



### *Performance Audit*

**Report Number:**  
**431-2601-20**

### *Adult Protective Services (APS)*

### *Michigan Department of Health and Human Services (MDHHS)*

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APS provides protection to vulnerable adults who are at risk of harm because of the presence or threat of abuse, neglect, or exploitation. APS's goal is to begin to investigate and assess situations referred to MDHHS within 24 hours. APS ensures, to the extent possible, adults in need of protection are living in a safe and stable situation, using legal intervention when needed, in the least intrusive and restrictive manner. Between October 1, 2017 and March 12, 2020, MDHHS received approximately 123,000 complaints of adult abuse, neglect, and/or exploitation and assigned approximately 70,000 for an APS investigation.

Audit Objective			Conclusion
Objective 1: To assess the effectiveness of MDHHS's Centralized Intake Division (CI) efforts to appropriately assign APS complaints for investigation and/or refer complaints to other agencies in accordance with applicable requirements.			Moderately effective
Findings Related to This Audit Objective	Material Condition	Reportable Condition	Agency Preliminary Response
Over 25% of APS complaints reviewed alleging criminal activity were not appropriately reported to law enforcement ( <a href="#">Finding 1</a> ).	X		Agrees
About 8% of APS complaints reviewed were denied by CI, although the complaint information indicated an investigation may have been required and/or sufficient justification to warrant an investigation existed ( <a href="#">Finding 2</a> ).		X	Disagrees
CI monitored less than 1% of the APS complaint calls received from October 2017 through September 2019 and discontinued monitoring as of September 30, 2019 ( <a href="#">Finding 3</a> ).		X	Agrees
MDHHS did not have a process to reconcile APS complaint call and screening records, nor had it developed a tracking and reconciliation process for other APS complaint sources ( <a href="#">Finding 4</a> ).		X	Agrees

<b>Observations Related to This Audit Objective</b>	<b>Material Condition</b>	<b>Reportable Condition</b>	<b>Agency Preliminary Response</b>
Legislative clarification is needed to help define MDHHS's responsibility for determining whether an adult is vulnerable when the reporting source cannot provide that information ( <u>Observation 1</u> ).			Not applicable for observations.

<b>Audit Objective</b>	<b>Conclusion</b>
Objective 2: To assess the effectiveness of MDHHS's efforts to appropriately investigate assigned complaints of adult abuse, neglect, and/or exploitation in accordance with applicable requirements.	Moderately effective

<b>Findings Related to This Audit Objective</b>	<b>Material Condition</b>	<b>Reportable Condition</b>	<b>Agency Preliminary Response</b>
See <u>Finding 1</u> .	X		Agrees
MDHHS did not require APS supervisors to review APS investigations at case closure; consequently, more than 25% remained unreviewed when closed.  APS supervisors also did not conduct required reviews of: <ul style="list-style-type: none"> <li>• 38% of APS investigations showing moderate or high risk in the assessment at the time the case was ready to close.</li> <li>• 37% of APS investigations open longer than 5 months.</li> <li>• 29% of APS investigations that were closed because of an adult's death (<u>Finding 5</u>).</li> </ul>	X		Agrees
Approximately 20% of the APS investigations reviewed were not properly commenced within 24 hours. This occurred most often because MDHHS did not obtain sufficient information to determine the adult's need for protective services and degree of risk within the 24-hour time frame required by State law ( <u>Finding 6</u> ).	X		Agrees
APS caseworkers did not verify or document the available referred services were in place for 9% of APS closed investigations reviewed ( <u>Finding 7</u> ).		X	Agrees
For 14% of investigations reviewed, MDHHS did not conduct an interview of an alleged perpetrator(s) or document the reasons why an interview did not occur ( <u>Finding 8</u> ).		X	Agrees
<b>Observations Related to This Audit Objective</b>	<b>Material Condition</b>	<b>Reportable Condition</b>	<b>Agency Preliminary Response</b>
Structured decision-making could improve MDHHS's APS risk assessment process ( <u>Observation 2</u> ).			Not applicable for observations.
Implementation of local investigative protocols could foster improvements in Michigan's APS activities; however, 75% of counties reviewed had not implemented a protocol ( <u>Observation 3</u> ).			

Audit Objective			Conclusion
Objective 3: To assess the sufficiency of MDHHS's efforts to provide appropriate training for the assignment and investigation of APS complaints in accordance with applicable requirements.			Not sufficient for CI staff  Sufficient, with exceptions, for APS supervisors and caseworkers
Findings Related to This Audit Objective	Material Condition	Reportable Condition	Agency Preliminary Response
Over 40% of CI staff reviewed had not received APS policy or assignment decision training ( <u>Finding 9</u> ).	X		Agrees
APS supervisors were not required to complete training specifically related to their APS supervision responsibilities. In addition, 14% of APS caseworkers reviewed did not complete the full amount of in-service training required by MDHHS policy ( <u>Finding 10</u> ).		X	Agrees

Audit Objective			Conclusion
Objective 4: To assess the sufficiency of MDHHS's efforts to evaluate the effectiveness of APS activities to protect vulnerable adults.			Sufficient, with exceptions
Findings Related to This Audit Objective	Material Condition	Reportable Condition	Agency Preliminary Response
Further evaluating the overall effectiveness of APS activities would enhance MDHHS's ability to identify areas of needed APS program improvement and provide value-added information to decision-makers ( <u>Finding 11</u> ).		X	Agrees
Observations Related to This Audit Objective	Material Condition	Reportable Condition	Agency Preliminary Response
Expanded outreach and analysis could help ensure more consistent reporting of suspected adult abuse, neglect, and/or exploitation by mandated reporters ( <u>Observation 4</u> ).	Not applicable for observations.		

Audit Objective			Conclusion
Objective 5: To assess the effectiveness of selected MDHHS and Department of Technology, Management, and Budget (DTMB) security and access controls over the Michigan Adult Integrated Management System (MiAIMS).			Moderately effective
Findings Related to This Audit Objective	Material Condition	Reportable Condition	Agency Preliminary Response
Contract improvements and completion of a system security plan would help MDHHS and DTMB ensure MiAIMS confidentiality, integrity, and availability, in accordance with State of Michigan standards, for carrying out APS activities ( <u>Finding 12</u> ).		X	Agrees
Access to MiAIMS was not removed timely for 75% of users that had departed State employment ( <u>Finding 13</u> ).		X	Agrees

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