



# COMMUNITY LIVING BC'S FRAMEWORK FOR MONITORING HOME SHARING PROVIDERS

An independent audit report

June 2021



The Honourable Raj Chouhan  
Speaker of the Legislative Assembly  
Province of British Columbia  
Parliament Buildings  
Victoria, British Columbia  
V8V 1X4

Dear Mr. Speaker:

I have the honour to transmit to the Speaker of the Legislative Assembly of British Columbia the report *Community Living BC's Framework for Monitoring Home Sharing Providers*.

We conducted this audit under the authority of section 11(8) of the *Auditor General Act*. All work on this audit was performed to a reasonable level of assurance in accordance with the Canadian Standard on Assurance Engagements (CSAE) 3001—Direct Engagements, set out by the Chartered Professional Accountants of Canada (CPA Canada) in the *CPA Canada Handbook—Assurance*.



Michael A. Pickup, FCPA, FCA  
Auditor General of British Columbia  
Victoria, B.C.  
June 2021

# CONTENTS

<b>Audit at a glance</b> .....	<b>4</b>
<b>Background</b> .....	<b>6</b>
<b>Objectives</b> .....	<b>8</b>
<b>Conclusions</b> .....	<b>9</b>
<b>Findings and recommendations</b> .....	<b>10</b>
<b>Establishing a monitoring framework</b> .....	<b>10</b>
Outcomes not clearly defined, but standards and service requirements were .....	<b>10</b>
Monitoring policies and procedures did not verify all contract requirements .....	<b>12</b>
<b>Applying the monitoring framework</b> .....	<b>14</b>
Extent of monitoring and critical incident response unclear from data .....	<b>15</b>
Inconsistent on-site monitoring and follow-up in our sample .....	<b>16</b>
<b>Evaluating the monitoring framework</b> .....	<b>19</b>
Partial follow-up on monitoring evaluations .....	<b>19</b>
<b>About the audit</b> .....	<b>21</b>
<b>Appendix A: Recommendations and auditee response</b> .....	<b>22</b>
<b>Appendix B: Audit criteria</b> .....	<b>25</b>
<b>Appendix C: Contract requirements</b> .....	<b>26</b>

The Office of the Auditor General of British Columbia would like to acknowledge with respect that we conduct our work on Coast Salish territories. Primarily, this is on the Lkwungen-speaking people's (Esquimalt and Songhees) traditional lands, now known as Victoria, and the W̱SÁNEĆ people's (Pauquachin, Tsartlip, Tsawout, Tseycum) traditional lands, now known as Saanich.

# AUDIT AT A GLANCE

## Why we did this audit

- Home sharing is the main form of residential support for adults with developmental and intellectual disabilities that is funded by Community Living BC (CLBC).
- People receiving home sharing services may be vulnerable, isolated and unable to advocate for themselves.
- CLBC must therefore ensure that they are cared for in a safe environment and that they receive the services they need to lead fulfilled lives.
- In 2018/19, roughly 4,200 people lived in a home sharing provider's home and received support based on their needs and goals.
- Almost 90% received home sharing support through a service provider that was monitored indirectly by CLBC via an agency; 10% received support through a service provider directly contracted and monitored by CLBC.

## Objectives

*To determine if CLBC had implemented a monitoring framework to ensure that home sharing providers:*

1. *aligned service delivery to further quality-of-life outcomes for individuals in care (Schedule A of its contracts)*
2. *complied with contracted standards and service requirements (Schedules B and C of its contracts)*

**Audit period: 2018 to 2019**

## Conclusions

We concluded that CLBC had not implemented a monitoring framework to ensure that home sharing providers:

1. aligned their service delivery to further quality-of-life outcomes for people in care
2. complied with all contracted standards and service requirements

We made 5 recommendations to help CLBC ensure that:

- home sharing providers understand what they must do to further quality-of-life outcomes
- monitoring enables staff to verify that providers meet contract requirements
- agencies oversee their home sharing providers
- it has the data it needs to oversee monitoring
- staff complete monitoring activities as expected

**CLBC has accepted all 5 recommendations.**

## What we found

**Outcomes were not clearly defined in contracts, but standards and service requirements were**

- Unclear how home sharing providers should align their services to further outcomes for people in their care
- Expectations to meet standards and service requirements were clear

[Recommendation 1](#)

## What we found (continued)

### Monitoring policies and procedures did not examine all contract requirements

- CLBC developed two processes to monitor home sharing providers based on contract type:
  - Process for **direct-contract providers** examined standards but not outcomes or service requirements
  - Process for **agencies** did not examine whether they were monitoring their home sharing providers

[Recommendation 2](#), [Recommendation 3](#)

### Extent of monitoring and critical incident response unclear from data

- Tools for tracking monitoring activities were incomplete or inconsistent with other monitoring reports
- System for monitoring critical incident response did not track timeliness of staff follow-up

[Recommendation 4](#)

### Inconsistent on-site monitoring and follow-up (in sample of providers)

- CLBC conducted on-site visits for 63% of providers sampled; of these, only 35% were conducted on time
- CLBC sent follow-up letters to 74% of providers who received visits; of these, only 48% were sent on time

[Recommendation 5](#)

#### *After reading the report, you may want to ask the following questions of government:*

- How can CLBC improve its monitoring of home sharing providers?*
- What other data could CLBC collect to improve its monitoring of home sharing providers?*
- How will CLBC involve people receiving services, and service providers, in any changes it makes to its monitoring framework?*

# BACKGROUND

Community Living BC (CLBC) is a provincial Crown agency that funds programs and services for adults with developmental and intellectual disabilities. Programs and services include residential care, community inclusion, employment support, and respite. In 2018/19, CLBC supported over 22,000 people.

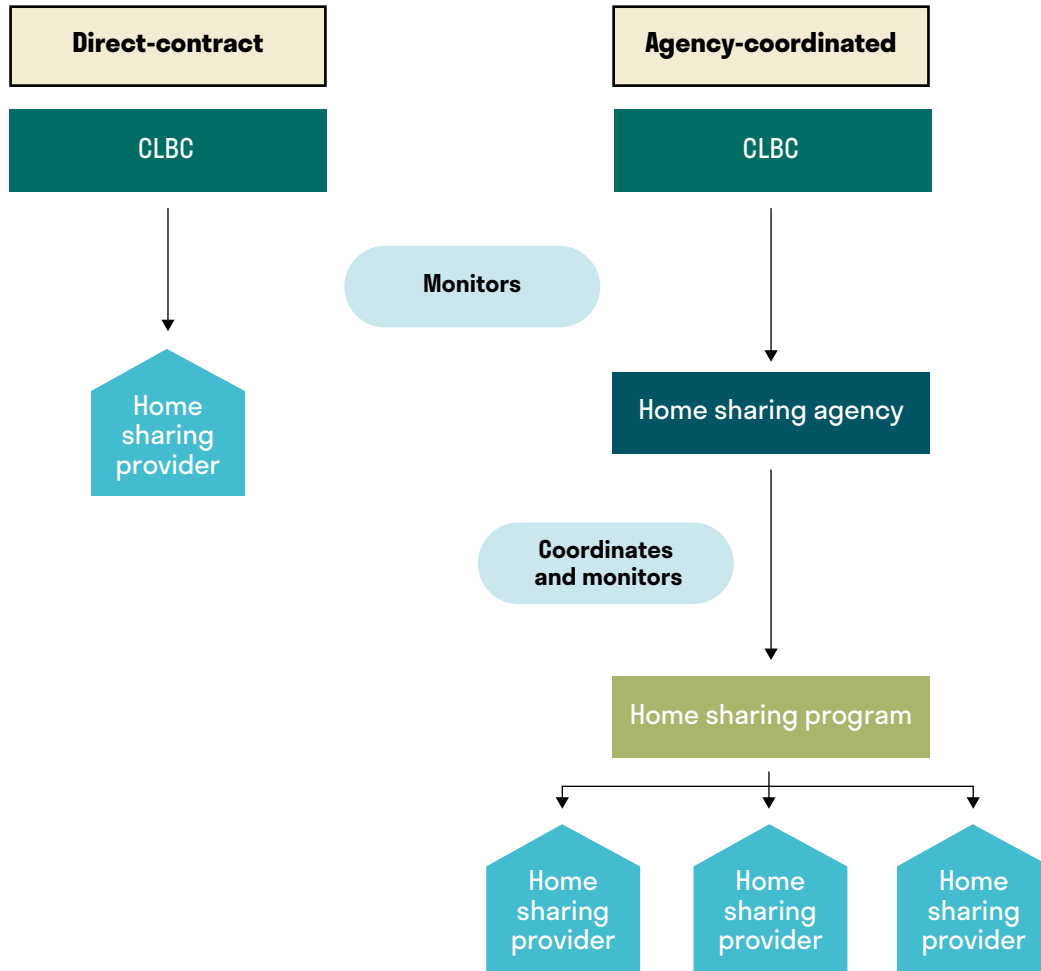
Home sharing is the main form of residential care funded by CLBC, supporting roughly 4,200 people. In a home sharing arrangement, a person lives in their provider's home and receives support and services based on their personal goals and needs.

CLBC contracts with service providers to deliver home sharing services. The contracts define the level and quality of service that home sharing providers must deliver to further quality-of-life outcomes for people in care. In 2018/19, CLBC relied on two types of service providers to deliver home sharing services ([Exhibit 1](#)):

- **Direct-contract**—CLBC had a direct contractual relationship with the home sharing provider. In 2018/19, 260 direct-contract providers supported around 350 people.
- **Agency-coordinated**—CLBC contracted with a home sharing agency that subcontracted with individual home sharing providers. In 2018/19, 102 agencies worked with roughly 3,200 providers to support around 3,800 people. Home sharing agencies include accredited (93%) and unaccredited (7%) organizations, as well as both non-profit and for-profit organizations.

CLBC is responsible for ensuring that its service providers meet their contractual requirements and has developed two distinct approaches to monitoring: one for direct-contracts and one for agency-coordinated contracts. With direct-contracts, CLBC monitors the service provider directly. With agency-coordinated contracts, CLBC monitors the agency, which then monitors its subcontracted home sharing providers ([Exhibit 1](#)).

**EXHIBIT 1:** Home sharing monitoring responsibilities



**Source:** Office of the Auditor General of British Columbia, based on descriptions of monitoring relationships in CLBC policies and procedures.

# OBJECTIVES

The objectives of our audit were to determine whether:

1. CLBC had implemented a monitoring framework to ensure home sharing providers aligned service delivery to further quality-of-life outcomes for individuals in care (as per Schedule A of the contract).
2. CLBC had implemented a monitoring framework to ensure home sharing providers complied with contracted standards and service requirements (as per Schedules B and C of the contract).

## Scope

- We examined the framework CLBC had developed to monitor its home sharing providers, including policies, procedures, templates and systems.
- We also examined CLBC's monitoring of home sharing providers in 2018/19, including on-site visits with providers, follow-up activities and responses to critical incidents.
- We did not audit home sharing providers or agencies themselves—we focused on CLBC's monitoring of them.

[Learn more about the audit criteria.](#)

[Learn more about how we did this audit.](#)



# CONCLUSIONS

**Conclusion 1:** CLBC did not implement a monitoring framework to ensure that home sharing providers aligned their service delivery to further quality-of-life outcomes for individuals in care.

While CLBC developed quality-of-life outcomes for home sharing providers to achieve, it did not define these outcomes in measurable terms or incorporate them into the policies and procedures staff used for monitoring. This limited CLBC's ability to assess whether home sharing providers had furthered quality-of-life outcomes for people in their care.

**Conclusion 2:** CLBC did not implement a monitoring framework to ensure that home sharing providers complied with all the contracted standards and service requirements.

While CLBC developed measurable standards and service requirements for home sharing providers, it did not incorporate all of these standards and service requirements into the policies and procedures staff used for monitoring.

CLBC lacked accurate and complete data to determine the extent of on-site visits, follow-up and critical incident response in 2018/19. Our detailed review of 49 providers found that CLBC conducted on-site visits in 63% of files; of these, only 35% were conducted on time. Follow-up was completed in 74% of files in which an on-site visit was conducted; of these, only 48% were done on time.

These shortcomings in policy, data and monitoring limited CLBC's ability to determine if home sharing providers delivered services that met established standards and requirements, and if they were taking the necessary steps to address any gaps found through monitoring.

# FINDINGS AND RECOMMENDATIONS

## Establishing a monitoring framework

Monitoring is a critical activity for any organization. It helps ensure that programs and services align with legislation, regulations, goals and objectives, and that they are achieving the desired results. Monitoring also allows organizations to identify opportunities for improvement and take timely action to address issues.

### HOME SHARING TERMS

**Home sharing provider:** A person or entity under contract with CLBC—either directly or via a home sharing agency—to provide home sharing services.

**Direct-contract provider:** A home sharing provider directly contracted by CLBC to provide home sharing services. CLBC staff are responsible for monitoring direct-contract providers (CLBC's term: CLBC contract home sharing provider).

**Home sharing agency:** An agency contracted by CLBC to coordinate home sharing services through subcontracts with individual home sharing providers. CLBC is responsible for monitoring the home sharing agency, and the agency is responsible for monitoring its subcontracted home sharing providers (CLBC's term: home sharing coordination agency).

**Home sharing agency-coordinated program:** A **group** of home sharing providers that are subcontracted by an agency to deliver home sharing services. CLBC monitors agencies at the program level.

## Outcomes not clearly defined, but standards and service requirements were

### What we looked for

An effective monitoring framework begins with well-defined performance expectations that describe how a program or service should operate and what it aims to achieve. This ensures that service providers understand what is expected of them and what they will be monitored against.

We examined whether CLBC had established measurable quality-of-life outcomes that providers had to align their services with, along with measurable standards and service requirements that home sharing providers had to comply with.

[Learn more about the audit criteria.](#)

## What we found

CLBC established [outcomes, standards and service requirements](#) for home sharing providers and documented them in the schedules to its contracts: Schedule A (Outcomes), Schedule B (Standards) and Schedule C (Service Requirements).

However, the outcomes were not clearly defined. Schedule A in the contracts stated that providers were responsible for “aligning the delivery of the Services to further the achievement of the following outcomes,” but did not define how service providers should “align” their services or what benchmark they needed to achieve to “further” each outcome. The description of each quality-of-life outcome was also general and high-level (see Exhibit 2).

### EXHIBIT 2: Schedule A—Quality-of-life outcomes

Outcome	Description
Emotional well-being	Individuals feel safe in their home and community. They have a positive sense of self and trust the people in their lives.
Interpersonal relations	Individuals have meaningful relationships with family and friends.
Material well-being	Individuals have the financial resources to do the things that are important to them.
Personal development	Individuals pursue their interests, have opportunities for personal growth and skill development, and have access to necessary information and support.
Physical well-being	Individuals are physically healthy and active. They have access to the health care they require.
Self-determination	Individuals make decisions in their lives about things that matter to them.
Social inclusion	Individuals participate in community life in roles they and society value.
Rights	Individuals have autonomy and their decisions are respected.

**Source:** Home Sharing Service Terms and Conditions—Schedule A.

The standards and service requirements—which outline different operational expectations for home sharing providers—were measurable. CLBC defined when the service requirement or standard had to be met and what the home sharing provider was expected to do to comply. The service requirements also outlined what CLBC staff were expected to monitor against.

## Why this matters

Without defined, measurable outcomes, it is hard for service providers to know what they must do to further the quality of life for people in their care. It also makes it difficult for CLBC to gauge success.

## Recommendation

We recommend that CLBC:

- 1 define what home sharing providers must do to further the quality-of-life outcomes stated in its contracts and define how CLBC staff should verify compliance**

[See the response from the auditee.](#)

## Monitoring policies and procedures did not verify all contract requirements

### What we looked for

We assessed whether CLBC had developed policies and procedures for monitoring home sharing providers against the outcomes, standards and service requirements stated in its contracts.

[Learn more about the audit criteria.](#)

### What we found

CLBC had developed two distinct approaches for monitoring home sharing providers: one for direct-contract providers and one for agencies. But neither approach enabled CLBC to monitor home sharing providers against all the requirements in its contracts.

#### Direct-contract: Policies and procedures verified standards, but not outcomes or service requirements

For direct-contract home sharing providers, CLBC staff were responsible for directly monitoring individual providers. CLBC's monitoring policy required analysts to visit the home at least once every fiscal year and—if possible—to speak with the person living in the home. The policy also required analysts to use one of two templates to document the visit—the Health and Safety Checklist (annually) or the Monitoring Tool (every three years)—and to send a follow-up letter to the provider within two weeks of the visit.

However, while the two templates enabled CLBC to verify a service provider’s compliance with the standards (at least every three years), they did not examine whether a service provider had furthered quality-of-life outcomes or had complied with the service requirements (Exhibit 3). The Monitoring Tool template covered all 15 standards in Schedule B, which, according to CLBC policy, staff were required to use every three years. For the other two years, CLBC used the Health and Safety Checklist template, which covered the four health and safety standards.

**EXHIBIT 3:** Alignment of monitoring templates with Schedules A, B and C

	Direct-contract providers		Agency-coordinated programs
	Health and Safety Checklist [annual]	Monitoring Tool [every three years]	Annual On-Site Visit Report Template
<b>Schedule A:</b> Quality-of-Life Outcomes	Did not enable verification	Did not enable verification	Did not enable verification
<b>Schedule B:</b> Standards	Partly enabled verification	Enabled verification	Did not enable verification
<b>Schedule C:</b> Service Requirements	Did not enable verification	Did not enable verification	Partly enabled verification

**Source:** Office of the Auditor General of British Columbia analysis of terms and conditions and monitoring report templates.

*Agencies: Policies and procedures did not cover CLBC’s oversight of agencies*

For agency-coordinated home sharing, CLBC’s monitoring focused on the agency program level (a group of home sharing providers overseen by an agency), not the home sharing provider. The contract required agencies to select, hire, train and supervise their subcontractors (the home sharing providers), as well as ensure that providers aligned their services with the outcomes and met the standards and service requirements. CLBC, in turn, had to ensure that agencies had “monitoring processes in place and demonstrate[d] appropriate, timely oversight of subcontractors.”

Despite this contractual requirement, CLBC had not developed policies, procedures or tools to ensure that home sharing agencies were monitoring their service providers against the contract.

Instead, CLBC's approach to monitoring agencies—using the Annual On-Site Visit Report template—focused on how the agency itself considered the service requirements in its work. It did not examine how the agency ensured that its providers were furthering the outcomes and complying with the standards and service requirements stated in its contracts.

### Why this matters

The mismatch between CLBC's contractual requirements and monitoring policies limited its ability to ensure that home sharing providers had aligned their services with quality-of-life outcomes and complied with standards and service requirements. It also limited CLBC's ability to verify that agencies were effectively overseeing their home sharing providers.

### Recommendations

We recommend that CLBC:

- 2 ensure that its monitoring framework enables staff to verify that home sharing providers align their services with quality-of-life outcomes and comply with all standards and service requirements stated in its contracts**

[See the response from the auditee.](#)

- 3 implement policies and procedures that enable it to verify that home sharing agencies are monitoring home sharing providers against the contracted quality-of-life outcomes, standards and service requirements**

[See the response from the auditee.](#)

## Applying the monitoring framework

Once an organization has designed its monitoring framework, the next step is to implement it. Implementation moves monitoring from a set of policies and procedures to a series of actions that ensures programs are working as intended.

## Extent of monitoring and critical incident response unclear from data

### What we looked for

We looked to see whether CLBC had implemented its monitoring activities in compliance with its own policies (on the frequency of on-site monitoring, follow-up and critical incident response) in 2018/19.

[Learn more about the audit criteria.](#)

### What we found

CLBC lacked accurate data to confirm whether it was completing monitoring activities (on-site visits, follow-up and critical incident response) in compliance with its own policies.

#### Monitoring activities: CLBC did not know the extent of on-site visits and follow-up from data

CLBC policy required staff to conduct an on-site visit with direct-contract providers at least once each year, and for agency-coordinated programs, no more than 15 months after the previous visit. It also required staff to send a follow-up letter within two weeks of the on-site visit for direct-contract providers and within 30 days of the on-site visit for agency-coordinated programs.

CLBC used two tools to track its monitoring activities: the Direct Home Sharing Provider (DHSP) registry for direct-contract providers and the Annual Monitoring Management Tool (AMMT) for agency-coordinated programs. We tried to use the information recorded in these tools to determine the frequency of on-site monitoring and follow-up in 2018/19, but we could not rely on the data. Some of the entries were inconsistent with information in monitoring documents (the on-site visit report and follow-up letters), while others were missing altogether. For example, in our file review (discussed further below), the date of the on-site visit in the monitoring report only matched the date recorded in the DHSP or AMMT 65% of the time.

#### Critical incidents: CLBC did not track timeliness of staff response to critical incidents

Critical incident reporting is another important safeguard for monitoring people in care. It allows organizations to respond to an incident, learn from it and reduce the likelihood of recurrence.

CLBC's policy lists 25 types of critical incidents that service providers must report. These were broken down by those that require mandatory follow-up by staff (including death, abuse, neglect, attempted suicide) and those that allow discretionary follow-up (including aggressive/unusual behaviour, falls, medication errors, other injuries). CLBC required all follow-up, both mandatory and discretionary (when pursued), to be completed within 14 business days of staff being notified of an incident.

We found that CLBC recorded 1,594 critical incidents in 2018/19, 150 of which required mandatory follow-up. While we saw evidence of follow-up, the system that CLBC used to record and track critical incidents did not capture the date on which CLBC was notified of the incident, which is when the 14-day follow-up period would begin. As a result, CLBC could not determine whether staff followed up within 14 days of being notified of a critical incident.

### Why this matters

The lack of complete and accurate data limited CLBC's ability to understand the extent of its monitoring through on-site visits, follow-up and critical incident response in 2018/19. This is particularly concerning when it comes to critical incidents, as CLBC could not easily verify that people in potentially high-risk situations received timely intervention when things went wrong.

### Recommendation

We recommend that CLBC:

- 4 ensure that it has accurate and complete data on on-site monitoring visits, follow-up activities and critical incident response**

[See the response from the auditee.](#)

## Inconsistent on-site monitoring and follow-up in our sample

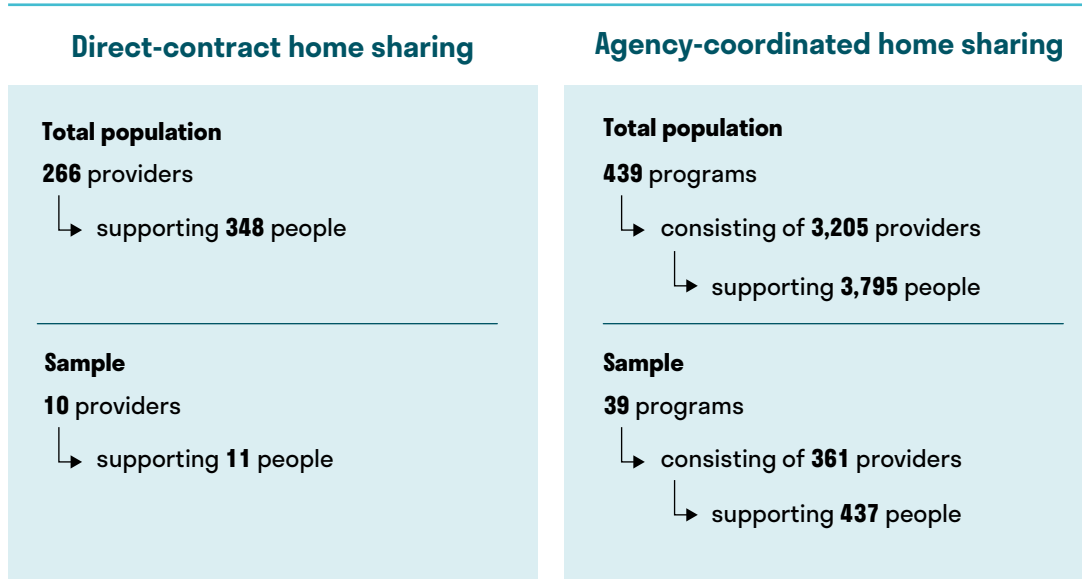
### What we looked for

To see if CLBC had monitored home sharing providers in compliance with its own policies, we completed a detailed file review on a sample of 49 providers (including 10 direct-contract providers and 39 home sharing agency programs). This involved reviewing on-site monitoring reports and follow-up letters.



We organized the sample by provider type (direct-contract or agency-coordinated) to reflect the overall population of home sharing providers. As Exhibit 4 shows, the sample of 10 direct-contract providers that we looked at supported 11 people. The sample of 39 agency programs that we looked at consisted of 361 home sharing providers supporting 437 people.

**EXHIBIT 4:** Breakdown of total population versus sample for home sharing file review (2018/19)



**Source:** Office of the Auditor General of British Columbia analysis of home sharing provider population data in 2018/19.

[Learn more about the audit criteria.](#)

## What we found

In our sample of 49 files from 2018/19, CLBC did not consistently conduct on-site visits and follow-up in compliance with its policies.

**On-site visits:** CLBC conducted on-site visits for 63% of files in our sample, but only 35% of these on time

In 2018/19, CLBC conducted on-site visits for 31 of 49 (63%) files in our sample. Only 17 (35%) of these visits were conducted on time. The results varied based on the type of contract:

- CLBC conducted an on-site visit, on time, in eight of the 10 (80%) direct-contract provider files. The other two visits were a month late.

- For agency-coordinated programs, CLBC had a lower compliance rate, conducting on-site visits for 23 of the 39 programs (59%) in our sample, and visiting only nine of the 39 programs (23%) within the prescribed time frame (within 15 months of the previous visit). CLBC conducted on-site visits for another 14 programs, but three of these were beyond the 15-month time frame (overdue by an average of three months), while the other 11 did not have a confirmed site visit in 2017/18 (making it impossible to confirm the time between visits). The expectation to conduct an on-site visit within 15 months of the previous visit was only introduced in March 2018 (the month before the monitoring cycle began), which may account for the low level of compliance.

Follow-up: CLBC sent follow-up letters to 74% of providers visited in 2018/19, but only 48% were sent on time

CLBC issued follow-up letters for 23 of the 31 (74%) on-site visits it conducted in 2018/19, but only 15 (48%) of these were sent on time. Again, our sample showed different rates of follow-up based on contract type:

- Four of the eight direct-contract providers received a follow-up letter, but only two of these had been sent on time (within two weeks).
- For agency-coordinated programs, 19 of the 23 agencies visited in 2018/19 received a follow-up letter, but only 13 had been sent on time (within 30 days).

CLBC did not track implementation of the recommendations and action items that analysts put in their follow-up letters to providers—despite several of the letters containing action items needing follow-up (3 of the 4 letters to direct-contract providers and 12 of the 19 letters to agencies).

### Why this matters

Monitoring is an important formal safeguard of people's health, safety and well-being. CLBC's monitoring gaps limited its ability to ensure that home sharing providers complied with its standards and service requirements and that people received quality care throughout the year. It also limited providers' ability to understand and resolve areas for improvement.

## Recommendation

We recommend that CLBC:

- 5 ensure staff complete on-site visits, follow-up, and critical incident response, consistent with its policy requirements**

[See the response from the auditee.](#)

## Evaluating the monitoring framework

An organization committed to continuous improvement should periodically evaluate whether its programs and services are working as intended. Program evaluations can help answer basic questions about a program’s effectiveness and inform improvements over time.

### Partial follow-up on monitoring evaluations

#### What we looked for

Because monitoring was such a crucial part of CLBC’s approach to quality assurance, we looked to see if CLBC periodically evaluated and improved the effectiveness of its monitoring framework.

[Learn more about the audit criteria.](#)

#### What we found

CLBC evaluated the effectiveness of its monitoring framework three times between 2013 and 2016 (Exhibit 5) and used some of the findings to improve the framework, but not all of them.

**EXHIBIT 5:** *Timeline of monitoring framework evaluations*



**Source:** Office of the Auditor General of British Columbia analysis of past monitoring framework evaluations.

All three reviews found problems with CLBC's ability to monitor whether service providers—including home sharing providers—were meeting the requirements of their contracts. The reviews also included several findings and recommendations on home sharing monitoring.

CLBC's Quality Assurance team led a multi-phase project in 2017 and 2018 to improve its monitoring framework and respond to the issues identified in the 2015 internal audit report. Their work resulted in revised monitoring guidelines and templates, as well as IT enhancements, used to monitor home sharing agencies during the audit period.

However, other recommendations and findings from these reviews were either not responded to or not fully implemented at the time of our audit, including recommendations that CLBC:

- integrate quality-of-life outcomes into the monitoring framework
- implement ongoing training programs for CLBC analysts
- improve the regularity and quality of monitoring reporting to CLBC senior management
- establish benchmarks to measure the success of monitoring processes with the migration of contracts to agency-coordinated home sharing

CLBC continued to respond to the recommendations from past evaluations throughout 2018/19 and continued to make changes to its monitoring framework while our audit was underway. These changes included:

- drafting of new standards for home sharing agencies
- development of new tools for monitoring agency-coordinated programs
- further updating of its IT systems to improve tracking of on-site visits and follow-up activities

However, we did not assess the impact of these changes because they occurred after the audit period, and several were still in draft form.

### Why this matters

Our findings show that CLBC took steps to assess the effectiveness of its monitoring framework and develop solutions. However, had CLBC implemented all of the recommendations, some of the gaps and inconsistencies we found in our audit might already have been resolved.

## ABOUT THE AUDIT

We conducted this audit under the authority of section 11(8) of the *Auditor General Act* and in accordance with the Canadian Standard on Assurance Engagements (CSAE) 3001—Direct Engagements, set out by the Chartered Professional Accountants of Canada (CPA Canada) in the *CPA Canada Handbook—Assurance*. These standards require that we comply with ethical requirements and conduct the audit to independently express a conclusion against the objective of the audit.

A direct audit involves understanding the subject matter to identify areas of significance and risk, and to identify relevant controls. This understanding is used as the basis for designing and performing audit procedures to obtain evidence on which to base the audit conclusion.

The audit procedures we conducted included document and file reviews, data analysis and interviews with CLBC staff and key stakeholders.

We believe the audit evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Our office applies the Canadian Standard on Quality Control (CSQC 1), and we have complied with the independence and other requirements of the code of ethics issued by the Chartered Professional Accountants of British Columbia that are relevant to this audit.

**Audit report date:** June 7, 2021



Michael A. Pickup, FCPA, FCA  
Auditor General of British Columbia  
Victoria, B.C.

# APPENDIX A: RECOMMENDATIONS AND AUDITEE RESPONSE

**RECOMMENDATION 1:** We recommend that CLBC define what home sharing providers must do to further the quality-of-life outcomes stated in its contracts and define how CLBC staff should verify compliance.

**RECOMMENDATION 1 RESPONSE: CLBC accepts this recommendation.**

- CLBC has a demonstrated commitment to quality service monitoring and approaches that further quality of life outcomes for all the people we serve.
- CLBC conducts a survey of people we serve every year to measure quality of life outcomes in three areas: well-being, independence, and social participation.
- [CLBC publishes this information on its web site](#) and encourages agencies to use this information to improve their services.
- CLBC will undertake a project to develop, test and implement requirements for home sharing providers that supports quality of life outcomes for the people who live with them.
- This project will include input from supported individuals, families, and home sharing providers.
- CLBC will incorporate these requirements into our monitoring framework to support a clear verification process.

**RECOMMENDATION 2:** We recommend that CLBC ensure that its monitoring framework enables staff to verify that home sharing providers align their services with quality-of-life outcomes and comply with all standards and service requirements stated in its contracts.

**RECOMMENDATION 2 RESPONSE: CLBC accepts this recommendation.**

- CLBC has a range of safeguards in place to support safe services, including: detailed pre-qualification criteria, an accreditation requirement for agencies, criminal record checks and a comprehensive home study process to verify skills, experience, suitability, environment and matching process for prospective home sharing providers.

- During and since the timeframe of this audit, CLBC implemented improvements to its on-site monitoring and follow up policies and tools.
- This included a new standardized report template, and improved monitoring guidance for reporting and tracking of follow-up activities to the agency and tracking of program performance outcomes.
- An important part of CLBC's current monitoring framework for home sharing providers is the contractual requirement for agency home sharing coordinators to recruit, conduct a home study, support and monitor home sharing providers regularly.
- As part of CLBC's commitment to continuous quality improvement, we will outline additional steps to verify and document compliance with all standards and service requirements for home sharing providers.

**RECOMMENDATION 3:** We recommend that CLBC implement policies and procedures that enable it to verify that home sharing agencies are monitoring home sharing providers against the contracted quality-of-life outcomes, standards and service requirements.

**RECOMMENDATION 3 RESPONSE: CLBC accepts this recommendation.**

- More than 90 per cent of the agencies that deliver agency coordinated home sharing are accredited by an independent, internationally recognized body, and are required to meet standards that outline expectations for monitoring of home sharing providers.
- CLBC is finalizing a new set of standards for agencies that coordinate home sharing programs to ensure that there is clarity for both agencies and CLBC staff on what is expected.
- CLBC staff will verify and document, in a timely way, compliance with these standards and all service requirements during monitoring visits.
- The new standards will be implemented in the 2021/22 fiscal year.

**RECOMMENDATION 4:** We recommend that CLBC ensure that it has accurate and complete data on on-site monitoring visits, follow-up activities and critical incident response.

**RECOMMENDATION 4 RESPONSE: CLBC accepts this recommendation.**

- In May 2019, CLBC launched a new online data system for tracking outcomes and follow-up of monitoring visits.
- The online monitoring system increases the integrity and reliability of data, allows for tracking of follow up activities and results of visits, and supports data analysis at the service provider level.
- CLBC has access to reliable data that is now available to all levels of the organization to support compliance with policy and to support quality services for CLBC eligible people.
- As part of CLBC's robust safeguards framework, service providers are required to report critical incidents to CLBC. This helps ensure that appropriate follow up has been completed.
- CLBC recently implemented new guidance and training to CLBC staff and service providers to support improved responses to critical incidents.
- Additional improvements to CLBC's IT systems will be made to more effectively track the timeliness of critical incident responses.

**RECOMMENDATION 5:** We recommend that CLBC ensure staff complete on-site visits, follow-up, and critical incident response, consistent with its policy requirements.

**RECOMMENDATION 5 RESPONSE: CLBC accepts this recommendation.**

- CLBC's top priority is the safety and wellbeing of those we serve, and we are committed to continuing to enhance monitoring, follow-up, and critical incident response.
- Compliance has improved each year since the period that the OAG audit reviewed in 2018.
- For the 2020/21 fiscal year, 92% of our home sharing programs were monitored in accordance with our policy requirements.
- CLBC have formulated an operational plan for the 2021/22 fiscal year that includes resourcing for this important activity.



# APPENDIX B: AUDIT CRITERIA

## 1. Establishing a monitoring framework

- 1.1A CLBC has established measurable quality-of-life outcomes for individuals in care that home sharing providers can align service delivery to
- 1.1B CLBC has established measurable standards and service requirements for its home sharing providers to comply with
- 1.2A CLBC has established policies and procedures to monitor whether home sharing providers have aligned their service delivery to further quality-of-life outcomes for individuals in care
- 1.2B CLBC has established policies and procedures to monitor whether home sharing providers have delivered services that comply with contracted standards and service requirements
- 1.3A CLBC has the information it needs to monitor whether home sharing providers have aligned their service delivery to further quality-of-life outcomes for individuals in care
- 1.3B CLBC has the information it needs to monitor whether home sharing providers delivered services that comply with contracted standards and service requirements
- 1.4A CLBC has established clear independence requirements for individuals responsible for monitoring whether home sharing providers align service delivery to further quality-of-life outcomes for individuals in care
- 1.4B CLBC has established clear independence requirements for individuals responsible for monitoring whether home sharing providers deliver services that comply with contracted standards and service requirements

## 2. Implementing a monitoring framework

- 2.1A CLBC regularly monitors whether home sharing providers align service delivery to further quality-of-life outcomes for individuals in care
- 2.1B CLBC regularly monitors whether home sharing providers deliver services that comply with contracted standards and service requirements
- 2.2A CLBC follows-up with home sharing providers that have not aligned their service delivery to further quality-of-life outcomes to ensure deficiencies are resolved
- 2.2B CLBC follows-up with home sharing providers that do not comply with contracted standards and service requirements to ensure deficiencies are resolved

## 3. Evaluating a monitoring framework

- 3.1A CLBC evaluates the effectiveness of its monitoring framework at ensuring home sharing providers align service delivery to further quality-of-life outcomes for individuals in care
- 3.1B CLBC evaluates the effectiveness of its monitoring framework at ensuring home sharing providers deliver services that comply with contracted standards and service requirements
- 3.2A CLBC implements improvements to its monitoring framework to enhance its effectiveness at ensuring home sharing providers align service delivery to further quality-of-life outcomes for individuals in care
- 3.2B CLBC implements improvements to its monitoring framework to enhance its effectiveness at ensuring home sharing providers deliver services that comply with contracted standards and service requirements

# APPENDIX C: CONTRACT REQUIREMENTS

## SCHEDULE A: *Quality-of-life outcomes*

Outcome	Description
Emotional well-being	Individuals feel safe in their home and community. They have a positive sense of self and trust the people in their lives.
Interpersonal relations	Individuals have meaningful relationships with family and friends.
Material well-being	Individuals have the financial resources to do the things that are important to them.
Personal development	Individuals pursue their interests, have opportunities for personal growth and skill development, and have access to necessary information and support.
Physical well-being	Individuals are physically healthy and active. They have access to the health care they require.
Self-determination	Individuals make decisions in their lives about things that matter to them.
Social inclusion	Individuals participate in community life in roles they and society value.
Rights	Individuals have autonomy and their decisions are respected.

**Source:** Home Sharing Service Terms and Conditions—Schedule A

**SCHEDULE B: Standards**

Home sharing provider	Standards	Examples of standards
<b>All providers (direct and agency)</b>	CLBC Standards for Home Sharing	15 standards covering: <ul style="list-style-type: none"> <li>▪ Planning</li> <li>▪ Health, safety and advocacy</li> <li>▪ Service delivery</li> <li>▪ Resources</li> </ul>
<b>Agency—accredited</b>	Commission on Accreditation of Rehabilitation Facilities standards	134 standards covering: <ul style="list-style-type: none"> <li>▪ Organizational leadership, governance and strategic planning</li> <li>▪ Performance management and improvement</li> <li>▪ Human resources, recruitment, screening and training</li> <li>▪ Financial planning and management</li> <li>▪ Individual rights</li> <li>▪ Accessibility</li> <li>▪ Planning for individuals</li> <li>▪ Health, safety and emergency protocols</li> <li>▪ Roles and responsibilities between agencies and providers</li> <li>▪ Monitoring protocols</li> </ul>
	Council on Accreditation standards	227 standards covering: <ul style="list-style-type: none"> <li>▪ Administration and management (financial, governance, human resources, quality improvement, risk management)</li> <li>▪ Service delivery administration (environment, behaviour support, rights, program admin., training and supervision)</li> <li>▪ Planning for individuals</li> <li>▪ Caregiver recruitment and assessment</li> <li>▪ Caregiver training and support</li> <li>▪ Monitoring and reassessment protocols</li> </ul>
<b>Agency—unaccredited</b>	CLBC Standards for Unaccredited Service Providers	24 standards covering: <ul style="list-style-type: none"> <li>▪ Financial accountability</li> <li>▪ Health and safety</li> <li>▪ Human resources</li> <li>▪ Rights and informed choice</li> <li>▪ Accessibility</li> </ul>

**Source:** Home Sharing Service Terms and Conditions—Schedule B

**SCHEDULE C:** *Service requirements*

---

**Service requirements**

- Bathing Guidelines
- Behaviour Support and Safety Planning
- Individual Financial Payment Policy: Residential Services
- Criminal Record Check Policy: Service Delivery
- Critical Incidents Policy
- Service Provision by Family Members
- Respite Guidelines\*

\* Respite Guidelines apply only to direct-contract providers

**Source:** Home Sharing Service Terms and Conditions—Schedule C



OFFICE OF THE  
**Auditor General**  
of British Columbia

### AUDIT TEAM

Malcolm Gaston,  
*Assistant Auditor General*

Peter Nagati,  
*Executive Director*

Laura Pierce,  
*Director*

Alexander Gunn,  
*Performance Auditor*

### SUBJECT MATTER EXPERT

Dr. Michael Bach,  
*Managing Director,*  
*Institute for Research and*  
*Development on Inclusion*  
*and Society*

### LOCATION

623 Fort Street  
Victoria, British Columbia  
Canada V8W 1G1

### OFFICE HOURS

Monday to Friday  
8:30 am – 4:30 pm

Telephone: 250-419-6100  
Toll-free through Enquiry BC: 1-800-663-7867  
In Vancouver: 604-660-2421

**FAX:** 250-387-1230

**EMAIL:** [bcauditor@bcauditor.com](mailto:bcauditor@bcauditor.com)

**WEBSITE:** [www.bcauditor.com](http://www.bcauditor.com)

This report and others are available on our website, which also contains further information about the office.

### REPRODUCING

Information presented here is the intellectual property of the Auditor General of British Columbia and is copyright protected in right of the Crown. We invite readers to reproduce any material, asking only that they credit our office with authorship when any information, results or recommendations are used.

