

PROGRAM EVALUATION

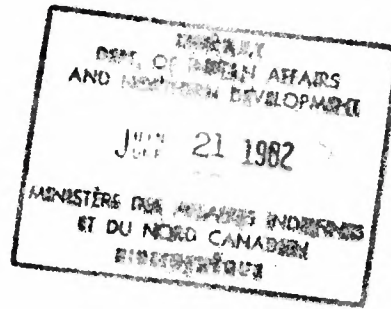
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A STUDY TO EXAMINE
THE ADMINISTRATIVE ELEMENTS AND
RELATED POLICY, MANAGEMENT AND
DELIVERY COMPONENTS OF
THE SOCIAL ASSISTANCE PROGRAM
(ALBERTA REGION)



Indian and Northern Affairs
Indian and Inuit Affairs Program
Program Evaluation Branch

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THE SOCIAL ASSISTANCE PROGRAM
(ALBERTA REGION)

COMMISSIONED BY
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INDIAN AND INUIT AFFAIRS PROGRAM
DEPT. OF INDIAN AFFAIRS AND NORTHERN DEVELOPMENT
OTTAWA, ONTARIO

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JUNE, 1979

This report was prepared by the author under contract and all opinions expressed in this report are those of the author.

It is not an official Departmental publication and the opinions/recommendations do not necessarily reflect the views of the Program Evaluation Branch of the Department of Indian and Northern Affairs. This report does not constitute an expression of Departmental policy.

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June 27, 1979

Mr. Alan Gratias
Director
Program Evaluation Branch
Department of Indian and
Northern Affairs
10 Wellington Street
Hull, Quebec

Dear Mr. Gratias:

We are pleased to submit our report entitled "A Study to Examine the Administrative Elements and Related Policy, Management and Delivery Components of the Social Assistance Program for Alberta Region." Our report integrates the study team's findings developed through the execution of both the Phase I and Phase II review components undertaken in the Region.

In presenting our report, we recognize the dual purpose of this initial regional review: to report on significant administrative deficiencies within the Alberta Region Social Assistance Program; and to provide a foundation for executing similar studies scheduled in other regions. Therefore, we have been careful to balance the need to report thoroughly on relevant issues within Alberta with the requirement to recognize that some commonality of issues and concerns likely will emerge in other regions. Accordingly, while this report pertains specifically to Alberta, its framework is designed to be sufficiently flexible to accommodate the results of future reviews in other regions. In this manner, issues and concerns of national importance can be assembled more easily at a subsequent date.

In submitting our report, we wish to thank the several regional, district and band personnel who offered unhesitatingly their time and comments to the study team; in particular, we thank Mr. Carl Latham who assisted greatly in planning and coordinating our activities in the Region. In

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addition, we acknowledge the contribution of those individuals who devoted their time to reviewing our draft report of April 27, 1979. We trust that the resulting understanding which we have gained is well reflected in our findings, conclusions and recommendations.

We have appreciated the opportunity of undertaking this challenging engagement on behalf of the Department. If you should wish to discuss any aspect of this report or the work it represents, we will be pleased to do so at your convenience.

Sincerely,

P.S. ROSS & PARTNERS



for
R.L. Cummings
Principal

RLC:ht

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I INTRODUCTION

The Department of Indian and Northern Affairs, as one element in its overall mandate, is responsible for the administration and delivery of social assistance to registered Indians. A principal objective of the Social Assistance Program is to encourage the development of Indian community self-sufficiency and social and economic prosperity. While this objective reflects a desirable policy ambition, increasingly the Registered Indian population and program administrators are concerned that intended expectations are not being fulfilled. Indeed, social assistance expenditures have expanded at an alarming rate, to the point where they now approach \$100 million annually. Moreover, there is serious concern that few visible developmental benefits have resulted from the Program, despite the escalating demand for funds. Neither self-sufficiency nor economic well-being has evolved. Rather, adversity and income dependency appear more prominently as the results.

Recently, two additional factors have emerged to cause considerable attention to be focussed on the Program's increasing demands for financial resources: the general weakness of the Canadian economy and the program of government-wide constraint. Faced with numerous alternatives for employing increasingly scarce funds and concerned that effective and efficient utilization is achieved, the Federal Government has begun to assess more vigorously the justification and accountability mechanisms in place before committing to major program expenditures. It is in this context that the Department of Indian and Northern Affairs has chosen to evaluate and assess its various program objectives and expenditures.

Among these, the Social Assistance Program has attracted specific attention. In this regard, the Evaluation Branch within the Policy, Research and Evaluation Group has identified three principal dimensions for review: an administrative review; examination of developmental applications; and selected case studies of social assistance in Indian communities. It is the intent of this review to assess existing capabilities to identify areas warranting improvement and to develop implementable corrective action plans. Results of this review will serve both to justify continuing requests for social assistance funds and to enhance the suitability and accountability of delivery mechanisms in place.

With the exception of the Northwest Territories, each region is to be evaluated. The Evaluation Branch has organized

and assigned certain of its resources to co-ordinate and manage the study efforts. To supplement internal resources, external assistance has been engaged to undertake specific study components. In this regard, P.S. Ross & Partners was retained to assist the Department with the administrative review dimensions of this overall study.

The administrative review component involves an examination of the administrative, management and delivery mechanisms of the Program. Specifically, the elements of the administrative review identified by the Department and undertaken by P.S. Ross & Partners include a review of:

- * Departmental controls to ensure accountability in transferring social assistance funds;
- * Procedures and regulations;
- * Operational controls;
- * Procedures to deal with abuse; and
- * Internal audit and quality control procedures.

In this report, we present the results of our work conducted on behalf of the Department in the Alberta Region. This work involved two phases: the first was concerned with obtaining sufficient background information on the Region to develop a methodology for collecting more detailed data; the second concentrated on executing the collection methodology and assessing the results. This report presents the study objectives, its scope and methodology, a perspective on social assistance delivery in Alberta and our findings, conclusions and recommendations.

II OBJECTIVES

The objectives of this review of the Alberta Region Social Assistance Program are:

- * To undertake a comprehensive program of data collection at regional, district and band levels in Alberta to ascertain the operational controls, procedures and practices available to deliver social assistance funds;
- * To consolidate and assess the material collected; and,
- * To prepare a report outlining our findings, conclusions and recommendations with respect to the operational effectiveness of social assistance delivery in Alberta.

III STUDY SCOPE AND METHODOLOGY

The study was conducted as originally planned, in two principal phases. Phase I began with initial research into the operation and background of the Social Assistance Program. Information, statistics and relevant legislative documents were collected and examined as a basis for formulating the initial parameters of the review. Furthermore, since a certain commonality of information and operations was presumed to exist across all regions administering the Social Assistance Program, the intention was to clarify generally and at an early stage the nature of these commonalities. A review of available literature, discussions with Departmental officials in Ottawa and a visit with representatives of the Ontario Ministry of Community and Social Services were the primary sources for this initial backgrounding.

To supplement this general understanding of the Program, we proceeded to obtain more specific data directly related to the operation of the Social Assistance Program in the Alberta Region. At the outset, it was understood that the Alberta Region was to be the first to be reviewed by the study team. In this regard, the study team visited the Alberta Region and conducted a series of initial interviews with regional, district and band personnel. From these inputs the study team was able to gain a first hand understanding of the environment within which the Program operated.

Once the initial visit to the region was completed, the development of a methodology for more comprehensive data collection program began. We established a framework to collect further data on the operations of the Program in Alberta. This involved the development of a series of data collection work tasks aimed at establishing the operating activities and practices employed at the regional, district and band levels. The purpose of the data collection methodology was to capture in reasonable detail the administrative processes, procedures, practices and controls in place to verify recipient eligibility and to deliver social assistance funds. This methodology was reviewed with national and regional personnel prior to commencing the more detailed data collection. Also, this review denoted the completion of the first phase of the work.

Phase II was concerned with executing the work program previously developed. In this regard, the study team visited the Alberta Region over a two-week period and interviewed various officials concerned with the management and administration of the Social Assistance Program in the Region. Our visit involved initial discussions with regional office

personnel to refine the parameters of our review and confirm the related district and band visit schedule. Following this, we proceeded to meet and interview various personnel at the district and band operating levels. Each district office within the Region was visited. Also, the activities and social assistance operations of eight bands within these six districts were examined. The review of social assistance administration at the band level involved both district and band administered operations. While eight bands are included in our study results, only five were the subject of direct visits to the reserve or band settlement. Finally, summary meetings were held with regional office personnel to review our preliminary findings and to ascertain more fully the management activities undertaken at the regional level.

Upon completion of the field visits, the final task of the review commenced. This concerned the consolidation and assessment of all the information collected. Also, during this analysis we identified those findings, conclusions and recommendations common to the administration of the Social Assistance Program in Alberta. The results of this effort are presented in the following sections of our report.

In reading this report, it should be noted that our comments are based on a sample of the population of Indian bands in the Region. We recognize that certain findings may not apply universally throughout the Region and, in this regard, caution the reader to assess our conclusions and recommendations in this context. Nevertheless, every attempt has been made to examine the nature of the social assistance administrative and control mechanisms in place at all levels within the Region, so that the conclusions and recommendations presented will be both relevant and practical.

IV SOCIAL ASSISTANCE IN ALBERTA - A PERSPECTIVE

This study focusses on the administrative effectiveness and efficiency with which social assistance funds are expended. The administrative practices and procedures, the controls to ensure accountability and adequate internal control and the procedures to deal with abuse, all are encompassed in the review framework. The study team's findings, conclusions and recommendations on these matters have been developed in the context of the environment in which the social assistance program operates in Alberta. It is useful, therefore, to present briefly certain characteristics of this environment as background to the study results.

Social Assistance Program

The Social Assistance Program of the Department of Indian and Northern Affairs is one of several national and provincial mechanisms directed towards ensuring that native people possess the means to maintain an equitable standard of living. Equitability is understood to imply that native people are entitled to the same social services as are available to other residents of Canada. It is in this context that the Department of Indian and Northern Affairs is organized to administer and to deliver social assistance to the Registered Indian population of Canada.

Section 91 of the British North American Act reserves for the Parliament of Canada the exclusive legislative jurisdiction with respect to Indians and land reserved for Indians. Parliament exercises this jurisdiction through the Indian Act which legislates several dimensions of the rights and privileges of Indians; social assistance, however, is not addressed specifically. Notwithstanding this, Treasury Board Minute No. 627879 dated July 23, 1964 authorizes the Department to adopt and follow provincial standards and regulations for the administration of financial assistance to Registered Indians. This enabling authority is consistent with the Indian Act which under Section 88 provides that, subject to the terms of any treaty or other Act of Parliament, all provincial laws of general application should apply to Indians in the province, except to the extent they are inconsistent with the Indian Act. Therefore, it is within this framework that the Department provides social assistance services to Registered Canadian Indians.

Currently, the Department operates in parallel eight regional programs to assess the socio-economic and educational requirements and needs of Indian communities. Each region's program, while not identical to its counterpart provincial program, is based on it.

In broad terms, the Department's Social Assistance Program provides for assistance necessary to maintain health, safety and family unity and to meet specific situations which would otherwise result in social and economic deterioration. Consistent with this broad mandate, each region develops its own procedures and regulations to complement or supplement the related provincial programs and, at the same time, to ensure that Federal Government policy is implemented properly. Accordingly, while uniformity in the application of social assistance policy is desirable on a region by region basis, flexibility in interpretation and administration inherently form part of the requirement for successful regional execution and management.

In the national context, funds approaching \$100 million annually are expended to meet the obligations of the Program. Regionally, expenditures vary according to the Indian population, distribution, economic circumstances and cultural influences. In Alberta, during fiscal 1978-79 the Federal Government's Social Assistance Program directed to Indian communities slightly more than \$18 million. Greater than ninety percent of these funds went directly to the payment of social assistance; the balance covered the related costs of administration.

Organization and Operation in Alberta

Though specific program functions and components will vary between regions, their overall structure, organization and purpose remain similar. Each has evolved in response to local needs and accommodates the unique requirements of the provincial Program within its respective jurisdiction. Within Alberta, three government organization levels participate in the administration of the Federal Government's Social Assistance Program. These include the Department's six district offices, the regional office and Departmental headquarters in Ottawa. In addition, certain band councils administer on behalf of the Department the delivery of social assistance to their respective band communities. However, in some cases, they do not share with the Department the basic principles and concepts underlying the Social Assistance Program and its inherent administrative responsibilities.

The district's principal responsibilities are to provide liaison and consultative services to band councils, to assess and audit those band councils administering their own program and to encourage and assist in the training and development of social welfare workers. Regional responsibilities are to establish the program regulations and procedures and to supervise the district administration of the Program. Also, regional personnel are expected to keep districts informed of new developments in provincial programs and their specific applicability to the Federal Government Program within the region. A continuous

assessment of the adequacy of the regional program, the development of improved services and the establishment of relevant programs of staff training all fall within the mandate of the regional office. The Departmental headquarters staff in Ottawa play a less direct but no less important role in the administration of the social assistance program. Primarily, they are responsible for liaison and consultation with respect to regional program administration, the monitoring and evaluation of regional administration in accordance with prescribed regulations and procedures, and the interpretation and communication of developments in Departmental social welfare policy and proposed program modifications.

In the Alberta Region considerable initiative has been taken to enhance the organizational framework and mechanisms in place to deliver social assistance. Recently, a comprehensive examination of social assistance regulations and procedures was undertaken to identify weaknesses in the administrative and delivery infrastructures. This has resulted in the introduction, as of April 1, 1979, of a revised social assistance manual. Moreover, consideration currently is being given to greater decentralization in the administration of the Program and already steps are underway to introduce a stronger and more focussed management capability and the social assistance staff resources within the regional office are to be expanded to more fully support the Region's coordinating and monitoring role. All of these factors are significant and reflect the commitment to improved services. Similarly, they demonstrate the state of transition in which the Region presently finds itself and confirm the need for a flexible and dynamic approach to effective social assistance administration.

Principal Management Concerns

The manner in which individuals and organizational units demonstrate that they have satisfied the obligations and responsibilities entrusted to them is clearly of major concern to both senior regional and headquarters management. Unless the proper mechanisms are in place, an accounting for and measurement of actions cannot be performed. This concern with accountability is foremost in the minds of senior Departmental officials and, in the light of the Government's current posture on restraint, the Region's concern certainly is justified. Consequently, the Region has taken, and is continuing to take, positive steps to improve the overall effectiveness of its social assistance management process.

Linked closely with the Program's overall effectiveness is the issue of staff resources. Several social welfare administrators currently do not possess broad backgrounds in the administration of a complex social assistance program. However, despite this deficiency, most are expected to perform a role which embraces

such diverse responsibilities as counselling, administration and financial control and interpretation of social assistance policy regulations. There is general concern that adequate training has not been made available. While training is encouraged and several programs do exist, they have tended to concentrate primarily on social and cultural dimensions, with very little attention to basic administration and financial control aspects of the Program. Both are integral components of the Social Assistance Program.

A further important characteristic of the Program relates to the problem of leakage. Defined as that amount of social assistance which inadvertently, incorrectly or fraudulently is lost through the system, it is of utmost interest to senior management. Several views exist on the extent of leakage; to our knowledge few ever have been substantiated fully. Nevertheless, insufficient verification of applicant needs and limited or non-existent monitoring of continuing needs together can account for a substantial loss of funds. To the extent that leakage does exist, it continues to be viewed by management as sufficiently serious to warrant assurances that all reasonable control mechanisms are in place.

In a broader context, senior management of the Alberta Region is concerned that the parameters of the Social Assistance Program require greater definition. In this regard regional management is seeking clarification and national direction as to the scope and limits of the services to be provided through the Program. Currently, it is perceived that inconsistencies between regions result more from the absence of this direction than from variations in provincial legislation and regulations and a stronger national coordinating role is being solicited.

Improvements to the social assistance delivery system are underway in Alberta. Further sophistication and system refinements are being introduced, and together they are placing additional pressures on the Region's resources to monitor effectively overall performance. It is becoming increasingly apparent that proper mechanisms need to be developed to assess, on a continuing and regular basis, the operating effectiveness of the Social Assistance Program. Currently, very little effective operational auditing or review exists. Performance measurement criteria will be necessary, if suitable and well founded management decisions are expected. Furthermore, to ensure that the system is operating as intended and that weaknesses are highlighted, a proper process of audit and examination will be required. This study is concerned in part with identifying these needs and assisting the Region to develop methodologies and controls to meet these requirements.

The Future

The emerging government-wide concern with accountability and improved control and the Region's desire to provide better service both will expand. Greater constraints on the availability of funds will require the Department to demonstrate and justify program expenditures even more fully. Further decentralization and the expansion of band administered programs also will demand improved delivery systems and monitoring mechanisms. The timing of the decision to permit all bands to administer the Department's Program will be influenced by the Region's ability to develop sound training and education programs and the consequent development of key regional personnel, a stable resource base and useful supporting information systems.

These are all relevant concerns that must be addressed in the future. In the immediate horizon the important issue requiring regional management's attention is the operation of a social assistance system which balances the need for cost-efficient delivery mechanisms with the requirement for effective control and monitoring. The following sections of our report present our findings, conclusions and recommendations opposite this important issue.

V FINDINGS AND CONCLUSIONS

This section of our report describes the findings and conclusions of our review of the Alberta Regional Social Assistance Program and reflects the results of the study team's Phase I and Phase II visits. Indeed, several areas were examined during the data collection phase. For clarity, we have grouped our results into five major categories. These are:

- * program interfaces;
- * social assistance eligibility and verification;
- * administration, accounting, internal control and reporting;
- * leakage, recovery and appeal; and,
- * training and staffing.

Under each category we discuss the relevant issues raised and the weaknesses and deficiencies identified and we present the conclusions that emerged. In presenting these findings and conclusions, we have identified separately band, district and regional practices. While our findings reflect the realities of the district and band operations examined, they are not intended to apply universally across the entire Region. Notwithstanding this qualification, we are confident that our findings and interpretations reflect the principal issues facing the administration and delivery of social assistance in Alberta.

In presenting our findings and conclusions we have been careful to preserve the confidentiality of information provided to us during the conduct of our review. Consequently, the names of specific bands and/or individuals have not been disclosed. We believe that this decision will neither lessen the validity nor the significance of the comments which follow.

A. PROGRAM INTERFACES

During the conduct of our review, we examined the various interfaces and relationships that exist to administer the Social Assistance Program in the Region. In this regard, we identified two principal dimensions which require discussion: internal interfaces and external interfaces. Interfaces in-

ternal to the program take various forms and include headquarters/regional, regional/district, district/band, and Social Assistance Program/other Departmental Programs. External interfaces refer primarily to the relations between the Region and the Province.

1. Headquarters/regional

Headquarters' chief concern relates to the development of broad policy guidelines and coordination of programs across all regions. Consequently, day-to-day involvement with regional activities and operations is limited. Only when specific matters emerge, either of a political nature or related to a national policy interpretation or directive, do headquarters personnel become involved with the application of the Region's program. Complicating this relationship is the absence of a clear national social assistance policy to assist the Region with implementation and management. Instead, broad policy guidelines and related directives issued from time to time serve as the basic parameters for regional administration and direction. This does not suggest poor relationships but rather that the interaction is more reactive than proactive.

Notwithstanding this program management constraint, reasonably consistent and regular interaction does occur between the two in the reporting of financial results. The government-wide financial reporting system requires that data be "rolled-up" for government reporting purposes. Though this system may not satisfy fully regional information needs at each organizational level nor meet completely the demands of accountability reporting, it does provide a mechanism to consolidate, report and monitor overall financial results. Moreover, it places certain responsibilities and controls at each level within the Program. Generally, summary financial reporting of the social assistance funds disbursed is provided and is available to headquarters financial personnel. Mechanisms within the Region to accumulate and report these data are established and function reasonably well within the framework of government financial reporting requirements. However, the same cannot be said of other informational data.

The transmission of statistical data is less well defined. Only recently has a manual system of reporting for summary social assistance statistics been reintroduced. From a national perspective, while this is a positive step, the quality of the data provided is poor, with the result that national program monitoring and policy development is restricted.

2. Regional/district

With respect to the regional/district interface and relationships, several anomalies were evident. While

communications do exist between the Region and district offices, practices vary. Field visits made by regional personnel are not conducted frequently nor on a consistent basis. In part, this is a function of the limited regional social assistance resources available. More often than not, the purpose of district visits is to gain first-hand knowledge of a particular problem or to resolve it. Infrequently are they employed to review the operation and to assess overall performance in relation to the district's ability to administer and manage the Social Assistance Program. As a result, there is no well developed feedback mechanism in place between district and regional offices to provide a basis from which improvements or system changes can readily occur. Furthermore, the reaction of district personnel indicates that sporadic regional visits often are interpreted as an encroachment on the district's management or decision making freedom or a criticism of capabilities in this area.

As long as the regional office maintains responsibility for social assistance regulations and procedures, it is essential that proper linkages and program evaluation practices be established. Only in this manner can there be reasonable assurances that consistent social assistance policies, regulations and procedures are applied.

3. District/band

District/band interfaces have two principal dimensions. The first involves supporting and assisting the Band Councils with the administration and management of the Social Assistance Program. The second is concerned with administering the Program itself on their behalf.

Where the band has authority to administer the Social Assistance Program, a Band Council Resolution outlines the conditions under which the band is to provide the local services. This authority is recommended by the district office and approved by the regional office. Within the agreement, the specific responsibilities of the Department and of the Band Council are identified. Inasmuch as the local service agreement structures the responsibilities of the two parties, inherently it also sets the parameters for the liaison and interface activities between the band and the Department. The Department, principally through the district office, provides a support role to the band and its responsibilities are defined in a series of eight broad conditions. On the other hand, the responsibilities of the band include in excess of fifty specific conditions which must be satisfied. On the surface, it appears strange that one set of responsibilities is subject to such specific definition while the other is framed only in broad general statements. To the extent that a local service agreement is intended to encourage and provide for increased autonomy and decentralization of administration to the band level, these arrangements and balance of responsibilities are

in order. However, to the extent that they impose on the band government financial control, accounting and reporting system requirements, they may be unrealistic. Although control and accountability are required, band resources often are not available nor trained sufficiently to assume these responsibilities. Consequently, district personnel are required to provide an increased liaison role to satisfy the requirements of the system. Alternatively, bands increase their resources to meet the control and accounting demands placed on them, resulting in higher overall program administration costs.

The transfer of responsibility from a district office to a band tends to reduce the interface between the two. While the scope of our examination did not include an assessment of all existing local service agreements, our review did not leave us convinced that each party to the agreement carried out fully his respective responsibilities. The district offices demonstrated little evidence that regular assessments and audits of band operated programs, in accordance with the local service agreement, were performed. No documentation or formal procedures were available to suggest that this occurred. However, through our discussions we did confirm that communications existed which took the form of questions regarding the interpretation of social assistance regulations: an extremely useful and significant activity.

4. Social Assistance Program/Other Regional Programs

A further regional interface which exists is that between Social Assistance Program personnel and those of other regional departments such as Education, Housing, Public Works and Local Government. Typically, each of these departments is responsible for a specific program. The existence and evidence of joint efforts was limited, although some coordination of the different departmental program thrusts is undertaken regionally. At the district level, each unit is concerned with managing its own activities and opportunities to interface and coordinate are not developed actively. Organizational structures and constraints as well as individual personalities also may impede this process. However, despite the rather loose arrangements between district programs, there was some evidence of emerging coordination between program activities.

Specific programs, such as the Work Opportunities Program (WOP) and band economic development projects, impact on the level of social assistance consumed in any given period. It is important, therefore, to recognize the need to coordinate these with the Social Assistance Program. For example, if a viable economic development program is introduced at the band level resulting in the creation of permanent jobs for some of the employable band people, this will have the effect of reducing the disbursement of social assistance funds during the life of

the program. However, if on the other hand, the economic development project does not result in long term employment opportunities, the costs of social assistance may well increase subsequent to its completion. Apart from ultimate cost considerations, failure of the project can create negative attitudes in the community, can affect the success of future similar projects and can preserve indefinitely a reliance on social assistance funds.

External program interfaces within the Region are limited largely to regional and district office relationships with the Department of Social Services and Community Health of the Province. As it is the provincial system of social assistance upon which the Federal regional system is patterned, there is a need for the Region to keep informed of changes or modifications in provincial regulations and rates. The regional office conducts regular meetings with the province and refinements to the Region's program are introduced normally on a timely basis. At the district level, we discovered that relations between the Department and the Province varied widely. In some cases, cooperation and communication were strong; in others, it was for all practical purposes non-existent or confrontational. Although the provincial and departmental roles are intended to compliment rather than challenge each other, the lines of responsibility often are unclear. For example, the issue of chargebacks for social assistance forwarded by the Province to the Department frequently raises questions of jurisdiction. If the most efficient social services are to be provided, increased effort needs to be expended to ensure that strong cooperative relationships develop between each district office and its provincial counterpart.

B. SOCIAL ASSISTANCE ELIGIBILITY AND VERIFICATION

Substantial effort was directed to examining the mechanisms and controls in place to determine eligibility, verification of data and control over the issuance and payment of benefits to social assistance recipients. In this context, we concentrated on the practices currently in place and devoted less effort to examining those being developed for introduction. We did examine the revised regional social assistance manual but could not assess fully the impact of all the improvements and refinements which it incorporates, since at the time of completion of our field visits in March, the new manual had not yet been introduced. Nonetheless, we commend the Region for taking the steps necessary to develop an improved manual and trust that the comments which follow will support the initiatives taken already.

Recognizing that the regional social assistance system is modelled after the provincial social allowance policies and procedures manual, substantial improvements were in progress to better acquaint the social assistance worker with the regional requirements. The determination of conditions of eligibility, the various benefits rates, special conditions and supporting application forms all are components of the revised social assistance procedures. In comparison to the counterpart procedures of the provincial system, generally the Region's are in less detail. Compared to the Region's earlier manual edition, however, they are improved substantially in both coverage and quality of content.

It is the social assistance manual that provides the basic documented procedures to assist the social welfare worker to administer social assistance in the Region. As the basic decisions to grant or not grant social assistance are made at this level, it is essential that some guidance be available to support decisions taken. The revised social assistance manual has introduced several significant and necessary improvements in this regard. However, different people under differing conditions within the Region vary the interpretation and application of the regulations.

The principal document used in the assessment of the eligibility of an applicant is the Budget and Decision (B & D) form. Approval or rejection of a request for assistance rests with the social worker. Approval results in the completion and processing of the Budget and Decision (B & D) form; rejection, more often than not, goes unrecorded in the system. Also, it is at this level in the system where in excess of ninety percent of the Region's social assistance funds are committed. Consequently, it is essential that sufficient documentation exist to demonstrate that proper verification procedures have been applied. Though some flexibility in the application of regulations is required by the social worker, improved documentation of verification activities must be achieved. The revised manual goes a long way to provide improved mechanisms and procedures to support this process.

At the time of our field visits, formal procedures to describe the steps involved in processing an applicant's request for social assistance did not exist. The interview process, the information and forms to be provided by the applicant, the elements of an applicant's file to be completed, and the process by which referrals, special needs or appeal provisions were made known to the applicant were not documented. Consequently, variations in the treatment and handling of applicants were numerous.

To supplement our review of the interview process at each district office and band site visited, we undertook to examine a random selection of social assistance recipient case files. The purpose of this exercise was to ascertain generally what level of supporting documentation existed. In total we examined slightly less than two hundred active files. We concluded overall that little or no supporting documentation existed to corroborate most completed B & D forms in an applicant's file.

Our findings revealed the following inadequacies:

- * No indication that income or absence of income was verified;
- * Categorization of cases by health, social or economic reason not supported consistently by appropriate current medical certificates or explanatory notes;
- * Visit reports and counselling activities often not prepared;
- * Special need cases frequently lack explanation, justification and verification;
- * Comments section of B & D form often left blank;
- * Reference to cheque or purchase voucher number issued frequently missing;
- * No evidence that district offices have checked band B & D forms prior to their processing with region; and
- * No evidence of any mathematical verification or pre-audit activities.

A further serious discrepancy revealed was that in some cases B & D forms obviously were pre-signed by an applicant pending completion by the social worker. This observation was supported by evidence of cancelled B & D forms signed by an applicant that were only partially completed. It is unreasonable, based on our sample, to suggest that this practice is wide-spread; yet it is disturbing to find that this practice exists. While not all social workers are guilty of this practice, the evidence does suggest that the rigour and discipline of the system are sufficiently loose to permit wide interpretation of the manner in which documents must be processed. Proper and regular examination and audit of the social assistance operations and related case files would assist to rectify this weakness.

One element of our work program required the study team to examine the treatment of eight specific social assistance services. In each case the Region's handling of these services as social assistance benefits was consistent with that employed by the province. However, in only three of the services was there consistently and uniform treatment within the Region; the balance attracted much broader interpretation. Those services where there was reasonable consistency of treatment across the Region included:

* Funeral and Transport of Remains
(especially across provincial boundaries)

Transport of remains within the province back to the normal residence of the individual was covered; costs of out-of-province transport were not.

* Guardian Social Allowances

Generally, coverage is accepted as a social assistance service.

* Assistance to non-Indians

The individual must be residing on the reserve and meet the eligibility requirements established for Indians.

Those services which were accepted as social assistance but which showed limited evidence of uniform interpretation within the region included:

* Indigent Travel

Assistance ranges here from no assistance to limited travel payments.

* Social Assistance to Persons in Pre-Employment Training and Education Programs

Generally, this type of assistance is not provided under the Social Assistance Program but rather is considered as being within Education. However, in off-reserve situations, where a budget deficit occurs in an applicant's cash projection, assistance sometimes is extended under the Program.

* Maintenance Grants to Adults in Residential Treatment Centres and Nursing Homes

The actual maintenance grants are a legitimate charge to Adult Care. Some confusion exists with respect to the other costs (ambulance services, transportation, etc. as these costs occasionally are paid as social assistance benefits.

* Homemaker and Day Care Services

Generally, these costs are provided under the Preventative Social Services Program and assistance ranges from none to reasonable assistance. Within the Social Assistance Program they occasionally show up as a special need item and are provided only for a limited period of time. Within the Region the nature of these vary.

* Assistance to Employable Persons for Travel to Seek Employment, Relocation Expenses, Trade Tools and Essential Work Clothing

Fairly broad interpretation exists for these types of assistance. In some situations it is considered as a cost to be covered by the Manpower Program. In others, limited assistance is provided to cover reasonable costs related to job seeking and no other costs are covered. In still other situations, some travel expenses and limited relocation expenses are compensated. Trade tools and clothing costs generally were not considered to be eligible.

Generally, social assistance eligibility criteria are established and defined. However, our review suggested that the application of the criteria and related policy regula-

tions is open to much interpretation. While consistency in application often exists at a particular location, variations do occur across locations. In part, the absence of a complete set of manual procedures and instructions has contributed to this variability. The recent revised manual has alleviated many of these difficulties. Also, staff training and indoctrination, which are discussed later in our report, have not communicated the fundamental principles of management and accountability which are essential to the successful administration of the program. In addition, while assistance to bands is provided from district offices on an "as required" or on an "as problems occur" basis, the absence of a regular auditing and evaluation of operations has contributed to several of the discrepancies which presently exist.

C. ADMINISTRATION, ACCOUNTING, INTERNAL CONTROL
AND REPORTING

In conducting our review of the administrative, accounting, internal control and reporting dimensions of the Social Assistance Program our orientation was to assess the control mechanisms in place. While an understanding of the systems was obtained, our perspective was not a detailed technical examination of the information and accounting processing systems in operation.

With respect to the administration and operating effectiveness of the Alberta Social Assistance Program there are three levels of concern: regional, district and band.

1. Regional

At the regional level very few administrative activities relative to the day-to-day operation of the system occur. This is consistent with its policy role to establish program procedures and regulations and supervise the operation of the program. Nevertheless, the regional social assistance staff increasingly are involved with band discussions, regulation interpretations, appeal hearings and general "fire-fighting" situations of regional significance. Not surprisingly, given the limited resources available, effective regular monitoring and program assessment activities are not performed. As of April 1, 1979, a new responsibility centre management approach has been introduced. The Director of Social Development effectively will control the regional social assistance budget. Expanded participation in the management of financial performance is expected as is the scope of the Region's general monitoring of operating activities. Also we understand that current plans call for some expansion of resources to assist in this monitoring role.

All of the B & D data prepared by the bands and district offices are forwarded ultimately to the processing centre of the Region's finance department, where they are entered into a computer facility for statistical statement and subsequent cheque and band reimbursement processing. These data are neither reviewed nor pre-audited by regional social assistance staff prior to processing. Moreover, no verification or internal audit procedures exist currently to ensure that all the data are received nor whether what is received is accurate or complete. Also, because of computer input control deficiencies, several opportunities for errors exist prior to data entry. Consequently, the resulting reports generated frequently are misleading or incorrect and extremely difficult to reconcile at the district and band level. This lack of confidence in the information reported has created the development of substitute systems and reports at both levels. More frequent monitoring and educating of users to the process is required if improvements are to be achieved.

Despite the fact that the input data source is the B & D form, it was brought to our attention that information employed for the preparation of permanent assistance cheque runs can differ from that used to produce statistical reports. In one case, the cheque run may void or cancel a recipient's entitlement because of expiry; in the statistical system while cancellation mechanisms do exist they are not as effective and differences between the two sets of records often are present. The difficulty occurs when the statistical system continues to indicate an eligible recipient and then is used as the basis to reimburse bands for expenditures which in fact they may not have made. Reconciliations at the band and district level create substantial problems and in many cases simply are not being attempted. Batch control mechanisms at the band and district office level and verification procedures prior to data entry would alleviate many of these difficulties.

The statistical information generated at the regional level takes the form of several computer reports which are available for distribution to the region, district and band levels, as well as headquarters in Ottawa. The accuracy of these reports is suspect and as a result their regular use as management tools is limited. Inaccuracies and lack of input control of the data entered or cancelled, different treatment of cash versus purchase voucher payments, and time consuming and difficult reconciliations to accounting and source B & D records at district and band levels are but a sample of the weaknesses inherent in the statistical information system. Only summary information is available to headquarters in Ottawa and, because of the inherent system weaknesses, this is used cautiously. Recently, instructions were issued by the regional office and by headquarters to provide manual summaries of social assistance payments to alleviate the information difficulties being experienced.

2. District

At the district and band levels, administration, accounting and internal control practices vary widely. The district office administrative processes and capabilities differ depending primarily on the availability of personnel. Though the systems of administration and accounting are similar in design across the district offices, many maintain supplementary management systems to better inform district Superintendents of the status of their program activities. In most cases the systems are not uniform, though traces of commonality in information needs do exist. In no case was there any evidence that these addendum administrative support systems were documented. Their effective operation, therefore, depended entirely on the experience and administrative capability of the personnel in place.

Similarly, with respect to internal control practices employed, no evidence existed to indicate that conscientious efforts are made to detect errors. There was more concern with processing the B & D data and providing the services than with ensuring that what was processed was accurate.

In part, this concentration on service to recipients is or is perceived to be a priority. However, disregard for proper control and verification mechanisms must be viewed as a serious weakness in the management and administration of that program. The actual accounting processing of cheques and purchase vouchers appeared to be less of a problem at each of the district offices. In many respects these control weaknesses result from the fact that social workers and social service administrators increasingly have been expected to assume greater administrative responsibilities. By virtue of their backgrounds, many workers and administrators are not qualified nor trained suitably to perform or initiate instinctively these mechanisms.

3. Band

Evidence of documented administration, accounting and control procedures at the band level, for all practical purposes was not available. Band practices relating to applicant interviews, B & D completion, processing and control procedures and accounting control mechanisms related more to the level of experience the band welfare administrator had gained than to standards established through local service agreements. While we anticipated some consistency of practice given the common requirements for control and reporting as outlined in the local service agreements, this was not evident. Band administrative and accounting processes varied depending both on the size of band and the nature of other administrative support systems imposed by the Band Council administration. Band processing

mechanisms were weak and did not satisfy fully the requirements of the local service agreements and strong internal control. In addition, evidence that the Department, provided effective monitoring and assistance also as recorded in the local service agreement, was not apparent.

At each of the bands we visited reasonable accounting records were maintained to reflect expenditures on social assistance. However, in some cases it was difficult to establish accurately what was band contributed versus department contributed. There was no indication that the Department has audited the band's processes of administration and accounting control. Nonetheless, social workers assigned to interface with specific bands did provide to the best of their abilities some support and assistance to band social assistance administrators as problems or difficulties of administration were identified.

D. LEAKAGE, RECOVERY AND APPEAL

1. Leakage

The definition of leakage as it pertains to the social assistance program is subject to wide interpretation. Broadly, it represents any intended or unintended appropriation of social assistance funds which otherwise would be available for use elsewhere. At one end of the spectrum it may result simply from a misinterpreting of the regulations or a failure to apply adequate verification practices. It may occur as a function of processing control weaknesses inherent in the delivery system or, in extreme cases, it may be the result of outright fraud.

In our review we were cognizant of the requirement to ascertain not only the types of leakage that existed but also the order of magnitude of the dollars involved. The identification of types, known or suspected, was relatively straightforward; determination of the related dollars was another matter.

Currently, no suitable mechanisms exist within the system to establish accurately the extent to which leakage occurs. System control features and supervisory practices have not evolved to a point where management is confident that no or controllable slippage occurs. More often than not, detection is accidental. As a result, the extent of leakage in all its forms can only be estimated.

Various sources estimated that leakage ranged between 1% and 20% of the total social assistance budget. We remain unconvinced that these extremes are realistic as

no evidence was provided to support these claims. Our examination, while not intended to quantify definitively the level of abuse, was sufficiently comprehensive to have detected flagrant abuses; yet we found no evidence to support estimates at the high end of this range, though system control and processing weaknesses do suggest the contention that some leakage does occur. The real issue is the balance to be achieved between the value of improved controls and the increased costs for that control. We believe that substantial improvements can be achieved without significant costs increases. Improvements in the determination and verification of an applicant's income, alone will be a major factor. Notwithstanding this, we acknowledge that some level of leakage always will be present in a complex social assistance system involving the interface of numerous personalities, cultural and social incongruities and the requirement to exercise judgement.

In our review we identified three principal categories of leakage, including leakage that is:

- * associated with the application and interpretation of regulations;
- * related to inadequate processing control mechanisms; and,
- * linked with intentional misrepresentation of data.

The first group is the most common and most difficult to control. It includes those instances where the social service worker or administrator, for a variety of reasons, does not or cannot substantiate fully the information provided by the applicant. Misinterpretation or non-reference to the regulations are shortcomings which collectively can result in significant overpayments. However, this condition also may result in underpayments as well. Examples of this type are:

- * an applicant claims no income; this is not fully verified and it is established subsequently that unemployment insurance or assistance was received from another agency;
- * payment of fuel and utility invoices are made beyond that permitted in the regulations; and
- * there has been a reduction in the number of dependents; this has not been reflected through a revised B & D form, so that assistance paid exceeds the allowable limit.

Instances where the system is at fault relate primarily to weak control practices. Either incomplete or no review is conducted of completed B & D forms prior to their processing. In no instances did we see evidence that any verification or review had been conducted. Also, control over documents flowing between band, district and regional offices was non-existent. The document flow was irregular and no controls existed to ensure that documents forwarded were received intact at their destination. Also, processing cut-off dates at the regional office were restrictive. Consequently, the untimely receipt of cancellation data frequently resulted in overpayments. Verification of input data at the regional office also was non-existent. The application of proper internal controls, approvals and batch control practices at all levels in the organization would alleviate many of these deficiencies.

The final category, while not representing necessarily the highest dollar volume, is the most serious. Intentional misrepresentation or fraud, if not detected and dealt with firmly, encourages widespread abuse throughout the system. If it is established in the community that certain opportunities exist for "using" the system, it is not long before they become fully exploited. Often, by the time the situation is arrested, the damage has been done.

The common-law relationship was mentioned most frequently as the principal problem in this area. Examples were brought to our attention where an applicant's claim of no common-law relationship was known to be fraudulent; yet social assistance continued to be disbursed as though none existed. In at least one instance, substantial documentation was available to support the Department's position. In this case an appeal process was in progress. However, other known or suspected cases were not being pursued with the same vigor and attention.

In these serious cases, the primary mechanism available for resolution is prosecution. However, this is an extremely delicate and sensitive process, often involving significant political publicity and consequent pressure. As a result, legal action may not be taken, given that current federal legislation provides no remedy other than the criminal prosecution process. When cursory or no action is taken, district and band staff feel very strongly that they are not being supported by regional management personnel. There is a tendency to "back-off" and not create disturbances. This results generally in reduced staff motivation, a relaxed attitude towards regulation interpretation and consequent inefficiencies across all dimensions of the Program.

Though it is recognized that leakage does and will continue to exist at some level in the system, steps are being taken to limit it. Increased formal and informal communications with other provincial and federal social service agencies, more regular home visits and closer working relationships with band administrators all are positive steps towards its prevention. Further improved administrative and control features as well as a clear position on prosecution would support these initiatives.

2. Recovery

Recovery of overpayments in the Region lacks any formal structure. The Region, unlike its Provincial counterpart, has no established recovery unit or non-criminal legislated mechanisms. The Province, through its provincial legislation can take legal action outside the criminal courts. Within the Region's program, the amount to be recovered determines what level in the organization decides on the recovery strategy. If the dollars are small, it is left with the social worker to develop an appropriate recovery methodology. Often, where there is a continuing social assistance payment, a monthly reduction is arranged. Where no further social assistance payments are to be made, recovery is difficult and more often than not never occurs. Where amounts are significant the District Superintendent or Regional Director of Social Development become involved. At this level a decision can be taken to initiate formal criminal legal action. However, no evidence of consistent treatment was apparent. In the band administered program, either the band program administrator or welfare committee decides on the appropriate recovery action. The absence of mechanisms to garnishee wages, an apparent reluctance to initiate criminal action and frequent inadequacy of documentary evidence to support legal processes are factors which restrict efficient recovery activity. Occasionally, political considerations also limit or influence the extent of recovery action taken.

3. Appeal

One area where the practices appeared to be well established at all levels within the Region was the appeal process. Our discussions revealed that few appeal cases reach the regional level; most can be dealt with adequately at the band or district level. Given that the process is clearly defined at each level, few serious problems with the appeal process itself were encountered. Notwithstanding this, the Alberta Region believes that the regional appeal process must be supported firmly by Headquarters in Ottawa. Only in this way will political intervention be avoided and decisions of the Regional Director General be seen as final.

The process is quite well defined within the Department. Generally, it is less structured but not necessarily less functional at the band level. This, in part, may be a function of the relatively low incidence of formal complaints registered at the band level. Cultural and peer pressures and the availability of suitable mechanisms at the district level may be factors which have reduced the need for rules of procedure at the band level.

When it is determined that an applicant is ineligible and hence is rejected for social assistance, the social worker regularly explains the reasons. If the applicant disagrees with the social worker's decision and explanation, the appeal mechanism is discussed; otherwise normally it is not raised. Beyond the social worker, the case is referred to the District Superintendent where the majority of cases are resolved. Lack of satisfaction at this level results in referral to the Region. The entire process is straightforward, simple and well defined. We did not identify any major weaknesses or deficiencies in this process. The actual content of the appeal, on the other hand, can be quite complex, messy and time consuming.

E. TRAINING AND STAFFING

A successfully administered social assistance program depends largely on the available personnel. Consequently, one dimension of our administrative review of the social assistance program in Alberta involved examining and assessing both the training practices and staffing within the Region.

Early in our review we identified that the training of social assistance staff focussed primarily on those skills related to interview, counselling and helping processes. The mechanisms available to assist staff in gaining a better appreciation of this role included informal internal seminars sponsored by the Department and extended courses provided by local community colleges. These principal vehicles for delivering training were available both to band and district office social assistance personnel.

The basis of selection for course enrollment, particularly with respect to the externally provided courses, was not well defined. While individuals, mostly at the band level, were encouraged to participate, there was no evidence that a formal evaluation process had been conducted to ascertain the specific training needs of different individuals. Training requirements are not identified clearly and result frequently in declining participant interest during these courses. Hence, the intended value and benefits may not be achieved satisfactorily.

The major activity of the social worker in the district and band office relates to the interviewing of welfare applicants and the issuing of social assistance. Concern was expressed by various District Superintendents of Social Assistance that there was a growing imbalance between the need to delivery social assistance (administration) and the requirement to provide counselling services. At the same time, there was no apparent effort being made to control more effectively the distribution of time between these key activities. More importantly, we were unable to identify any training programs designed to up-grade the administrative and management capabilities of social assistance personnel at either the district or band level.

Generally, for the non-Indian social worker joining the staff, there is no formal training. A limited "on-the-job" familiarization and orientation program does exist, but it is not structured and varies with the individual providing the on-site training. Background on Indian culture and social mores; the regional social assistance program; regulations and related administrative features; and regional social assistance program; regulations and related administrative features; and regional social assistance objectives are left entirely to the district office Superintendent of Social Assistance and his staff. This practice has several weaknesses; absence of any consistency in orientation methods across the Region is the most significant. Moreover, biases of those furnishing the training are perpetuated and reinforced immediately with new personnel.

On the positive side, there was evidence that training courses and seminars were provided to band and district employees. However, the periodic and unstructured nature of training in general suggested it was of low priority. Given the variation in background qualifications and experience of those involved in the program, there is a need to rationalize the balance and nature of training courses offered within the Region. There is a definite requirement for improved training in management accounting and administrative skills to equip social workers with higher standards of business acumen in the performance of day-to-day activities. It should not be forgotten that it is these social workers who authorize the payments which account for in excess of ninety percent of the Region's social assistance funds. If they are to be held accountable for executing the Program's objectives, then it is essential that they are trained to discharge responsibility the full range of their duties.

With respect to staffing, we found little evidence that suitable position descriptions existed or were available at regional, district and band levels. While some did exist, generally they were either outdated or incomplete and most

often did not cover all employees. Furthermore, those that did exist were developed more to justify a salary classification or category than to reflect the actual duties and responsibilities of the incumbents.

Linked to the position description weaknesses above, there was a distinct absence of any defined criteria to measure the performance of those involved in the delivery of the program. This was true at each organization level. Consequently, the criteria available for performance and salary evaluations are very unclear.

At the band level, the band council's ability to pay or supplement the government's contribution to administration costs often determined the social worker's salary level. Across bands the levels varied widely. There was concern expressed by band personnel that the salaries paid for personnel performing essentially the same functions at the district level were significantly lower. In establishing salary levels, the real issue to be addressed is whether the functions and responsibilities performed and assigned warrant equivalent compensation.

Unlike its provincial counterpart, the Region has not made any attempt to date to quantify the workload requirements of individual social workers. Criteria such as proximity to the areas being served, composition of the case loads as between temporary and permanent assistance cases and the related administrative and counselling requirements need to be defined to assess both the assignment of tasks and the individual position profiles. Indirectly, these could serve as a basis for performance evaluation. However, it must be recognized that to achieve successful and accurate performance measurement, suitable supporting systems to collect the data must be in place. Currently, this capability does not exist.

VI RECOMMENDATIONS

On the basis of our findings and conclusions, the study team presents the following recommendations with respect to the delivery of social assistance in Alberta. Since the Region has taken the initiative to introduce a revised social assistance manual, some of these recommendations already are under consideration.

- * The Alberta Region should introduce a program of effective and regular examination and monitoring of the Social Assistance Program's operations.

In an environment where justification and accountability are becoming increasingly important, the ability of senior management to support the continuance of existing activities and to justify the introduction of expanded or new services is essential. Assurances must be available to management that: stated program objectives are being achieved; fair and equitable treatment is applied; and, system delivery instruments and controls are in place. The implementation of procedures which require regular and continuous examination of all delivery and control components will contribute greatly to providing these assurances. The examination procedures must be designed to review and report on the effectiveness of eligibility, administrative control, reimbursement and reporting practices inherent to the system at each organization level. They must encompass the review of both statistical and financial information requirements and must be capable of highlighting problems of consistency and non-conformity where these arise.

Acting on this recommendation will require the designation of staff resources to conduct and carry out the examination procedures. We envisage that not more than two experienced individuals would be required. Also, we encourage the Region to take immediate action in this regard, so that in the longer term effective proven examination procedures will be in place. Also, we believe that commitment now to their development and introduction will provide a continuing means to monitor system processing and control practices, identify weaknesses and assist in the development of a strong infrastructure for social assistance delivery. If senior management is to be expected to monitor effectively the Program's activities, not only will their commitment be required, but also there will be a need for the additional staff support.

- * Attention to the administrative practices which support Alberta's social assistance program should be proactive rather than reactive.

All too often, modifications or refinements to the administration and management of social assistance have been made in reaction to a specific weakness or problem. Forward thinking and planning should be applied to the administrative practices associated with the Social Assistance Program. The development of the revised Social Assistance Program Manual was a positive step in this direction. The development of a strong infrastructure and support networks, eligibility verification, processing control, education and training, band/district/region communications and organizational flexibility all offer opportunities for improved planning of administrative practices. Moreover, positive and creative steps in these areas can assist the Department as a whole in the development of national policies; at the same time, confidence, enthusiasm and support will be generated among personnel within the Region. Several specific recommendations in this regard are presented.

- * Regional social assistance management should make increased efforts to visit district and band operations regularly.

Improved communications with operating levels are required, if regional direction and guidance are to be channelled to those areas requiring it most. Field visits by regional social assistance personnel has been limited because of resource constraints and interfaces have tended to take place at the Region instead. However, greater positive impact and linkages would develop if the regional personnel were more visible at the district and band level.

- * Local service agreements should specify the administrative responsibilities of the band and the Department should introduce formal review and audit procedures to ensure that these responsibilities are discharged properly.

The principal objective of local service agreements is to record that the responsibility for administering social assistance funds has been transferred to the band. The agree-

ment further implies that, as the administrator of the Program, the band has delegated responsibility from the Department to ensure that funds, as assets of the Crown, are managed prudently. However, the Department's responsibilities are not discharged simply by imposing on the band, as part of the agreement, a variety of accounting, control and reporting requirements. Rather, the Department is obligated for its part to undertake and ensure that appropriate monitoring and auditing activities do occur.

- * Eligibility verification procedures must be enhanced and audits performed, if proper control is to be achieved.

Recipient eligibility criteria for social assistance are well defined. However, supporting documentation to confirm eligibility remains weak. While in certain circumstances documentation will not be possible, at least this fact should be noted. The general absence of supporting documentation is more the rule than the exception. More vigorous eligibility verification standards are required to achieve proper control. Also, audits of eligibility documentation and explanations would ensure that the eligibility regulations are being followed.

- * Documentation standards for components of the case file should be developed more fully.

Evidence of proper and complete supporting documentation in recipient case files must be available, if management is to be assured that all regulations are being followed. While the revised Social Assistance Program Manual provides considerable information to assist the social worker in interpreting the regulations, its description of the intended contents of a recipient's case file is less complete. Procedures for maintaining and updating client case files must be developed. Procedures outlining minimum contents and maintenance requirements and a checklist which could be included directly in the case file would enhance this weakness considerably. These procedures and maintenance requirements must cover not only the application and eligibility dimensions but also the counselling aspects of the social workers activities. These changes also would assist District Superintendents and others in their review or audit of case information.

- * Administrative procedures should be developed to better inform districts and bands of the control requirements necessary to ensure that data are processed properly.

In any system where information flows from one unit to another, it is essential that proper mechanisms be in place to transmit and control the data. Also, an awareness on the part of the issuing authority of the subsequent administrative processes which depend on the data he/she provides should contribute to an improvement in the quality of the initial data and result in increased discipline in the system. To achieve this, administrative processing procedures not currently documented should be formalized and issued to all user personnel.

- * Internal control practices should be developed and implemented throughout the Region.

If information to be processed is of poor quality and unreliable, its value and ultimate end use are reduced. Procedures to ensure that information is valid at each stage in the operation must be in place. Evidence that control has been exercised also must be reflected in the documentation processed. Proper approvals and mathematical and rate verifications are areas where little evidence of internal control exists currently. Improved internal controls also will restrict leakage in the Program.

- * A prospectus of internal audit and examination procedures should be developed and implemented to assure management that all Program components are functioning properly.

The only method of confirming that all aspects of social assistance delivery are operating as intended is to conduct a regular program of audit or examination. Currently no mechanisms exist within the Region to satisfy this requirement; early development of internal audit or examination procedures is essential. Over the longer term, as the procedures are improved and refined, operating deficiencies, such as those described in this report, automatically would be identified and rectified, as part of the process of internal audit. It is equally important that such internal audits are conducted regularly, so that new or recurring deficiencies in practices are detected and corrected as soon as possible.

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- * Standard procedures for recovery action should be introduced at all levels in the Region.

Even when the proper controls are in place, mechanisms also must exist to deal with any recovery action that is required. Uniform procedures are preferred, since this will minimize the tendency of personnel to adopt a wide variety of collection strategies where only a few basic strategies are required. Moreover, if recipients are aware that standard recovery mechanisms exist they may be more reluctant to "test the system". These procedures should accommodate all forms of recovery, including the legal processes as necessary.

- * The Region should make training in general a priority activity and should proceed immediately to develop materials specifically for staff training in administrative practices.

As many of the administrative, accounting and control weaknesses result from an insufficient knowledge on the part of personnel of administrative processing and reporting requirements, efforts to improve the social workers' understanding of these areas are essential. The development and introduction of administrative case studies represent one mechanism for achieving this objective. If proper training programs are made available to those lacking formal administrative background, fewer system processing and control deficiencies likely will result.

- * Position profiles and performance measurement criteria should be established for all personnel involved in the social assistance program.

Unless an individual knows what is expected of him in the performance of his day-to-day activities, it is difficult to insure that his time is utilized efficiently. Also, vague statements of expectations make it difficult to assess performance properly. The introduction of realistic position profiles will contribute to improved performance measurement and will assist management in matching individual skills and backgrounds with job requirements. Also, as skill requirements and responsibilities increase from one job level to another, the determination of remuneration levels will be simplified and the levels themselves will be easier to justify.