



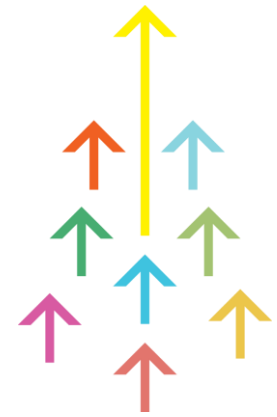
# Audit and Accountability Fund – Region of Peel

Child Care Fee Subsidy Program

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December 2019



## Audit and Accountability

### Fund – Region of Peel

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#### Child Care Fee Subsidy Program

December 2019

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# Executive Summary

As part of the Government of Ontario’s Audit and Accountability Fund, the Region of Peel commissioned Optimus SBR to conduct a review of the Child Care Fee Subsidy program with a focus on enhancing program efficiency and accountability of public funding.

The CCFS program has experienced a number of changes over the last decade including program growth and expansion, departmental business support service integration, new guiding legislation and a number of reviews and audits. Many of these changes have emphasized client experience and efficiency and getting people into the program, often with an unintended negative impact to accountability.

The review also found a number of program strengths including ongoing initiatives to enhance program accountability which should be continued in the future.

The review recommendations align with 6 overall categories and can be implemented over the next 3 years:

- Enhancing program philosophy and case management approach to be risk-based and accountability focused
- Enhancing communication with clients across the program lifecycle and between the Region’s programs that are serving common clients
- A stronger leadership approach to the Region’s relationships with service providers
- Enhancements to the policies, processes, and tools for overpayment identification, application, and recovery
- Streamlining processes and enhancing efficiency and effectiveness
- Better leveraging technology and automation

## *Expected Impact*

	2020	2021	2022
<b>1. Cost Avoidance of Future Overpayments</b>	\$438,000	\$ 990,000	\$ 1,358,000
<b>2. Increased Recovery Rate of Overpayments for Active Clients</b>	\$ 51,840	\$ 101,088	\$ 167,962
<b>3. Enhanced Program Capacity</b>	13%	25%	25%
<b>4. Reallocation of CCFS Program Funding</b>	Up to \$ 977,500	Up to \$ 1,955,000	Up to \$ 1,955,000

# Project Context

As the designated Service Manager under the Child Care and Early Years Act, the Region of Peel (the Region) is responsible for building and expanding an early years and child care system that is responsive to the current and future needs of children and families in Peel. Peel's growth and changing demographics have and will continue to place different demands on the Region's early years and child care system. These include an increasing population, a large percentage of children aged 0-12, and a high proportion of visible minorities and diverse language requirements. The Region has incorporated these factors into its Early Years and Child Care Service System Plan 2019-2024. A key part of that strategy is that the system is future-oriented, responsive and accountable which means enhancing program efficiency, reducing red-tape, and ensuring that the right amount of subsidy is provided to those who are eligible for it. This aligns with the Region's overall financial principles of respect for the tax payer and demonstrating value for money and an ongoing commitment to continuous improvement.

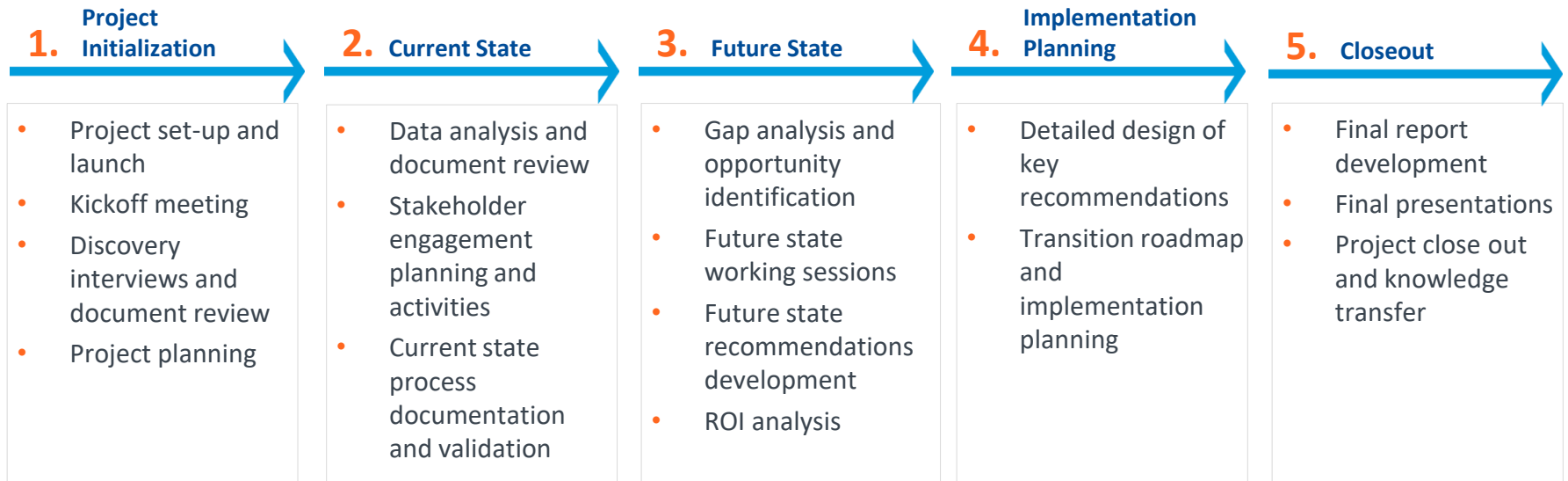
The Child Care Fee Subsidy Program (CCFS program) is one of key programs that is delivered by the Region to support children and families. Through this program, the Region manages the distribution and accountability of subsidy to help clients pay for the cost of licensed child care for children under the age of 12 or to support children with special needs. As shown in the following slides, the size and expansion of this program as well as the complexity of the external environment make this program a prime candidate for review and continuous improvement.

As part of the Government of Ontario's Audit and Accountability Fund (AAF), the Region conducted a review of the CCFS program. Given the focus of the fund on helping municipalities review and modernize service delivery with a view toward enhancing efficiency, increasing accountability, and reducing red tape, the review of the CCFS program focused on:

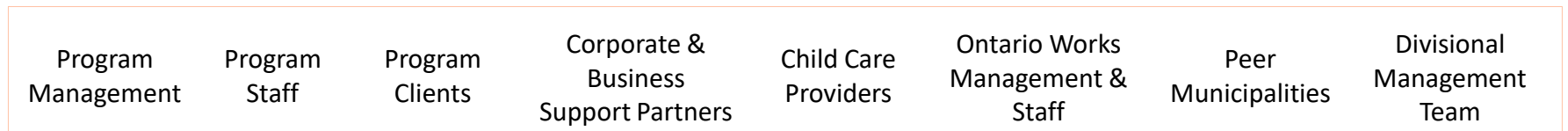
- Streamlining the current administrative process for determining eligibility for a CCFS recipient and identifying other efficiencies to ensure that the subsidy is provided to eligible families in the right amount and in a timely manner
- Developing a robust internal audit process to assess the level of consistency and accuracy when determining on-going eligibility for the fee subsidy
- Identifying opportunities to enhance accountability of the CCFS program through an assessment of the upfront fee subsidy eligibility requirements and process
- Assessing opportunities for better data analytics to prevent fraud and to enhance the use of third-party information-sharing to identify high risk cases

# Project Approach & Engagement

The project had a 5 phase approach that was completed between September and December 2019.



## Stakeholder Engagement

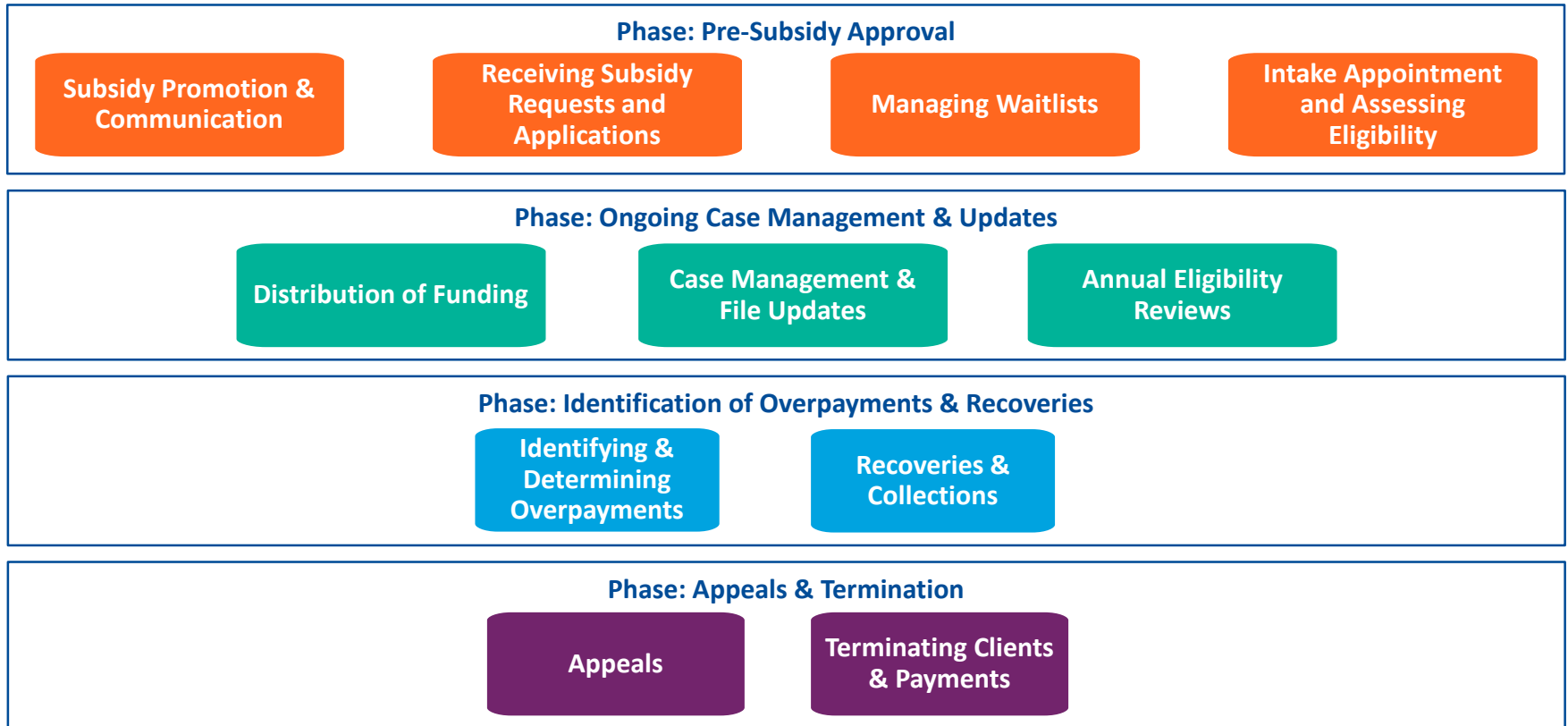


## Milestones



# Program Overview

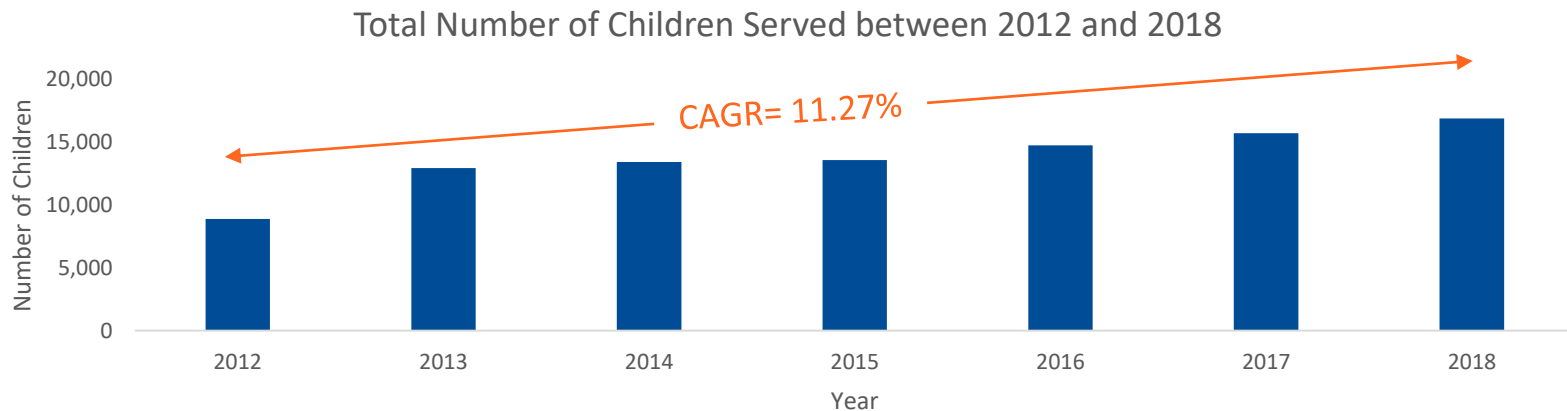
As the designated Service System Manager under the Child Care and Early Years Act, the Region has responsibility across the entire program lifecycle, including receiving applications for the subsidy, managing waitlists, reviewing applications for eligibility, case management, distribution of funding, annual eligibility review, appeals, terminating payments, collections of overpayments, and investigating cases of fraud. For the purposes of the review, the program lifecycle elements have been organized into the following phases and functional areas.



# Program Overview

Accountability for the Child Care Fee Subsidy (CCFS) program sits within the Human Services department in the Early Years and Child Care (EYCC) Division. The CCFS program has a team who directly support the program’s administration. In addition to these dedicated resources, the program is supported by other staff from Human Services, Finance and Corporate Services.

The CCFS program has grown rapidly over the last decade, both in terms of the program budget and the number of children served. The program budget has grown 175% since 2010, from \$32 million to \$88 million in 2019. The number of children served, has also increased 90% since 2012 from 8,900 to 16,887 in 2018. In 2018, the Region had an average monthly caseload of 10,451 children and this number is expected to increase in 2019 and 2020.



The program receives funding from the Ministry of Education as well as contributions from the Region. However, there is some cross-program funding of Ontario Works clients for child care including the Ontario Works Learning, Earning and Parenting (LEAP) program and the Ontario Works Advance Child Care funding, which are both managed through internal charge-backs to the program.

# Program Overview

The CCFS program has experienced a number of changes over the last decade including program growth and expansion, departmental business support service integration, new guiding legislation and a number of reviews and audits. Many of these changes have emphasized client experience and efficiency and getting people into the program, often with an unintended negative impact to accountability.

Timeline	Change Description
2008	<p><b>Departmental Integration and Re-organization</b></p> <ul style="list-style-type: none"> <li>Administrative business supports were pulled out of program areas and into a common shared service division (IBSD), which provided certain business supports to all Human Services programs</li> </ul>
2013	<p><b>New Funding Formula and Framework</b></p> <ul style="list-style-type: none"> <li>Additional \$28.5 million in CCFS program funds was received by the Region from the province</li> <li>No more waitlist at the Region to receive subsidy</li> </ul>
2014	<p><b>New Legislation</b></p> <ul style="list-style-type: none"> <li>Service Managers were responsible for additional activities</li> <li>Opened up subsidy to more families</li> </ul> <p><b>Region of Peel - Service Pathways Review</b></p> <ul style="list-style-type: none"> <li>Focused on enhancing client experience and streamlining processes to enhance efficiency</li> </ul>
2015	<p><b>Addition of Commercial Childcare Centres</b></p> <ul style="list-style-type: none"> <li>New agreements with commercial childcare centres (previously agreements were only with non-profits); resulted in 110 new agreements in 1.5 years</li> </ul>
2018	<p><b>Internal Audit Explores Overpayment Challenge</b></p> <ul style="list-style-type: none"> <li>Internal audit (requested by Commissioner, HS) identified overpayment challenges and accountability gaps</li> </ul>



# Current State Summary: Strengths

The CCFS program has a number of strengths and ongoing initiatives proactively aimed at addressing some of the program's challenges.

The program has a dedicated and expert team of CSWs who are committed to clients and see the importance and impact that child care subsidies have for children and families. The team is open and willing to change, and especially motivated to enhance client accountability and improve efficiency.

The program has continued to function with significant increases in its fee subsidy budget, the number of child care provider relationships, and the number of clients with very little increase in staffing levels. The caseload for CSW's is measured by the number of families, and in Peel the caseload ranges from the mid-300s per CSW.

Many processes and policies are client-centric, including a single window access point (assessment unit) for Human Services programs, limiting the administrative burden associated with subsidy applications and maintaining a large volume of child care providers for eligible families to select from.

There has been enhanced management reporting and monitoring of overpayments since an internal audit identified it as a challenge in 2018, with an increased focus on business intelligence and data-informed decision making, such as:

- Monthly monitoring of overpayment levels and changes; and
- Business intelligence work to identify risk profiles for CCFS program clients.

New improvement initiatives that increase accountability, streamline processes, and clarify roles and responsibilities, including:

- Approval of overtime to address annual review backlogs and the addition of more administrative days to support CSWs
- Revision of the intake meeting process and documentation (e.g., family agreement)
- Updates to the family composition policy
- Updates to the roles, responsibilities and process for recoveries and collections
- Updates to the website
- Working with partners to enhance collaboration and information sharing between different divisions
- Increased engagement of the Assessment Unit in policy changes
- Implementation of the Integrated Business Support Division (IBSD) Review to enhance the effectiveness of internal business support services

# Current State Summary: Challenges

Despite some of the CCFS program strengths and ongoing work, the review identified a number of areas that are contributing to overpayments and inefficiency in the program.

Challenge	Description
<p>Program philosophy of being a social support program vs administration and stewardship of a funding program</p>	<ul style="list-style-type: none"> <li>• All clients undergo the same service delivery model and caseloads don't reflect different case complexity or risk.</li> <li>• Culture and desire from program staff to connect with clients and support more active case management.</li> <li>• This challenge is compounded by the program's current resourcing model in which the average caseload of Peel CSWs is in the mid 300s (number of families). This is higher than other municipalities and yet the Region's population is more complex (e.g., many languages, high immigration, socio-economic). This limits CSWs ability to provide more active case management to clients that are in need of it and to support program accountability.</li> <li>• Ultimately, these factors mean that the program's resourcing model is misaligned to its current philosophy which negatively impacts staff workload and doesn't support overall program efficiency and accountability.</li> </ul>
<p>Current communication channels with clients are ineffective throughout the program lifecycle</p>	<ul style="list-style-type: none"> <li>• Information and communication about the program is not in plain language, is only available in English, and doesn't reinforce client accountability.</li> <li>• Clients that are more complex or at-risk need more regular touchpoints with the program using different modalities (e.g., text, emails, phone-calls, in-person reviews).</li> </ul>
<p>Lack of standardization and inefficient processes in engaging with Service Providers</p>	<ul style="list-style-type: none"> <li>• Approving placements at a site vs provider level and assessing eligibility each time there is a change in care is time consuming and results in duplication of work.</li> <li>• There are too many care codes (est. 160) and limited use of blended rates, which are easier to administer but require financial reconciliation.</li> <li>• Providers each have their own policies on payment frequency, notice for termination, application forms, and application timelines requiring Regional staff to have detailed knowledge of a specific provider.</li> </ul>

# Current State Summary: Challenges

Despite some of the CCFS program strengths and ongoing work, the review identified a number of areas that are contributing to overpayments and inefficiency in the program.

Challenge	Description
Information and process challenges for investigation of fraud	<ul style="list-style-type: none"> <li>• The Region does not have access to external searches (e.g. CRA) that would allow staff to confirm eligibility more efficiently and identify fraudulent applications leaving the Region with limited tools to enforce accountability.</li> <li>• There is only one dedicated program support for investigations of fraud leading to backlogs and there is no system to triage investigations, as they are processed in the order they are submitted.</li> </ul>
One size fits all case management approach is contributing to overpayments and administrative backlogs	<ul style="list-style-type: none"> <li>• All clients currently have an in-person intake appointment and a mail-in annual review and there are not any standard requirements for Region-initiated communication during the year, yet some clients are at higher risk of being in an overpayment situation and need more active follow-up.</li> </ul>
The application of overpayments happen inconsistently and have not historically informed program improvement	<ul style="list-style-type: none"> <li>• There is not a consistent and well-defined policy guiding the identification and application of overpayments leading to variable practices by different program staff.</li> <li>• There is no tracking or regular reporting on the reason for overpayments to support continuous improvement (e.g., policy change, training).</li> <li>• Historically the success rate of entering into an overpayment agreement has been low, especially for clients that are no longer active in the program, and there have not been consequences of not abiding by a repayment agreement (e.g., termination of ongoing subsidy, negative impact on credit).</li> </ul>
The level of administrative burden on CSWs is high, leading to administrative backlogs and inefficient use of program resources	<ul style="list-style-type: none"> <li>• More specialized program staff spend a significant amount of time doing small administrative tasks which could be supported by administrative staff and/or automated.</li> </ul>
Technology challenges contribute to inefficiency	<ul style="list-style-type: none"> <li>• Intake of client applications and files happen by phone and clients have to bring in physical documents since there is no true on-line application or document uploader.</li> <li>• OCCMS has a number of improvement opportunities to reduce duplication of effort and better support program staff.</li> </ul>

# Current State Summary: Challenges

Given the large proportion of CCFS clients who are shared with Ontario Works and the contribution to overpayments, the relationship between the programs was a special area of focus to identify opportunities for enhanced efficiency and accountability.

Challenge	Description
<p>Challenges with the assessment process which impacts efficiency and quality of assessments</p>	<ul style="list-style-type: none"> <li>• The assessment unit is not always engaged about program and policy changes that they need to use to assess eligibility (e.g., missing job aids).</li> <li>• Clients cannot complete a full application on-line (they can only submit their interest) resulting in all applicants having to go through the phone channel to complete their application, after which they are not able to submit any documentation electronically.</li> <li>• There is no reporting of the quality of assessments that get referred to the program area limiting the ability of the programs to manage performance.</li> </ul>
<p>Lack of knowledge and communication between CCFS and OW programs</p>	<ul style="list-style-type: none"> <li>• There is little information sharing and communication between the two programs at an operational level resulting in inappropriate referrals and lack of communication on shared clients.</li> <li>• Some program staff have access to SAMS but without a universal consent there is resistance to sharing information on shared clients which leads to overpayments if a client reports a change in their circumstance that impacts their eligibility to one program but not to the other.</li> <li>• Shared OW clients do not have an intake appointment with the CCFS program and so their understanding of the fee subsidy program and their different responsibilities with respect to the fee subsidy program are not always clearly communicated.</li> </ul>
<p>Confusion over available funding pools to cover child care for shared clients leading to inefficient use of resources and increased risk of overpayments</p>	<ul style="list-style-type: none"> <li>• OW has funding available to cover child care expenses that help clients retain or move towards employment and historically this funding source has not been fully used by the OW program because all clients are referred to the fee subsidy program. For working clients, there is a negative financial impact when child care funding comes from OW because of a STEP calculation, but for OW clients in other activities (e.g., training program, ESL classes) there is no negative financial impact. These clients are also at higher risk of being in an overpayment situation because of the stability of these 'other' activities. Referring these non-employed clients requires having people enrolled in two programs which is administratively inefficient.</li> </ul>

# Key Learnings from the Jurisdictional Review

While the program fundamentals are common across jurisdictions there are significant differences in areas of focus and organization across a number of peer municipalities in Ontario.

## **Program Philosophy & Structure:**

- Other municipalities have placed less emphasis on overpayments and have emphasized the social work philosophy of their programs. Even though most peer municipalities reported low levels of overpayments, this may be due to different program philosophies and/or policies related to when and how an overpayment is applied.
- Some municipalities did not have specialized resources for investigations and/or recoveries/collections and most had more dedicated administrative supports and program staff caseloads were smaller.

## **Screening & Onboarding Clients:**

- Some of the municipalities conduct a pre-screening of applicants once the application documents have been received, and this is done by a dedicated administrative support resource, increasing the capacity of specialized program staff.
- Communication material after the intake appointment, such as a declaration form or an information booklet is provided by a majority of the peer municipalities and this is customized to a client's unique circumstance.
- Some municipalities have waitlists, which provide more time for thorough screening.

## **Overpayments:**

- The most common causes of overpayments across municipalities are family composition, unreported changes in the client's circumstances and clients no longer being engaged in an eligible activity.
- Some municipalities were more lenient with 'first-time offenders' and did not pursue a client's first overpayment unless there were instances of fraud.
- Many municipalities do reminders and follow up with clients every 6 months (especially at the beginning of subsidy) to help to identify changes as people often do not understand the CCFS policies and the terms of their Parent Agreement.

## **Ontario Works Shared Clients:**

- Most municipalities have taken conscious steps to work towards improving the internal communication between OW caseworkers and CCFS program through technology integration, organizational integration, standard policies, and more regular reporting.

# Guiding Principles

The following guiding principles are being used to guide future state design and recommendations development for the CCFS program. Although these have been developed specifically for this AAF review, with a focus on enhancing efficiency and accountability, the principles may be useful for the CCFS program's broader continuous improvement activities going forward.

## Guiding Principles

1. The focus of the child care fee subsidy program is the administration of financial support for eligible families
2. The program will collectively optimize client, provider, and staff experience; program efficiency; and accountability
3. The program will emphasize stewardship of public resources while reducing red tape
4. The primary focus of the fee subsidy program are the families receiving subsidy
5. The program will be more consistent and standardized, allowing for flexibility within reasonable limits for both clients and service providers
6. Roles and responsibilities will be aligned with the right resource
7. Clients in the program will be triaged and managed according to need and risk
8. The program aims to help clients fully understand their responsibility and accountability and make it as easy as possible to comply

# Recommendations Overview

#	Recommendation	Description
1	<b>Enhance Stewardship Philosophy</b>	<p><b>1a: Enhance stewardship philosophy</b></p> <ul style="list-style-type: none"> <li>Clarify the main philosophy of the program to be more focused on providing accurate fee subsidy rather than as a social support. Emphasize the main focus of the program is on distributing subsidy to families that need it, and to ensure that the accurate distribution of public funds is the main characteristic of the program. In certain situations, additional support to families could be helpful to them to maintain their subsidy, but this should occur in only a small minority of cases.</li> </ul> <p><b>1b: Caseload assignment by client</b></p> <ul style="list-style-type: none"> <li>In support of the updated program philosophy, and once more standardization is achieved with service providers, assigning cases to CSWs can be shifted to a more family-centric, rather than a provider-focused allocation. Given that higher risk clients will require more attention, regular review and rebalancing of CSW caseloads should be undertaken so that a CSW's caseload and the number of high-risk vs low-risk clients is appropriate to enable a CSW to spend the adequate time on higher risk cases.</li> </ul>
2	<b>Communication &amp; Information Sharing</b>	<p><b>2a: Enhance client communication throughout program lifecycle</b></p> <ul style="list-style-type: none"> <li>Implement new and/or revise existing communication channels with clients to enhance their understanding of the program and their accountabilities and make it easier to provide updates (e.g., easy to navigate website, texting capability, pre-intake webinars and info-sessions, client code of conduct, evening and weekend appointments, better translation for commonly used languages, more frequent reminders and communication).</li> <li>Leverage child care providers to enhance communication with clients (e.g., signage at child care service providers, generic reminders to be included in provider communication to parents).</li> </ul>
3	<b>Service Provider Relationship &amp; Management</b>	<p><b>3a: Stronger leadership role with service providers</b></p> <ul style="list-style-type: none"> <li>The Region should take a stronger role in setting and enforcing standards and policies for interactions with service providers. Specifically reduce the number of care codes, use blended rates (with the appropriate analysis and reconciliation to minimize over/under payment), standardize policies for attendance reporting, guide where administrative support subsidies are used, and simplify the camp process. Focus on opportunities to streamline process and administrative requirements that will benefit the Region and providers.</li> </ul>

# Recommendations Overview

#	Recommendation	Description
4	<b>Strengthen Pre-Screening and Assessment Process</b>	<p><b>4a: Strengthen accountability at program initiation</b></p> <ul style="list-style-type: none"> <li>Continue implementing the Region’s ongoing changes to the client intake visit and enhance the pre-screening process to ensure the Region receives complete applications prior to an intake appointment, allow for electronic submission of applications and documentation, and provide CSWs with the relevant information to determine eligibility. This includes planned changes to the Parent Agreement to strengthen the language on client accountability, continued implementation of the updated family composition policy, establishing deadlines for documents prior to intake and having an administrative support person review packages to ensure they are complete, verifying a client’s program history in OCCMS, and getting direct access to clients’ CRA information.</li> </ul>
5	<b>Enhance Investigation Resources and Process</b>	<p><b>5a: Enhance investigation resources and process</b></p> <ul style="list-style-type: none"> <li>Enhance the review and investigations function to strengthen program accountability and continuous improvement. This can be done by increasing the Region’s access to searches and third-party checks to confirm eligibility as well as support investigations of suspected fraud or misrepresentation of client information. Access to searches would enhance efficiency and accountability for all municipalities if MOUs were set-up at a ministry-level for the whole CCFS program. The service standard for investigations need to be improved and a triage methodology for investigations across Human Services needs to be created to leverage existing capacity and focus effort on high priority investigations. The results of investigations should be communicated and reported back to the program and used to support performance management of program staff and continuous improvement initiatives.</li> </ul>
6	<b>Enact Risk-Based Case Management</b>	<p><b>6a: Develop a measure of case file health</b></p> <ul style="list-style-type: none"> <li>The Region should ensure that it is applying a more active case management approach to clients who are more complex or at higher risk of being in an overpayment situation. The cases that are determined to be higher needs should be based on some measure of the overall health of the case file so as to not unfairly profile marginalized groups (e.g., all single parents). For clients with low risk files, the region should continue to conduct lighter case management to reduce administrative burden, encourage program efficiency and support a positive client experience.</li> </ul>



# Recommendations Overview

#	Recommendation	Description
6	<b>Enact Risk-Based Case Management</b>	<p><b>6b: Implement risk-based case management</b></p> <ul style="list-style-type: none"> <li>Develop a risk-based case management approach for the program that includes more active case management and communication with higher needs/more complex case files. For healthy case files (low risk/low complexity), the Region should continue with a more client-centred and less administratively burdensome approach (e.g., less frequent communication and annual reviews completed by mail/e-mail). For higher risk or more complex case files, clients should have more frequent communication (e.g., annual reviews in person, semi-annual or quarterly check-ins by phone and/or more frequent communication and reporting (e.g., submitting pay stubs).</li> </ul>
7	<b>Update Overpayment Policies</b>	<p><b>7a: Update overpayment policies</b></p> <ul style="list-style-type: none"> <li>The Region needs to develop a clear guiding policy and process for identification and application of overpayments to reduce variability between different CSWs and ensure that overpayments are being applied correctly. This policy should differentiate between simple overpayments (e.g., NOA submitted for an annual review shows the client has been unemployed for 6 months) and overpayments that require an investigation to confirm (e.g., CSW suspects that a client may be misrepresenting their marital status). To enhance the repayment of overpayments, a standardized set of repayment agreements and schedules should be developed and there should be consequences for missing repayments (e.g., clients who are not in compliance with their repayment agreement are not eligible for subsidy).</li> </ul>
8	<b>Enhance the Appeals Process</b>	<p><b>8a: Enhance separation of duties for appeals</b></p> <ul style="list-style-type: none"> <li>Re-engage CSWs in the appeals process to deal with new information as the first response to an appeal and transfer the responsibility for second-tier review away from supervisors to a program appeals committee or shared business support services.</li> </ul>
9	<b>Policy &amp; Process Improvement</b>	<p><b>9a: Streamline file updates and program administration</b></p> <ul style="list-style-type: none"> <li>Clients should be approved for a package of services they need for an entire year as long as their activity requires full-time care, irrespective of what level of care they are first entering into. An eligibility assessment should not be completed each time there is a change in the level or type of care.</li> </ul> <p><b>9b: Develop a client prioritization framework for intake</b></p> <ul style="list-style-type: none"> <li>Develop a prioritization framework to prioritize the program’s waitlist during peak times for applications and intake, including in the scenario where there is a waitlist for subsidy or wait times for intake appointments.</li> </ul>

# Recommendations Overview

#	Recommendation	Description
10	<p><b>Enhance Administrative Support</b></p>	<p><b>10a: Enhance program administrative support</b></p> <ul style="list-style-type: none"> <li>To reduce the administrative and clerical burden on CSWs and create more capacity to focus on accountability activities, increase the level of dedicated administrative support to the program. Administrative support activities could include coordinating intake visits, including ensuring that applications are complete prior to an intake visit with a CSW, booking appointments for annual reviews that are occurring in-person, sending documents to EIM, data entry, generating letters, administering caseload reassignments in OCCMS, administrative case file updates in OCCMS, producing monthly reports, and reviewing mail-in annual reviews to ensure completeness prior to being reviewed by a CSW.</li> </ul>
11	<p><b>Community Access Relationship</b></p>	<p><b>11a: Enhance communication and reporting with the assessment unit</b></p> <ul style="list-style-type: none"> <li>The assessment unit needs to have a baseline understanding of the CCFS program as well as up-to-date information on program policies that impact eligibility. There are a number of ways this communication could be enhanced including: updating assessment unit job aids, continuing to engage supervisors on CCFS program changes to support implementation planning, and enhance opportunities for relationship-building at the front line through team meetings. There should be more consistent reporting between programs to support continuous improvement.</li> </ul> <p><b>11b: Enhance the on-line application process</b></p> <ul style="list-style-type: none"> <li>The Region will need to maintain a phone channel for applications to ensure a client-centred experience and this should remain as a shared service to support a client-centred experience. However there should be more focus on enhancing on-line applications so that clients can complete a subsidy application, submit their documentation on-line, and book an intake appointment without having to speak with a member of the assessment unit.</li> </ul> <p><b>11c: Clarify OW referral policy and process</b></p> <ul style="list-style-type: none"> <li>Clarify the referral policy between OW and CCFS with an aim to optimize both provincial funding streams, reduce confusion, best serve a client’s interests, and reduce administrative duplication. Consider a policy change so that OW clients who are not employed but need child-care for employment support-related activities (e.g., training) are funded and managed through OW funding pools, and only referring to the CCFS program when they are employed. Consider a process change so that OW clients who need to be referred to fee subsidy would be granted their advanced child care benefit through the OW program to give a 3 week window to onboard them into the CCFS program and confirm that their activity will be stable beyond 1 month.</li> </ul>

# Recommendations Overview

#	Recommendation	Description
11	<b>Community Access Relationship</b>	<p><b>11d: Enhance communication between OW and CCFS</b></p> <ul style="list-style-type: none"> <li>Encourage information sharing between programs on shared clients by creating visual aids, determining common information, consolidating the case management of shared OW-CCFS clients to a few caseworkers, and encouraging proactive communication about changes to client circumstances by developing universal consent.</li> </ul>
12	<b>Training &amp; Performance Management</b>	<p><b>12a: Enhance training for CSWs and administrative staff</b></p> <ul style="list-style-type: none"> <li>Additional training supports should be implemented to ensure CSWs are capable and confident when engaging in difficult conversations with clients and are knowledgeable in new program policies.</li> </ul> <p><b>12b: Enhance performance management of CSWs</b></p> <ul style="list-style-type: none"> <li>Supervisors should perform random case file audits. These and other feedback mechanisms should be used to identify areas where additional training or coaching may be required.</li> </ul>
13	<b>Technology &amp; Automation</b>	<p><b>13a: Automate the calculation of overpayments</b></p> <ul style="list-style-type: none"> <li>A technology tool should be introduced to automate the overpayment calculation process that could be used by CSWs and administrative supports.</li> </ul> <p><b>13b: Self-scheduling for clients</b></p> <ul style="list-style-type: none"> <li>Enable clients to schedule their own appointments for visits and check-ins.</li> </ul> <p><b>13c: Case management system enhancements</b></p> <ul style="list-style-type: none"> <li>Leverage the capabilities of GovGrants to enhance automation and opportunities in technology and/or enhance the utilization of OCCMS through enhanced relationship and partnership with York Region for training and updates.</li> </ul>

# Recommendation Savings Implications

Savings from the implementation of recommendations will be achieved through reducing the number of new overpayments generated each year as well as enhancing the collections of outstanding overpayments. These recommendations have a number of interdependencies and the expected savings may be adjusted as implementation is carried out to reflect new timelines and external interdependencies outside of the program's and the Region's control.

Impact Area	Description	Recommendations	Financial Impact		
			2020	2021	2022
<b>1. Cost Avoidance of Future Overpayments</b>	Implementation of the recommendations will reduce the amount of overpayments that occur in the future. The impact of the recommendations implementation has been assessed against the expected levels of future overpayments in a status quo situation. Note that this is <b>cost avoidance</b> rather than direct savings.	1a, 2a, 4a, 5a, 6a, 6b, 7a, 10a, 11c, 11d, 11d, 12a, 12b, 13c	\$ 438,000	\$ 990,000	\$ 1,358,000
<b>2. Increased Recovery Rate of Overpayments for Active Clients</b>	Implementation of the recommendations will increase the effectiveness of internal recoveries so that more active clients with an overpayment will enter into an overpayment agreement that will allow them to repay their debt to the Region before a child ages out of the program. Note that terminated clients were not considered addressable because the Region no longer has an active relationship with the client and more aggressive collections policies would require additional cost benefit analysis.	1a, 7a	\$ 51,840	\$ 101,088	\$ 167,962

# Capacity and CCFS Program Subsidy Impacts

The recommendations are also expected to create some efficiency gains which will increase capacity of the CCFS team to ensure a manageable workload for program staff as well as redeploy capacity to concentrate on activities that will enhance program accountability. It is important to note that these do not represent expected savings to the program as the capacity will be used to support implementation activities. In addition, the recommended policy change for OW clients not being referred to the CCFS program for school or training activities will result in lower overall levels of subsidy being managed by the program. Child care funding for these clients would now come through the OW program rather than CCFS.

Impact Area	Description	Recommendations	Other Impacts		
			2020	2021	2022
<b>3. Enhanced Program Capacity</b>	Redistribution of administrative tasks and policy and process redesign will allow the program to increase capacity of program resources which can be redistributed to other activities to enhance program accountability. These do not represent expected savings.	1a, 1b, 3a, 6a, 6b, 9a, 9b, 10a, 11a, 11b, 11c, 12a, 12b, 13a, 13b, 13c	13%	25%	25%
<b>4. Reallocation of CCFS Program Funding</b>	Implementation of the recommendations will result in fewer OW clients being referred to the CCFS program. Given that the Region does not currently have a waitlist this will impact the overall CCFS program budget due to a reduction in overall subsidy distributed. Note the value of this impact will be finalized as the program referral policy is further developed and defined and child care funding for these OW clients would now come through the OW program.	11c	Up to \$ 977,500	Up to \$ 1,955,000	Up to \$ 1,955,000

# Implementation plan

The anticipated implementation of the recommendations is outlined below. It is expected that the recommendations will be implemented over a three year period. This timeline and sequencing is based on recommendation priority as well as interdependencies between the recommendations and other corporate initiatives.

Recommendation	2020	2021	2022
<b>Work Stream: Program philosophy</b>			
1a: Enhance stewardship philosophy			
12b: Enhance performance management of CSWs			
6a: Case File Health Measure			
6b: Case Management Approach			
1b: Caseload Assignment by Client			
<b>Work Stream: Communication and information sharing</b>			
2a: Enhance client communication throughout program lifecycle			
11a: Enhance communication and reporting with assessment unit			
11d: Enhance communication between OW and CCFS program			
<b>Work Stream: Service provider relationship</b>			
3a: Stronger leadership role with service providers			
<b>Work Stream: Approach to overpayment</b>			
5a: Enhance Investigation Resources and Process			
7a: Update overpayment policies			
<b>Work Stream: Organizational efficiency and effectiveness</b>			
4a: Strengthen accountability at program initiation			
9a: Streamline file updates and program administration			
10a: Enhance program administrative support			
11c: Clarify OW referral policy and process			
9b: Develop a client prioritization framework for intake			
11b: Enhance the on-line application process			
8a: Enhance separation of duties for appeals			
12a: Enhance training for CSWs and administrative staff			
<b>Work Stream: Technology and automation</b>			
13a: Automate the calculation of overpayments			
13b: Self-scheduling for clients			
13c: Case management system enhancements			
<b>Project Management and Change Management</b>			



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