

Child Protection Services Program—Ministry

1.0 Background

1.1 Overview

Child protection services are intended to help children and youth who have been, or are at risk of being, abused or neglected grow up in safer, more stable, caring environments. In Ontario, child protection services are governed by the *Child and Family Services Act* (Act). The purpose of the Act is to promote the best interests, protection and well-being of children. The Ministry of Children and Youth Services (Ministry) administers the Child Protection Services Program through which child protection services are provided, and the Minister has designated 47 local not-for-profit Children's Aid Societies (Societies) located throughout Ontario to directly deliver child protection services. These Societies are each governed by an independent volunteer board of directors and are mandated to perform the following functions:

- investigate allegations and/or evidence that children under the age of 16 or in the Society's care or under its supervision may be in need of protection;
- protect, where necessary, children who are under the age of 16 or are in the Society's care or under its supervision, by providing the

required assistance, care and supervision in either residential (e.g., foster home or group home) or non-residential (family home) settings;

- work with families to provide guidance, counselling and other services where children have suffered from abuse or neglect, or are otherwise at risk; and
- facilitate adoptions for Crown wards or children relinquished to Societies for adoption on consent by parents.

Unlike most other ministry programs, where the provision of services is subject to availability of funding, under legislation the Child Protection Services Program requires each Society to provide all the mandatory services to all identified eligible children. In other words, waiting lists are not an option for Child Protection Services. Ministry transfer payments to Societies to fund their expenditures were \$1.47 billion in the 2014/15 fiscal year.

Figure 1 identifies the funding provided to Societies over the last five years and gives a breakdown of protection services the Societies provided, including the number of children in the care of Societies, which has declined by more than 10% over the last five years. Our VFM audit in **Section 3.02** of this Annual Report details the roles and responsibilities of Societies in delivering child protection services.

Figure 1: Ministry Funding Provided to Societies and the Protection Services They Provided, 2010/11–2014/15

Source of data: Ministry of Children and Youth Services

	2010/11	2011/12	2012/13	2013/14	2014/15
Transfer Payments					
Amounts paid to Societies (\$ million) ¹	1,451	1,492	1,501	1,512	1,470
Key Service Volumes					
Total number of inquiries and reports	168,833	170,308	166,137	158,882	162,600
Total number of investigations completed	84,548	85,526	84,540	81,393	81,771
Average number of family protection cases ²	26,682	27,386	28,236	27,829	26,932
Average number of children in care ³	17,868	17,697	17,273	16,434	15,625
Total number of adoptions completed	979	838	837	974	862

1. Amounts paid to Societies include funding for other Ministry priorities including one-time funding to Societies for their historical debts, and one-time funding to support amalgamations.
2. Family protection cases are cases where the child has been determined to be in need of protection. These include cases where the child and family receive supports and services from the Society while the child remains at home with the family.
3. Children in care are children who have been determined to be in need of protection and have been admitted into the care of a Children's Aid Society. The children may be placed with relatives or in a foster home or group home. This includes Crown wards (children who have been permanently removed from their parents or guardians). Crown wards numbered 8,605 in 2010/11 and 6,373 in 2014/15.

The Ministry administers the Child Protection Services Program under the requirements of the Act. The Ministry's functions in the administration of the Program include:

- setting overall strategic direction, legislative and policy framework, and standards for service quality and delivery;
- monitoring Societies' delivery of child protection services based on applicable legislation, regulations, policies, expectations and resource allocations;
- monitoring performance and outcomes against expectations; and
- determining the funding policy, and allocating resources according to the funding policy and program resources.

1.2 Funding Provided to Societies

Until 2012/13, transfer payments to Societies were allocated based on historical spending and activity levels of individual Societies, with some adjustments for changes in the volume of services provided. In 2013/14, in an attempt to address the recommendations of the former Commission to Promote Sustainable Child Welfare (a commission

established by the Ministry in 2009 to examine and recommend changes to the child protection services sector), the Ministry implemented a new funding model aimed at funding Societies based on their relative need instead of historical spending. Under the new model, funding to Societies is allocated based on a 50/50 split between five socio-economic factors pertaining to the area where the Society operates, and four volume-based factors pertaining to its cases. **Figure 2** outlines the socio-economic and volume-based factors along with their weighted percentage used to determine funding. In addition to this funding, Societies also receive additional funding for policy priorities such as the Continued Care and Support for Youth program that helps youth aged 18 to 20 transition to adulthood and independent living, and for specific expenses related to infrastructure, administration, travel and technology.

Along with the new funding model, Societies are now also required by legislation not to exceed their fixed allocation for each fiscal year. Funding allocations are provided to Societies (a significant portion of which is in accordance with their service volumes) for the current year, as well as two years of planning allocations to manage their expenses. By matching

Figure 2: Factors Used in the Ministry's Funding Model

Source of data: Ministry of Children and Youth Services

Socio-economic Factors ¹	%	Volume-based Factors ²	%
Child population (0-15 years)	15.0	Number of investigations completed	5.0
Low-income families	15.0	Average number of open protection cases	20.0
Lone-parent families	15.0	Average number of children in care	20.0
Remoteness	2.5	Children moving to permanency ³	5.0
Aboriginal child population (0-15 years)	2.5	Total	50.0
Total	50.0		

1. Pertain to the geographical area where the Society operates.

2. Pertain to the Society's caseload.

3. Permanency refers to safe placement in a long-term family situation.

the allocations to service volumes, the Ministry attempts to help reconcile the Societies' legislated requirement to provide all the mandatory services to all identified eligible children with the requirement that they cannot exceed the allocation provided.

To help maintain stability during the transition to the new funding model, increases and decreases in funding resulting from the new model are being capped at +/- 2% per year, to a maximum of +/- 10% over five years, for each Society. As well, the Ministry plans to conduct a formal review of the funding model before the end of the five year implementation period in 2017/18 to determine its appropriateness and make any adjustments where necessary.

1.3 Monitoring the Delivery of Child Protection Services

The Ministry uses a number of processes to monitor the delivery of child protection services, including the following reviews, inspections and reports:

1.3.1 Annual Review of Crown Ward Files

When a court order designates a child as a Crown ward, the child is permanently removed from his or her parents or guardians and is placed in the care of a particular Society that assumes responsibility for the child. The Society can place the Crown ward with his or her next of kin, with a foster parent or

in a group home. In the 2014/15 fiscal year, there were about 6,400 Crown wards in Ontario.

The Act requires the Ministry to annually review the status of every child who has been a Crown ward for the previous 24 months and whose status has not been reviewed by the court in that year, and report the results of these reviews to the appropriate Society. The review assesses compliance with legislation, regulations and Ministry policies, and ensures that the placement, needed services, and educational and social needs of a Crown ward are identified and appropriately addressed. Each review consists of a review of the Society's files on the Crown ward, a questionnaire completed by the Crown ward, and an interview with the Crown ward if the ward requests one. In 2014, the Ministry conducted 3,556 Crown ward reviews.

1.3.2 Licensing and Annual Inspections of Children's Residences

The Ministry is responsible for annually inspecting and licensing children's residences, including group homes, and foster care agencies. The licensing and inspection process is a means of assessing whether or not a basic level of care and safety will be provided in a children's residence where a Society places children in its care. The Act, its accompanying regulations and ministry policies outline the minimum level of care that must be provided in a residence.

1.3.3 Child Death Reporting

Societies must file a case report on all deaths of children who were receiving services, or had received services from a Society within 12 months of their death. The case report is to be prepared within 14 days of a child's death or learning of the child's death and provided to the Ministry and to the Chair of the Paediatric Death Review Committee (Review Committee) of the Office of the Chief Coroner.

If, after reviewing the case report, the Review Committee deems that an internal review is necessary, the Society must establish a review team that includes an external reviewer with appropriate clinical expertise to conduct a full Internal Child Death Review (Death Review) within 90 days of the Review Committee's decision. If the Death Review includes recommendations for further action or follow-up, the Society must submit progress reports every six months to the Ministry until the recommendations have been implemented.

Based on the Society's Death Review, the Chief Coroner will determine whether the Review Committee will undertake a further review, to be completed within one year of the child's death. The related Society must consider the Review Committee report, implement the recommendations as appropriate, and incorporate them in its progress reports to the Ministry. The Ministry is responsible for monitoring Society implementation of recommendations in Death Reviews and Review Committee reports, and following up with Societies on outstanding recommendations. The Ministry is also responsible for responding to recommendations addressed directly to the Ministry by the Review Committee.

1.4 Performance Measurement and Reporting

The Ministry is responsible for monitoring the effectiveness of the Child Protection Services Program. Before the end of the 2014/15 fiscal year, the Ministry had one publicly reported performance indicator, which was related to the number of com-

pleted adoptions. The Ministry recently established five new performance indicators designed to better monitor the effectiveness of the program that were reported publicly at the end of the 2014/15 fiscal year (see **Appendix**).

1.5 The Child Protection Information Network System

In 2010, the Ministry began a multi-year initiative to develop and implement the Child Protection Information Network (CPIN)—a single province-wide information system to be used by all Societies and the Ministry. CPIN is an integrated system built on four commercial off-the-shelf software applications for case management, financial management, document management and reporting.

At the time this initiative began, Societies used different and independent information systems to document child protection case information and financial information. These systems, which most Societies are still using, are not capable of sharing case information electronically and do not collect sufficient comparative data on services and their costs. Through CPIN, the Ministry aims to enable timely sharing of critical child protection information among Societies, simplify administrative processes, and facilitate oversight through more timely, accurate and comparable service and expenditure data.

The Ministry received Cabinet approval and planned to implement CPIN in two stages over a five-year period from 2010/11 to 2014/15. Stage 1 originally involved an initial deployment to 14 early adopter Societies over three years beginning in 2010/11. The early adopters would include representative Societies using the various legacy systems. Stage 2, which was originally scheduled to begin in April 2013, was meant to deploy the system to all remaining Societies by March 2015.

2.0 Audit Objective and Scope

The objective of our audit of the Ministry of Children and Youth Services (Ministry) was to assess whether the Ministry has effective policies and procedures for ensuring that children in need of protection receive the appropriate service in accordance with legislation, policy and program requirements; and whether funding provided to Children's Aid Societies (Societies) is commensurate with the value of the services provided.

Prior to commencing our work, we identified the audit criteria we would use to address our audit objectives. These were reviewed and agreed to by senior management at the Ministry. Most of our audit work was conducted between November 2014 and June 2015.

The scope of our audit included a review and analysis of relevant files and administrative procedures, as well as interviews with appropriate staff at the Ministry's head office, and offices in three of the Ministry's five regions (Toronto, East and West). We also surveyed all Ontario Children's Aid Societies, and received responses from most of them, on the new funding model, and we surveyed the 14 Societies that were expected to be early adopters to the Child Protection Information Network.

In addition, we met with senior staff at the Ontario Association of Children's Aid Societies, which represents 44 of the 47 Societies in Ontario, to gain a better understanding of their responsibilities and the issues in the child protection services sector. We also met with the Provincial Advocate for Children and Youth and with the Chief Coroner of Ontario to obtain their perspectives on the province's child protection services and related challenges.

We also reviewed reports prepared by the former Commission to Promote Sustainable Child Welfare, a commission established by the Ministry in 2009 to examine and recommend changes to the child protection services sector. We additionally contacted the offices of the Provincial Auditor of

Saskatchewan and the Auditor General of Alberta to discuss information systems used in the delivery of social services in their provinces.

Our observations concerning the Societies' delivery of child protection services are presented in detail in our VFM audit in **Section 3.02** of this Annual Report.

3.0 Summary

Ontarians expect an effective system of child protection services that ensures children and their families receive the care and supports they require. Thus, it is critical that the Ministry has appropriate oversight processes in place to help Societies meet their mandated requirements, enabling children in need of protection and their families to receive suitable and timely protection services.

Since our last audit in 2006, the Ministry has worked towards improving the Child Protection Services Program (Program). For example, the Ministry has introduced a funding model that is intended to better distribute funding to Societies based on their needs, and it has introduced performance indicators for which it has started to collect data to help it monitor the effectiveness of the Program in the future.

Nevertheless, we found that the Ministry lacks sufficient information on the quality of care provided to the vast majority of children in receipt of child protection services to enable it to provide effective oversight of Societies.

Also, the Ministry needs to better ensure that the pressures Societies are facing with the introduction of the new funding model—including its fixed allocation that Societies cannot exceed—and problems associated with implementing the Child Protection Information Network system are not adversely affecting the Societies' ability to deliver effective child protection services. The Ministry also needs to further assess and take action on the data that shows that young people who have received

protection services face significant challenges when transitioning to independent living.

The following are some of our key concerns with the Ministry's administration of the Child Protection Services Program:

- **The outcomes of children who have received protection services highlight the need for the Ministry to better monitor the Child Protection Services Program**—Many children who have previously received protection services continue to require additional protection services, and young people in Society care face significant challenges transitioning to independent living. Specifically:
 - a survey by the Ontario Association of Children's Aid Societies identified that in 2013 just 46% of youth in Societies' care attained an Ontario Secondary School Diploma, compared to the Ontario average of 83%;
 - the Provincial Advocate for Children and Youth has identified that an estimated 43% of homeless youth have previous child protection services involvement, and that youth leaving the care of Societies are over-represented in youth justice, mental health and shelter systems; and
 - one of the Ministry's new performance indicators identified that protection concerns recurred in about 20% of closed child protection services cases.
- **Ministry does not have sufficient information to monitor the performance of the Child Protection Services Program**—Although the Ministry recently established five new performance indicators, we found that the Ministry has yet to establish targets to measure progress against these indicators. In addition, the Ministry could not perform meaningful comparisons or analysis, or appropriately follow up where necessary at individual Societies, as data associated with the new indicators was collected in aggregate instead of from each Society, and was not collected from all Societies.
- **Ministry's oversight of non-Crown wards receiving protection services is limited**—Although the Ministry reviews the files of all eligible Crown wards annually for compliance with requirements and to assess whether their needs are identified and appropriately addressed, it no longer reviews the files of non-Crown wards. The Ministry discontinued such reviews over 10 years ago in 2003, even though when it had performed such reviews they identified numerous instances of Societies not complying with legislated and ministry program requirements.
- **Crown ward reviews are identifying recurring operational concerns at Societies from one year to the next**—We found that in over 40% of the ministry Crown ward files we examined, some non-compliance issues recurred from one year to the next. Such non-compliance issues included, for example, failing to develop a plan of care that identifies the child's strengths, needs and goals and that is appropriately updated to reflect the child's progress, and failing to have the child receive annual medical and dental examinations.
- **Ministry licensing inspections of children's residences found repeated concerns that were not addressed, potentially affecting children's safety**—In about 40% of the inspections of group homes and foster care operators we reviewed, some non-compliance issues recurred repeatedly from one year to the next. As well, in nearly two-thirds of inspections we reviewed, some non-compliance issues identified by the Ministry were not reported to the licensee and therefore were not addressed. Such non-compliance issues included foster parents and group home staff who were not aware of reporting requirements and procedures for serious occurrences, and group homes that were unable to demonstrate that annual medical exams for children were being completed as required.

- **Ministry’s new funding model still does not provide funding to Societies based on service needs**—Although the Ministry introduced a new funding model in 2013/14 that was intended to fund Societies based on relative need, we found that the new model does not appropriately allocate funding as intended, potentially putting Societies under operational pressures and compromising their ability to provide the necessary and appropriate protection services to children. Specifically:
 - The weights assigned to socio-economic and case-volume-based inputs used to determine Society funding allocations were based on “judgment” rather than supportable analysis. In some cases the new model determined year-over-year increases that were as large as \$31 million (or 50% more than a Society’s prior year funding) and decreases as large as \$9 million (or 20% less than a Society’s prior year funding).
 - While the Ministry capped each Society’s funding increases and decreases at 2% per year, almost half the Societies experienced a funding reduction in 2013/14 relative to the actual funding they had received in 2012/13. Consequently, the reduction in funding experienced by many Societies, combined with the requirement to balance their budget, required Societies to undertake cost-cutting initiatives that included reductions in management, support and front line staff, as well as the elimination of some special programs used to help children receiving protection.
- **Ministry’s Child Protection Information Network (CPIN) system is not currently delivering on its promised benefits despite significant investments in time and money**—We found that poor project planning and management by the Ministry has resulted in significant cost overruns, delays in development and implementation, and a system that is not delivering on its promised benefits. Specifically:
 - Although the Ministry’s 2010 Cabinet-approved implementation plan expected to have CPIN in use by all Societies by the end of the 2014/15 fiscal year at a total cost of \$150 million, as of the end of 2014/15, CPIN has been deployed in just five of the province’s 47 Societies. The Ministry’s revised plan hopes to have CPIN deployed to the remaining Societies by the end of the 2019/20 fiscal year at an estimated total cost of \$200 million.
 - The Ministry developed the original implementation plan without consulting key stakeholders such as the users of the previous systems to understand Society user needs. As well, it did not fully understand the functionality of existing legacy systems that were in use from which data had to be transferred to CPIN, and the resources needed for implementation.
 - Although the Ministry had provided 14 early adopter Societies with about \$2.8 million in additional funding to help support CPIN implementation, the early adopters indicated they had incurred significantly higher costs, totalling about \$18.7 million, which were funded through the Societies’ own operating funds and may have impacted funds available for providing child protection services.
 - All five Societies that initially implemented it indicated that as they transitioned to CPIN, due to numerous functionality limitations, they had to revert to using their legacy systems to perform some functions, and had to implement numerous workarounds to ensure that their ability to deliver protection services within legislative requirements was not compromised.

This report contains nine recommendations, consisting of 12 actions, to address the findings noted during this audit.

OVERALL MINISTRY RESPONSE

The Ministry of Children and Youth Services appreciates the work of the Auditor General and welcomes input on how it can further improve child protection services in Ontario. These recommendations will help inform the Ministry's continued pursuit of improved outcomes for children and youth involved with the child welfare system to help them reach their full potential.

In 2012, the former Commission to Promote Sustainable Child Welfare released its final report that included recommendations to help modernize and sustain Ontario's child protection services. Since that time, the Ministry has worked in collaboration with Children's Aid Societies (Societies), sector associations, child welfare practitioners, youth, Aboriginal partners and others to implement a number of the Commission's recommendations and other significant system changes, including the development of a new funding model and the introduction of a new approach to accountability for Societies.

Although the Ministry has made significant progress over the last five years, it recognizes that further work is needed to continue to improve effectiveness, oversight and accountability with respect to Ontario's child protection services. To that end, the Ministry is taking the following steps:

- exploring potential amendments to the Act, including improving oversight and accountability, in response to feedback received through the 2015 Review of the Act;
- implementing a Performance Management Strategy to guide how the Ministry and Societies learn from, and respond to, performance data and information in order to facilitate continuous quality improvement, learning and accountability;
- working with Societies to further refine performance indicators (PIs), build sector capacity to collect and use PI data and publicly report Society-level PI data in 2016;

- exploring additional opportunities to support youth through the Continued Care and Support for Youth (CCSY) program, as part of the Ministry's ongoing work to establish outcome measures for the program;
- established a panel of experts that is undertaking a review of child and youth residential services and will provide the Ministry with a report and recommendations on improving positive outcomes for children and youth;
- enhancing oversight and monitoring of business processes related to licensing and Crown ward reviews;
- continuing to work with Societies to implement CPIN across Ontario by 2019/20 and to identify, prioritize and resolve any functionality issues; and
- proceeding with a formal review of the Child Protection Funding Model by the end of the five-year implementation period (i.e., 2017/18) to further improve effectiveness, sustainability and value for money.

We appreciate the opportunity to respond to the Auditor General's recommendations for ongoing improvements made in this report. The Ministry is committed to continuing the ongoing transformation of the child protection system to improve outcomes for children and youth receiving child protection services.

4.0 Detailed Audit Observations

4.1 Ministry Does Not Have Sufficient Information to Monitor the Performance of the Child Protection Services Program

The Ministry does not have sufficient information to monitor and assess the performance of the Child Protection Services Program as a whole, or the

performance of individual Societies in their delivery of child protection services. We found that before the end of the 2014/15 fiscal year, in an attempt to improve its monitoring of Society performance, the Ministry established five new performance indicators for which it is collecting and reporting on results. However, the data collected for these indicators is not sufficient to adequately monitor and assess the performance of the Child Protection Services Program, since not all Societies are tracking and reporting on them. (See the **Appendix** for a listing and description of all 26 planned performance indicators, including the five new performance indicators and the number of Societies that reported on them.) In addition, even though the Ministry has established these performance indicators, we found that it has yet to establish targets to measure performance against them.

4.1.1 Data on New Performance Indicators Is Incomplete and Reported in Aggregate Instead of by Each Society

While the Ministry published data on its five new performance indicators at the end of the 2014/15 fiscal year, as shown in the **Appendix**, it was not complete since not all Societies provided data on these indicators. Also, because the Ministry collected data on these performance indicators in aggregate through a third party instead of from each individual Society, it could not perform any meaningful Society comparisons or analysis, or appropriately follow up where necessary at individual Societies.

4.1.2 Societies May Not Be Able to Provide Data on Other Indicators That the Ministry Is Planning to Implement

We were advised that the newly implemented performance indicators represent just five of 26 performance indicators the Ministry plans to have in place by the end of the 2016/17 fiscal year to measure and assess the performance of the Child

Protection Services Program. As the **Appendix** shows, these include performance indicators focused on measuring service, including outcomes related to safety, permanency (safe placement in a permanent family situation) and well-being; and others focused on assessing organizational capacity and governance.

According to the Ontario Association of Children's Aid Societies (OACAS), many Societies face significant issues with extracting data to report on performance indicators. These issues include technical limitations such as data that was never entered into existing Society case management systems and data that is available but difficult to extract because it is in a text field. As well, more time and expertise are needed to map and test the data from some existing Society systems to enable reporting on performance measures, and Societies have not always been able to assign staff to the performance indicators initiative due to competing priorities. As noted earlier, many Societies have not yet reported on the existing five indicators. Therefore, we question the Ministry's ability to effectively collect and analyze data on these additional indicators from each Society by the end of the 2016/17 fiscal year, as intended.

4.1.3 The Outcomes of Children Who Have Received Protection Services Highlight the Need for the Ministry to Better Monitor the Child Protection Services Program

There are many signs that point to the Ministry's need to better analyze and assess Societies' performance and the reasons for the outcomes obtained from the Child Protection Services Program. Based on available information, we noted that many young people struggle after receiving protection services. In particular:

- OACAS conducted three surveys in 2007, 2010 and 2013 on the high-school completion rate for youth in Societies' care in which most Societies participated. Although the survey noted that comparisons to the provincial

average should be taken with caution due to differences in how results are calculated, the survey found that these youth have less than 50% chance of completing their Ontario Secondary School Diploma: 42%, 44% and 46% for the three years surveyed, compared to the provincial average of 83% in 2013. OACAS however noted that the youth who do remain in the care of Societies are often those who have very complex needs and/or significant limitations, which means that high-school graduation or post-secondary admission is much harder to achieve. Nonetheless, once the findings of the surveys were shared with Society staff across the province, many expressed disappointment in the results.

- One of the Ministry's new performance indicators identified that protection concerns recurred in 18–20% of cases closed between 2010/11 and 2012/13 where protection services had been provided. This is based on data reported by only 26 Societies.
- The Provincial Advocate for Children and Youth identified the following:
 - an estimated 43% of homeless youth have previous child protection involvement, and 68% have come from foster homes, group homes and/or a youth centre; and
 - numerous reports going back to the mid-1980s recognize that youth leaving care are over-represented in the youth justice, mental health and shelter systems.

In addition, our VFM audit in **Section 3.02** of this Annual Report identified that in more than half of the reopened child protection cases and cases of children readmitted into the care of Societies that we reviewed, the circumstances and factors that resulted in the subsequent report to the Society or readmission of a child into the Society's care had been present when the case was previously closed or when the child was discharged from the Society's care. As well, our VFM audit in **Section 3.02** identified that in almost half of the Continued Care and Supports for Youth program cases we reviewed, it

was not evident that youth had made reasonable efforts to prepare for the transition to adulthood as intended by the program.

RECOMMENDATION 1

To appropriately monitor and assess the performance of the Child Protection Services Program and the Children's Aid Societies that deliver child protection services, the Ministry of Children and Youth Services should:

- assess the proposed performance indicators it intends to roll out to ensure they target the necessary areas that will adequately evaluate the current and long-term outcomes of the Child Protection Services Program and of children receiving protection;
- collect data from each Society on each of the confirmed performance indicators, and analyze this data to identify trends that require follow-up and/or corrective action both program-wide and at an individual Society; and
- analyze the outcomes of children who received protection services to identify opportunities to improve protection services and ultimately the future of these children.

MINISTRY RESPONSE

The Ministry appreciated the support for this critical area of work and agrees with the Auditor General that the monitoring and assessing of the performance of Children's Aid Societies is important. As such, the five performance indicators (PIs) already introduced by the Ministry, in addition to the 21 the Ministry plans to implement, are based on the set of PIs developed by the former Commission to Promote Sustainable Child Welfare, in consultation with the child protection sector. The indicators:

- reflect immediate (e.g., child safety) and intermediate outcomes (e.g., permanency, well-being such as educational outcomes that measure age-to-grade performance)

that relate directly to the mandate of children's aid societies (Societies), as well as organizational and governance capacity; and

- recognize the practicalities of tracking longer-term outcomes for individual children and youth.

Following the current cycle of data collection and reporting on the 26 PIs, the Ministry will consider these indicators to determine which, if any, can be adjusted to better evaluate long-term outcomes of the Child Protection Services Program.

The Ministry will continue to support Societies and build sector capacity to collect, understand and report PI data. In addition, the Ministry will work to support the full implementation and maturation of a data collection process that provides a comprehensive set of PIs to better understand the outcomes of children and youth. One of the Ministry's goals for the collection and public reporting of PIs is to increase transparency and accountability of Societies and promote an evidence-based approach to ongoing quality improvement. Once a comprehensive set of PIs is available, it will be used to support improved service delivery at the Society level and system-wide improvements at the provincial level.

The Ministry is collecting validated Society-level PIs directly from Societies over October/November 2015 for three fiscal years (2010/11 to 2012/13) and will publicly report Society-level PIs in 2016. In the coming years, the Ministry will continue to collect data and report publicly on a growing number of PIs that will strengthen the Ministry and the sector as well as advance public knowledge of how well children are being served and what their outcomes are.

4.2 Children 16 to 17 Years of Age Who Feel Unsafe Are Not Able to Access Protection Services

The *Child and Family Services Act*, under which child protection services are governed in Ontario, does not extend to children older than 15 years of age. We found that while several Canadian provinces provide protection services up to the age of 18, children in Ontario aged 16 and 17 who feel unsafe in their family living situations are not able to access child protection services.

In 2011 the Government of Ontario made it possible for 16 and 17 year olds who had been in the care of Societies and had their care terminated at age 16 or 17, to resume receiving service. However, those children who have not already been in the care of a Society cannot access protection or support services after they turn 16 (nor can children who were in Society care and had their service terminated prior to age 16).

The Ontario Association of Children's Aid Societies is requesting that the Ministry enact legislative, regulatory and/or policy changes to offer protection services to children up to the age of 18, and provide the required services.

We noted that the Ministry performed a review of the *Child and Family Services Act* (Act) in 2015 that included a variety of stakeholders such as children, youth, families and service providers in Ontario. The 2015 review of the Act focused on two areas: improving outcomes for children and youth, and modernizing and clarifying the language in the Act. One area of focus was on supporting older youth who are in need of protection. There was broad agreement among participants in this review that it is "essential" that the age of protection be raised from 16 to 18 years of age. In addition, participants suggested that changing the age of protection would bring Ontario into alignment with some other Canadian provinces.

The Ministry noted that recommendations made in this review, including changing the age of protection will be explored in greater depth prior to any legislative changes scheduled in the future.

RECOMMENDATION 2

The Ministry of Children and Youth Services should consider the feedback they are receiving for extending child protection services to all children under the age of 18 to ensure that all children have access to protection from abuse and neglect.

MINISTRY RESPONSE

One of the key themes of the recent 2015 review of the *Child and Family Services Act* (Act) is to improve outcomes for children and youth, which includes a specific focus on supporting older youth in need of protection. The Ministry of Children and Youth Services is developing policies and exploring potential updates to the Act and/or its regulations based on the findings of the review, and this work will include engagement with key stakeholders and youth.

4.3 Ministry's Oversight of Children Receiving Protection Services Is Limited

The Ministry is mandated by legislation to conduct annual reviews of the status of only Crown wards (children in the care of Societies where parental rights have been terminated). It does not have processes in place to review the status of the remaining children who are receiving protection services from the Societies but are not Crown wards. This is especially concerning because non-Crown wards vastly outnumber Crown wards. For example, in 2014/15 the Ministry conducted over 3,500 Crown ward reviews, compared to Societies handling about 27,000 family protection cases that include children living with their families. In addition, when the Ministry reviews the status of Crown wards and finds non-compliance with its requirements, it is not ministry practice to request documentation from a Society to verify that its compliance directives have been addressed.

4.3.1 Ministry Has Yet to Replace a Review Process Discontinued Over 10 Years Ago for Non-Crown Wards

In response to findings in our 2006 audit of the Ministry's Child Welfare Services Program, the Ministry responded that it would re-establish its periodic file reviews of non-Crown wards. These reviews were discontinued as of 2003, even though in its previous reviews the Ministry had identified numerous instances of Societies not complying with legislated and ministry program requirements. For example, it was noted that child protection investigations and plans of service were not being completed on a timely basis.

In the 2008 follow-up to our 2006 report, the Ministry informed us that it had developed a file review process that would include regular reviews of non-Crown ward files beginning in 2008. Such reviews would assess compliance with requirements and whether children were appropriately placed and adequately cared for. However, during our current audit we were advised that the Ministry did not implement those reviews (or another review process aimed at these children) and that it has been over 10 years since the Ministry has completed regular file reviews of non-Crown wards.

Conducting such reviews is particularly important in light of our current finding of numerous instances where Societies we visited did not comply with program requirements, such as meeting required time frames for completing Plans of Care tracking the progress of children in care (such as in foster and group homes), completing Service Plans that guide family and service provider goals for children residing with their families, and visiting both children in care and children residing with their families. (See our VFM audit in **Section 3.02** of this Annual Report.) Failing to meet program requirements increases the risk of a child receiving inappropriate care or being subject to neglect that goes unnoticed. We also observed that children may not always be appropriately protected, as we found instances where the Societies we visited may

have prematurely closed child protection files or discharged children from their care while safety concerns were still present.

4.3.2 Crown Ward Reviews Identify Recurring Operational Concerns at Societies from One Year to the Next

If the Ministry's review of a Crown ward's status identifies that the documentation in the child's file does not indicate full compliance with ministry requirements, it must issue a directive to the Society to take action. The Society must comply within 60 days and advise the Ministry of its compliance. In less serious issues of non-compliance with ministry requirements, the Ministry is to issue a recommendation to the Society informing it that file documentation does not fully comply with ministry requirements. However, Societies are not required to act on these recommendations. The Ministry provides the Society with an individual report for each review as well as a summary report that provides an overview of strengths and areas requiring improvement.

It is not the Ministry's practice to request documentation from a Society to verify that directives issued to a Society for non-compliance are appropriately addressed. Instead, the Ministry simply requires the Society to provide written confirmation that the directives were appropriately addressed without any verification. Some of these directives and recommendations address significant issues that may have implications for the child's well-being—for example, Plans of Care that were not being reviewed on a timely basis and caseworkers who were not conducting visits within the required frequency—increasing the risk that the child will not receive the proper care and supports.

We found that in over 40% of the Ministry Crown ward review files we examined, some of the same directives and recommendations issued to a Society previously in 2013 for non-compliance with requirements were issued again in 2014. Some of the repeat non-compliance issues included, for

example, failing to develop a plan of care that identifies the child's strengths, needs and goals that are appropriately updated to reflect the child's progress, and failing to have the child receive annual medical and dental examinations.

RECOMMENDATION 3

To better ensure that all children and youth in receipt of child protection services are safe and receive care that meets their needs and is in compliance with legislative and ministry program requirements, the Ministry of Children and Youth Services should review Children's Aid Societies' files for non-Crown wards in receipt of child protection services.

MINISTRY RESPONSE

The Ministry agrees with the Auditor General that all children and youth in receipt of protection services should receive services that meets their needs and is in compliance with legislative and Ministry program requirements.

In keeping with recommendations of the former Commission to Promote Sustainable Child Welfare, with the introduction of the new approach to accountability in 2013, the Ministry's focus includes compliance while shifting focus to the outcomes being achieved by children and youth receiving the services of Children's Aid Societies (Societies). The Ministry is in the process of implementing cyclical reviews, which will be conducted in all Societies and will assess whether they: have appropriate processes in place to monitor their compliance with legislative and program requirements, including for non-crown wards; and are carrying out internal reviews to monitor their compliance with legislative and program requirements. Should the cyclical review determine that the necessary processes/practices to monitor compliance are not in place, a recommendation would be issued to the Society and the Ministry will work with the Society through the Performance Improvement

Plan process to meet the requirements. Cyclical review tools have been piloted in two Societies and a plan to conduct cyclical reviews in Societies is under development, with the launch targeted by the end of the 2015/16 fiscal year.

RECOMMENDATION 4

In order for the Ministry of Children and Youth Services' review of Crown ward files to be effective in ensuring children are receiving protection services in accordance with legislation and ministry policies, the Ministry should put mechanisms in place to confirm that directives and recommendations issued to a Children's Aid Society as a result of non-compliance with legislative and program requirements are acted upon and corrected.

MINISTRY RESPONSE

The Ministry agrees with the Auditor General that further work is needed to strengthen processes to consistently address non-compliances identified in Crown ward reviews. The Ministry will review its current mechanisms that address non-compliance with legislative and program requirements found in Crown ward files. To facilitate appropriate oversight of non-compliance on an ongoing basis, the Ministry is working to implement a formal process to monitor the progress of Children's Aid Societies against Quality Improvement Plans and Crown ward review findings. The process will help determine and confirm that Societies act upon and correct any issued directive and recommendation as a result of non-compliance with a Crown ward file review.

4.4 Ministry Licensing Inspections of Children's Residences Found Repeated Concerns That Were Not Addressed, Potentially Affecting Children's Safety

We reviewed a sample of ministry licensing inspections of children's residences (group homes and foster care agencies) that assess whether or not a basic level of care and safety is being provided in a children's residence. We found that some non-compliance issues were repeatedly recurring year after year, and that non-compliance issues were identified but not brought to the attention of the licensee by ministry staff from their review and therefore were not addressed by the licensee.

4.4.1 Licensing Inspections Frequently Identify Recurring Non-compliance Issues from One Year to the Next

The Ministry conducts annual licensing inspections, using the licensing checklist supported by the Children's Residence Licensing Manual and the Foster Care Licensing Manual it has developed. These manuals specify the policies related to the number of files to be reviewed; the interviews to be conducted with children, staff and foster parents; and the procedures to be used when reviewing a licensee's policies and procedures.

We found that in about 40% of the licensing inspections we reviewed for the regions we visited, the Ministry identified non-compliance issues that were recurring from one year to the next. These included, for example, Plans of Care (tracking the child's developmental progress) that were not completed in the required time frame; foster parents not being aware of the reporting requirements for serious occurrences (such as a serious injury, alleged abuse or a missing child); and residences unable to demonstrate that annual medical exams were being completed as required.

At two of the three regions we visited, we also noted that it was not the practice of ministry staff to verify that corrective actions are taken to address instance of non-compliance that they identified. Rather, they relied on representations from the licensee that issues of non-compliance had been addressed, even though the Ministry had identified recurring issues at a licensee year after year. Although ministry staff at the third region we visited informed us that they do, in fact, verify that non-compliance issues are addressed, in every case we reviewed we found issues of non-compliance where there was no evidence that staff had verified that the issues had been resolved.

4.4.2 Some Issues of Non-compliance Were Not Reported to the Licensee and Therefore Not Addressed

In nearly two-thirds of the licensing inspections we reviewed, we found issues of non-compliance identified by the Ministry that were not brought to the attention of the licensee to address. These non-compliance issues included, for example, group home staff who were not aware of reporting procedures for serious occurrences, foster parents who did not receive health records necessary for the care of children, and foster parent files that did not contain the necessary references in support of their application.

RECOMMENDATION 5

To ensure that children in the care of Children's Aid Societies are placed with residential care providers (group homes and foster care agencies) that provide appropriate care to children, the Ministry of Children and Youth Services should ensure that all instances of non-compliance with requirements are documented, brought to the attention of residential care providers, and addressed by the residential care providers on a timely basis.

MINISTRY RESPONSE

The Ministry agrees with the Auditor General and is committed to supporting children and youth to reach their full potential. To deliver on this commitment, the Ministry has established a panel of experts that is undertaking a review of child and youth residential services and will provide the Ministry with a report and recommendations on improving positive outcomes for children and youth.

The Ministry has also undertaken a review of the *Child and Family Services Act* (Act) in 2015 that focused on two areas: improving outcomes for children and youth and modernizing and clarifying the language of the Act. A key focus of this review was residential services and licensing. The Ministry is exploring potential changes to the Act as a result of the review, including residential services and licensing.

In addition, the Ministry is continuing to work to improve current licensing processes and practices related to the documentation of licensing non-compliance issues and follow-up procedures with residential care providers, ensuring that they are addressing all instances of non-compliance on a timely basis.

The Ministry also continues to provide training to staff that addresses an array of topics, including the use of consistent tools, documentation, and follow-up business processes to ensure that residential care providers are informed and work to address all non-compliance issues identified.

4.5 Ministry Is Not Verifying That Children's Aid Societies Are Implementing Recommendations from Death Investigations

At the three ministry regions we visited, we reviewed a sample of child deaths where Societies were required to conduct an Internal Child Death Review (Death Review) and/or where a review was

conducted by the Paediatric Death Review Committee, and corrective actions were recommended.

Although the Ministry notes that the majority of recommendations made by the Review Committee and in Death Reviews were implemented, we found that there was no documented evidence that regional office staff reviewed the appropriateness of corrective actions taken by Societies to address recommendations. Recommendations from Death Reviews and the Review Committee to Societies included: to ensure that previous child protection history is obtained and reviewed in a timely manner during the course of an investigation; to ensure Society staff are trained in safe sleeping practices for infants; and to develop a policy on drug assessment and testing, including the completion of unannounced home visits, where substance abuse is a concern.

RECOMMENDATION 6

To reduce the risk of recurrence of circumstances that may have contributed to the death of children who have received child protection services, the Ministry of Children and Youth Services should ensure that Children’s Aid Societies implement all recommendations directed to them from child death reviews on a timely basis and obtain and review relevant progress reports on their implementation.

MINISTRY RESPONSE

The Ministry’s highest priority is the safety and security of children in the province. We all have a role to play in supporting children and youth in need of protection. The Ministry is committed to continue working with the Office of the Chief Coroner and our partners in child protection to strengthen safeguards for children receiving protection services.

The Ministry will be reviewing its strategy on Child Death Reporting in order to strengthen current processes so that the Ministry can continue to monitor how Societies implement all

recommendations directed to them on a timely basis. This may include:

- enhancing the requirements of the current child death management strategy;
- improving the internal child death reporting database;
- establishing a consistent system to track Paediatric Death Review Committee recommendations that have been implemented or are in progress; and
- establishing processes for generating regular reports and information for Ministry use in order to support evidence-based decision-making.

4.6 Ministry’s New Funding Model Still Does Not Provide Funding to Societies Based on Service Needs

Although the Ministry introduced a new funding model in the 2013/14 fiscal year that is intended to allocate funding to Societies based on relative need, we found that the model still does not appropriately allocate funding as intended, potentially putting Societies under operational pressures and potentially compromising their ability to provide the necessary and appropriate protection services required of them under the Act.

4.6.1 Variables Used in the Funding Model Are Not Targeted to Society Needs

The majority of Ministry funding provided to Societies is allocated based on a 50/50 split between five socio-economic factors in the area where the Society operates, and four volume-based factors (as described in **Section 1.2** and in **Figure 2**). We found that the weights assigned to these factors, which significantly affect the funding each Society receives, were based on “judgment” rather than supportable analysis. The Ministry informed us that it primarily assigned weights with the aim of minimizing the impact of the new funding model on funding allocations to Societies, instead of basing them on supportable analysis to address Societies’ needs.

We also surveyed all the Societies to obtain their perspective on the new funding model, and received responses from almost 90% of them. Although Societies acknowledged that the new model is an improvement over prior models, 80% of respondents expressed concerns that the factors, weights and data sources used to allocate funding to their Society were not reflective of their needs and the needs of the communities they serve. Specifically, we noted concerns from the survey relating to the following:

- *Accuracy of data used to calculate the Aboriginal portion of funding.* Approximately one-fifth of the respondents raised concerns that the tax filer and census data the Ministry uses to calculate the Aboriginal portion of the funding (Aboriginal child population 0–15 years; see **Figure 2**) may be vastly understated when it comes to First Nations populations, since some Aboriginal communities do not regularly report such information.
- *Appropriateness of basis for and weighting assigned to remoteness factor.* Over one-third of the respondents raised concerns that the Ministry's use of land mass (the geographic extent of the area served) as the basis for calculating the remoteness factor does not adequately capture the costs of delivering services in less dense, rural areas. In addition, respondents noted that the remoteness factor

is given insufficient consideration in the funding model.

- *Omission of other key factors that affect demand for services.* Many of the respondents raised concerns that key factors that directly affect service demand, not just in their particular community but throughout the province, are not captured in the funding model. For example, the funding model considers only child populations aged 0–15 years in Societies' particular areas, but Societies provide protection services until the age of 18. Other factors identified by Societies that are not taken into consideration by the funding model include the occurrence of domestic violence, mental health issues and addictions, and the availability of services to address these issues; and the proportion of high-needs children and youth served by Societies.

4.6.2 Funding Determined by the Model Highlights Its Flaws

We found cases where funding allocations calculated for individual Societies under the new funding model differed vastly from Societies' prior-year funding. **Figure 3** provides examples of Societies whose funding was calculated by the new model to be significantly different than their previous year's funding. Societies' funding increases or cuts were not as significant as those identified in **Figure 3**,

Figure 3: Comparison of Society Funding Prior to the New Funding Model and Using the New Model

Source of data: Ministry of Children and Youth Services

Societies	Total Funding Received in 2012/13, Prior to New Model (\$ million)	Funding Allocation per New Model in 2013/14, before Cap* (\$ million)	Change Prior to Cap		Funding Allocation per New Model in 2013/14, after Cap (\$ million)
			Increase/(Decrease) (\$ million)	(%)	
Society 1	16.9	28.0	11.1	66	17.2
Society 2	62.8	94.1	31.3	50	62.9
Society 3	45.2	67.5	22.3	49	44.1
Society 4	19.6	14.4	(5.2)	(27)	17.7
Society 5	45.8	36.7	(9.1)	(20)	45.8

* The Ministry capped funding increases and decreases resulting from the new funding model to +/- 2% of the prior year's funding allocation (to a maximum of 10% over five years).

however, because the Ministry limited increases and decreases to +/- 2% of the prior year's funding allocation (to a maximum of 10% over five years); in this way, it intended to maintain stability while transitioning to the new model. Nevertheless, these vast differences indicate that unless Societies were drastically historically underfunded or overfunded, there may be flaws in the new funding model. The Ministry acknowledges that the funding model is not perfect and will require some further changes.

4.6.3 Some Societies Experienced a Significant Funding Cut Resulting In Reduced Staff and Services, Potentially Compromising Their Ability to Deliver Child Protection Services

In the three years prior to the new funding model's implementation, over 80% of Societies required additional ministry year-end funding in at least one of the years to help meet their legislated mandate to provide child protection services. Although, as noted in **Section 4.6.2**, under the new model the Ministry capped each Society's funding increases and decreases at 2% per year (to a maximum of 10% over five years), the cap was based on the funding allocation prior to the introduction of the new model. This cap excluded the additional year-end funding provided to Societies over and above their approved allocations to cover expenses due to legislated service requirements. As a result, based on the comparison we made of actual funding that Societies received (allocation plus additional year-end funding) to funding they received after the introduction of the new model, we found that almost half of Societies experienced a funding reduction in 2013/14 relative to the actual funding they received in 2012/13. On average, we found that these Societies experienced a 4.5% funding reduction, including one Society that experienced a 9.5% funding reduction of \$1.9 million.

As previously noted in **Section 1.2**, with the introduction of the new funding model in 2013/14, Societies were provided with a fixed funding alloca-

tion that they cannot exceed. Specifically, based on the results of our survey of Societies:

- Four in five respondents indicated they had to reduce staff—including one Society we visited that had reduced the number of its workers responsible for cases involving children in its care by 60%, from 22 caseworkers to nine in less than two years, while still providing protection services to roughly the same number of children (about 400 children in care). More than doubling the caseload of the remaining caseworkers increased the risk that children will not receive adequate supervision and regular visits required under legislation and the appropriate protection services.
- Almost one in five respondents indicated they had to discontinue programs over and above regular case management such as additional support for foster parents in managing children with challenging behaviour.

We also noted that several Societies raised concerns that although to date they have been able to deliver protection services, their ability to effectively deliver mandated services while operating within their allocation is questionable in the future. Nevertheless, we noted that the Ministry has not reviewed the impact of the steps taken by the Societies to meet the balanced budget requirement and, specifically, if these steps compromised their ability to meet their mandate.

RECOMMENDATION 7

In order to ensure that funding is commensurate with each Children's Aid Society's individual needs, the Ministry of Children and Youth Services should assess the impact that its current funding model has on the delivery of protection services and make the necessary changes to its funding model if service is being adversely affected.

MINISTRY RESPONSE

While the design of the funding model was informed by the extensive consultation and research conducted by the former Commission to Promote Sustainable Child Welfare, the implementation of the model was undertaken to maintain stability in the sector, given the mandated role of the Societies to protect children and youth. A formal review of the current funding model will commence in 2016/17 as the Ministry had committed when the new approach to funding was rolled-out in 2013/14. This review will include sector participation to assess the effectiveness of the model to enable Societies to fulfill their child protection mandate while allocating a finite amount of funding across individual Societies. The review will determine what, if any, changes are necessary to support these goals.

4.7 Potential for Society Amalgamation and Shared Services

In 2010, the former Commission to Promote Sustainable Child Welfare (Commission) identified that a number of smaller Societies should move toward amalgamating with a neighbouring Society to realize economies of scale, and to enhance quality, expertise and managerial capacity. In response, the Ministry encouraged these Societies to pursue amalgamation, and since that time 16 Societies have amalgamated into seven—including two Societies that amalgamated during our audit. Among other advantages, the Ministry's estimate of cost savings attributed to the amalgamations (excluding the most recent amalgamation) indicates that the Societies projected savings of about \$6.6 million in 2013/14.

Although the Commission noted that there were many additional Societies that would benefit from amalgamation, it did not include these in its list of Societies that should undergo amalgamation,

because they lacked a nearby Society to partner with. Nevertheless, the Commission highlighted that the sustainability of these Societies will continue to be a challenge, and other options should be explored. These include, for example, arrangements where a smaller Society could become a satellite office of a larger Society.

Another recommendation of the Commission was that a range of business functions currently performed separately by Societies should be implemented as shared services across all Societies. Some of the candidates for shared services include back-office functions, training and recruitment, promotion and publicity, and specialized assessments such as drug testing and psychological services. Based on our analysis of expenditure data provided by the Societies, expenditures related to the aforementioned services totalled approximately \$196 million in 2014/15, comprising 13% of total expenditures. Although the Commission did not quantify potential savings from implementing shared service arrangements, one of the benefits it identified was the possibility for Societies to redirect resources from back-office functions and infrastructure and reinvest them in direct client services. The Ministry is currently working with the Ontario Association of Children's Aid Societies (OACAS) to determine the feasibility of shared services in the child protection sector.

RECOMMENDATION 8

To ensure that Children's Aid Societies provide quality child protection services cost-effectively, the Ministry of Children and Youth Services should work with Societies to further identify and implement opportunities for improving the efficiency of their service delivery (including further amalgamations and shared services), while keeping children's needs in the forefront.

MINISTRY RESPONSE

The Ministry agrees with the Auditor General and continues to work with Societies to identify

opportunities to streamline services in order to become more efficient and effective. For example, the Ministry, in keeping with the recommendations of the former Commission to Promote Sustainable Child Welfare, supported the amalgamation of 16 Societies to seven between 2011 and 2015. The Ministry is open to supporting additional Society amalgamations where it would lead to improvements in services and the achievement of better outcomes for children and families.

In 2013, the Ministry of Government and Consumer Services (MGCS) provided funding to the Ontario Association of Children's Aid Societies to conduct a Planning and Business Case Development project on the feasibility of shared services in the child protection sector. The project's final report will be submitted to MGCS and the Ministry in December 2015 and opportunities for improving the efficiency of service delivery will be further examined in conjunction with this report.

4.8 Ministry's Child Protection Information Network System Is Not Currently Delivering on Its Promised Benefits Despite Significant Investments in Time and Money

Poor project planning and management by the Ministry on the Child Protection Information Network (CPIN) system has resulted in significant cost overruns, delays in its development and implementation, and therefore a system that is not delivering on its promised benefits.

4.8.1 CPIN Implementation Has Suffered Significant Cost Overruns and Delays Due to Poor Project Planning

As described in **Section 1.5**, the Ministry's initial 2010 Cabinet-approved implementation plan expected to have the Child Protection Information

Network system in use by all Societies by the end of the 2014/15 fiscal year at a total cost of approximately \$150 million. However, as of March 31, 2015, CPIN had been deployed in only five of the 47 Societies. The Ministry's revised implementation plan hopes to have CPIN deployed to the remaining Societies by the end of 2019/20 at a total estimated cost of \$200 million, or \$50 million in excess of the original estimate.

We found that the original implementation plan was developed internally within the Ministry without consulting key stakeholders such as the Societies and the vendors of the existing legacy systems, thereby resulting in unrealistic timelines for the new system's implementation. The limited Society consultation did not allow for meaningful discussions regarding user needs and availability of resources in the planning phase, which resulted in extensive discussions while the project was already under way. The Ministry also did not consult with users of the old legacy systems to obtain an understanding of the various systems from which data needed to be migrated to CPIN. Late engagement of legacy users was cited by an independent review as one of the factors contributing to the delays in data migration.

4.8.2 Societies Lack Necessary Human and Financial Resources to Support CPIN Implementation

In the 2010/11 fiscal year, all Societies were asked to complete a readiness assessment to help the Ministry determine each Society's organizational and technological capacity to implement CPIN. We reviewed the readiness assessments completed by all Societies and found that over half of the Societies did not have the resources to provide some key functions, including a CPIN project lead or a training lead. In addition, about 40% of Societies did not have the IT resources to support the overall implementation, and almost half the Societies did not have the resources to identify and resolve data-quality-related problems during migration to CPIN. The Ministry had not estimated the additional

costs that Societies would need to incur to meet the implementation readiness requirements.

Our survey of the 14 early adopter Societies that were expected to implement CPIN by the end of the 2012/13 fiscal year noted that these Societies have made significant investments in human and financial resources in the past three years to prepare for CPIN implementation. Such investments include hiring additional staff, undergoing training activities and performing data-cleansing activities. Although the Ministry has provided up to \$220,000 in funding to each early adopter, totalling approximately \$2.8 million, to help support CPIN implementation, we found that the early adopters have actually incurred additional expenses totalling approximately \$18.7 million from 2011/12 to 2014/15 (or the date that CPIN went live), or over six-and-a-half times the funding they received from the Ministry.

In addition, our survey of the five Societies that have currently implemented CPIN indicated that, since going live on CPIN (starting in June 2014), those Societies have spent an additional \$5.4 million to manage workload pressures resulting from inefficiencies in CPIN, primarily on additional front line staff and administrative and IT support. These additional costs are funded through the Societies' own operating funds, which may have further impacted protection services, as Societies were already experiencing the impacts from the funding model and balanced budget requirement described in **Section 4.6.3**.

4.8.3 Ministry Has Spent Three Times More but Received Data Migration Services for Only One-third of Societies Originally Contracted For

In October 2012, the Ministry tendered for and contracted with a vendor for data planning, management and migration services for the 14 early adopter Societies. The original contract term was for a nine-month period from October 1, 2012, to June 30, 2013, with a maximum contract value of almost \$3 million.

From October 2012 to May 2015, the contract was amended 18 times to extend its term and its value. As described in **Section 4.8.1**, limited consultation with stakeholders in the initial stages of the CPIN project resulted in unrealistic implementation timelines, including the time and resources required to successfully migrate legacy data into CPIN. As a result, only five of the 14 Societies received data migration services over a 30-month period at a total cost of over \$9.5 million—over three times the original contract amount.

4.8.4 Some Key Functions within CPIN Are Not Performing as Expected

We surveyed the five Societies that are currently using CPIN and found that several key components are not performing as expected. For example, the reporting function that was expected to facilitate Society and ministry oversight of service delivery is not working properly. One of the Societies evaluated the standard reports produced in CPIN that are meant to provide information on Society operations, such as caseloads and service volumes, and found that four out of every five reports were not accurate (for example, producing no results, not pulling correct information, having duplicate records), and one in every five reports could not be run at all. In addition, Societies indicated that caseworkers continue to lose critical information in contact logs and other documents in CPIN. As a workaround, workers have been asked to initially document their contacts and other activities using Microsoft Word before transferring the information into CPIN.

Societies also indicated that certain components of CPIN that are not functioning properly have important implications for child safety and Societies' ability to meet legislative requirements. Specifically, Societies indicated that they cannot track important legislative milestones for their cases in CPIN, such as due dates for visits with the child and family, and scheduled reviews of Service Plans intended to ensure that caseworkers conduct these on time. As a workaround, Societies are manually tracking due

dates for each case using Microsoft Excel. As well, all five Societies indicated that as they transition to CPIN, due to numerous functional limitations they had to revert to using their legacy systems to perform some functions and to some degree implement numerous workarounds to ensure that their ability to deliver child protection services within legislative requirements is not compromised.

4.8.5 Other Jurisdictions Using the Same Case Management Software Have Experienced Positive Results

As described in **Section 1.5**, CPIN is built on four off-the-shelf applications that have been customized for the needs of the Ministry and the Societies. The core of the CPIN system is the Cúram application for the case management function, which is also used by three other Canadian provinces and several jurisdictions in the United States. One Canadian province that uses the same case management application has not reported any major outages or problems in the three years since implementation. We contacted the offices of the Provincial Auditor of Saskatchewan, and the Auditor General of Alberta, who both informed us that they were not aware of any significant concerns surrounding the use of Cúram for their new social services information systems. Other jurisdictions have also reported positive results. For example, one U.S. jurisdiction saw the percentage of children who received monthly visits increase from 50–65% to approximately 90% as accountability was better enforced through the case management system. Another U.S. jurisdiction saw the number of cases reopened with verified protection concerns within six months of prior closure decrease from 8% to 6.5% after implementing the case management system.

The positive results experienced in other jurisdictions suggest that the underlying software should be sound. However, the design and implementation of CPIN is complicated by the number of different legacy systems used in Ontario and the need to integrate three other applications for

financial management, document management and reporting. This complexity and the lack of meaningful stakeholder consultations during key stages of the project have likely contributed to the functionality problems described in **Section 4.8.4**.

RECOMMENDATION 9

To help ensure that the Ministry of Children and Youth Services and the Children's Aid Societies realize the intended benefits of the Child Protection Information Network (CPIN) system, the Ministry should work closely with all key stakeholders to:

- review and update its recently developed strategy for CPIN to ensure that all critical functionality gaps are identified and resolved before the remaining Societies implement CPIN, and ensure that the strategy allows the system to be functioning as intended by 2020; and
- determine the cost of CPIN implementation to the remaining Societies, the impact of such costs on the Societies' ability to deliver mandated child protection services within their budget allocations, and how such costs should be funded.

MINISTRY RESPONSE

The Ministry agrees with the Auditor General and functionality issues will continue to be addressed as part of the CPIN deployment strategy. The Ministry has acted upon functionality issues highlighted in this report through planned updates made to CPIN in recent system releases, through assessment of local Society technological issues or resolution of user errors through additional training.

In addition, a governance process, which includes sector and Ministry representation, has been established to address and prioritize defects and enhancements. The Ministry will continue to work closely with the child protection sector to identify, prioritize and resolve any

functionality issues with CPIN. System upgrades and enhancements will be ongoing and will continue to reflect user feedback and the evolving regulatory and policy landscape in child protection. The Ministry plans to have CPIN implemented in all Societies by fiscal year 2019/20.

The Ministry will continue to assess and revise its CPIN deployment methodology to provide enhanced supports to Societies for change management and data migration. In 2015/16, the Ministry has begun collecting more detailed data from Societies to analyze CPIN-related expenditures including size and scope of training, change management and sustainability requirements. The Ministry will continue to monitor CPIN-related expenditures to ensure a smooth and responsible transition to the new system.

This approach reflects an appropriate mix of pace, change management, and technical integrity. The Ministry will work to continually improve, applying lessons learned with CPIN deployment. The Ministry will work closely with the sector through the remaining deployment phases of CPIN to support ongoing delivery of mandated child protection services as each of the Societies are brought onto the CPIN.

Appendix—Recent and Planned Performance Indicators (PIs) for Child Protection Services

Source of data: Ministry of Children and Youth Services

Policy Priority Area	PI #	PI Name	Definition	# of Societies for which Data was Publicly Reported in 2014/15
Safety	1	Response time (12hr)	The percentage of investigations completed in the fiscal year where the response occurred within the required time frames or was subject to an approved departure.	n/a ¹
	2	Response time (48hr)		
	3	Response time (7 days)		
	4	Recurrence of child protection concerns in a family after an investigation	The percentage of families that were investigated for child protection concerns (with no further service provided) and were later reinvestigated within 12 months, and protection concerns were verified during the reinvestigation.	27
	5	Recurrence of child protection concerns in a family after ongoing services were provided	The percentage of families that received services from a Society and were reinvestigated within 12 months following receipt of services and where protection concerns were verified during the reinvestigation.	26
	6	Safety in care	To be determined	n/a ¹
Permanency	7	Entry to care	The percentage of children who were investigated and subsequently placed in care within 12 months following the investigation.	n/a ¹
	8	Re-entry to care	The percentage of children who were discharged from care in the fiscal year and re-entered care within 12 months.	n/a ¹
	9	Days of care by placement type	The percentage of days of care in the fiscal year by placement type for children in care.	44
	10	Time to permanency	For all children admitted to care during the fiscal year—the percentage discharged to a permanent living arrangement within a specific timeframe.	18
	11	Placement stability/moves in care	The average number of significant placement changes during 36 months experienced by children who enter out-of-home care during a fiscal year.	n/a ¹
	12	Worker continuity/family services	For all cases transferred to ongoing services during the fiscal year, the percentage of changes in family service workers.	n/a ¹
	13	Worker continuity/children in care	For all children admitted to care during the fiscal year, the percentage of changes in children's services worker since admission to care by length of time in care.	n/a ¹

Policy Priority Area	PI #	PI Name	Definition	# of Societies for which Data was Publicly Reported in 2014/15
Well-being	14	Developmental assets of children in care	The average score of the Society caseworker's perspective on how the child/youth is developing based on the presence/absence of 20 internal (child/youth) attributes and 20 external (life circumstances) assets that are related to children's well-being on outcomes such as educational performance and avoidance of high risk behaviour.	n/a ¹
	15	Quality of the caregiver and youth relationship	The average score on the quality of the caregiver and youth relationship as scored by children in care.	41
	16	Education performance of children in care	The proportion of children in care who are at an age-appropriate grade level, or a year or more behind or a year or more ahead.	n/a ¹
Organizational Capacity	17	Client feedback	Percentage of Societies that have formal regular processes to collect client feedback.	n/a ¹
	18	Stakeholder feedback	Percentage of Societies that have formal regular processes to collect stakeholder feedback.	n/a ¹
	19	Staff turnover	Percentage of staff turnover by job classification for the calendar year.	n/a ¹
	20	Staff sick days	Percentage of short-term and long-term sick days by job classification for the calendar year.	n/a ¹
	21	Employee qualifications	Percentage of staff holding professional qualifications by job classification.	n/a ¹
	22	Accuracy of financial reporting	The percentage variance of the Society's year end actual against the original budget estimates and 3rd quarter budget forecast.	n/a ¹
Governance ²	23	Right people as directors	Percentage of Societies that have qualified and capable directors and individuals that possess the requisite skills, experience, capacity, and attitude to fulfill the expectations of the role.	n/a ¹
	24	Clear and supportive structures	Percentage of Societies that have clear and supportive structures. For example, regular committee evaluations and clearly articulated terms of reference that describe roles and responsibilities of committees.	n/a ¹
	25	Reliable and enabling processes	Percentage of Societies that have reliable and enabling processes. For example, quarterly financial reviews and regular board performance assessments.	n/a ¹
	26	Healthy and sustainable culture	Percentage of Societies that have a healthy and sustainable culture. For example, a culture that emphasizes service quality and continuous improvement with a focus on the child, youth, and family.	n/a ¹

Note: The shaded performance indicators represent the five new performance indicators for which the Ministry collected aggregate data from Societies and reported the results publicly.

1. These performance indicators were not intended to be publicly reported in the 2014/15 fiscal year.

2. Based on survey responses from Society board members and executive directors to 10 questions per governance indicator.