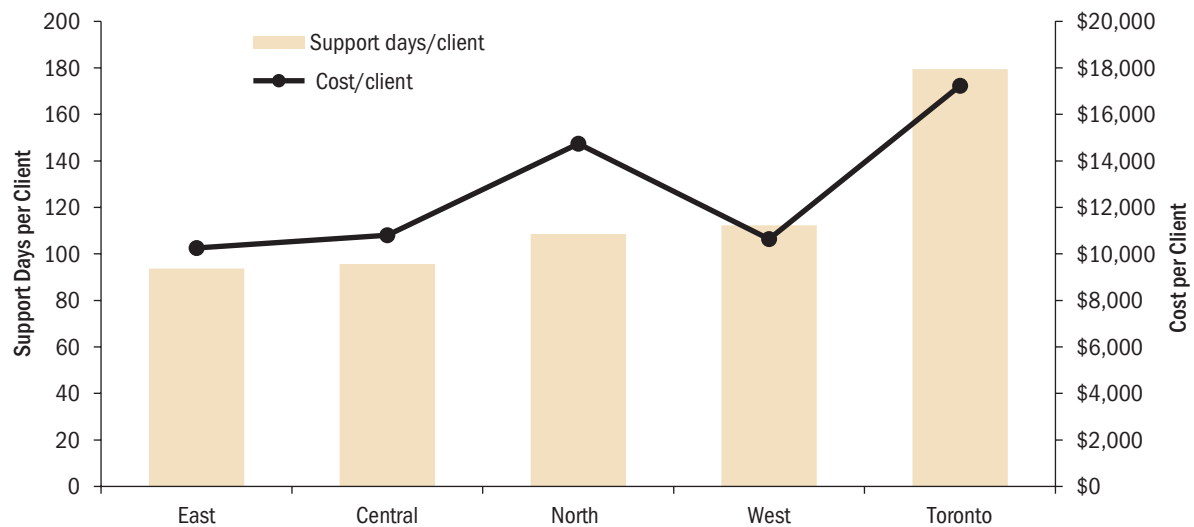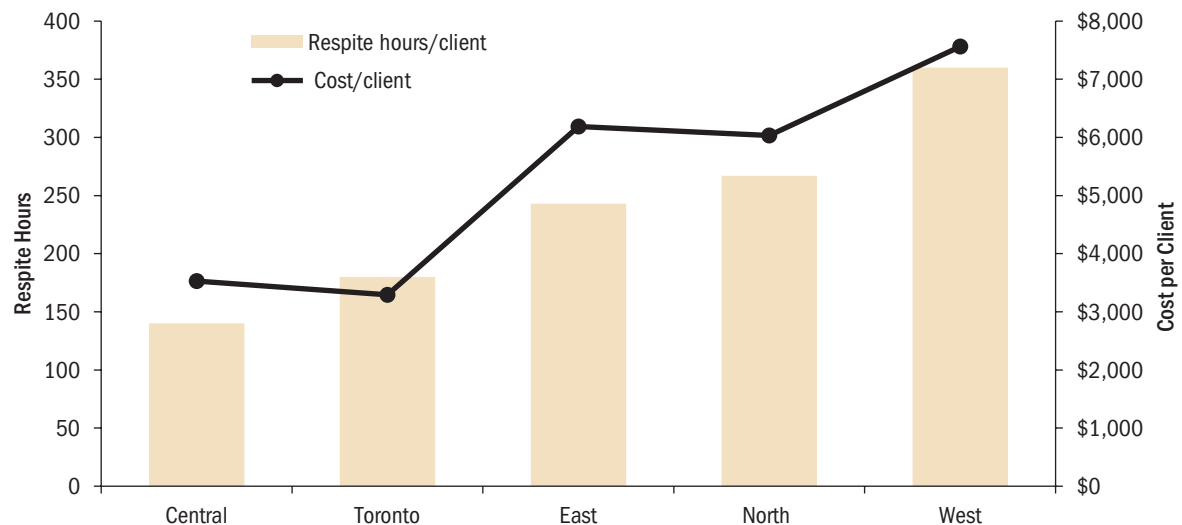

Figure 20: Support Hours and Cost per Client of Service Agency-Provided Caregiver Respite by Region, 2018/19

Source of data: Ministry of Children, Community and Social Services

Similar differences exist in agency caregiver respite supports. As **Figure 20** shows, agencies in the West region provided 360 hours of respite per client in 2018/19, at a cost of over $7,500 per client, while an average client in the Central region received 140 hours at a cost of $3,500.
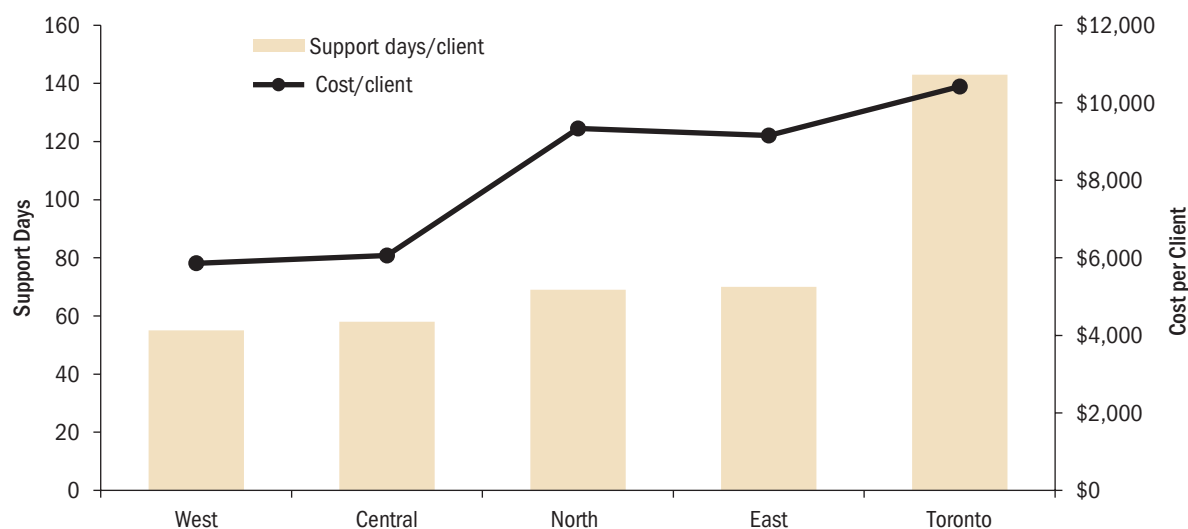
Our analysis of employment supports showed similar differences, as illustrated in **Figure 21**. The Toronto region provided 143 support days to the average client at a cost of $10,400, while an aver-

age client in the West region received 55 support days at a cost of $5,900. The North and East regions provided a similar average number of support days as the West and Central regions, but at a far higher cost per client served.

We found that the Ministry does not perform provincewide analyses of support levels and costs per client served at agencies or regions. Contracting with Service Agencies is managed by the regional offices, and funding received by the agencies is

Figure 21: Support Days and Cost per Client of Service Agency-Provided Employment Supports by Region, 2018/19

Source of data: Ministry of Children, Community and Social Services

usually based on historical funding decisions. While regions are required to review information about the number of clients served at individual agencies, they do not compare support levels or client costs to the levels or costs at other regions. Therefore, the Ministry could not explain why there were significant differences amongst the regions, or if they were justified.

The Ministry Chose to Reduce Reporting Requirements

We noted that for 2019/20, the Ministry reduced Service Agencies' reporting requirements about the clients they served. The Ministry explained it made the change to reduce the administrative burden for Service Agencies. However, the change limits the Ministry's ability to compare support levels or client costs between agencies and regions. For example, for caregiver respite, the Ministry no longer requires Service Agencies to report the number of hours of respite provided, and for employment and community participation supports, it no longer requires Service Agencies to report the number of days of service provided.

RECOMMENDATION 4

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

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

MINISTRY RESPONSE

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 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.

4.2.3 Ministry Does Not Always Follow Up to Take Corrective Action When Service Agencies Do Not Meet Contracted Targets

We found that the Ministry did not always perform the required analyses when agencies reported that their services fell significantly short of their targets. Analyzing variances between targets and results could help the Ministry to assess the reasonableness of Service Agencies' explanations for these issues, and to create action plans to address them.

The Ministry's contracts with Service Agencies include agreed-upon service targets, and agencies report their results against these targets quarterly. Ministry policy directives state that agencies must provide explanations when actual service volumes fall short of targets by 10% or more. These explanations include a description of the impact on service delivery and staffing, and action plans for improving.

In 2018/19, the most recent year that agency reporting was complete at the time of our audit, almost 50% of agency programs reported at least one service measure that was 10% or more below the target for the year. We reviewed a sample of fourth quarter reports for these instances, and found that the majority contained no explanation

for the variance from the target, or the included comments did not explain the variance. For instance, one agency that fell 20% short of its target for the number of support days provided for caregiver respite simply commented "less than anticipated" as its explanation to the Ministry. However, there was no indication in these cases that the Ministry followed up to assess if the shortfall from the target was reasonable.

RECOMMENDATION 5

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

- require Service Agencies to submit written, detailed explanations for all variances greater than the Ministry's established threshold; and
- perform variance analyses to evaluate whether these explanations are reasonable, and facilitate corrective action where they are not.

MINISTRY RESPONSE

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.

4.2.4 Ministry Does Not Verify Service Output Data Reported by Agencies

We found that although the Ministry collects output data from Service Agencies, such as on number of clients they serve by type of supportive service, the Ministry does not validate the accuracy of the information reported by Service Agencies. We found several instances where Service Agencies claimed that they provided services to more individuals than they actually did. This calls into question whether the Ministry received value-for-money for the services provided by these Service Agencies, and whether their funding should be reduced.

The Ministry's contracts with Service Agencies include agreed-upon service measures with targets. Agencies report results against these targets quarterly, as described in **Section 4.2.3**. Although service measures are the primary information available to the Ministry to evaluate agency performance, the Ministry does not attempt to verify the accuracy of the information reported by the agencies, which limits the reliability of the information.

We noted that the Ministry requires DSO offices to maintain a list of all clients eligible for supportive services at agencies in its information systems.

However, it does not require agencies to submit a list of their clients when reporting the number of individuals served to enable the Ministry to match the list against its records.

We analyzed the number of individuals who received services by service type, against service targets for 2018/19 (the most recent year for which complete data is available), as shown in **Figure 22**. Out of 626 agency programs delivered in 2018/19, for the five most common types of supports, 284, or 45%, reported hitting their targets exactly. This appears to be unrealistic, as the reported numbers are not rounded or adjusted. For example, one agency reported providing community participation supports to exactly 252 individuals each year for the five years between 2014/15 and 2018/19 – exactly the same number of people as their annual target.

We selected a sample of agencies, including the four Service Agencies we visited, that reported meeting their targets exactly for the number of individuals served in 2018/19. We found that 73% of the agencies did not have client records that supported the number of individuals served they had reported to the Ministry. For example:

- Three agencies had over-reported the number of individuals they served in one or more of their programs by between 13% and 120%.
- One agency was unable to provide a complete list of individuals served for the year.
- One agency reported meeting their contractual target of individuals served under respite services, even though the agency does not

Figure 22: Service Agency-Reported Outputs Compared to Targets by Service Type, 2018/19

Source of data: Ministry of Children, Community and Social Services

Service Type	Met Target (#)	Under Target (#)	Over Target (#)	Total (#)
Community participation	145	62	55	262
Caregiver respite	76	50	21	147
Employment supports	38	11	28	77
Professional and specialized services	18	34	32	84
Adult protective services	7	27	22	56
Total	**284**	**184**	**158**	**626**
% of Total	**45**	**30**	**25**	**100**

provide respite services. The agency had sent multiple letters to the Ministry over the course of several years explaining that they provided service co-ordination supports, not respite services, and that the targets in their contract needed to be adjusted. However, the Ministry took no action to adjust the contract to reflect this.

Our 2011 audit of supportive services for people with disabilities found similar issues with agency reporting. That audit found that many agencies reported their service results by replicating their approved targets or making arbitrary allocations, regardless of actual clients served.

RECOMMENDATION 6

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

- require Service Agencies to submit client lists that support the individuals they have reported providing service to, and link these lists to the Ministry's database of eligible clients for verification;
- perform spot audits on Service Agencies to validate the information provided in the quarterly reports; and
- take corrective action where actual results achieved by Service Agencies fall short of the results they have reported.

MINISTRY RESPONSE

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 appropri-

ate business processes and begin implementation for the 2021/22 contract year.

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 year-end reporting process.

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.

4.2.5 Ministry Does Not Have Performance Indicators to Measure the Effectiveness of Supportive Services Delivered by Agencies or Client Outcomes

Although we have recommended that the Ministry put in place outcome-based performance indicators for developmental services in three reports since 1997, we found that the Ministry still only collects output data from Service Agencies, such as the number of clients served. The Ministry does not have performance indicators in place to measure the effectiveness of the developmental supportive services it funds, or the outcomes of clients who receive those services. In addition, more than three years after developing a performance measurement framework to begin measuring the effectiveness of these services, the Ministry did not have a timetable to implement its framework, and had not taken steps to begin collecting additional performance data from Service Agencies to enable its implementation.

Ministry Does Not Measure the Effectiveness of Supportive Services or Their Impact on Persons with Developmental Disabilities

As discussed in **Section 4.2.3**, the Ministry's contracts with Service Agencies include agreed-upon service measures with targets against which agencies report results, such as individuals served and support days provided. However, these output-based indicators cannot be used to measure the outcomes of people with developmental disabilities who receive the supports, or the quality of those supports.

As a result, we found that the Ministry does not measure the impact of supportive services it funds on people with developmental disabilities. The Ministry also does not solicit client feedback on the services they receive from Service Agencies. For example, the Ministry had not performed an analysis to determine if the employment supports it funds led to improvements in employment rates or wages among clients, nor did they track the information that would allow them to perform such an analysis. Other supports, such as those related to community participation and caregiver respite, would require more qualitative measurement, such as surveying clients and their families about their satisfaction with supports and their quality of life.

As a result, the Ministry cannot assess whether the agencies it funds provided the right services according to their clients' needs, or identify whether it is funding poor-performing agencies.

Ministry has Not Implemented Outcomes-Based Performance Measurement Framework Developed in 2017

We found that in the spring of 2017, the Ministry developed an outcomes-based Performance Measurement Framework (framework) for developmental supportive services to measure the effectiveness of the supportive services it funds and the outcomes of those receiving supportive services. However, at the time of our audit three years later,

the Ministry had yet to implement this framework and did not have a timetable for doing so.

The key objectives of the Ministry's framework are to:

- define a shared set of outcomes that can tell a meaningful 'story' from the perspective of people with developmental disabilities, families, caregivers and service providers; and
- assess whether people with developmental disabilities, families and caregivers are benefiting from services and/or supports as intended.

We noted that the framework includes specific performance indicators that, if measured, can provide useful information to the Ministry to assess the effectiveness of the supportive services it provides, and the outcomes of those who receive those services, including for example:

- the percentage of families/caregivers who report typically receiving accurate information from Service Agencies about the process and timelines to receive services and/or supports in their community;
- the percentage of families/caregivers who report receiving services and/or supports that meet most or all of their needs;
- the percentage of people with developmental disabilities who report that it is clear why they currently receive or do not receive specific services and/or supports;
- the percentage of people with developmental disabilities who report living as independently as they want; and
- the percentage of people with developmental disabilities who report being satisfied with their level of participation in the community.

We also noted that as part of the development of its framework, the Ministry performed a scan of other jurisdictions that identified that, as of early 2017, 19 international jurisdictions had adopted frameworks measuring the quality of life of people with developmental disabilities, and were using those frameworks to inform continuous quality improvement. In addition, the scan of

other jurisdictions similarly identified that Alberta and British Columbia were using frameworks that measure the quality of life of people with developmental disabilities.

In contrast to Ontario, British Columbia and Alberta have been using outcomes-based performance measurement for services that support people with developmental disabilities for almost a decade. In 2011, Alberta developed and implemented, with the assistance of experts in the field, a quality-of-life measurement framework for persons with developmental disabilities known as *My Life: Personal Outcomes Index*. This outcomes index is based on eight quality of life "domains": emotional well-being, material well-being, physical well-being, self-determination, personal development, rights, interpersonal relations, and social inclusion.

Each domain receives a score based on the results of a survey provided to people with developmental disabilities and their families. In 2016, Alberta discontinued the use of the survey and instead incorporated this outcomes index directly into service agency reporting contracts, requiring agencies to report on client outcomes under these eight domains.

In 2013, British Columbia implemented the same outcomes index, by agreement with Alberta. British Columbia has taken the additional step of publicly reporting on the outcome index survey annually. For instance, British Columbia's 2018/19 summary report provides year-over-year scores for the province in all eight domains, and breaks down these scores by client factors such as living situation, region, and type of funding received. In addition, the most recent annual report compares client scores to a sample of the general population without developmental disabilities surveyed for comparison purposes.

RECOMMENDATION 7

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

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

MINISTRY RESPONSE

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.

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).

4.2.6 Ministry Does Not Take Enforcement Action for the Recurrence of Serious Issues at Service Agencies

We found the Ministry identified recurring compliance issues during its inspections of Service Agencies that provide supportive services. However, we noted that the Ministry did not take any enforcement action to deter repeated non-compliance by these agencies—even in instances involving significant issues.

As described in **Section 2.9**, the Ministry's compliance unit has a target to inspect agencies funded to provide supportive services at least once every three years. Agencies that provide multiple

developmental services are often inspected every year. The purpose of inspections is to check for and enforce compliance with the 236 quality assurance standards related to supportive services set out in Ontario Regulation 299/10 under the Act and the requirements set out in related Ministry policy directives. When non-compliance issues are found, Service Agencies are required to report to the inspector how they have addressed the issue, and certify that the issue has been resolved.

We selected a sample of agencies inspected multiple times between 2016/17 and 2019/20, and reviewed year-over-year inspection results. Despite Service Agencies certifying that non-compliance issues in the original inspection had been resolved, we found that:

- Nine out of 10, or 90% of the agencies in our sample had non-compliance issues identified in inspections show up again in subsequent inspections. In total, we found that 34 non-compliance issues identified across the agencies in our sample were identified again in subsequent inspections. Some of these 34 issues recurred in residential programs for people with developmental disabilities.
- Some of the issues we identified posed serious risks to client safety. For instance, one Service Agency was found to be improperly storing medication in one inspection and in a subsequent inspection. Another agency failed to provide clients and staff with training to prevent, identify, and report abuse within required timelines. Another did not have policies and procedures for training staff working with persons with challenging behaviours.
- Other issues called into question the quality and appropriateness of services provided to individual clients. Some agencies could not provide evidence that they were reviewing and updating client support plans annually. These issues appeared in agency inspections, and then again in subsequent inspections.

None of the Service Agencies in our sample were disciplined for any of the issues that were identified again during subsequent inspections. Under the Act, the Ministry may take the following actions in response to Service Agency non-compliance:

- Issue a compliance order directing the Service Agency to develop and implement a plan for achieving compliance within a specified period of time.
- Issue a compliance order directing the Service Agency on the specific action it must take to achieve compliance.

If the Service Agency fails to comply with the order within the specified timeline, the Ministry may:

- Terminate the Service Agency's funding agreement.
- Appoint a person to take over and manage the affairs of the Service Agency with respect to services and supports funded by the Ministry.

We found that the Ministry had not taken enforcement action or imposed consequences on any Service Agencies as the result of inspection findings since 2016.

RECOMMENDATION 8

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

MINISTRY RESPONSE

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.

4.3 Passport

4.3.1 $5,000 Minimum Passport Funding Reduces Available Funding for Higher Need Individuals by Over $8 million

For the 2018/19 fiscal year, the Ministry implemented a policy change to the Passport program. The change means that clients eligible for supportive services receive $5,000 in Passport funding before they have completed their needs assessment. This allows clients to purchase some supports while they wait for their needs assessment, and the agency services and additional Passport funding that they may be eligible for based on the results of the needs assessment.

Prior to this change, clients could receive as little as $690 in annual Passport funding, depending on their assessed need. Since the change, the client may still receive more Passport funding after completing their needs assessment, but funding is not reduced below $5,000, even if a client's needs are assessed below this level.

By not reducing funding in subsequent years when a client's needs are assessed below the $5,000 minimum, we found that clients with higher needs were waiting longer for much-needed additional funding. The wait list for Passport funding increased significantly from 2015/16 to 2019/20, as shown is **Figure 23**. The number of individuals waiting for additional Passport funding was almost 19,500 in 2019/20.

Based on Passport Agency-provided data, at the time of our audit, there were 5,239 individuals assessed with needs which entitled them to less than the $5,000 minimum. We calculated that these 5,239 Passport recipients, on average, would have been assessed for annual Passport funding of $3,390 – or $1,610 less than the $5,000 minimum allocation.

The $1,610 in additional funding allocated to these clients represents, on average, $8.4 million dollars in annualized funding that could be allocated to individuals with higher needs waiting for additional funding. This amount will continue to grow as more applicants for supportive services are approved for the minimum Passport funding. As discussed in **Section 2.8.2**, Passport funding is allocated to individuals on the wait list based on a priority score. At the time of our audit, we calculated that this $8.4 million would provide more than 650 individuals with the highest priority scores on the wait list with their full, assessed annual Passport funding averaging $12,600 per client.

We also note that our estimate of $8.4 million is likely understated, as it does not consider individuals receiving the $5,000 minimum who have not had their needs assessed. Since there is no requirement to undergo a needs assessment, clients can continue to receive the $5,000 minimum indefinitely, without ever completing a needs assessment. At the time of our audit, over 3,700 individuals who had not yet been assessed were receiving the $5,000 minimum Passport funding. Many of these individuals appeared to be delaying or declining needs assessments, and continued to receive the $5,000 minimum. This may indicate they have lower needs. The Ministry could not provide an estimate of Passport recipients who had chosen not

Figure 23: Passport Funding, Recipients and Individuals Waiting, 2015/16–2019/20

Source of data: Ministry of Children, Community and Social Services

	2015/16	2016/17	2017/18	2018/19	2019/20	Change (%)
Passport funding ($ million)	184.6	192.9	251.2	324.0	434.1	135
Passport recipients	19,138	23,445	24,619	47,014	52,588	175
Individuals waiting*	**14,820**	**13,532**	**16,429**	**17,752**	**19,497**	**32**

*   Individuals waiting for funding include those not yet receiving funding, and those receiving some funding and waiting for additional funding.

to complete their needs assessment, as there is no indicator in their information systems that identifies whether a client is choosing not to be assessed.

RECOMMENDATION 9

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

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

MINISTRY RESPONSE

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.

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
- 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.

4.3.2 Some Passport Clients Spent the Majority of Funding Paying Family Members for Support Work Which Was Inconsistent with Their Needs

We found that many Passport program clients spend the vast majority of their funding allocation to pay family members for support work. While using Passport funding for this purpose is within the rules of the program, we found it was often not aligned with the individual's needs as identified by the Supports Intensity Scale (described in **Section 2.6**). We also found that there was no process in place at PassportONE to confirm that family members provided supportive services to clients.

In 2019/20, PassportONE reimbursed Passport clients $197 million for support workers, which accounts for 58% of total Passport program expenditures in 2019/20. We analyzed PassportONE's information systems and found that 23% of all Passport clients had registered at least one family member as a support worker. In addition, we found that $61.8 million of $197 million, or 31% of funds reimbursed to Passport clients for support workers in 2019/20, was related to paying family members for support work.

Personal Support Workers are unregulated in Ontario, and anyone can identify themselves as a support worker regardless of education, training or qualifications. Under the Passport program, anyone over the age of 18 can provide Passport clients with support work, including family members except a client's child, spouse, parent or primary caregiver. Support work can be provided to meet the client's needs in the areas of community participation, caregiver respite, and employment, education and training.

We found that Passport clients who only had relatives as support workers spent, on average, 65% of their annual funding on support work in

2019/20, compared to 51% for recipients who did not have relatives perform support work. Over 2,100 Passport recipients spent more than 90% of their Passport funding on family support workers, and over 1,300 spent 100%. While this spending is within the rules of the program, we found it was often not aligned with the individual needs as identified by the Supports Intensity Scale (described in **Section 2.6**).

We reviewed needs assessments for a sample of 15 Passport clients who spent 100% of their annual funding allocation on support workers who were relatives in 2019/20. In the majority of assessments reviewed, we found that family support work did not align with the client's support needs as determined by their Supports Intensity Scale results. For example:

- One client spent $17,107, 100% of their funding, on a relative support worker to provide caregiver respite. However, their greatest need, as identified by the Supports Intensity Scale, was for lifelong learning, such as problem solving, and functional academics like reading signs and counting change.
- Another client used 100% of their $5,175 Passport funding to pay a sibling support worker for caregiver respite. However, the client scored highest in the areas of lifelong learning and employment supports, and lower in areas like home living and health and safety that would indicate the need for caregiver respite.

Our review also identified limited controls for PassportONE approval of support work provided by family members. For example:

- $17,250 was reimbursed for support work provided by a client's sibling between May 2018 and April 2020. This represented 100% of the client's reimbursed Passport expenses during this period. A flat rate was being charged each month for support work, with no indication of how many hours of support were being provided, on what days, or at what rate. In addition, the Passport Agency

serving the client listed the support worker sibling as the person managing the client's Passport funds, a clear conflict of interest, as the sibling could approve and submit their own account of services provided for reimbursement.

- $22,600 was reimbursed for support work by a client's family member between July 2018 and June 2020—this included almost $1,200 for mileage claims for the support worker without any indication of where the support worker had travelled with the client. This represented 57% of the client's reimbursed Passport expenses during this period. While reviewing this claim, we discovered that the support worker was the client's step-parent—a fact that was not disclosed in PassportONE's information system. Support work provided by step-parents is not eligible for reimbursement

By approving support work claims for family members without information such as dates, hours provided, and locations and distances travelled, though these claims may be within the program guidelines, PassportONE cannot assess whether services were provided, the reasonableness of the amounts claimed, or whether they provide value-for-money for the person with a developmental disability.

RECOMMENDATION 10

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

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

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

MINISTRY RESPONSE

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 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. 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.

4.3.3 Passport Recipients Reimbursed for Expensive Professional Sports and Concert Tickets in Large Numbers

We found many instances where Passport clients were reimbursed for expensive and/or large numbers of tickets to professional sports and entertainment events which do not represent value-for-money, particularly given the Passport program's limited resources and the unmet demand for the program.

As noted in **Section 2.8.2**, Passport program clients can purchase supportive services aligned with the support categories listed in **Figure 3**, which includes Community Participation. We noted that professional sports and entertainment events were considered eligible expenses under Community Participation. However, we found that the Ministry's program guidelines do not include any restrictions on purchases for these events such as the cost, number of events, location of events, or percentage of a client's total Passport program funding.

We noted that in 2019/20, Passport program clients were reimbursed over $18.5 million for expenses they incurred for events and activities, including professional sports and entertainment. We reviewed a sample of claims and related invoices for these expenditures and found numerous examples of Passport clients claiming and receiving reimbursements from PassportONE for expensive and/or large numbers of concert and professional sports tickets, including season's tickets. These instances included the following most significant examples:

- A client spent $2,214 on two tickets to a Toronto Raptors game. PassportONE initially

rejected the claim because it would only reimburse the cost of a second ticket if the client's registered support worker had attended. After advising the client that they did not have a support worker registered, the client registered a cousin who attended the game. PassportONE subsequently approved the claim for $2,214 in full. Three weeks later, the same client purchased two tickets to a concert for $2,070. Both ticket purchases were reimbursed by PassportONE. We also found that the $4,284 spent on these two events represented over 55% of the client's annual Passport funding.

- A client's primary caregiver was reimbursed for two season's tickets for the Buffalo Bills 2020 season, at a cost of $3,860 (or $483 per game). The Canada-United States border was closed at the time the tickets were purchased due to the COVID-19 pandemic, and the Buffalo Bills later announced that 2020 season's ticket holders would have the option to receive a refund or an account credit. The $3,860 had not been recovered from the client at the time of our audit. Buffalo Bills season's tickets were not aligned with the client's Supports Intensity Scale results, which indicated that the client had a high need for lifelong learning and employment supports, and a lower need for recreation and leisure activities.

Although concerts and sports events can provide valuable community participation experiences for people with developmental disabilities, unrestricted event ticket purchases may not provide value-for-money, because other individuals with developmental disabilities are waiting for Passport funding to purchase much-needed supports as discussed in **Section 4.3.1**. In addition, large purchases of event tickets are less likely to be aligned with identified support needs for Passport clients.

Information Systems Capture Insufficient Claim Information to Identify How Much Has Been Spent on Expensive Concert and Professional Sports Tickets

We found that because insufficient information on each claim is recorded in PassportONE's information system, we could not determine how many concert and professional sports tickets have been purchased by Passport clients. As a result, analyses to identify purchases of expensive tickets or excessive quantities of tickets is not possible.

Claims submitted in 2019/20 included more than 183,000 invoices for events and activities. PassportONE staff responsible for reviewing individual claims submitted by clients (as described in **Section 2.8.2**) can review all relevant supporting documents related to a claim. However, the claim form, and as a result PassportONE's information system, is missing key details required to analyze trends or identify systemic issues in claims reimbursed by PassportONE. For example, we found the claim form does not include a field for a description of the services purchased (for example, hockey tickets). In addition, while the claim form includes a field to identify the service provider, we found it often included only a vague description such as "event ticket" or "activity".

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

RECOMMENDATION 11

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

- establish reasonable restrictions on the cost, number, and location of events for tickets purchased for sports, concerts, and other activities and events that can be claimed for reimbursement;
- work with PassportONE to update its claim form to capture relevant details about activities and events, including concerts and sports tickets claimed; and
- 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.

MINISTRY RESPONSE

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.

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. Passport Agencies will follow up with clients who submit claims that surpass the standard.

4.4 Response to COVID-19

The government of Ontario declared an emergency on March 17, 2020 in response to the COVID-19 pandemic. We found that after the emergency declaration, DSO offices continued to process applications for developmental supportive services and complete needs assessments remotely. In addition, in response to the COVID-19 pandemic, the Ministry expanded the list of services that Passport recipients could use their funding to purchase, and provided them with advance payments to do so.

The Ministry also made several changes to funding, oversight and reporting requirements related to supportive services provided by Services Agencies to provide agencies with the flexibility to respond to the outbreak. However, we found that the Ministry did not have a complete summary of how many agencies had closed due to the pandemic, for how long they had closed, and the degree to which the services they provide and the individuals they provide them to were affected.

Applications and Needs Assessments

The Ministry informed us that DSO offices are equipped to process applications and perform needs assessments remotely via videoconferencing. We found that after the onset of COVID-19, all DSO offices were physically closed to the public. However, at the time of our audit they continued to process applications and perform needs assessments via video conferencing, and were meeting with clients in person by appointment only if necessary.

Passport Funding

To continue to support Passport recipients during the COVID-19 pandemic, the Ministry put in place temporary measures to provide at least some advance funding instead of reimbursing them only after they had incurred expenses and submitted invoices for those expenses. These funding arrangements included:

- All Passport clients who had not spent their entire 2019/20 funding allocation received an automatic advance payment of up to $1,000 of their remaining allocation by the end of June, 2020. Clients are still required to submit invoices for these advanced payments, and the Ministry advised us that unspent funds are to be returned.
- Passport program recipients who submitted claims for the 2019/20 fiscal year, and continued to be eligible for funding in 2020/21, received 25% of their annual authorized allocation as an advance payment in May 2020. Clients are still required to submit invoices for these advanced payments, and the Ministry advised that unspent funds are to be returned.

The Ministry also temporarily expanded the list of expenses eligible for Passport funding because many community-based activities and settings are closed. The expanded list of eligible expenses targets goods and services that make it easier for individuals with developmental disabilities and their families to stay at home and practice physical distancing. The expanded list includes:

- Technology that allows the client to stay safe, connected, occupied and engaged at home. This includes laptops, videogame systems and e-readers.
- Items to support home-based recreation and fitness activities that would otherwise be accessed through day programs and other community-based programs. This includes arts and craft supplies, hobby supplies, books, and fitness and sports equipment.

- Essential service delivery fees, such as grocery, pharmacy, and meal delivery charges.
- Personal protective equipment and supplies.

Agency Services

After the province's emergency declaration in response to the COVID-19 pandemic, the Ministry advised Service Agencies to self-report through the Ministry's Serious Occurrence Reporting System if they were closing their physical locations. The Ministry speculated that most Service Agencies stopped providing in-person supportive services after the emergency declaration. However, at the conclusion of our fieldwork six months after the province's emergency declaration, we found the Ministry still did not have a summary of how many agencies had closed, how long they had been closed for, and the degree to which the services they provide and the individuals they provide them to were affected.

The Ministry indicated that with the onset of COVID-19, it expected agency service delivery costs to increase. Agencies would incur additional costs to adhere to public health guidelines for the health and safety of their clients and staff through physical distancing and other COVID-19 safety measures. In response, the Ministry made several changes related to Service Agencies' use of Ministry funding, oversight and reporting requirements, including:

- Advising Service Agencies that supportive services funding could be shifted between different types of supportive services that agencies were funded to provide, including residential services where an agency was also funded to provide them. Service Agencies received guidance from the Ministry in September 2020 on how these funding shifts should be tracked and reported.
- Service Agencies were advised they would not be held to the 10% of funding cap on administration expenses in the 2020/21 fiscal year.
- The Ministry advised us that Service Agencies were to be provided with full funding alloca-

tions for the 2020/21 fiscal year, and that they told Service Agencies they would not be held accountable to meet service targets, such as the number of individuals served.

At the conclusion of our fieldwork, the Ministry could not say whether, as a result of the COVID-19 pandemic, it expected Service Agencies would report having unspent supportive services funding in the 2020/21 fiscal year. However, it advised us that, as in prior years, it would recover any unspent funds.

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

RECOMMENDATION 12

So that it has the necessary information to understand the impact on the developmental supportive services it funds, and maintains accountability for the transfer payments it provides, we recommend that the Ministry of Children, Community and Social Services (Ministry):
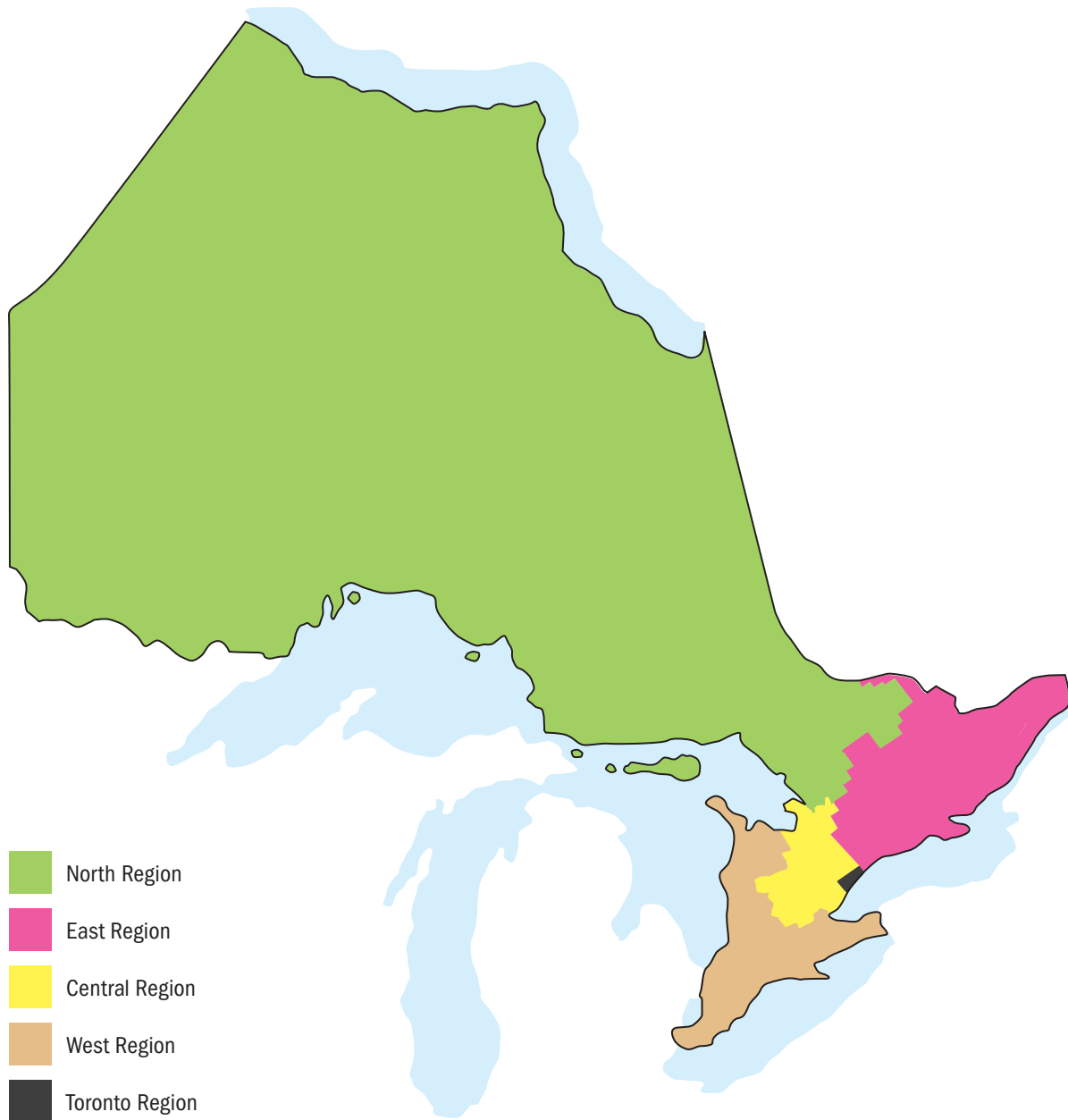
- require Service Agencies to report to the Ministry any changes on the availability of their supportive services during the COVID-19 pandemic, including whether their physical locations are open; and
- use this information to assess the reasonability of expenditures reported by Service Agencies.

MINISTRY RESPONSE

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.

Appendix 1: Ministry of Children, Community and Social Services Regional Map

Source: Ministry of Children, Community and Social Services

North Region

East Region

Central Region

West Region

Toronto Region

Appendix 2: Developmental Services Ontario (DSO) Offices and Passport Agencies by Region

Prepared by the Office of the Auditor General of Ontario

Region	Service Agency (#)[1]	Sub Region	Service Agency	Agency City	DSO Office	Passport Agency
North	57	North East	Hands TheFamilyHelpNetwork.ca	North Bay	✓	✓
		Northern	Lutheran Community Care Centre	Thunder Bay	✓	✓
East	86	East	Service Coordination for People with Developmental Disabilities	Ottawa	✓	
			March of Dimes Canada	Ottawa		✓
		South East	Extend-A-Family Kingston	Kingston	✓	✓
		Central East	Tri-County Community Support Services[2]	Peterborough		✓
Central	60	Central East	York Support Services Network	Aurora	✓	✓
			Catulpa Community Support Services	Barrie		✓
		Central West	Sunbeam Centre	Waterloo	✓	
			Central West Specialized Developmental Services	Milton		✓
West	98	South West	Community Services Coordination Network (CSCN)	London	✓	✓
		Hamilton-Niagara	Contact Hamilton for Children's and Developmental Services	Hamilton	✓	✓
Toronto	41	Toronto	Surrey Place Centre	Toronto	✓	
			Family Service Toronto	Toronto		✓

1. The Ministry funds 316 Service Agencies to provide supportive services to adults with developmental disabilities. The total number of Service Agencies by region is more than 316 because some agencies operate in multiple regions.

2. Tri-County Community Support Services is in the East region, but in the Central East sub-region.

Appendix 3: Passport Program Management Options*

Source of data: PassportONE

Funding Management Option	Description	Invoice Signoff and Submission	Allowable Management Fee
Self-Managed	Client or their primary caregiver chooses to manage the funding themselves.	Signed and submitted to PassportONE by client or primary caregiver.	Up to 10% of the total Passport funding may be used for administrative supports (such as bookkeeping, scheduling support workers, bank fees for Passport-dedicated bank accounts).
Administrator	The client or primary caregiver can designate any individual to manage the funding on their behalf.	• Signed by client or primary caregiver • Submitted to PassportONE by administrator.	Administrator may charge up to 10% to manage the funding.
Service Agency	Service Agencies contracted by the Ministry can manage client funding. These agencies often provide the required services.	Agency submits invoices to PassportONE directly on the client's behalf.	Transfer payment agency may charge up to 10% for managing the funding.
Non-Designated Agency	An organization that is not designated by the Ministry, but authorized by the client or primary caregiver to manage Passport funding.	• Signed by client or primary caregiver. • Submitted by agency to PassportONE	Non-designated agency may charge up to 10% for managing the funding.

*   In addition to the above options, a client may choose a combination of any of the above options to manage portions of their Passport funding. If the client chooses the transfer payment agency management option, they will be referred by their Passport Agency to a transfer payment agency in their region that manages Passport funding. Clients must find and enter into agreements with non-designated agencies and administrators on their own, using standardized forms provided by the Passport Agency.

Appendix 4: Audit Criteria

Prepared by the Office of the Auditor General of Ontario

1.	The eligibility of applicants for adult supportive services is reviewed, their needs are assessed, and their priority for services and direct funding is determined on a timely basis and in accordance with applicable legislative and Ministry requirements.
2.	Eligible adult applicants are allocated direct funding and provided supportive services based on their needs, and in accordance with applicable legislative and Ministry requirements.
3.	Invoices submitted by adult direct funding recipients are assessed and reviewed, and reimbursement payments to recipients are processed on a timely basis, in accordance with applicable legislative and Ministry requirements.
4.	Funding provided to Service Agencies is based on the relative needs of those they serve and commensurate with the value of the services they provide.
5.	Effective oversight processes are in place to assess whether Service Agencies funded by the Ministry administer and deliver supportive services in accordance with applicable legislative and Ministry requirements. Where necessary, corrective action is taken on a timely basis.
6.	Meaningful performance indicators and targets are established for supportive services funded by the Ministry. Results are monitored and compared against targets to ensure that intended outcomes are achieved. Corrective action is taken on a timely basis when issues are identified.

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