

PERFORMANCE AUDIT
OF
ADULT PROTECTIVE SERVICES
FAMILY INDEPENDENCE AGENCY

April 2003



Michigan
Office of the Auditor General
REPORT SUMMARY

Performance Audit

Report Number:
43-260-02

Adult Protective Services

Family Independence Agency

Released:
April 2003

Adult Protective Services (APS), Office of Adult Services, Child and Family Services Administration, is responsible for the overall administration of services to adults in need of protection, including the development of policies and procedures. The Family Independence Agency's (FIA's) Field Operations Administration oversees APS workers located in FIA local offices throughout the State and is responsible for implementing the provisions of the Social Welfare Act and APS policies and procedures.

Audit Objectives:

1. To assess APS's effectiveness and compliance with laws, policies, and procedures in investigating and substantiating referred cases of adult abuse, neglect, and/or exploitation.
2. To assess APS's effectiveness and compliance with laws, policies, and procedures in coordinating and providing services for substantiated cases of adult abuse, neglect, and/or exploitation.
3. To assess other pertinent issues related to APS.

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Audit Conclusions:

1. We concluded that APS was moderately effective in investigating and substantiating referred cases of adult abuse, neglect, and/or exploitation.
2. We concluded that APS was moderately effective in coordinating

and providing services for substantiated cases of adult abuse, neglect, and/or exploitation.

3. We concluded that several other pertinent areas within APS need improvement.

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Noteworthy Accomplishments:

FIA had developed and planned to start implementing a formal APS risk assessment tool in 2002. The risk assessment tool is a structured method used to assess whether an adult is vulnerable and in danger of harm from abuse, neglect, and/or exploitation. The risk assessment tool is required at case opening, whenever there is a perceived change in vulnerability or the risk of harm, and at case closing.

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Material Conditions:

APS workers sometimes did not conduct thorough investigations to determine whether adults suspected of being abused,

neglected, and/or exploited were in need of protective services (Finding 3). APS workers sometimes did not coordinate and provide appropriate and/or sufficient services to vulnerable adults at risk of harm from abuse, neglect, and/or exploitation (Finding 5). FIA had not developed and implemented a comprehensive process to evaluate and improve the effectiveness of APS in protecting vulnerable adults (Finding 7).

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Other Conditions:

APS workers frequently did not document their notification of the referral source that a case was assigned for investigation or that the referral was not appropriate for investigation and was denied. Also, APS workers frequently did not identify the specific reasons for denying a referral in the notification letters sent to referral sources (Finding 1). FIA frequently did not commence investigations within 24 hours as required by statute. Also, APS workers sometimes did not conduct initial face-to-face interviews with customers within 10 working days as required by FIA policy (Finding 2). APS workers frequently did not complete service plans and/or interim narratives in accordance with FIA policy. Also, FIA had not established a formal policy regarding the completion of service plans for unsubstantiated cases in which ongoing services were provided (Finding 4). FIA had not established a formal policy requiring APS workers to make contact with customers in need of protective services at least on a monthly basis, and

APS workers frequently did not contact customers on a monthly basis (Finding 6). FIA needs to develop formal caseload standards for APS workers. Also, FIA needs to expand policy guidance pertaining to case closing time frames (Finding 8). FIA had not established a formal policy regarding supervisory review of APS investigation cases, and supervisors frequently did not review investigation cases (Finding 9). APS workers sometimes did not record accurate and/or complete information on the Adult Services Comprehensive Assessment Program (ASCAP) automated database (Finding 10). FIA should determine the feasibility of developing and maintaining a central registry of perpetrators of adult abuse, neglect, and/or exploitation (Finding 11).

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Agency Response:

Our report includes 11 findings and 15 corresponding recommendations. The agency preliminary response indicates that FIA agrees with 13 recommendations, partially agrees with 1 recommendation, and disagrees with 1 recommendation.

In response to the majority of our findings, FIA stated that it plans to issue a major rewrite of APS policies and practices effective October 1, 2003. This rewrite will help ensure quality services for vulnerable adults.

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A copy of the full report can be obtained by calling 517.334.8050 or by visiting our Web site at: www.state.mi.us/audgen/



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AUDITOR GENERAL

April 24, 2003

Ms. Nannette M. Bowler, Director
Family Independence Agency
Grand Tower
Lansing, Michigan

Dear Ms. Bowler:

This is our report on the performance audit of Adult Protective Services, Family Independence Agency.

This report contains our report summary; description of services; audit objectives, scope, and methodology and agency responses and prior audit follow-up; comments, findings, recommendations, and agency preliminary responses; and a glossary of acronyms and terms.

Our comments, findings, and recommendations are organized by audit objective. The agency preliminary responses were taken from the agency's responses subsequent to our audit fieldwork. The *Michigan Compiled Laws* and administrative procedures require that the audited agency develop a formal response within 60 days after release of the audit report.

We appreciate the courtesy and cooperation extended to us during this audit.

AUDITOR GENERAL

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GLOSSARY

Glossary of Acronyms and Terms

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Description of Services

Adult Protective Services (APS), Office of Adult Services, Child and Family Services Administration, Family Independence Agency (FIA), is responsible for the overall administration of services to adults in need of protection*, including the development of policies and procedures. FIA's Field Operations Administration oversees APS workers located in FIA local offices throughout the State and is responsible for implementing the provisions of the Social Welfare Act (Act 280, P.A. 1939, as amended, being Sections 400.1 - 400.119b of the *Michigan Compiled Laws*) and APS policies and procedures.

APS provides protection to vulnerable adults* who are at risk of harm because of the presence or threat of abuse*, neglect*, and/or exploitation*. APS's goal is that its services will:

1. Provide immediate (within 24 hours) investigation and assessment of situations referred to FIA when a vulnerable adult is suspected of being or believed to be abused, neglected, or exploited.
2. Assure that adults in need of protection are living in a safe and stable situation*, including legal intervention, where required, in the least intrusive or restrictive manner.

In accordance with the Social Welfare Act, FIA is responsible for investigating most referrals* of suspected abuse, neglect, or exploitation of adults. For substantiated cases*, FIA is also responsible for making available to the adult the most appropriate and least restrictive protective services*, either directly or through the purchase of such services from other agencies and/or contractors. FIA is not responsible for investigating referrals in cases in which the adult is a resident of a Department of Community Health State-funded and operated mental health facility, unless the incident occurred prior to the adult's admission to the facility, while the adult was on a leave of absence from the facility, or while the adult was off the facility premises in the custody of another person or organization. Also, FIA is not responsible for investigating referrals in cases in which the adult is a patient or resident of a licensed Department of Consumer and Industry Services facility (e.g., county medical care facility, hospital, or nursing home), unless the

* See glossary at end of report for definition.

incident occurred outside the facility or occurred inside the facility and the alleged perpetrator is not a facility employee or staff person.

The number of new APS cases each year and the average monthly number of active cases have risen dramatically in recent years. There were approximately 4,900, 7,900, and 9,600 new APS cases in fiscal years 1991-92, 1995-96, and 2000-01, respectively. The average monthly number of active cases was approximately 1,600, 2,400, and 3,900 in fiscal years 1991-92, 1995-96, and 2000-01, respectively. APS, which expends approximately \$7.0 million annually, had approximately 100 full-time equated central office and local office employees as of March 31, 2002.

Audit Objectives, Scope, and Methodology and Agency Responses and Prior Audit Follow-Up

Audit Objectives

Our performance audit* of Adult Protective Services (APS), Family Independence Agency (FIA), had the following objectives:

1. To assess APS's effectiveness* and compliance with laws, policies, and procedures in investigating and substantiating referred cases of adult abuse, neglect, and/or exploitation.
2. To assess APS's effectiveness and compliance with laws, policies, and procedures in coordinating and providing services for substantiated cases of adult abuse, neglect, and/or exploitation.
3. To assess other pertinent issues related to APS.

Audit Scope

Our audit scope was to examine the program and other records related to Adult Protective Services. The audit scope included the examination of case file and other records at FIA local offices in six counties: Genesee, Grand Traverse, Gratiot, Kent, Oakland, and Wayne. Our audit was conducted in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States and, accordingly, included such tests of the records and such other auditing procedures as we considered necessary in the circumstances.

Audit Methodology

Our audit procedures, performed between January and July 2002, included examining APS records and activities primarily for the period April 1, 2000 through March 31, 2002.

To accomplish our objectives, we reviewed pertinent legislation, FIA policies and procedures, and other authoritative literature. Also, we interviewed staff at FIA's central office. We visited FIA local offices in six counties and interviewed APS workers and supervisory staff. We reviewed both the electronic and hard-copy case files for a

* See glossary at end of report for definition.

sample of referrals received and cases open during the period July 1, 2000 through December 31, 2001.

In connection with our first objective, we evaluated the appropriateness of APS's referral intake, referral assessment, and investigation processes. In particular, we reviewed the recording of referrals on the electronic database, the complaint coordinator's decision as to whether the referral warranted investigation, the notifying of the referral source of the status of the referral, the timeliness of commencing investigations, and the thoroughness of investigations.

In connection with our second objective, we examined the coordination and providing of services needed by vulnerable adults. We also examined service plans and interim narratives. In addition, we reviewed the frequency of APS worker contacts with adults in need of protective services.

In connection with our third objective, we assessed efforts to evaluate the effectiveness of APS, supervisory review of cases, and the accuracy and thoroughness of information on the electronic case files. Also, we obtained and analyzed staffing level and caseload data for local offices within six counties and overall APS statistics and trends. In addition, we reviewed issues related to case closings and development of a central registry for adults.

Agency Responses and Prior Audit Follow-Up

Our report includes 11 findings and 15 corresponding recommendations. The agency preliminary response indicates that FIA agrees with 13 recommendations, partially agrees with 1 recommendation, and disagrees with 1 recommendation.

In response to the majority of our findings, FIA stated that it plans to issue a major rewrite of APS policies and practices effective October 1, 2003. This package will integrate policy and services delivery via protocols and change the way FIA delivers customer* services in its local offices. Policy will be strengthened by establishing clear requirements and redesigning the workflow from referral to case disposition to support staff who have case decision-making responsibilities. The following items will be included: referral response, including priorities and time frames; accurate and complete reports; service planning and delivery to directly address presenting problem(s); and case closure based on removal or reduction of risk. This package will strengthen accountability, build on FIA's enhanced system capabilities with the Adult Services

Comprehensive Assessment Program (ASCAP), support workers and managers in FIA local offices, and improve the quality of service to vulnerable adults in the State.

The agency preliminary response that follows each recommendation in our report was taken from the agency's written comments and oral discussion subsequent to our audit fieldwork. Section 18.1462 of the *Michigan Compiled Laws* and Department of Management and Budget Administrative Guide procedure 1280.02 require FIA to develop a formal response to our audit findings and recommendations within 60 days after release of the audit report.

FIA complied with 4 of the 16 prior audit recommendations included within the scope of our current audit. We repeated 4 prior audit recommendations (presented as Findings 2 and 4), and the 8 other prior audit recommendations were rewritten for inclusion in this audit report.

COMMENTS, FINDINGS, RECOMMENDATIONS, AND AGENCY PRELIMINARY RESPONSES

INVESTIGATION AND SUBSTANTIATION OF REFERRED CASES

COMMENT

Background: Family Independence Agency (FIA) local offices receive referrals of suspected abuse, neglect, and/or exploitation of an adult from numerous sources. Each referral is initially screened to determine if it involves an adult at risk of harm from abuse, neglect, and/or exploitation and there is reasonable belief that the person is vulnerable and in need of protective services. Accepted referrals are assigned to an Adult Protective Services (APS) worker for investigation.

In the investigation process, the APS worker determines if evidence exists to substantiate that a vulnerable adult is or was abused, neglected, and/or exploited. FIA policy requires that the APS worker commence the investigation immediately if the referral indicates the possibility of physical danger to the adult.

Audit Objective: To assess APS's effectiveness and compliance with laws, policies, and procedures in investigating and substantiating referred cases of adult abuse, neglect, and/or exploitation.

Conclusion: We concluded that APS was moderately effective in investigating and substantiating referred cases of adult abuse, neglect, and/or exploitation. Our assessment disclosed one material condition*. APS workers sometimes did not conduct thorough investigations to determine whether adults suspected of being abused, neglected, and/or exploited were in need of protective services (Finding 3). Our assessment also disclosed reportable conditions* regarding notification of referral sources and commencement of investigations and timely interviews (Findings 1 and 2).

Noteworthy Accomplishments: FIA had developed and planned to start implementing a formal APS risk assessment tool in 2002. The risk assessment tool is a structured method used to assess whether an adult is vulnerable and in danger of harm from abuse, neglect, and/or exploitation. It is used to focus the investigation and assist

in case planning, including defining areas that require emphasis, determining when legal intervention may be appropriate, and determining when to close a case. Also, it may be used to quantify the effectiveness of services provided. The risk assessment tool is required at case opening, whenever there is a perceived change in vulnerability or the risk of harm, and at case closing.

FINDING

1. Notification of Referral Sources

APS workers frequently did not document their notification of the referral source that a case was assigned for investigation or that the referral was not appropriate for investigation and was denied. Also, APS workers frequently did not identify the specific reasons for denying a referral in the notification letter sent to the referral source.

FIA Adult Services Manual item 382, page 9, requires that APS complaint coordinators review referral information and determine if there is sufficient justification to warrant an APS investigation. Investigation criteria are:

- a. The subject of the reported referral is an adult at risk of harm from abuse, neglect, or exploitation.
- b. There is reasonable belief that the person is vulnerable and in need of protective services.

If the referral meets these criteria, the APS complaint coordinator immediately assigns the referral to an APS worker for investigation. If the referral does not meet the investigation criteria, the APS complaint coordinator denies the referral. The Manual also requires that APS workers notify the referral source in writing that the referral was received and was assigned for investigation or that the referral was not appropriate for an APS investigation and the reason it was denied. FIA management informed us that the notification letter should contain the specific reasons for denial and not just a general reference to the investigation criteria.

Our review of 180 investigation case files and 60 denial case files for the notification letter sent to the referral source disclosed:

- (a) Case files did not contain evidence that the notification letters were sent in 51 (31%) of 166 applicable investigation cases and 13 (33%) of 40 applicable denial cases.
- (b) For the 27 notification letters sent to the referral source in which the referral was denied, APS workers did not include the specific reason for the denial in 15 (56%) of the letters.

Local office management informed us that it believes that letters to referral sources are being sent, but a copy of the letter is not always maintained in the case file. Maintaining a copy of a complete notification letter in the case file would document APS workers' compliance with FIA policy and management intentions and help ensure that each referral is reviewed and assigned in an appropriate manner. In addition, Section 400.11a of the *Michigan Compiled Laws* requires mandated reporters, such as doctors, nurses, and teachers, to report suspected abuse, neglect, or exploitation of an adult. FIA also receives reports from other sources. Appropriate notification letter feedback to mandated reporters and other sources would provide them with some assurance that FIA has taken action to determine if abuse, neglect, and/or exploitation has occurred and would encourage continued reporting.

RECOMMENDATIONS

We recommend that APS workers document their notification of the referral source that a case was assigned for investigation or that the referral was not appropriate for investigation and was denied.

We also recommend that APS workers identify the specific reasons for denying a referral in the notification letter sent to the referral source.

AGENCY PRELIMINARY RESPONSE

FIA agrees. Current policy requires that referral sources be notified whether or not a case was assigned for investigation or if the referral was not appropriate. For an inappropriate referral, policy requires an explanation to the referral source of why the referral was not appropriate. Beginning January 2003, the new version of the

Adult Services Comprehensive Assessment Program (ASCAP) will record the date and content of notification letters on the contact screen for each case. For cases determined to be inappropriate referrals, notification letters will include an explanation of why a referral was not appropriate. Copies of the letter and dates become part of the permanent electronic ASCAP case record.

FINDING

2. Commencement of Investigations and Timely Interviews

FIA frequently did not commence investigations within 24 hours as required by statute. Also, APS workers sometimes did not conduct initial face-to-face interviews with customers within 10 working days as required by FIA policy.

Section 400.11b of the *Michigan Compiled Laws* requires that local offices commence an investigation within 24 hours after receiving a referral to determine whether the person believed to be abused, neglected, and/or exploited is an adult in need of protective services. Also, FIA Adult Services Manual item 382, page 10, requires that commencing an investigation include two contacts within 24 hours, one with the customer and one with the referral source or a collateral source* who has information about the customer's situation. The purpose of the two contacts is to determine the customer's need for protective services and the degree of risk. The APS worker is to commence the investigation immediately if the referral indicates the possibility of physical danger to the customer. Also, the Manual requires that APS workers conduct a face-to-face interview with the customer within 10 working days from the date FIA received the referral.

Our review of 180 investigation case files disclosed that APS workers did not:

- a. Successfully contact both the customer and the referral or a collateral source within 24 hours in 86 (48%) of 179 applicable investigations.
- b. Attempt to contact the customer and/or the referral or a collateral source within 24 hours in 59 (69%) of the 86 investigations. In 6 (10%) of these 59 cases, there was no evidence that the APS worker ever attempted to contact either the customer or the referral or a collateral source.

* See glossary at end of report for definition.

- c. Conduct face-to-face interviews with customers within 10 working days in 14 (8%) of 173 applicable investigations. Also, APS workers did not record a date for 2 (1%) of the 173 face-to-face interviews conducted.

Also, APS complaint coordinators often did not assign cases for investigation in a timely manner. For the 167 investigation cases with coordinator action dates, we determined that the average time between the receipt of the referral and the APS worker receiving the case was 5.3 hours. In 28 (17%) of the 167 cases, the APS worker did not receive the case until at least 6 hours after FIA had received the referral. These delays may have contributed to the lack of compliance with the 24-hour requirement.

Commencing investigations and conducting face-to-face interviews in a timely manner is necessary to help ensure that APS workers obtain critical information pertinent to the investigation as soon as possible.

We reported on the need to commence investigations within 24 hours in our prior audit of APS. FIA responded that it agreed with the recommendation and would initiate corrective action.

RECOMMENDATIONS

WE AGAIN RECOMMEND THAT FIA COMMENCE INVESTIGATIONS WITHIN 24 HOURS AS REQUIRED BY STATUTE.

We also recommend that APS workers conduct initial face-to-face interviews with customers within 10 working days as required by FIA policy.

AGENCY PRELIMINARY RESPONSE

FIA agrees. ASCAP now requires entry of referral dates and times. If contacts are overdue or if initial interviews are not completed and documented within 10 days, workers are required to provide an explanation of why the standard of promptness was not met. In addition, APS will also include standards of promptness in its Statewide case readings.

FINDING

3. Investigations

APS workers sometimes did not conduct thorough investigations to determine whether adults suspected of being abused, neglected, and/or exploited were in need of protective services.

Section 400.11b of the *Michigan Compiled Laws* requires that APS investigations include a determination of the nature, extent, and cause of the abuse, neglect, or exploitation; examination of evidence; identification of the person responsible for the abuse, neglect, or exploitation; the names and conditions of other adults in the place of residence; an evaluation of the persons responsible for the care of the adult; the environment of the residence; the relationship of the adult to the person responsible for the adult's care; an evaluation as to whether or not the adult would consent to receiving protective services; and any other pertinent data. Also, FIA Adult Services Manual item 382, page 11, requires that APS workers include the criteria established under Section 400.11b of the *Michigan Compiled Laws* in their investigations.

Our review of 177 applicable investigations disclosed that, in some of cases, APS workers either did not conduct a thorough review of all investigation criteria or did not include a review of all required criteria in the investigation. Specifically, we determined deficiencies in the:

- a. Determination of the nature, extent, and cause of the abuse, neglect, or exploitation in 26 (15%) investigations.
- b. Examination of evidence in 26 (15%) investigations.
- c. Review of the environment of the residence in 12 (7%) investigations.

As a result, vulnerable adults may have remained at risk of suspected abuse, neglect, and/or exploitation in 26 (15%) of the 177 investigations we reviewed. In 12 (46%) of these 26 cases, the APS worker did not investigate an alleged abuse, neglect, or exploitation.

The following are examples of investigations that were not thorough or did not include all of the required criteria;

- (a) The referral source stated that a bad odor was coming from the customer's house. The APS worker did not determine the cause of the odor during the initial visit. More than three months later, the referral source called again and the APS worker returned to the house to find rotten food with flies hovering and the house infested with cockroaches.
- (b) The referral source alleged that the customer's son/guardian* was mishandling the customer's funds and that the customer was \$5,000 behind in nursing home bills. The investigation did not determine why the customer was behind in the nursing home bills and who was responsible for the delinquency.
- (c) The referral source stated that: the customer's daughter, who lived with the customer, was a drug addict; the customer was disoriented, confused, and needed 24-hour care; and his medications had disappeared. The investigation did not address the daughter's reported drug problem and its potential effect on the care of the customer.

Complete investigations are critical to ensuring that APS workers determine whether the customer is in need of protective services and the specific services needed to remedy the identified problems.

RECOMMENDATION

We recommend that APS workers conduct thorough investigations to determine whether adults suspected of being abused, neglected, and/or exploited are in need of protective services.

AGENCY PRELIMINARY RESPONSE

FIA agrees. FIA acknowledges that a percentage of investigations are deficient and will systematically monitor for compliance with statutory and policy requirements. APS will establish a work group composed of supervisors and staff to review current policies and investigative procedures and establish guidelines for supervisory case reviews. Policy will also be rewritten to clarify that all alleged

* See glossary at end of report for definition.

harm or risk of harm must be addressed in the investigation and service plan. Minimum standards for follow-up visits will be developed for open cases. New policies will be ready for release by October 2003.

COORDINATION AND PROVIDING OF SERVICES FOR SUBSTANTIATED CASES

COMMENT

Background: For substantiated cases of adult abuse, neglect, and/or exploitation, APS workers make available to the adult the most appropriate and least restrictive protective services, either directly or through the purchase of such services from other agencies and/or contractors. APS workers also take necessary action to safeguard and enhance the welfare of the adult, if possible. Specifically, APS workers take whatever action is necessary to: respond directly to the adult's needs in cases in which other sources of assistance are inadequate or cannot be obtained promptly, develop and enhance the adult's coping abilities, and make maximum use of resources within the adult's natural helping environment (e.g., friends and relatives) and the community. Also, APS workers evaluate the need for voluntary or nonvoluntary legal intervention (e.g., guardianship or conservatorship*) only when other measures fail to provide adequate protection.

Audit Objective: To assess APS's effectiveness and compliance with laws, policies, and procedures in coordinating and providing services for substantiated cases of adult abuse, neglect, and/or exploitation.

Conclusion: **We concluded that APS was moderately effective in coordinating and providing services for substantiated cases of adult abuse, neglect, and/or exploitation.** Our assessment disclosed one material condition. APS workers sometimes did not coordinate and provide appropriate and/or sufficient services to vulnerable adults at risk of harm from abuse, neglect, and/or exploitation (Finding 5). Our assessment also disclosed reportable conditions regarding service plans and interim narratives and contacts with customers (Findings 4 and 6).

* See glossary at end of report for definition.

FINDING

4. Service Plans and Interim Narratives

APS workers frequently did not complete service plans and/or interim narratives in accordance with FIA policy. Also, FIA had not established a formal policy regarding the completion of service plans for unsubstantiated cases* in which ongoing services were provided.

FIA Adult Services Manual item 382, page 14, requires that APS workers complete a service plan within 14 working days of the referral date for each substantiated case for which ongoing services will be provided. The service plan is to include the plan of action, how the plan will be accomplished, and the time frames. When the service plan cannot be completed within 14 working days, the APS worker is to document the reason in the case file and complete the plan as soon as possible. The Manual also requires that APS workers complete an interim narrative on a quarterly basis and at the time of any significant developments affecting the service plan. Interim narratives are to include the current progress of carrying out the service plan and the need for continuation of services or new developments indicating the need to change the service plan.

Our review of 66 substantiated cases that required the provision of ongoing services disclosed that APS workers did not:

- a. Prepare 24 (36%) of the 66 required service plans.
- b. Document the date that 8 (19%) of the 42 service plans were completed to facilitate supervisory oversight.
- c. Prepare 20 (59%) of the 34 dated service plans within the required 14 working days. Seventeen (85%) of these 20 service plans were at least 20 calendar days late and the average length of time to prepare them was 151 days.
- d. Document in the case file the reason that the service plan was not completed on a timely basis for 20 (59%) of the 34 dated service plans and for 24 (100%) of the 24 service plans not completed.

* See glossary at end of report for definition.

- e. Include the method that would be used to accomplish the service plan in 2 (5%) of the 42 service plans completed nor the time frames for completion in 6 (14%) of the 42 service plans.
- f. Prepare 74 (72%) of the 103 interim narratives that were required for 57 applicable cases.

The service plan formalizes the APS worker's plan of action to remedy the customer's identified problems and is critical to ensuring that services focus on resolving these identified problems. Noncompliance with FIA policy regarding service plans and interim narratives may result in customers not receiving the most appropriate services.

In addition, FIA policy does not require APS workers to prepare a service plan for cases that are determined to be unsubstantiated. However, FIA management informed us that it expects APS workers to prepare a service plan for all unsubstantiated cases in which ongoing services are provided. We noted that 55 (53%) of the 104 cases that APS workers had designated as unsubstantiated were open more than 90 days and APS workers had prepared service plans for only 2 (4%) of the 55 cases. It is probable that APS workers provided services in many of these cases and that the APS worker should have prepared a service plan.

We reported on the need to complete service plans and interim narratives in accordance with FIA policy in our prior audit of APS. FIA responded that it agreed with the recommendation and would initiate corrective action.

RECOMMENDATIONS

WE AGAIN RECOMMEND THAT APS WORKERS COMPLETE SERVICE PLANS AND/OR INTERIM NARRATIVES IN ACCORDANCE WITH FIA POLICY.

We also recommend that FIA establish a formal policy regarding the completion of service plans for unsubstantiated cases in which ongoing services are provided.

AGENCY PRELIMINARY RESPONSE

FIA agrees. FIA will establish a process to monitor the timely completion of service plans and review current manuals to ensure that appropriate policies are thorough and clearly presented. FIA will also assess the types of services provided to

unsubstantiated cases and determine if non-APS workers may more appropriately serve these cases. New policies and procedures will be included in the October 2003 policy release.

FINDING

5. Coordination and Providing of Services

APS workers sometimes did not coordinate and provide appropriate and/or sufficient services to vulnerable adults at risk of harm from abuse, neglect, and/or exploitation.

FIA is responsible for protecting vulnerable adults who are in danger of harm from abuse, neglect, and/or exploitation. FIA Adult Services Manual item 382, page 13, requires that APS workers provide the most appropriate and least restrictive protective services to the customer. Also, the APS worker should, whenever possible, take necessary action to safeguard and enhance the welfare of the adult.

Our review of 180 investigation cases identified 93 cases in which the investigation determined that APS services were needed. Based on our review of case files, it appeared that APS workers did not coordinate and provide appropriate and/or sufficient services in 21 (23%) of the 93 cases. Following are three examples of such cases:

- a. A minister alleged that a 57-year-old woman was sick with a yellow tint to her skin. The APS worker visited the customer and did not notice a yellow tint and stated that the customer was able to walk without assistance. The next day the minister told the APS worker that he had talked with the customer's doctor who wanted the customer in the hospital. Although the APS worker subsequently contacted the customer and several other individuals, the APS worker did not verify the minister's reported concern and the need for hospitalization. The customer was found dead in her apartment three weeks after the APS worker was informed that the doctor reportedly wanted her admitted to the hospital. Also, the APS worker did not document the cause of death in the case file as required by policy.
- b. A woman diagnosed with dementia lived at home with her husband who was also diagnosed with dementia. The cognitive disorder clinic treating her

dementia recommended placement in a supervised setting and reported that she should no longer be driving because of her mental incompetence. The APS worker made the initial contact with the customer and assisted the daughter in taking the customer's car away. However, the APS worker did not provide any other services to address the need for supervision and did not contact the customer or the customer's family for seven months after the initial contact. During this time, the customer became confused while upstairs in her house and walked out of a second story bedroom window and fell to the ground. The customer was admitted to the hospital with a broken hip. The APS worker was subsequently informed that the customer would be placed in a nursing home. The APS worker closed the case without ensuring that the customer was placed in a nursing home.

- c. A woman, who lived alone, fell frequently and had been taken to the emergency room seven times in a nine-month period. However, the cause for the falls had not been determined. The customer was willing to move to an assisted living environment and the APS worker contacted the customer's physician to request a prescription for "Lifeline" (a service available to enable an individual to notify others of the need for assistance) until the customer moved to assisted living. The customer's daughter was supposed to get Lifeline connected the next day. The APS worker stated that she intended to follow up regularly until safety precautions were in place. However, as of the date of our review, the worker had not contacted the customer or the family in over four months to confirm that safety precautions were in place.

Coordinating and providing appropriate and/or sufficient services is necessary to help ensure that vulnerable adults are protected from further harm caused by abuse, neglect, and or exploitation and, therefore, remain in a safe and stable living situation.

RECOMMENDATION

We recommend that FIA ensure that APS workers coordinate and provide appropriate and/or sufficient services to vulnerable adults at risk of harm from abuse, neglect, and/or exploitation.

AGENCY PRELIMINARY RESPONSE

FIA agrees and acknowledges that APS workers sometimes did not coordinate and provide appropriate and/or sufficient services. By October 2003, FIA will revise policy to establish standards for follow-up visits, including verification that services identified in the service plan are provided. Supervisors will be instructed to include verification of services delivered in their case readings.

FINDING

6. Contacts With Customers

FIA had not established a formal policy requiring APS workers to make contact with customers in need of protective services at least on a monthly basis, and APS workers frequently did not contact customers on a monthly basis.

FIA policy does not specify how often an APS worker should contact each customer. However, FIA management, including management at all six local offices visited, informed us that it expects APS workers, at a minimum, to contact each customer monthly while the APS case is open.

Our review of 180 investigation case files disclosed that, in 81 (45%) cases, APS workers did not contact the customers in 87 instances for periods of two or more months. Specifically, APS workers did not contact the customers:

- a. For periods of between two and three months in 26 instances.
- b. For periods of between three and four months in 27 instances.
- c. For periods of between four and six months in 15 instances.
- d. For periods of over six months in 19 instances.

These 87 periods of no contact occurred 6 (7%) times while the APS worker was investigating the alleged abuse, neglect, and/or exploitation; 21 (24%) times while the APS worker was providing or coordinating services; and 60 (69%) times while the APS worker was monitoring the case after the customer was believed to be in a safe and stable living situation.

Maintaining contact with customers is necessary to help ensure that APS workers thoroughly and expeditiously investigate the alleged harm, provide and/or coordinate needed services, and monitor the cases appropriately to ensure that the customers remain in safe and stable living situations.

RECOMMENDATION

We recommend that FIA establish a formal policy requiring APS workers to make contact with customers in need of protective services at least on a monthly basis and that APS workers comply with the policy.

AGENCY PRELIMINARY RESPONSE

FIA agrees. FIA will review current policy to establish guidelines for ongoing monitoring of open cases in which risk of harm continues to be a factor by the October 2003 policy release.

OTHER PERTINENT ISSUES

COMMENT

Audit Objective: To assess other pertinent issues related to APS.

Conclusion: **We concluded that several other pertinent areas within APS need improvement.** Our assessment disclosed one material condition. FIA had not developed and implemented a comprehensive process to evaluate and improve the effectiveness of APS in protecting vulnerable adults (Finding 7). In addition, we identified reportable conditions in the areas of caseload standards and case closing, supervisory review, automated case file information, and the central adult abuse registry (Findings 8 through 11).

FINDING

7. Evaluation of APS Effectiveness

FIA had not developed and implemented a comprehensive process to evaluate and improve the effectiveness of APS in protecting vulnerable adults.

The goal of APS is to provide protection to vulnerable adults who are at risk of harm because of the presence or threat of abuse, neglect, and/or exploitation. APS workers are to conduct an investigation within 24 hours of a referral to FIA

and provide and/or coordinate appropriate services for those adults in need of protection.

APS can best evaluate and improve the effectiveness of its investigation process and the provision and/or coordination of services for substantiated cases by using a comprehensive evaluation process. Such a process should include: performance indicators* for measuring outputs* and outcomes*; performance standards* or goals* that describe the desired level of outputs and outcomes based on management expectations, peer group performance, and/or historical performance; a management information system to accurately gather actual output and outcome data; a comparison of the actual data with desired outputs and outcomes; a reporting of the comparison results to management; and proposals of program changes to improve effectiveness.

FIA compiles statistical data and analyzes county and Statewide trends for certain broad performance indicators, such as the number of cases: that are opened and closed, that have legal intervention, and that are substantiated. FIA also analyzes the length of time cases are open, the frequency of harm types, and the frequency of specific referral and perpetrator categories. Further, FIA analyzes compliance with a limited number of specific legal or policy requirements, such as the 24-hour response time and the completion of service plans within 14 days.

Our review of FIA's overall analysis and evaluation of APS disclosed the following deficiencies:

- a. FIA had not established sufficient performance indicators and related performance standards by which management could assess APS effectiveness.

Performance indicators based particularly on outcomes, along with performance standards for each indicator, would allow FIA to evaluate APS effectiveness. For example, such performance indicators could include: the extent to which the severity of neglect, abuse, and/or exploitation was reduced by services provided; progress in achieving goals identified in service plans; appropriateness of services provided; and the number of repeat cases.

* See glossary at end of report for definition.

- b. FIA had not established performance standards for the various broad performance indicators for which it gathered data and analyzed trends.

Performance standards define a desired level of output or outcome. Comparison of actual output and outcome data for each performance indicator with the performance indicator's defined performance standard would allow management to assess the actual effectiveness for the various indicators. For example, APS could establish a performance standard pertaining to closing a certain percentage of cases within six months. APS could then compare actual data on the length of time cases were open with this standard to assess the effectiveness of APS in providing timely services.

Although useful as broad indicators of performance, without performance standards with which to compare actual results, APS's performance indicators are of limited usefulness in evaluating the overall effectiveness of APS.

- c. Some data that FIA compiled and analyzed and the resulting conclusions may be inaccurate.

Our review of certain APS performance indicator outputs disclosed a significant difference from the results derived by FIA in its analysis of the performance indicator data. For example, FIA reported a 63% compliance rate with the requirement to commence investigations within 24 hours for calendar year 2001. However, as discussed in Findings 2 and 10, we determined that APS workers were not successful in contacting both the customer and the referral or a collateral source in 86 (48%) of the 179 applicable investigations we reviewed, resulting in a 52% compliance rate. Also, APS workers sometimes recorded unsuccessful contacts as successful contacts.

Further, FIA reported for calendar year 2001 an 89% compliance rate with the requirement to complete service plans within 14 days. In contrast, as discussed in Finding 4, we determined that APS workers did not prepare 24 (36%) of the 66 required service plans, did not document the date that 8 (19%) of the 42 service plans were completed, and did not prepare 20 (48%) of the 34 dated service plans within 14 days. In total, the APS workers documented that a service plan was prepared on a timely basis for only 14 (21%) of the 66 cases requiring a service plan. As a result, it appears that the accuracy of FIA's analyses of compliance with the requirements to commence an

investigation within 24 hours and complete service plans within 14 days is questionable and may be of limited usefulness.

Without a comprehensive process to evaluate effectiveness and make appropriate improvements, if needed, FIA's ability to administer APS is significantly diminished. Also, the State Legislature and the Governor have required in various appropriations acts and Executive Directive No. 1996-1 that State programs use continuous quality improvement* processes to manage the use of limited State resources. Further, in Executive Directive No. 2001-3, which rescinded Executive Directive No. 1996-1, effective June 8, 2001, the Governor stated that it was his goal to increase efforts toward continuous improvement and directed department and agency heads to actively support the State's Quality Recognition System and ensure the implementation of quality and customer service management techniques.

RECOMMENDATION

We recommend that FIA develop and implement a comprehensive process to evaluate and improve the effectiveness of APS in protecting vulnerable adults.

AGENCY PRELIMINARY RESPONSE

FIA agrees. FIA stated that in January 2003, it implemented an APS risk assessment to measure the level of risk and the impact of APS intervention. APS caseworkers are required to complete an assessment at case openings, at case closings, and whenever there is a perceived change in harm, risk of harm, and vulnerability. This instrument, along with additional data reporting tools in the new ASCAP, provides the information needed for ongoing evaluation of the effectiveness of intervention.

FINDING

8. Caseload Standards and Case Closing

FIA needs to develop formal caseload standards for APS workers. Also, FIA needs to expand policy guidance pertaining to case closing time frames.

* See glossary at end of report for definition.

Caseload standards for APS workers servicing vulnerable adults have not been established in the *Michigan Administrative Code* or FIA policy. However, in 1997, the National Association of Adult Protective Services Administrators (NAAPSA) completed a study of APS caseloads. Based on this study, NAAPSA recommended that APS caseloads not exceed 25 cases when the cases include investigations and are ongoing. We also noted in the study that one state agency indicated that those programs that operate within the staffing guidelines usually perform better than those that exceed the guidelines.

We analyzed FIA data on the number of APS cases and full-time equated APS workers at local offices within six counties visited as of September 30, 2001 and March 31, 2002. As of September 30, 2001, 43 (55%) of the 78 APS workers in the local offices were also responsible for other FIA programs. As of March 31, 2002, 45 (55%) of the 82 APS workers were also responsible for other FIA programs. For these APS workers, we computed equivalent caseloads using the APS workers' caseloads and the percentage of time allocated for APS cases. Our review disclosed:

- a. The average caseload per APS worker as of September 30, 2001 was 38.8 cases.
- b. The average caseload per APS worker as of March 31, 2002 was 37.4 cases.
- c. The local office average caseload per APS worker as of September 30, 2001 ranged from 13.2 to 44.7 cases. Five (83%) of the 6 local offices had average caseloads of more than 25 cases.
- d. The local office average caseload per APS worker as of March 31, 2002 ranged from 18.4 to 45.8 cases. Three (50%) of the 6 local offices had average caseloads of more than 25 cases.
- e. As of September 30, 2001, 62 (78%) of the 79 APS workers had caseloads that exceeded the level recommended by NAAPSA. The caseloads for the 62 APS workers ranged from 26 to 121 cases, with an average caseload of 44.6 cases.
- f. As of March 31, 2002, 60 (73%) of the 82 APS workers had caseloads that exceeded the level recommended by NAAPSA. The caseloads for the 60 APS

workers ranged from 26 to 161 cases, with an average caseload of 41.2 cases.

Most cases for the APS workers at all six local offices included both investigations and ongoing services. As a result, these caseload averages indicate that most APS workers at the six local offices had case assignments in excess of NAAPSA's recommended maximum standard of 25 cases.

In addition to the number of cases, other issues may warrant consideration in the development of APS caseload standards, such as the extent of the adults' vulnerability, the types of harm involved, the seriousness of alleged issue(s) reported in the referral, court involvement, and travel involved.

Also, our review disclosed that APS workers sometimes did not close cases in a timely manner. FIA policy does not provide specific case closing time frames. However, FIA management informed us that it is reasonable to close a case within 90 days of the time that the APS worker determined that the case is unsubstantiated or a vulnerable adult is no longer at risk of abuse, neglect, and/or exploitation. Using this reasonableness criteria for closing cases, we determined that APS workers had not closed 36 (22%) of the 167 applicable investigation cases reviewed on a timely basis. Sixteen (44%) of these 36 cases were open 6 or more months longer than the 90-day period, with 8 (50%) of the 16 cases open 12 or more months longer than the 90-day period. Not closing cases on a timely basis inflates caseloads and may result in disproportionate allocation of personnel among local offices.

In addition, the local office in one large county routinely opened delinquent property tax referrals as APS cases before determining whether the referrals qualified as APS cases. The local office informed us that approximately 10% of the total APS cases in the county during calendar year 2001 were delinquent property tax referrals. Section 211.140a of the *Michigan Compiled Laws* requires FIA to make an attempt to contact the owner and occupant of property with delinquent taxes to determine whether the owner or occupant is in need of assistance or protection of the court. FIA Adult Services Manual item 382, page 8, states that the local office must attempt to contact the owner and occupant within 10 days of the office receiving notification and that contact may be by certified mail, telephone, or home visit. The Manual further requires that, regardless of the method of attempted contact, FIA is required to open a case as an APS case only after it determines that

the owner or occupant is a vulnerable adult at risk of harm. As with failure to close cases on a timely basis, opening delinquent property tax referrals as APS cases before determining whether they qualify inflates caseloads and may result in disproportionate allocation of personnel among local offices.

By developing caseload standards and providing case closing time frames, FIA could assist local offices in ensuring that caseloads are reasonable and that staff have sufficient time to provide services to vulnerable adults. Also, formal caseload standards and case closing time frames would be useful management tools when assigning cases to APS workers and making local office budgeting and staffing level decisions.

RECOMMENDATIONS

We recommend that FIA develop formal caseload standards for APS workers.

We also recommend that FIA expand policy guidance pertaining to case closing time frames.

AGENCY PRELIMINARY RESPONSE

FIA agrees. FIA, using existing information on caseload standards and time studies, will review the current staffing allocations for APS.

The Office of Adult Services, for the October 2003 policy release, will further review and revise policies that establish standards for follow-up contacts, ongoing monitoring of active cases, and use of ASCAP to establish more effective supervisory case reviews. The newly incorporated APS risk assessment instrument should provide more consistent guidelines for workers and supervisors to determine when a case can reasonably be closed.

FINDING

9. Supervisory Review

FIA had not established a formal policy regarding supervisory review of APS investigation cases, and supervisors frequently did not review investigation cases.

FIA policy, as defined in L-Letter 00-207, requires that each supervisor of APS workers review a minimum of three cases per APS worker per quarter.

L-Letter 00-207 further requires that supervisors document their reviews using current case reading forms and complete quarterly case reading reports summarizing their reviews. When an APS worker is also responsible for cases related to other FIA programs, the three-case minimum per APS worker per quarter pertains to the total cases assigned to the APS worker. FIA policy does not specifically require supervisors to review APS cases. However, APS management informed us that APS supervisors are expected to review all investigation cases.

Our review of 160 closed investigation case files disclosed that 72 (45%) case files did not contain any evidence of supervisory review. Supervisory review is necessary to help ensure that APS workers commence and conduct timely and thorough investigations; develop appropriate service plans to address identified abuse, neglect, and/or exploitation; provide or coordinate services needed to help ensure that customers in need of protection are living in a safe and stable situation; and close cases in a timely manner.

RECOMMENDATION

We recommend that FIA establish a formal policy regarding supervisory review of APS investigation cases and that supervisors comply with the policy.

AGENCY PRELIMINARY RESPONSE

FIA stated that it partially agrees. FIA's current policy requires supervisors to review three cases per worker each quarter but does not provide guidelines specific to APS cases. FIA will establish guidelines for supervisory case readings of APS cases by October 2003.

FINDING

10. Automated Case File Information

APS workers sometimes did not record accurate and/or complete information on the ASCAP automated database.

Since 1996, APS workers have recorded and documented most case information on the ASCAP automated database. APS workers maintain certain information and documents not suitable for entry on the ASCAP automated database in hard copy case files at each local office.

Our review of the automated case files for 180 investigation cases disclosed:

- a. APS workers improperly recorded unsuccessful attempts to contact the customer and/or the referral or a collateral source as successful contacts on the automated database in 27 (15%) of the 180 cases. Also, APS workers did not document in the automated database case file the details of contacts with the customer and/or the referral or a collateral source in 23 (13%) of the 180 cases.

FIA compiles contact information recorded on the automated database to analyze Statewide compliance with Section 400.11b of the *Michigan Compiled Laws*, which requires commencing an investigation within 24 hours of receiving the referral. Therefore, FIA needs accurate and documented information to properly assess compliance with the statute.

- b. The date and time that the APS complaint coordinator assigned a case for investigation was not accurately recorded in 46 (26%) of the 180 cases.

FIA needs accurate information related to the date and time that the complaint coordinator assigned the case to assess responsibility in cases in which FIA did not commence the investigation within 24 hours, as required by Section 400.11b of the *Michigan Compiled Laws*.

- c. APS workers did not sufficiently describe the nature of the contacts in 12 (7%) of 180 cases.

FIA Adult Services Manual item 382, page 13, requires that the investigation summary include a list of contacts, the dates of the contacts, and the nature of the contacts. We noted that APS workers did not sufficiently describe the nature of the contacts in these 12 cases or otherwise document in the local office case files the subject matter discussed during the contacts.

- d. APS workers did not consistently and/or appropriately designate cases as either substantiated or unsubstantiated in 30 (17%) of 180 cases.

In accordance with Section 400.11b of the *Michigan Compiled Laws*, local offices make protective services available to vulnerable adults who are, or have been, abused, neglected, or exploited. However, the APS worker

sometimes determined that the allegation in the referral was partially or completely untrue, yet the adult was vulnerable and in danger of harm from abuse, neglect, or exploitation and, therefore, the adult was in need of protective services. Some APS workers designated these types of cases as unsubstantiated and did not prepare a service plan, even though the APS workers provided or coordinated services; however, other APS workers designated these types of cases as substantiated.

Our review also noted other cases in which the information in the case file did not appear to support the APS worker's designation of substantiated or unsubstantiated. For example, we noted cases in which the investigation appeared to substantiate the referral, yet the APS worker designated the case as unsubstantiated and vice versa. We also noted cases in which the investigation was not complete, but the APS worker had designated the case as unsubstantiated.

FIA needs consistent and appropriate designation of cases as substantiated or unsubstantiated and, if applicable, another category to help ensure that needed services are provided and that management information used in program evaluation is accurate.

RECOMMENDATION

We recommend that APS workers record accurate and complete information on the ASCAP automated database.

AGENCY PRELIMINARY RESPONSE

FIA agrees. FIA stated that ASCAP now requires workers to address allegations of harm included in the referral or identified during an investigation. The current version also clarifies policy regarding the reporting of contacts. Failure to meet established standards of promptness is flagged and workers are required to enter an explanation before they can proceed in ASCAP.

FINDING

11. Central Adult Abuse Registry

FIA should determine the feasibility of developing and maintaining a central registry of perpetrators of adult abuse, neglect, and/or exploitation.

A central adult abuse registry is a system for archiving the identity of individuals who are found, through an APS investigation, to have abused, neglected, or exploited an adult. Such a registry could be used by a number of State agencies and private entities to investigate allegations of adult abuse, neglect, and exploitation and to screen applications for paid or volunteer positions at various institutions, including medical care facilities, hospitals, nursing homes, adult foster care homes, and assisted living facilities. Currently, FIA maintains the Central Registry of known perpetrators of child abuse and neglect that is critical to FIA's efforts to protect children.

The National Center on Elder Abuse, National Association of State Units on Aging, reported that 21 states maintain a perpetrator database. Also, the Association's 1997 report, entitled "Structure and Utilization of Adult Abuse Registries in Selected States," summarizes its investigation of policies and procedures used for abuse registries or related programs in 11 states. The Association's report and our performance audit of FIA's Children's Protective Services Program disclosed issues that should be considered in developing and implementing an effective central registry of perpetrators of adult abuse, neglect, and exploitation, such as:

- a. Persons to be included in the registry. Certain types of perpetrators, such as nursing assistants and registered nurses, would likely be included. Other possible inclusions would be perpetrators of all types of adult abuse, neglect, and exploitation as well as adults who neglect themselves because of their inability to respond appropriately to harmful situations.
- b. Controls to ensure that registry data is complete and accurate.
- c. Registry access controls and methods of access to help ensure that confidential information on the registry is not accessed, edited, or expunged by unauthorized individuals.
- d. Confidentiality requirements to limit the release of registry information for specific purposes. For example, perhaps only certain types of employers should have access to the registry and the legitimacy of requests for information may need to be verified.

- e. Due process procedures for notifying all perpetrators of their placement on the registry within a specified number of days and for requesting expungement of records.
- f. Determination of responsibility for operating the registry and associated costs.

FIA's operation of an adult abuse registry in conjunction with its Central Registry should reduce system development costs and provide operating efficiencies.

Consideration of these and any other pertinent issues in the development of a central adult abuse registry would help to ensure the propriety and usefulness of the registry to help protect vulnerable adults from abuse, neglect, and exploitation.

RECOMMENDATION

We recommend that FIA determine the feasibility of developing and maintaining a central registry of perpetrators of adult abuse, neglect, and exploitation.

AGENCY PRELIMINARY RESPONSE

FIA disagrees. FIA stated that while, on the surface, a central registry may appear to have merit, a survey completed in 1998 by the State of Virginia Department of Social Services raised numerous questions, including costs, liabilities, and frequent involvement of multiple agencies and complexity of adult protective services. Only seven states reported having a central registry. Two of these states reported that the registry was not effective and five reported limited effectiveness of a registry in prevention of abuse. FIA does believe that perhaps a database of home help providers who have perpetrated harm while providing services to a vulnerable population may be useful. FIA will study the effectiveness of such a database and develop a report by January 2004.

Glossary of Acronyms and Terms

abuse	Harm or threatened harm to an adult's health or welfare caused by another person. Abuse includes, but is not limited to, nonaccidental physical or mental injury, sexual abuse, or maltreatment (Section 400.11(a) of the <i>Michigan Compiled Laws</i>).
adult in need of protection	A vulnerable person not less than 18 years of age who is suspected of being or believed to be abused, neglected, or exploited (Section 400.11(b) of the <i>Michigan Compiled Laws</i>).
APS	Adult Protective Services.
ASCAP	Adult Services Comprehensive Assessment Program.
collateral source	Someone who has information about a customer's situation.
conservatorship	A legal arrangement created by a probate court appointing a person or other entity to exercise power over the property and affairs of a person in cases in which the court has determined that the person is unable to manage his/her property or affairs effectively because of mental illness, mental deficiency, physical illness or disability, chronic use of drugs, or chronic intoxication. The court may grant the conservator broad or limited power.
continuous quality improvement	A process that aligns the vision and mission of an organization with the needs and expectations of internal and external customers. It normally includes a process to improve program effectiveness and efficiency by assessing performance indicators that measure outputs and outcomes related to the program vision, mission, goals, and objectives.
customer	An adult in need of protection.

effectiveness	Program success in achieving mission and goals.
efficiency	Achieving the most outputs and outcomes practical with the minimum amount of resources.
exploitation	An action that involves the misuse of an adult's funds, property, or personal dignity by another person (Section 400.11(c) of the <i>Michigan Compiled Laws</i>).
FIA	Family Independence Agency.
goals	The agency's intended outcomes or impacts for a program to accomplish its mission.
guardian	A person or other entity appointed by probate court to provide necessary supervision and care of a legally incapacitated person (one who lacks understanding or capacity to make or communicate informed decisions because of a mental or physical impairment or because of use of drugs or chronic intoxication).
material condition	A reportable condition that could impair the ability of management to operate a program in an effective and efficient manner and/or could adversely affect the judgment of an interested person concerning the effectiveness and efficiency of the program.
mission	The agency's main purpose or the reason that the agency was established.
NAAPSA	National Association of Adult Protective Services Administrators.
neglect	Harm to an adult's health or welfare caused by the inability of the adult to respond appropriately to a harmful or potentially harmful situation or by the conduct of a person who assumes responsibility for a significant aspect of the adult's health or

welfare. Neglect includes the failure to provide adequate food, clothing, shelter, or medical care (Section 400.11(d) of the *Michigan Compiled Laws*).

objectives	Specific outcomes that a program seeks to achieve its goals.
outcomes	The actual impacts of the program.
outputs	The products or services produced by the program.
performance audit	An economy and efficiency audit or a program audit that is designed to provide an independent assessment of the performance of a governmental entity, program, activity, or function to improve public accountability and to facilitate decision making by parties responsible for overseeing or initiating corrective action.
performance indicators	Information of a quantitative or qualitative nature used to assess achievement of goals and/or objectives.
performance standards	A desired level of output or outcome.
protective services	Services that include, but are not limited to, remedial, social, legal, health, mental health, and referral services provided in response to a report of alleged harm or threatened harm because of abuse, neglect, or exploitation (Section 400.11(e) of the <i>Michigan Compiled Laws</i>).
referral	An allegation, report, or other communication that contains information about known or suspected abuse, neglect, or exploitation of vulnerable adults.
reportable condition	A matter that, in the auditor's judgment, represents either an opportunity for improvement or a significant deficiency in management's ability to operate a program in an effective and efficient manner.

safe and stable living situation

An environment in which there is no immediate threat to the life, health, or welfare of an adult from self or others and there is reason to believe that this status will continue for the foreseeable future.

substantiated case

A case in which an APS worker determines that the subject of the complaint is an adult who is vulnerable and is threatened by actual harm because of abuse, neglect, or exploitation.

unsubstantiated case

A case in which an APS worker determines that the subject of the complaint is an adult who is either not in danger of any harm or not vulnerable or that the referral is one which is inappropriate for APS.

vulnerable adult

A condition in which an adult is unable to protect himself or herself from abuse, neglect, or exploitation because of a mental or physical impairment or because of advanced age (Section 400.11(f) of the *Michigan Compiled Laws*).

Also, an individual age 18 or over who, because of age, developmental disability, mental illness, or disability, whether or not determined by a court to be an incapacitated individual in need of protection, lacks the cognitive skills required to manage his or her property (Section 750.174a(11)(d) of the *Michigan Compiled Laws*).