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THOMAS H. MCTAVISH, C.P.A.
AUDITOR GENERAL

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THOMAS H. MCTAVISH, C.P.A.
AUDITOR GENERAL

December 15, 2011

Ms. Maura D. Corrigan, Director
Department of Human Services
Grand Tower
Lansing, Michigan

Dear Ms. Corrigan:

This is our report on our follow-up of the 2 material conditions (Findings 1 and 3), 2 reportable conditions (Findings 2 and 4), and 5 corresponding recommendations reported in the performance audit of Training and Staff Development, Department of Human Services (DHS). That audit report was issued and distributed in March 2007. Additional copies are available on request or at <<http://www.audgen.michigan.gov>>.

Our follow-up disclosed that DHS had complied with 2 recommendations, had substantially complied with 1 recommendation, and had partially complied with 2 recommendations. Reportable conditions exist related to the continuing education requirements for adult services and juvenile justice specialists, family independence specialists, and eligibility specialists (Finding 1) and the development of a comprehensive process to evaluate the effectiveness of its training programs for services specialists (Finding 3).

If you have any questions, please call me or Scott M. Strong, C.P.A., C.I.A., Deputy Auditor General.

Sincerely,

A handwritten signature in black ink that reads "Thomas H. McTavish".

Thomas H. McTavish, C.P.A.
Auditor General

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TRAINING AND STAFF DEVELOPMENT DEPARTMENT OF HUMAN SERVICES FOLLOW-UP REPORT

INTRODUCTION

This report contains the results of our follow-up of the material conditions* and reportable conditions*, the corresponding recommendations, and the agency's preliminary responses as reported in our performance audit* of Training and Staff Development, Department of Human Services (DHS) (431-0316-06), which was issued and distributed in March 2007. That audit report included 2 material conditions (Findings 1 and 3) and 2 reportable conditions (Findings 2 and 4).

PURPOSE OF FOLLOW-UP

The purpose of this follow-up was to determine whether DHS has taken appropriate corrective measures in response to the 2 material conditions, 2 reportable conditions, and 5 corresponding recommendations.

BACKGROUND

DHS was created by the Executive Organization Act of 1965. DHS's mission* is improving the quality of life in Michigan by providing services to vulnerable children and adults that will strengthen the community and enable families and individuals to move toward independence. As a means to accomplish its mission, DHS strives to develop its work force at all levels.

DHS has organized the responsibility for training its employees primarily among the Child Welfare Training Institute (CWTI), the Office of Training and Staff Development (OTSD), and the Office of Child Support (OCS) Training Section. In addition, the Child Welfare Contract Compliance Unit (CWCCU) is responsible for ensuring that private agency contractors receive training as required by their agreements with DHS.

** See glossary at end of report for definition.*

CWTI's mission is to improve individuals' work performance by equipping professionals with the knowledge and skills necessary to help them be successful in their work with families. CWTI develops, implements, trains, tracks, and monitors training for child welfare staff.

OTSD's mission is to improve individual work performance by equipping people with the knowledge, skills, and attitudes they must possess to be successful in their work. OTSD was established for the purpose of providing a coordinated training effort for local office staff in the Field Services Administration.

The OCS Training Section's purpose is to develop and deliver child support programmatic training and training materials to program-wide child support staff. This staff includes persons involved in child support operations from the Friend of the Court offices, prosecuting attorney offices, and OCS.

SCOPE

Our fieldwork was primarily conducted from July to September 2011. In addition, we conducted fieldwork in November 2011 to consider new information presented by DHS subsequent to September 2011 that could have an effect on our follow-up conclusions. We interviewed DHS personnel and reviewed DHS's corrective action plans to determine the status of compliance with our recommendations for Findings 1 through 4. We reviewed DHS contract language, policies, and procedures related to training requirements. We identified the population of employees that were required to have training and tested a sample of them to determine if they attended all required training. We reviewed DHS's procedures for monitoring whether contract agency employees received all required training. We examined DHS's efforts to identify training needs for its employees. We reviewed documentation to determine if DHS obtained evaluations of the effectiveness* of the training provided to services specialists*. We also reviewed the training requirements ordered upon DHS in the *Dwayne B. v. Jennifer Granholm, et al.*, Settlement Agreement, effective October 24, 2008. In addition, we reviewed the *Dwayne B. v. Rick Snyder* Modified Settlement Agreement and Consent Order, effective July 18, 2011, to obtain an understanding of future training requirements for child welfare workers. Further, we reviewed the child support training database to determine if it provided a permanent record of employee training transcripts and training session evaluations.

* See glossary at end of report for definition.

FOLLOW-UP RESULTS

EFFECTIVENESS AND EFFICIENCY* OF ADMINISTRATION OF TRAINING AND STAFF DEVELOPMENT FUNCTIONS

RECOMMENDATION AND RESPONSE AS REPORTED IN MARCH 2007:

1. Initial and Continuing Education Requirements

RECOMMENDATION

We recommend that DHS institute initial instruction requirements for newly hired family independence specialists (FIS) and eligibility specialists (ES) and continuing education* requirements for all services specialists, FIS, and ES.

AGENCY PRELIMINARY RESPONSE

DHS agrees and it informed us that, effective January 1, 2007, all newly hired FIS and ES are required to attend initial instruction. Also, DHS agrees that all services specialists, FIS, and ES should receive continuing education training. DHS will improve its documentation process to demonstrate that staff are attending such training.

FOLLOW-UP CONCLUSION

We concluded that DHS had partially complied with this recommendation. Although DHS had made improvements in its training requirements, it had not fully addressed the conditions cited in our 2007 audit report. A reportable condition exists. Specifically, our follow-up determined:

- a. DHS fully addressed the condition in our 2007 audit report to require newly hired FIS and ES workers to attend initial instruction. We sampled 20 FIS and ES workers hired from July 11, 2010 through July 9, 2011 and noted that all 20 completed initial instruction.
- b. DHS partially addressed the condition in our 2007 audit report to institute continuing education requirements for all services specialists, FIS, and ES. DHS instituted continuing education requirements for adoption workers, foster care workers, and child protective services (CPS) workers as required by the

* See glossary at end of report for definition.

Dwayne B. v. Jenifer Granholm, et al., Settlement Agreement and the *Dwayne B. v. Rick Snyder* Modified Settlement Agreement and Consent Order. However, DHS did not institute continuing education requirements for adult services and juvenile justice specialists, FIS, and ES.

In response to our conclusion, DHS informed us that it disagrees with the conclusion that a reportable condition exists. DHS indicated that its preliminary response to the 2007 audit stated that DHS agreed that workers should receive continuing education training; however, it did not commit to implementing a requirement for a specified number of training hours, nor a specific curriculum. DHS indicated that it believes that continuing education training should be offered to adult services and juvenile justice specialists, FIS, and ES, but that the continuing education should not be prescriptive in terms of hours or coursework. DHS also indicated that these workers are provided with opportunities to obtain continuing education training on-line and in the classroom.

In addition, DHS indicated that the recently implemented Training Governance Model includes curriculum councils composed of representatives from field offices, the program office, and DHS training areas that are charged with the development of a comprehensive needs assessment and training curriculum for each job family. DHS further indicated that this process will result in the identification of in-service training topics that will be recommended for professional development of employees within each program.

RECOMMENDATIONS AND RESPONSE AS REPORTED IN MARCH 2007:

2. Monitoring of Private Agency Training

RECOMMENDATIONS

We recommend that DHS institute a monitoring process to ensure that contracted private agency staff providing adoption services receive all required training.

We also recommend that DHS ensure that contracted private agency staff providing foster care and Families First of Michigan (FFM) services attend all required training.

AGENCY PRELIMINARY RESPONSE

DHS agrees and informed us that it has put a corrective action plan in place to ensure that contractually required training is completed by private agency staff.

FOLLOW-UP CONCLUSION

We concluded that DHS had complied with the first recommendation and had substantially complied with the second recommendation. Specifically, our follow-up determined:

- a. Regarding the first recommendation, DHS fully addressed the condition in our 2007 audit report to institute a monitoring process to ensure that private agency staff providing adoption services attended all required CWTI training. We determined that DHS instituted a monitoring process to ensure that contracted private agency staff providing adoption services attended all required training. We determined that CWCCU performed annual reviews of private agencies for their compliance with contractual requirements. The reviews included an examination of private agency personnel records to determine compliance with training requirements. In addition, DHS informed us that, during the six-month period ended March 31, 2011, it developed and implemented a cross-check review of independent data sources to identify private agency newly hired staff who were assigned adoption cases but had not yet completed CWTI preservice training.
- b. Regarding the second recommendation, DHS fully addressed the condition in our 2007 audit report to ensure that contracted private agency staff providing foster care services attended all required CWTI training. We sampled 10 private agency staff providing foster care services and noted that all 10 attended all required CWTI training.

In addition, DHS fully addressed the condition in our 2007 audit report to ensure that contracted private agency staff providing FFM services attended all required core training. We sampled 9 private agency staff providing FFM services who were required to complete core training and noted that all 9 did complete the required core training.

Further, DHS fully addressed the condition in our 2007 audit report to ensure that contracted private agency supervisors providing FFM services attended all required supervisory training. We sampled 2 private agency staff providing FFM services who were required to complete supervisory training and noted that both did complete the required supervisory training.

However, DHS did not address the condition in our 2007 audit report to ensure that contracted private agency staff providing FFM services attended mandatory special topics training. We sampled 6 private agency staff providing FFM services who were required to complete special topics training and noted that 4 (66.7%) had not completed mandatory special topics training, such as domestic violence, working with substance affected families, and self-awareness, within one year after the employees' core training. DHS informed us that its practice was to require private agency staff providing FFM services to complete special topics training within one year of the employees' core training. DHS also informed us that its CWCCU allowed a three-year window for the staff providing FFM services to complete mandatory special topics training. We determined that DHS's contract language with private agencies did not clearly indicate the time period requirement for mandatory special topics training. DHS informed us that it will review all private agency training requirements vis-à-vis contract language to ensure that the private agency contracts are clear and consistent regarding the expectations and requirements of programmatic training.

EFFECTIVENESS OF EFFORTS IN EVALUATING TRAINING PROGRAMS

RECOMMENDATION AND RESPONSE AS REPORTED IN MARCH 2007:

3. Evaluation of Services Specialist Training

RECOMMENDATION

We recommend that DHS develop a comprehensive process to evaluate the effectiveness of its training programs for services specialists.

AGENCY PRELIMINARY RESPONSE

DHS agrees that a comprehensive evaluation process for training programs is important and will expand and enhance its evaluation process.

FOLLOW-UP CONCLUSION

We concluded that DHS had partially complied with this recommendation. Although DHS had made improvement in its identification of training needs and its evaluation of the effectiveness of its training programs, it had not fully addressed the conditions reported in our 2007 audit report. A reportable condition exists. Specifically, our follow-up determined:

- a. DHS partially addressed the condition in our 2007 audit report to fully identify current and future training needs of its services specialists. DHS conducted activities to identify training needs and revise its curriculum for newly hired foster care, adoption, and CPS workers. In addition, DHS obtained feedback from its field supervisors on the effectiveness of training for newly hired foster care, adoption, and CPS workers and developed refresher training sessions as a result of the feedback. However, DHS did not provide us with evidence that it conducted activities to identify current and future training needs for juvenile justice workers (newly hired or experienced) or for experienced foster care, adoption, and CPS workers. DHS informed us that a wide variety of staff, supervisors, and stakeholders identified current and future training needs. DHS indicated that it relied on these parties to inform the respective DHS training departments of services specialists' training needs, but it did not have a formal process.

We determined that DHS is in the process of implementing a Training Governance Model, consisting of a Training Council, Training Manager's Committee, and Training Curriculum Councils, to help ensure meaningful stakeholder involvement in training activities and training content. DHS informed us that a formal needs analysis and a formal process for tracking and responding to training requests is in draft form and a goal of the model. However, because the model was in the infancy stage of implementation during our fieldwork, we could not evaluate its effectiveness or whether it would fully address DHS's identification of current and future training for all experienced services specialists.

- b. DHS partially addressed the condition in our 2007 audit report to fully evaluate the effectiveness of its training programs for its services specialists. DHS implemented three primary methods to evaluate the effectiveness of its training programs. DHS obtained formal written initial evaluations of training sessions from participants (level one evaluations), competency tests of pretraining and posttraining sessions (level two evaluations), and surveys of participants' supervisors to assess whether the participants were able to perform the training objectives learned on the job (level three evaluations).

We sampled training programs offered by CWTI and OTSD for services specialists from July 2010 through July 2011 and noted that DHS had not obtained level one evaluations for 4 (40.0%) of 10 CWTI training programs. After sharing our follow-up results with DHS, it informed us that, for 3 of the 4 training sessions, it suspended its level one evaluations from services specialists in CWTI preservice institute sessions from March 2011 through July 2011. We determined that this decision resulted in a missed opportunity for DHS to obtain training feedback from approximately 700 services specialists. The CWTI preservice institute sessions were critical child welfare training sessions of initial instruction for newly hired adoption, CPS, and foster care workers. DHS informed us that the training sessions were too large and it could not dedicate resources to obtain and evaluate feedback.

In addition, DHS informed us that it did not conduct level two or level three evaluations on a consistent basis. DHS conducted level two evaluations only for CWTI preservice institute and supervisory training sessions. We also noted that DHS completed only 2 level three evaluations since the issuance of our 2007 audit report and only conducted the 2 evaluations for CWTI preservice institute sessions. DHS conducted a level three evaluation in September 2007 for 2007 preservice institute sessions and one in March 2011 for 2009 preservice institute sessions.

DHS informed us that, as part of the new Training Governance Model, it is in the process of redesigning and developing the most appropriate and cost-effective evaluation protocols for training sessions. DHS indicated that it plans to conduct multiple levels of evaluation as part of the design and development of a consistent evaluation protocol.

- c. DHS did not address the condition in our 2007 audit report to obtain written evaluations of training provided to services specialists by other public agencies, private vendors, and DHS local offices. DHS informed us that it did not believe that tracking this type of training to services specialists would be cost beneficial or a good use of training resources. However, we believe that DHS should develop a mechanism to consider specific training sessions offered by sources other than CWTI or OTSD to identify any sessions or best practices that would be of value to offer Statewide to services specialists.

DHS informed us that it will develop a mechanism to obtain basic feedback from participants in outside training sessions in order to determine if the training would be valuable to offer Statewide.

RECOMMENDATION AND RESPONSE AS REPORTED IN MARCH 2007:

4. Child Support Specialist Training

RECOMMENDATION

We recommend that DHS further enhance its child support specialist training process by developing a recordkeeping system that includes long-term tracking of attendance and documentation of the evaluation of training provided to child support specialists.

AGENCY PRELIMINARY RESPONSE

DHS agrees and informed us that it has developed a spreadsheet that will provide a long-term record of training attendance. DHS also will document supervisory input of training effectiveness.

FOLLOW-UP CONCLUSION

We concluded that DHS had complied with this recommendation.

We determined that DHS developed and implemented a database to provide long-term tracking of child support specialists' training activity, including classes and date(s) attended. The database also provides long-term documentation of evaluations. DHS requested staff to complete on-line evaluations upon completion of training classes. DHS had the capability to view the details of individual evaluations or to create summary evaluation reports.

GLOSSARY

Glossary of Acronyms and Terms

continuing education	Education and training that are oriented to maintain, improve, or enhance knowledge, values, and skills.
CPS	child protective services.
CWCCU	Child Welfare Contract Compliance Unit.
CWTI	Child Welfare Training Institute.
DHS	Department of Human Services.
effectiveness	Success in achieving mission and goals.
efficiency	Achieving the most outputs and outcomes practical with the minimum amount of resources.
ES	eligibility specialists.
FFM	Families First of Michigan.
FIS	family independence specialists.
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 main purpose of a program or an agency or the reason that the program or the agency was established.
OCS	Office of Child Support.

OTSD Office of Training and Staff Development.

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 program operations, to facilitate decision making by parties responsible for overseeing or initiating corrective action, and to improve public accountability.

reportable condition A matter that, in the auditor's judgment, is less severe than a material condition and falls within any of the following categories: an opportunity for improvement within the context of the audit objectives; a deficiency in internal control that is significant within the context of the objectives of the audit; all instances of fraud; illegal acts unless they are inconsequential within the context of the audit objectives; significant violations of provisions of contracts or grant agreements; and significant abuse that has occurred or is likely to have occurred.

services specialists Employees who complete and oversee a variety of professional assignments to provide services to socially and economically disadvantaged individuals in programs administered by DHS, such as protective services, foster care, adoption, juvenile justice, foster home licensing, and adult services.

