SUPPLEMENTAL
AGENDA MATERIAL
for Supplemental Packet 2

Meeting Date: September 10, 2019

Item Number: 68

Item Description: Recommendations Status: Easy Does It City Grant Funding Audit

Submitted by: Jenny Wong, City Auditor

Since the publication of the September 10, 2019 Council Agenda, HHCS has worked with Easy Does It to prepare updated contract language based on the audit recommendations. The City Auditor's Office has determined that items 1.18 and 1.19 of the *Audit Findings and Recommendations Response Form* have been fully implemented. Therefore, changes have been made to Agenda Item Number 68, "Recommendations Status: Easy Does It City Grant Funding Audit" in Attachment 1: Easy Does It Audit Recommendation Response Form.

Recommendations 1.18 and 1.19 have been changed as follows:

	Original Auditor Response, May 2019	**Revised Auditor Response, September 2019**
1.18	**Auditor Response:** We consider this recommendation partially implemented. We verified that HHCS informed EDI of the City Attorney's guidance but are waiting for the contract renewal to confirm this information was incorporated into the city contract.	**Auditor Response:** We consider this recommendation implemented. We verified that HHCS informed EDI of the City Attorney's guidance and that this information is incorporated into the contract.
1.19	**Auditor Response:** We consider this recommendation partially implemented. EDI slightly modified their thresholds. However, we are waiting for the contract renewal to confirm this information was incorporated into the city contract.	**Auditor Response:** We consider this recommendation implemented. EDI slightly modified their thresholds and the contract includes those threshold requirements.

Attachment:
1. Revised Audit Findings and Recommendations Response Form

City of Berkeley City Auditor's Office
Audit Findings and Recommendations Response Form

Audit Title: Stronger Oversight Necessary to Ensure Continued Assistance for Severely Physically Disabled Persons		
Finding 1: Easy Does It unable to substantiate compliance with funding requirements		
Recommendations	**EDI Response**	**Auditor Response May 2019**
1.1	Recruit and cultivate qualified people with the business and financial expertise necessary to serve as active Easy Does It board members. Include a process for vetting and voting on nominees to ensure members have the required skills and time to commit to the development and support of Easy Does It.	Expected: TBD Ongoing; first steps taken immediately **Initial Status 5.1.18: Partially implemented.** Easy Does It is actively recruiting qualified board members with business and financial expertise. All candidates will be required to submit resume, references and be interviewed by board. The board will vote on candidate and candidate will be accepted with a majority vote. **Updated 3.4.19: Implemented.** Easy Does It has a new treasurer with financial experience and continues to recruit qualified people.	**Auditor Response:** We considered this recommendation closed. The addition of a new treasurer is a good first step of an ongoing process to have a board that consists of qualified people who are to be involved with strategic and financial planning, oversight, etc. The long-term solvency of the organization is dependent on EDI continuing to cultivate new board members who are able to help with strategic planning, risk management, and fundraising.
1.2	Have staff and board members jointly perform a risk assessment of all major processes to identify the operational weaknesses that leave Easy Does It vulnerable to fraud, misuse, and abuse, and result in noncompliance with funding	Expected: July 1, 2018 Process started March 1, 2018 Updated July 1, 2018 **Initial Status 5.1.18**: **Not implemented.** We are	**Auditor Response:** We consider this recommendation closed and implemented via the incorporation of our audit recommendations into the contract granting EDI city funding. Doing so provides a mechanism by which to hold EDI accountable for addressing the risks of fraud,

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requirements. Rate the risks to identify those most significant to preventing Easy Does It from achieving its mission and becoming fiscally stable.	currently reviewing all of our major processes to identify operational weaknesses and making changes to prevent fraud misuse and abuse in noncompliance with funding requirements. **Updated 3.4.19: Implemented.** Easy Does It reviewed and did a risk assessment all major processes. They updated their payroll procedures, client intake form and dispatch triage service call eligibility procedures to ensure compliance with funding requirements.	waste, and misuse (noncompliance).
1.3 Have management and board members jointly establish a written strategic plan that includes short- and long-term goals using the recommendations from this audit and the risk assessment performed in response to recommendation 1.2. Include target implementation dates in the strategic plan. Prioritize implementation of goals identified as presenting the highest risk. Use the plan to guide the changes needed for an adequate system of internal controls,	Expected: October 2018 Initial Phase Completion Expected: May 10, 2018 Updated November 2018 **Initial Status 5.1.18: Not implemented.** The board and management will be having a board retreat in May to discuss development, implementation, and timeline to complete strategic plan. **Updated 3.4.19: Implemented.** Easy Does It developed a new strategic plan in November 2018 and are in the process of refining goals and target implementation dates.	**Auditor Response:** We consider this recommendation closed and implemented via the incorporation of our audit recommendations into the contract granting EDI city funding. Doing so provides a mechanism by which to hold EDI accountable for addressing the risks of fraud, waste, and misuse (noncompliance); and laying out plan for long-term fiscal health and financial accountability.

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Recommendations		EDI Response	Auditor Response May 2019
	including the recommendations in this report.		
1.4	Create and enforce written payroll processing and monitoring procedures that include practices for detecting and deterring fraud, waste, and abuse; and that ensure payroll accuracy. This includes but is not limited to: • Ensuring that no single person performs all the tasks related to a single transaction cycle. • Designating a second person to review and sign off on approved timesheets, changes to payroll data, time entry, and payroll pre-process registers.	Expected: May 31, 2018 [Revised employee handbook with updated policies and procedures] Initial Phase Completion Expected: April 30 2018 [Change in procedures] Updated May 2018 **Initial Status 5.1.18: Not implemented.** We are writing up new payroll processing and monitoring procedures. We are dividing payroll tasks between office manager, program manager and bookkeeper so no single person performs all tasks. This segregation of duties will detect and deter fraud. We are also consulting our payroll company to aid in the development of these procedures. These procedures will then be reviewed by the executive director and approved by board to eliminate risk of fraud. **Updated 3.4.19: Implemented.** Employee handbook has been updated. All staff have been trained on overtime policy.	**Auditor Response:** We consider this recommendation closed and implemented via the incorporation of our audit recommendations into the contract granting EDI city funding. Doing so provides a mechanism by which to hold EDI accountable for using payroll processing procedures designed to detect and deter fraud, waste, and misuse (noncompliance); and ensure payroll accuracy.

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1.5	Perform a staff scheduling and service needs analysis to establish optimal staffing schedules. Perform the analysis on a recurring basis, e.g., quarterly, to identify needed changes.	Expected: June 1, 2018 Implemented June 1, 2018 **Initial Status 5.1.18: Not implemented.** Running an emergency service organization is uniquely challenging in that emergencies do not follow schedules so there may not be a consistent time when emergencies arise. However we will do a review and an analysis to determine staffing schedules quarterly to determine optimal staffing levels. **Updated 3.4.19: Implemented.** Easy Does It did review all staff schedules and service needs and continues to do this on an ongoing basis. They have reduced some staffing during some shifts. However, due to the unpredictable nature of emergencies, they do not feel they can reduce staffing on every shift.	**Auditor Response:** We consider this recommendation closed and implemented via the incorporation of our audit recommendations into the contract granting EDI city funding. Doing so provides a mechanism by which to hold EDI accountable for using a staffing analysis to schedule attendants consistent with what is supported by Measure E as clarified by the City Attorney (see Rec. # 1.17).
1.6	Create and enforce written procedures for analyzing and managing staff schedules. Include the requirement for conducting the analysis on a recurring basis to keep up with scheduling change needs.	Expected: June 1, 2018 Completed June 1, 2018 **Initial Status 5.1.18: Not implemented.** A written procedure will be developed to do review quarterly.	**Auditor Response:** We consider this recommendation closed and implemented via the incorporation of our audit recommendations into the contract granting EDI city funding. Doing so provides a mechanism by which to hold EDI accountable for using a staffing analysis to

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	Updated 3.4.19: Implemented. A written procedure was developed and is reviewed quarterly.	schedule attendants consistent with what is supported by Measure E as clarified by the City Attorney (see Rec. # 1.17).
1.7 Establish and enforce clear written procedures for evaluating individual eligibility for Measure E services during client intake and service delivery. Use the City contract as a guide in creating the procedures and include: • Definitions for severe physical disability and emergency that are in alignment with Measure E requirements. • Requirement to complete intake and evaluation forms, and to thoroughly document and data enter Measure E eligibility criteria: residency, severity and type of disability, and reason the client situation is an emergency.	Expected: April 6, 2018 Intake form changed: March 31, 2018 Dispatcher initial training: February 27, 2018 Effective immediately: Data from intake and service sheets are entered in Salesforce database Completed April 2018 **Initial Status 5.1.18: Not implemented.** We will be redesigning new client intake form to include more detailed disability information to ensure alignment with Measure E definition of severe physical disability and to collect new data to coincide with new City Data Services information requirements. We usually ask clients to update their information yearly generally in the month of July. We are going to start updating client information as soon as new intake is complete. We will include questions:	**Auditor Response:** We consider this recommendation closed and implemented via the incorporation of our audit recommendations into the contract granting EDI city funding. Doing so provides a mechanism by which to hold EDI accountable for using procedures to track and record services so that they can demonstrate that those services were eligible for Measure E funding.

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	- Because of your disability do you experience substantial limitations and need personal assistance with activities of daily living such as dressing, meal prep, bathing, transferring, toileting, housekeeping, taking medication, mobility assistance? - Are you an IHSS recipient? - Are you a Regional Center client? - Do you use East Bay Paratransit? - Are you signed up with Berkeley Paratransit? - Do you know about the Berkeley Paratransit Voucher program? These changes to client intake will clearly show client has a severe physical disability even if they do not have an identified diagnosis. Some of our clients have cognitive and or intellectual disabilities and may not self-identify as having a severe physical disability but our highly experienced staff can clearly make that determination onsite. We will review with staff in an upcoming staff meeting what is	

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	considered a severe physical disability and will train new staff on making that determination.	
	It is also difficult to complete an intake with our homeless clients. They are often very suspicious and reluctant to answer intake questions and quickly become agitated if they feel we are prying too much. We have created a streamlined version of intake for our homeless clients in order to get basic information. We always attempt to get the information but if a client is highly agitated we will not do a complete intake for the safety of our staff.	
	We will develop a written procedure for this process.	
	During the dispatch process we are asking more questions to screen and triage emergency calls. We have updating our service sheets to include questions that will further determine if service call is an emergency. The following questions have been added:	
	- I was unable to find assistance from other sources prompting my call to Easy Does It	

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	- Without this call I would have to call 911 for assistance. - I was unable to get assistance from other wheelchair repair shops within 24 hours - There was no other accessible transportation available to fill this urgent need - This is an urgent call because The changes to service sheet clearly identify this service request as an emergency need. Dispatchers have been trained on the new procedures. **Updated 3.4.19: Implemented.** Easy Does It has been using new intake forms, service sheets, and dispatch procedures since April 2018.	

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1.8	Update all forms used for client intake and eligibility evaluation with guidance for identifying the severe physical disability and emergency that are in alignment with Measure E requirements. Include on the intake form an area for staff to conclude as to whether the services provided are considered Measure E eligible. Use the City contract as a guide in creating the forms.	Expected: April 6, 2018 Completed April 2018 **Initial Status 5.1.18: Not implemented.** We will be redesigning new client intake form to include more detailed disability information to ensure alignment with Measure E definition of severe physical disability and to collect new data to coincide with new City Data Services information requirements. **Updated 3.4.19: Implemented.** Easy Does It has been using new intake forms since April 2018.	**Auditor Response:** We consider this recommendation closed and implemented via the incorporation of our audit recommendations into the contract granting EDI city funding. Doing so provides a mechanism by which to hold EDI accountable for demonstrating that those services paid for with Measure E money were eligible for that funding source.
1.9	Record services to the financial system to clearly account for expenditures that are funded by Measure E and those that are not. Use the information collected during the improved screening, intake, and eligibility evaluation processes to identify the appropriate funding source.	Actual: March 15, 2018; prior to audit issue **Initial Status 5.1.18: Implemented.** The bookkeeper has implemented cost centers into accounting system to delineate services to appropriate funding stream. New dispatch procedure and service sheets determine eligibility for Measure E and B funds.	**Auditor Response:** We consider this recommendation closed and implemented via the incorporation of our audit recommendations into the contract granting EDI city funding. Doing so provides a mechanism by which to hold EDI accountable for properly recording expenditures to its financial system to track services funded by Measure E versus those that are not.
1.10	Create written case management procedures and enforce the	Expected: May 1, 2018	**Auditor Response:** We consider this recommendation closed and implemented via

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requirements for Measure E clients when usage exceeds the threshold. Ensure the procedures and any related forms are consistent with Measure E contract requirements for basic case management. Use the City contract as a guide in creating the procedures and include written processes for: • Identifying and documenting client overuse • Creating case management files • Assessing client needs • Developing a plan with the client • Identifying and documenting clients who refuse assistance • Documenting all support and intervention, including progress made in, or obstacles	Implemented May 1, 2018 **Initial Status 5.1.18: Not Implemented.** We have established written case management procedures. We will review these procedures and make changes as necessary to comply with city contract. We have established a new Salesforce database that will make it easier for case manager to track usage of service and identify high-users more quickly. An immediate change now requires case manager to include a case note when a file is closed documenting the outcome of case, referrals given if any and any follow up she intends to do. **Updated 3.4.19: Implemented.** Updated written case management procedures to include closing case file that document outcomes and referrals given. Case manager now uses Salesforce to track client usage of service and identify high users.	the incorporation of our audit recommendations into the contract granting EDI city funding. Doing so provides a mechanism by which to hold EDI for using its stated thresholds and providing case management to those who exceed those thresholds.

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	to, obtaining reliable attendant care		
1.11	Enforce the use of the written Measure B voucher processing procedures developed by HHCS personnel to capture information necessary to obtain reimbursement from the City of Berkeley.	Actual: March 1, 2018 **Initial Status 5.1.18: Implemented.** We just received written Measure B voucher processing procedures from HHCS after this audit was performed. We will follow these procedures. HHCS has changed the vouchers multiple times in the last year and has not given us directions on new processing procedures despite our request they do so. HHCS has never notified us when a voucher was completed incorrectly.	**Auditor Response:** We consider this recommendation closed and implemented. During our audit, we found this area to be low risk as EDI was generally in compliance with Measure B requirements. Therefore, we accept EDI's response.
1.12	Create written and improved gas card and van use monitoring procedures that will allow management to detect fraud and misuse, and that require reconciliation of gas and van use to service data.	Actual: March 31, 2018 **Initial Status 5.1.18: Implemented.** We have reviewed our gas card procedures. We have revised our log sheet to include mileage so it will be easier to detect fraud. We are also designating a specific card for each vehicle. We will update our written procedures to reflect these changes. We will train staff on procedure changes. Logs will be reconciled by transportation manager monthly, and office manager will do a reconciliation to detect fraud and misuse.	**Auditor Response:** We consider this recommendation closed and implemented. EDI created procedures that allow the agency to detect fraud and misuse as it relates to the use of a gas card.

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1.13	Train staff on all procedures including those created in response the recommendations in this audit and any developed as a result of the risk assessment performed in response to recommendation 1.2. Monitor staff's work and provide additional training as may be warranted to ensure staff follow procedures.	Expected: TBD Initial: March 1, 2018 Implemented March 1, 2018 **Initial Status 5.1.18: Partially implemented.** We have monthly all staff meetings. As part of monthly staff meetings we do and will continue to review Easy Does It personnel policies and will train staff of procedure changes as they are made. We also hold bimonthly office team meetings and we will train on procedure changes as they are made. The executive director and program manager have an informal open door policy in which we welcome staff to discuss individual concerns about any Easy Does It policy or procedure. **Updated 3.4.19: Implemented.** Easy Does It does ongoing monthly meetings with staff and train on new policies and procedures as needed.	**Auditor Response:** We consider this recommendation closed and implemented via the incorporation of our audit recommendations into the contract granting EDI city funding. Doing so provides a mechanism by which to hold EDI accountable for ensuring its staff receive training and, most specifically, understanding how Measure E money is to be used and identifying when services qualify that funding stream.
1.14	Create informational literature that helps educate the public on why Easy Does It service is almost entirely limited to	Expected: June 1, 2018	**Auditor Response:** We consider this recommendation closed and implemented via the incorporation of our audit recommendations

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	Measure E eligible services. Provide this literature to new clients and their families, as well as staff, to help clarify any misconceptions about Easy Does It's service delivery restrictions and capabilities.	Immediate: Sending information on limits of Measure E to clients that over use service. Completed June 1, 2018 **Initial Status 5.1.18: Not implemented.** We will be sending out information packets to all clients when we update our client intake forms. Packet information will outline our services and the limitations Measure E places on Easy Does It as an emergency service. We have already begun sending information on the limits of Measure E to clients that overuse service. **Initial Status 3.4.19: Implemented.** Easy Does It sent out information to all clients about limits of Measure E program.	into the contract granting EDI city funding. Doing so provides a mechanism by which to hold EDI accountable for educating its clients that EDI limits its own service delivery capabilities by significantly relying on Measure E funding meant for emergency response needs.
1.15	If funding allows, implement a mobile, electronic data collection system that allows Easy Does It staff to capture and record client intake, service, and billing data to the central database. Train staff on the use of the system and enforce its requirements. Update procedures as may	Expected: TBD Initial: March 2, 2018 **Initial Status 5.1.18: Partially Implemented.** We now have a new Salesforce database that is much more user friendly and easier to do data entry in than our previous Filemaker database. It is also easier to run reports and to determine if there is missing data. It	**Auditor Response:** We consider this recommendation closed and implemented. EDI is using Salesforce and will be required via its city contract to demonstrate it is properly tracking client information.

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be necessary to reflect the use of the system.	allows us to enter service information when calls come into our dispatch program. We will continue to refine data capture as the database is fully implemented. We have made some personnel changes and data is now being inputted in a more timely manner. Our dispatchers are also now able to input a call directly into the database making it easier to track calls. Each call is assigned a case number and the case number will now be put on the service sheet so we can track a service throughout the service process. We will be writing up a procedure for how this process will work and outlining staff responsibilities and duties. We are also testing Verizon Field Force phone app to do data collection at the time of service. **Updated 3.4.19: Implemented.** Easy Does It field tested Verizon Field Force phone app but determined it was not cost effective and did not fit the needs of staff. They are using the Salesforce database more efficiently and staff find it is capturing data sufficiently.	
1.16	If funding allows, integrate an electronic scheduling and timekeeping software	Expected: TBD	**Auditor Response:** We consider this recommendation closed and implemented. EDI

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application with the current payroll system that will allow for a more efficient analysis of staffing trends as aligned with service delivery needs. Train staff on the use of the system and enforce its requirements. Update procedures as may be necessary to reflect the use of the application.	Not implementing due to lack of appropriateness for our agency. **Initial Status 5.1.18: Not implemented.** We will discuss with our Salesforce consultant if it is capable to do electronic scheduling and timekeeping and determine if it is appropriate for our agency. Funding permitting we will consider purchasing a system if Salesforce does not allow us to do this function. **Updated 3.4.19: Not Implemented.** Easy Does It looked into different software options but determined it was not useful or cost effective for our specific needs.	determined that funding did not allow for the purchase.
1.17 Request an opinion from the City Attorney on whether the use of Measure E, per the governing legislation, is intended for: • Persons who work or go to school, but do not reside, in the City of Berkeley.	n/a	**Auditor Response**: We consider this recommendation closed and implemented. We verified that the City Attorney provided HHCS guidance.

	Recommendations	EDI Response	Auditor Response May 2019
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	• Ensuring one male and one female attendant are on staff or on call at all times. • Ensuring optional staff availability to work with clients who are known to be abusive or who refuse to work with specific attendants. • 24-hour service availability. • Other items HHCS believe require clarification. • Maintain documented opinion to allow for transparency and reference.		
1.18	Use the City Attorney opinion to: • Inform Easy Does It on whether or not Measure E money may be used for: non-Berkeley residents who work and/or go to school in	n/a	**Auditor Response**: We consider this recommendation implemented. We verified that HHCS informed EDI of the City Attorney's guidance and that this information is incorporated into the contract.

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	Berkeley; staffing both a male and female attendant at all times; and providing 24-hour services. • Clarify in the scope of services of new City contracts using Measure E funding whether or not Measure E money may be used for: non-Berkeley residents who work and/or go to school in Berkeley; staffing both a male and female attendant at all times; and providing 24-hour services.		
1.19	Work with EDI to lower the thresholds for high-use clients. For example, identify high-use clients as those with 10 or more calls a month, and require clients obtain case management services once they reach 20 calls in one month. Incorporate those thresholds into new City contracts for Measure E funding.	n/a	**Auditor Response**: We consider this recommendation implemented. EDI slightly modified their thresholds and the contract includes those threshold requirements.

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1.20 Communicate with Easy Does it when there are changes to Measure B requirements and provide EDI with updated Measure B procedures discussing those changes.		**Auditor Response:** We consider this recommendation closed and implemented. HHCS has improved its communication with EDI regarding Measure B requirements.