

LAC

Report to the General Assembly

5

May 1991

**A Limited-Scope
Review of the
Department of
Social Services**

Legislative Audit Council

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Copies of all LAC audits are available to the public at no charge.

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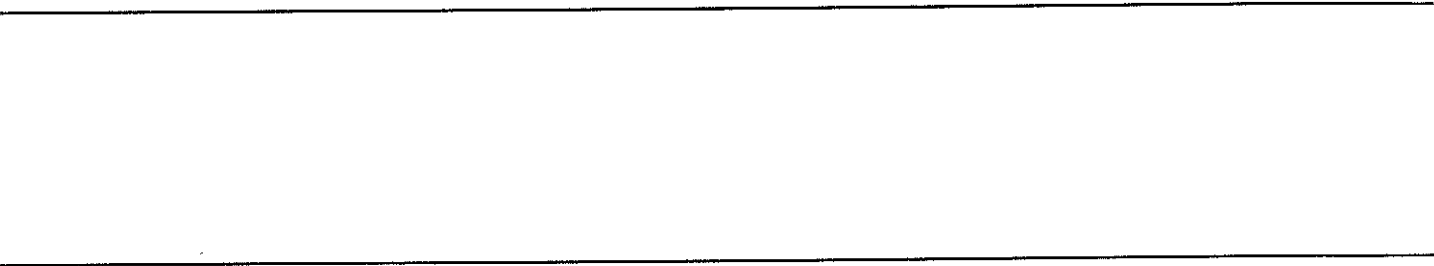
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Contents

Executive Summary

Audit Request

Members of the General Assembly requested us to conduct a limited-scope review of the South Carolina Department of Social Services. The review focused on four areas.

- The size and cost of the agency's administration, relative to its oversight of county programs, as well as the effectiveness of oversight.
- Compliance with child protective and preventive services (CPPS) statutes and policy.
- Screening and licensing procedures for foster care homes.
- The efficiency and responsiveness to the public of the DSS county offices, including the use of volunteers and paraprofessionals to ease caseworkers' caseloads.

To answer our audit requests, we developed specific audit objectives which guided our work. A summary of the findings for each of these objectives follows.

Central Office Issues

Administrative Structure

Is the DSS central office in Columbia administratively "top-heavy"?

Yes, we found that the central office is staffed at 119 administrative positions above the average of similarly structured offices in four states (see p. 7). One of every six (719 of 4,640) DSS employees is an administrative employee assigned to the central office. According to DSS staffing standards, the 46 county DSS offices are understaffed by 547 employees. Through attrition of 119 nonessential personnel in the central office, DSS could employ 162 entry-level caseworkers in the counties.

Have the two largest benefit programs AFDC (aid to families with dependent children) and food stamps, been administered efficiently and accurately?

Administrative costs for the AFDC and food stamp programs were higher than the average for eight southeastern states in FY 88-89 (see p. 14). In addition, DSS error rates for FY 85-86 through FY 87-88 were higher than the southeastern average. The federal government uses error rates to determine the accuracy of a state's eligibility decisions. Several major initiatives to reduce error rates have been introduced, discussed on pages 17-18. Preliminary FY 88-89 error rates appear to show significant decreases.

Oversight of County Programs

What does the state office do to ensure that county programs operate properly, and how well do they do it? How much does this oversight cost?

We evaluated the effectiveness of four major types of state oversight of county programs, summarized on page 22. We found that the state does not effectively oversee the county programs in human services, but does a reasonably thorough job in economic services. Findings include:

- Sampling procedures for the coordinated internal review system (CIRS), which formally evaluates all county programs once every three years, were not adequate to produce valid, reliable results in child protective and preventive services (see p. 24). Also, CIRS has not reported in a timely manner to the counties (see p. 27).
- Visits by state program consultants to the counties are not frequent enough in human services to ensure that policy is followed (see p. 30).
- Review of management information reports from the counties by the state office was not documented for four of seven program areas (see p. 34).

- Rather than reporting directly to the commissioner or the board, the division of internal audit is "buried" under four layers of bureaucracy (see p. 36).

For FY 89-90, of the 301 total state office personnel who work with the county's economic and human services programs, 82 personnel monitored county programs at a cost of \$3.7 million (personnel and other operating costs). Also, two sections of the administration division, internal audit and management consulting, have 15 personnel who monitor the counties at a cost of \$500,000 (see p. 38).

County Office Issues

Child Protective and Preventive Services (CPPS)

Is DSS protecting children who are reported as abused or neglected in accordance with state law and policy?

We found considerable evidence that DSS is not doing enough to protect children based on our review of 504 case reports from eight counties in FY 89-90.

- *DSS policy requires a supervisor to review and approve the caseworker's decision to substantiate or not substantiate the allegation of abuse or neglect.* We found evidence of supervisory review of case decisions in 53% of the reports we reviewed (see p. 42).
- *In emergency situations, contact by DSS with the alleged victim should be made, or attempted, in two hours.* Such contact by DSS was documented in 75 (43%) of the 176 emergency reports reviewed (see p. 44). We reviewed whether contact was made by caseworkers, not law enforcement officers. Neither the law nor DSS policy states that the two-hour contact may be made by law enforcement instead of caseworkers. However, a DSS official states that it may be.

- *In nonemergency situations, DSS policy and state law require contact, or attempted contact, with alleged victims within 24 hours. Such contact was documented in 75% of the reports reviewed (see p. 45).*
- *In cases where allegations of abuse or neglect have been substantiated, DSS policy requires assessment summaries and treatment plans to be part of the victim's file. Assessment summaries were missing in 24% of the cases we reviewed; treatment plans were not present in 28% of the cases in our sample (see p. 46).*
- *State law requires DSS to notify the family court within one week of cases in which allegations of sexual, physical, or mental abuse are substantiated. Of 77 cases in our sample which should have been referred to the family court, 30 cases (39%) were actually referred within one week (see p. 46).*
- *State law requires that all allegations of abuse or neglect of children are to be investigated by DSS. We reviewed 664 reports received between March and July 1990 by seven of the eight counties in our sample, which the counties had "screened out" or chosen not to investigate. One county kept no records of its screened out reports during this time. Approximately half (326 or 49%) of these reports should have been investigated, since the alleged conduct fit the statutory definition of abuse and/or neglect. Controls for the screening out process are lacking, and caseworkers frequently gave inappropriate reasons for not investigating reports (see p. 48).*

County Foster Care Licensing

Has DSS screening and licensing of foster care homes protected foster children adequately as required by state law and policy?

No. By not requiring background checks on foster parents and not always enforcing training, fire and health regulations, DSS has not adequately protected foster children.

- DSS does not require criminal background checks on foster parents; nor does it require foster parents to be checked against the DSS registry for substantiated cases of child abuse and neglect (see p. 55).

- Requirements for foster parent training have not consistently been enforced. Sixty-two percent of the foster parents whose files we reviewed did not receive the required ten hours of pre-service training, and 56% had not always received the five hours annually required for relicensure (see p. 57).
- Regulations were not consistently enforced for fire and health inspections; 41% of the homes had not received a fire inspection and 21% had not received a health inspection (see p. 59).
- Twenty percent of the licenses in our sample were not renewed on time. Also, over half of the foster parents in our sample held temporary or irregular licenses, indicating deficiencies in fire, health and training requirements (see pp. 60, 62).

In its December 1990 meeting, the DSS board voted to require criminal background checks on foster parents and DSS staff are in the process of negotiating an agreement for criminal background checks with the State Law Enforcement Division. The board also voted to upgrade all temporary and irregular licenses to standard licenses by March 1, 1991. However, as of March 4, 1991, not all foster homes had standard licenses, and a DSS staff person could not estimate when, or if, all homes would have standard licenses.

Other County Office Issues

Does DSS use of volunteers and paraprofessionals help to relieve the caseworkers' load in the counties?

We found limited use of volunteers in our sample counties, and also concluded that yearly volunteer statistics reported by the state office are overstated (see p. 75). DSS encouraged paraprofessional use in the county human services divisions by allocating 46 part-time paraprofessional positions to the counties in FY 89-90. DSS could save as much as \$1.3 million a year through greater use of paraprofessionals (see p. 79).

Are telephones answered responsively?

Most were, according to our study. We placed 30 calls over an eight-week period in March and April 1990 to each of the eight county offices in our sample to determine:

- *Do local offices answer the telephone in a reasonable length of time?*
One of the eight counties met our definition of "unresponsive," because 40% of the calls we placed were unanswered (see p. 83). Responsiveness was defined as answering the telephone within a ten-minute time period.
- *Were workers reasonably courteous when they answered the phone?*
Most were, rating in the average range (see p. 83).

Was caseworker turnover high enough to affect efficiency in the county offices?

- Annually, approximately 30% of DSS caseworkers leave their jobs for another position in DSS, or for a job elsewhere (see p. 84). This level of turnover is slightly higher than that for DSS state office employees and for all state employees.
- When turnover was defined as only those who left their employing agencies, caseworker turnover for FY 86-87 through FY 88-89 was comparable to that of all state employees, and slightly greater than that of DSS state office employees, approximately 13%.

We were asked to determine if county caseworkers were allowed to pursue personal interests at work, once a "weekly quota" of tasks were met.

We found no evidence that this was true in any of the eight counties in our sample. Also, DSS policy does not permit employees to work fewer than the required 37.5 hours weekly.

Executive Summary

Introduction and Background

Objectives

Members of the General Assembly requested us to conduct a limited scope review of the South Carolina Department of Social Services. The review focused on four areas:

- The size and cost of the agency's administrative structure, relative to its oversight of county programs, as well as oversight effectiveness.
- Compliance with child protective and preventive services (CPPS) statutes and policy.
- Screening and licensing procedures for foster care homes.
- The efficiency and responsiveness to the public of the DSS county offices, including the use of volunteers and paraprofessionals to ease caseworkers' caseloads.

This report contains a further discussion of the review's objectives and findings.

Scope and Methodology

We interviewed officials from state and county DSS offices, other South Carolina and central state government agencies, child caring agencies in South Carolina and in other states, professional associations and national organizations, and foster parents. Surveys were mailed to other southeastern states and to former and current foster parents in South Carolina. We reviewed documents and policies maintained by DSS and other state agencies. Comparative data obtained by survey from other states and foster parents was not verified in all cases, but was reported as survey data. We also reviewed data processing controls (see p. 19).

We reviewed local office efficiency and responsiveness at the county level. We used an eight-county sample to review foster care licensing, child protective services, and the use of paraprofessionals and volunteers in the counties. The eight counties chosen for the sample were Allendale, Charleston, Clarendon, Darlington, Greenville, Greenwood, Horry, and Richland. These counties were chosen because their size, their geographic location, and their income distribution were varied and representative, and as a result of interviews with DSS officials and other state government officials.

Specific sampling methodology is reported in individual findings, as applicable. The audit was conducted in accordance with generally accepted government auditing standards.

Department History and Organization

With Act 560 in 1937, the General Assembly established the permanent State Department of Public Welfare and the State Board of Public Welfare. The department retained this title until 1972 when the General Assembly changed the name to the Department of Social Services (DSS). In July 1984, the responsibility for administering two of DSS's programs, medicaid (Title XIX) and social services block grant programs, was transferred from DSS to the newly created Health and Human Services Finance Commission (HHSFC).

State and County Organizational Structure

The South Carolina DSS organization chart, in Appendix A, illustrates the agency's state-level structure. In each of the 46 counties, a social services director reports to a county board. The counties' administrative structures differ, depending on the size of the county. As of June 1990, the counties had a total of 3,571 authorized positions compared to 1,069 such positions in the state office. Also in Appendix A is a table which presents a five-year history of revenues and expenditures for DSS.

In FY 89-90, the state office of the Department of Social Services had a total operating budget of approximately \$74 million, and distributed over \$437 million in assistance payments. The agency has two main program divisions: the office of self-sufficiency (including food stamps and aid to families with dependent children, or AFDC), and the office of children, family and adult services. For this report, we refer to the office of self-sufficiency as "economic services," and the office of children, family and adult services as "human services."

Table 1.1 which follows presents a functional overview of the state office. Areas 1 (administration), 2 (direct state programs) and 3 (Hugo Relief) do not directly monitor and oversee county programs. Human services and economic services have oversight responsibilities for county programs.

**Chapter 1
Introduction and Background**

Table 1.1: Functional Overview of the DSS State Office FY 89-90

Area	Operating Budget	Total FTEs	Major Functions/ Offices (FTEs)	Assistance Payments
1 Administration	\$36.4 million	421	(a) Commissioner (6) (b) General Counsel (13) (c) Senior Deputy Commissioner (13) (d) Deputy Commissioner for Audits, Investigations and Support Services (210) ^a (e) Planning, Management and Staff Development (57) ^a (f) Fiscal and Personnel Management (114) (g) Deputy Commissioner for Self-Sufficiency (5) (h) Deputy Commissioner for CFAS (3)	\$51,531
2 Direct State Programs^b	\$16.6 million	346.6	(a) Child Support Enforcement (see also 5e) (236) (b) Birth Parent Services (see also 4f) (110.6)	\$37.2 million
3 Hugo Relief	\$1.5 million	0	One-time federal- and state-funded relief.	\$132 million
4 Human Services	\$7.5 million	70	(a) Executive Assistant (4) (b) Child Protective and Preventive Services (CPPS) (17) (c) Adult Services (12) (d) Substitute Care (foster care) (12) (e) Program Quality Assurance (25) (includes day care and foster home licensing units--10 FTEs) (f) Adoption and Birth Parent Services (see 2b)	\$10.1 million
5 Economic Services	\$11.8 million	231.5	(a) Economic, Administrative and Management Support (AFDC and Food Stamps) (70.5) (b) Medical Support (Medicaid) ^c (70) (c) Work Support (21) (d) Economic Assessment and Quality Control (error rates for division) (70) (e) Child Support Enforcement (see 2a)	\$258.3 million
Total	\$73.8 million	1069.1	(1069.1)	\$437.7 million

^a We address the effectiveness of county program oversight for the division of internal audit, under audits, investigations, and support services, and the office of management consulting, under planning, management and staff development, in Chapter 3 of this report. In FY 89-90, internal audit had 26 employees and spent \$846,000; the office of management consulting had 9 employees and spent \$375,000.

^b Direct state programs are presented in this table to illustrate areas of human and economic services which delivered services directly from the state office and did not operate or have oversight activities in the county offices. In our review of FY 89-90 central administration (see Chapter 2), we found that child support enforcement had 19 central administrative employees, and adoptions and birth parent services had 15. The remaining employees in these areas delivered direct client services.

^c Within medical support, 37 of the employees provide direct client services.

Source: DSS Budgeting and Cost Allocation Systems unaudited FY 89-90 Schedule of Expenditures.

General Description of Assistance Programs

DSS serves the public primarily at the county level, with the exceptions of child support enforcement and birth parent services. Assistance is provided in three ways: cash payments, food coupons, and social services.

Economic Services

- AFDC (Aid to Families with Dependent Children)

The state and federally funded AFDC program provides financial assistance to eligible children under the age of 18. These children become eligible for assistance due to the death, absence from the home, unemployment, or mental or physical incapacity of the parent. During FY 89-90, the AFDC program served an average of 108,593 persons in South Carolina, with payments totalling \$93,231,673.

- Food Stamp Program

The federally funded food stamp program provides low income families with food coupons. In FY 89-90, the food stamp program distributed approximately \$174 million in food stamps. An average of 93,038 households per month was served.

- Child Support Enforcement

Child support enforcement's functions include setting up case files and orders of support, locating absent parents, and determining paternity. Other services involve assessing financial responsibility, collecting and distributing funds, and enforcing support orders. In FY 89-90, child support enforcement obtained and distributed approximately \$59 million in child support collections.

Human Services

- Substitute Care

The substitute care program seeks to ensure that all children requiring substitute care receive the placement planning that meets their needs. During FY 89-90, the foster care system served 5,361 children. The long-term goal of this program is to provide suitable permanent placement, either with the biological, foster, or adoptive

parents. The statewide specialized training program for foster care workers requires all direct delivery staff to complete initial certification training and be recertified on a regular basis.

- **Foster Care Licensing**

During FY 88-89, foster family home licensing was decentralized so that each of the 46 counties has responsibility for licensing foster family homes and recommending directly to the commissioner licenses for his approval. The licensing unit coordinates recruiting, training, and licensing of foster family homes. During FY 89-90, the agency licensed 2,155 homes, and 82 group facilities. Foster parent training for licensing and relicensing is required statewide.

- **Child Protective and Preventive Services (CPPS)**

The department's central office division of child protective and preventive services has responsibility for the investigation of institutional abuse and neglect. County protective services offices are responsible for the investigation and provision of services to abused and neglected children and their families. CPPS also maintains a statewide central registry for child abuse and neglect cases. During FY 89-90, child protective services received a total of 19,124 child abuse and neglect reports.

Chapter 1
Introduction and Background

DSS Central Office Structure and Related Issues

DSS Central Office Structure

Based on our request, we answered the following questions:

- Is the DSS central office in Columbia administratively "top-heavy"?
- What efforts have been made by the agency to assess its staffing needs?
- Have the two largest benefit programs, AFDC (aid to families with dependent children) and food stamps, been administered efficiently and accurately?
- What efforts have been made by the central office to increase efficiency and effectiveness of the AFDC and food stamps programs?
- Does the central office have sufficient data processing controls?

We answer each of these questions in this chapter.

DSS Has a Relatively High Number of Central Office Administrative Positions

Is the DSS central office in Columbia administratively "top-heavy"?

Yes, the Department of Social Services' central office is staffed at 119 administrative positions above the average of comparably structured state social service agencies. A relatively high number of administrators compared to direct service workers (workers who deliver services directly to clients) indicates a "top-heavy" agency. DSS has a higher ratio of central office administrative positions to direct client services positions than four states which are comparably structured.

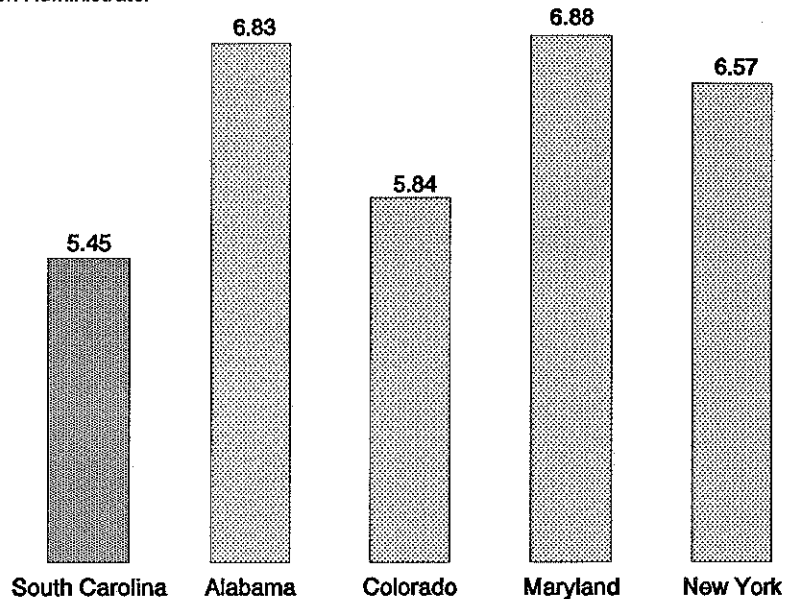
We analyzed the organizations of the social service agencies in Alabama, Colorado, Maryland and New York because they were similarly structured to South Carolina's DSS. The survey average was one central office administrative position for every 6.53 client service positions. Of the 1,069 positions assigned to the DSS central office, 719 (67%) are administrative. We define administrative employees as those employees who do not directly deliver services to clients. This includes all state office personnel except those who directly deliver services to clients in

child support enforcement, birth parent services and medical support programs.

Using the survey average, the DSS central office should be staffed closer to 600 administrative positions. Graph 2.1 shows that DSS has one central administrative position for every 5.45 positions involved directly in delivering services to clients, while Maryland has one central administrative position for every 6.88 client services positions.

Graph 2.1: FY 89-90 Client Services Positions (Per Each Central Administrative Position)

Client Services Positions
Per Each Administrator



The lower the number of direct client services positions per each central administrative position, the more "top heavy" the organization.

Source: LAC administrative structure survey, 1990.

Based on our analysis, the central office has excess administrative employees, while according to DSS staffing standards the counties are understaffed by 547 employees. As of August 1990, the human services divisions in the eight-county sample we used to evaluate many of the issues in this report, were staffed at an average of 72% of assessed need. Statewide, 897 caseworkers (including supervisors) worked in county

offices in human services; there was an assessed need for 1,232 caseworkers. Therefore, the 46 county human services offices were staffed at 73% of assessed need in FY 89-90.

Table 2.1 provides the August 1990 staffing levels and needs for our eight-county sample.

Table 2.1: Human Services Staffing Needs August 30, 1990

County	Total Assigned Staff	Additional Staff Needed	Total Staff Needed	Level of Staffing in Each County as of August 1990
Allendale	5	3	8	63%
Charleston	63	26	89	71%
Clarendon	12	3	15	80%
Darlington	23	2	25	92%
Greenville	69	25	94	73%
Greenwood	12	-1	11	109%
Horry	27	22	49	55%
Richland	70	27	97	72%
8-County Total	281	107	388	72%
State Total (46 Counties)	897	335	1,232	73%

Source: DSS - Human Services Quality Assurance, August 30, 1990.

Staffing need was first established in 1985 by Omni Systems, Inc., a consulting firm, (see p. 11) and was partially updated by Omni in 1988. Since that time, the human services quality assurance section has maintained current information on staffing levels, updated yearly using the Omni methodology.

DSS officials have stated that it is not realistic to expect that DSS policies and South Carolina statutes can be adhered to 100% of the time by caseworkers in child protective and preventive services (or any other

area), if only 73% of the staffing needs are met. Understaffing can reduce efficiency and effectiveness of the county offices, where most client services are delivered.

As discussed earlier, DSS has 119 more central office staff than the average of comparably structured states. DSS spent an estimated \$2.5 million on these 119 positions, based on the FY 89-90 average salary of \$20,795 for state employees. This level of funding could be used in the county offices to employ 162 entry-level caseworkers at the starting salary of \$15,229.

Extra Managerial Level

One cause we identified for the relatively high number of administrative positions is the existence of both a deputy commissioner level and an executive assistant level. The DSS organization chart in Appendix A shows 17 administrators, including 1 senior deputy commissioner, 5 deputy commissioners, and 11 executive assistants, between the commissioner and the program directors.

We reviewed organization charts for social service agencies in the four comparably structured states mentioned earlier and for two South Carolina human services agencies, Departments of Mental Health and Mental Retardation. None of these agencies had two managerial levels between the commissioner/director and all of the program directors. Graph 2.2 illustrates the standard managerial structure found in the seven agencies reviewed.

The DSS Administration Policy and Procedure Manual states:

Organizational charts should be reflective of our commitment to responsiveness, effectiveness and efficiency in the utilization of the resources allocated to meet the needs of our citizens who for a temporary time must look to their state government for assistance. Organizational change will be aimed toward achieving the most cost effective, humane structure.

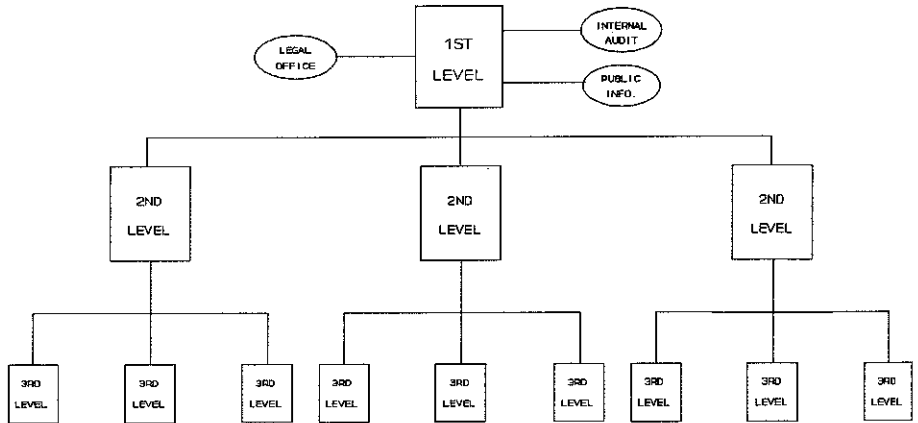
DSS could bring its ratio of central office administrative positions more in line with the survey average gradually through attrition. When an employee in a nonessential function leaves the state office, DSS could transfer the position to the county with the highest level of need, based upon the county staffing analysis.

Graph 2.2: Prototypical Managerial Structure

1st Level: Commissioner

2nd Level: Deputy Commissioner

3rd Level: Program Director



The number of 3rd level managers under each 2nd level manager is for illustrative purposes only. There was no uniform number of 3rd level managers. The graph illustrates that the comparably structured agencies typically had three managerial levels.

Source: LAC

Recommendation

- 1 DSS should reduce central office administrative staffing through attrition and increase the number of new positions assigned to the counties so that county staffing standards are met.

No Plan Addressing Study Recommendations

What efforts have been made by the agency to assess its staffing needs?

In 1984, DSS contracted with Omni Systems, Inc. for \$160,000, to determine the proper staffing levels for each DSS county office. DSS has used this information to make county staffing decisions, and DSS has updated the county staffing standards in 1988 and 1989.

In 1985, DSS contracted with Omni for a similar study of the state office for \$204,613. The contract required an analysis of the staffing levels of each unit within the state office. DSS did not contract with Omni to determine how the state office should be organized or to review whether or not the units were necessary to complete the agency's mission. The agency contracted with Omni to analyze how many employees it needed to perform the work within each unit adequately, as it existed.

Omni State Office Plan Not Implemented

While DSS officials indicate that the study was accurate and appropriately conducted, the agency did not develop a formal plan for addressing the Omni study recommendations for the state office and has not updated the staffing analysis. The agency did not involve the planning division or the personnel division in making a plan to implement the study's recommendations.

The commissioner stated that he has used the study to make decisions on organizational changes, to delete certain staff allocations, to establish additional positions in areas of critical needs and to make both strategic and operational planning decisions. However, the purpose of the study, as stated in both the contract and the study's executive summary, was to provide DSS with the ability to monitor and update staffing levels in the state office.

DSS has not used the study for its intended purpose. For example, DSS has not fully implemented the Omni recommendation to reduce the number of staff in the treasurer's office by 19. After the agency transferred one over-staffed section of the treasurer's office to another division in 1988, the office remained over-staffed by nine employees. These nine employees cost the state an estimated \$187,155 annually. DSS could have reduced staff through attrition, since 30 employees left the treasurer's office during the three fiscal years following the Omni recommendation.

Proper management of state resources requires that clear benefits be achieved from an expenditure of \$204,000 for a study. The Omni state office study was patterned after the study of the county offices. However, the same results have not been achieved. DSS has updated the county office study, and has made attempts to correct the staffing shortages by requesting additional positions.

DSS has not documented improvements in the efficiency and effectiveness of the state office as a result of the study. The agency could have shifted the nine excess positions in the treasurer's office to the counties. The over-staffing in the state office also could have been reduced (see p. 7).

Recommendation

- 2 DSS should use an update of the Omni staffing analysis, or a similar analysis, of the state office as an aid in shifting personnel from the state office to the counties.
-

Federal Reimbursements of \$62,000 Lost

In reviewing the use of the Omni study, we also found that proper procurement procedures were not followed. DSS did not seek pre-approval for the two Omni contracts from the Food and Nutrition Service Division of the United States Department of Agriculture (FNS), as cited in an administrative cost audit issued June 1987. As a result, FNS refused to pay for their portion of the contract, which resulted in the loss of \$62,000 in federal reimbursements for portions of the contract allocated to the food stamp program.

Federal procurement guidelines require the agency to obtain prior approval before signing contracts exceeding \$10,000. The state lost \$27,700 for the September 1984 contract, and \$34,501 for the July 1985 contract because DSS did not seek pre-approvals.

Recommendation

- 3 DSS should follow proper contract procedures to ensure maximum reimbursement of federal matching funds.
-

Contracts Not Competitively Bid

DSS did not follow proper contracting procedures in the handling of the Omni contracts, as cited in a food stamp program administrative cost audit issued June 1987. The agency inappropriately handled the September 1984 Omni contract as an emergency procurement and inappropriately procured the July 1985 Omni contract as a sole source.

The South Carolina Office of Audit and Certification also cited the July 1985 contract as an inappropriate sole source procurement. The justification for using a sole source contract of Omni, "being able to provide the service at a reasonable cost in a short time frame" was not valid. Furthermore, Omni completed the study seven months after the deadline.

Both the South Carolina and federal procurement codes dictated that the contracts be handled through a competitive process. Without the benefit of the bid process, the agency might have obtained the same or better services from another source at a lower price.

Recommendation

- 4 DSS should follow proper contracting procedures.
-

DSS Administrative Costs Higher Than Southeastern Average

Have the two largest benefit programs, AFDC (aid to families with dependent children) and food stamps, been administered efficiently and accurately?

DSS's average administrative costs were higher than the southeastern average for FY 88-89. Despite the high administrative costs, DSS's error rates were also higher than the southeastern average for FY 85-86 through FY 87-88.

Funds budgeted for distribution in the aid to families with dependent children (AFDC) and food stamp programs for FY 89-90 account for 92% of all DSS assistance payments. During FY 89-90, DSS distributed over \$437 million in South Carolina. Most administrative costs incurred in distributing this assistance are reimbursed by federal agencies at 50%.

DSS's average administrative costs for the AFDC and food stamp programs have been higher than the average for the eight southeastern states. Increasing efficiency in these programs means lowering administrative costs. The higher the number of dollars distributed to clients for each

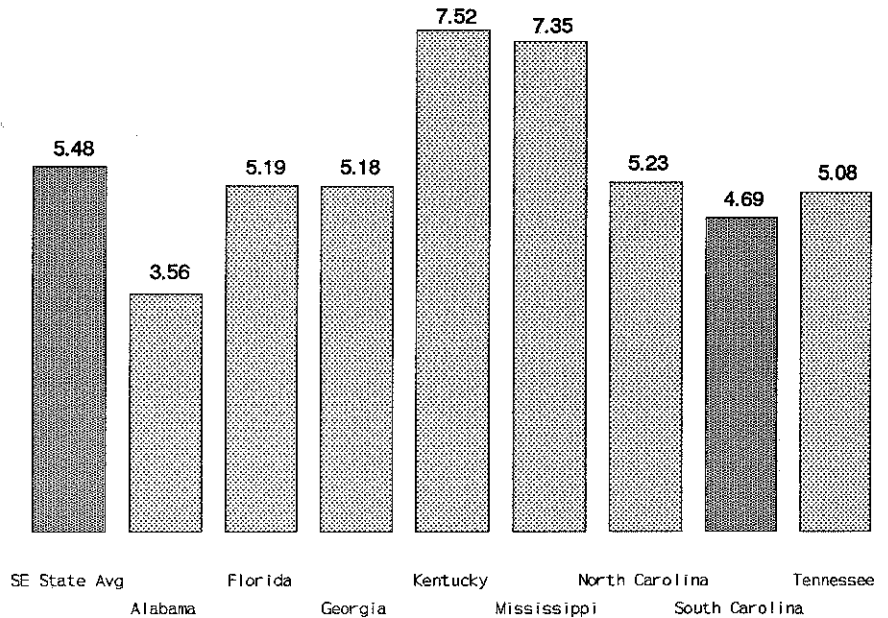
dollar spent on administration, the more cost-effective the program is likely to be.

In FY 88-89, DSS distributed \$4.69 in AFDC payments to clients for every dollar that the agency spent administering the program. The regional average was \$5.48 in AFDC payments distributed for every dollar in administrative costs of the assistance funds. Only Alabama ranked lower in AFDC payments to clients per dollar spent on administrative costs (see Graph 2.3).

Graph 2.3: FY 88-89 AFDC Distributed (Per Each Dollar Spent Administering Program)

The greater the number of dollars distributed to clients for each dollar of administration, the more cost-effective the program.

Dollar Value of AFDC Distributed



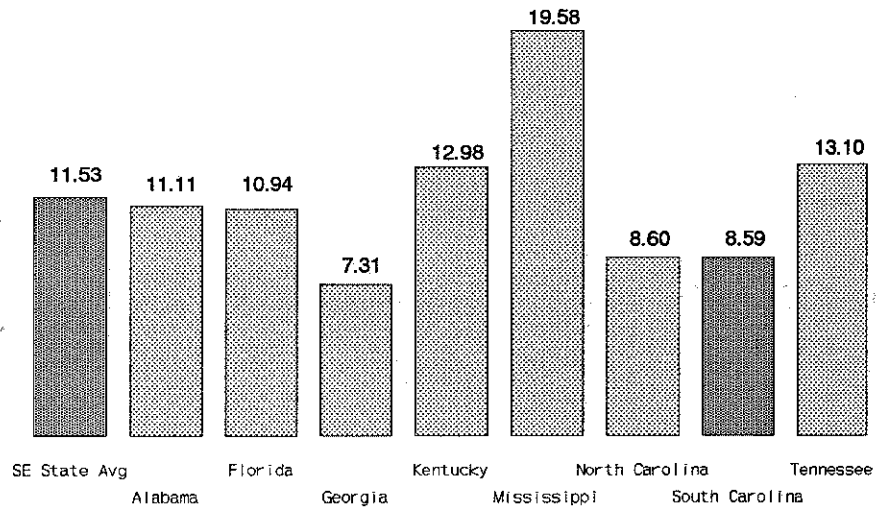
Source: Family Support Administration, 1990.

In FY 88-89, DSS distributed \$8.59 in food stamps to clients for every dollar that the agency spent administering the program. The regional average was \$11.53 in food stamps distributed to clients for every dollar in administrative costs. Only Georgia ranked lower in food stamps per dollar spent on administrative costs (see Graph 2.4).

Graph 2.4: FY 88-89 Food Stamps Distributed (Per Each Dollar Spent Administering Program)

As with AFDC, the greater the number of dollars in food stamps distributed to clients for each administrative dollar, the greater the efficiency of the program.

Dollar Value of Food Stamps Distributed Per Administrative Dollar



Source: USDA Food and Nutrition Service, 1990.

AFDC and Food Stamp Error Rates

How effectively is DSS administering the AFDC and food stamp programs, based on error rates for FY 85-86, FY 86-87 and FY 87-88?

We found that DSS error rates have been higher than the southeastern average, even though the agency's administrative costs for the programs have exceeded the regional average.

The federal government uses error rates to determine the accuracy of a state's eligibility decisions. States can face financial penalties by having error rates higher than the acceptable standard. In FY 87-88, DSS had the

third highest AFDC error rate and the highest food stamp error rate in the region.

Some of DSS's administrative costs can be attributed to error rate reduction efforts such as the implementation of the Client History Information Profile System (CHIPS) in FY 88-89 (see p. 19). Development of the CHIPS computer system accounted for 27.8% of the agency's total AFDC administrative costs and 8.9% of the agency's total food stamp administrative costs for FY 88-89.

DSS administrative costs should be similar to the southeastern regional average. By reducing administrative costs, DSS could employ additional caseworkers in the counties or distribute more assistance.

Recommendation

-
- 5 DSS should lower administrative costs with the goal of reaching the southeastern state average.
-

State Office Efforts to Reduce Error Rates

What efforts have been made by the central office to increase efficiency and effectiveness of the AFDC and food stamps programs?

The agency has introduced several major initiatives to reduce error rates. Preliminary FY 88-89 error rates show significant decreases. The Professional Academy for Self Sufficiency, a comprehensive training program for AFDC and food stamp eligibility workers, was implemented in June 1989. DSS staff also revised the AFDC and food stamp manuals into one compact manual which went into effect in September 1990. In addition, DSS established monthly on-site and off-site county monitoring procedures (see pp. 30, 34).

Economic Service Training Program

DSS implemented the Professional Academy for Self Sufficiency in June 1989. The academy is the first statewide coordinated training program for economic service workers. Before the program was offered, each county was responsible for training new employees. As a result, training varied from county to county, with new county employees starting work without formal training.

The academy is an initiative to reduce error rates, increase job satisfaction and ensure consistent client service. Each new employee must attend the 18-day training session during the first month of employment. The academy was based on Kentucky's economic service training program. Kentucky had the lowest combined error rate in the southeast and was in the top ten nationwide in FY 87-88. DSS officials state that the academy will have a significant effect on lowering error rates.

Revised AFDC/Food Stamp Manual

DSS has completed revision of the AFDC/food stamp manual. Prior to the revision, the agency had separate manuals for AFDC and food stamps. The new manual combines both of the programs into a format that is one-third the size of the former manuals combined. The format was developed to be compatible with the CHIPS computer system. The agency's eventual goal is to automate the manual, which will allow the counties to implement federal regulation changes more efficiently.

The Food and Nutrition Services (FNS) Division of the United States Department of Agriculture (USDA) reviewed the manual and stated that DSS should be commended for successfully combining the two programs into one manual. They also noted that DSS had adopted common policies for both programs where possible, thereby easing the burden on caseworkers. When contacted earlier, a FNS official had stated that DSS had a much more confusing manual than other states, which could have been a factor in the high error rates. The combined AFDC/food stamp manual should be an asset to county caseworkers and help reduce error rates.

Data Processing Controls

Does the central office have sufficient data processing controls?

We noted no significant weaknesses in either the general data processing controls or the specific application controls reviewed, with the exception of the Data Processing Standards Manual as discussed in the following section.

We reviewed the general controls over the department's electronic data processing division, the office of information systems (OIS). We conducted interviews with OIS personnel and studied department policy and procedures manuals. Our review focused on controls over the development and implementation of new data processing systems, as well as the operation of existing systems.

At the time of our fieldwork, the department had 26 separate electronic data processing systems in use. We selected three of these systems with information integral to our audit work for a detailed review of application controls.

- Client History Profile System (CHIPS) - Manages the aid to families with dependent children and food stamp programs.
- Client Information System (CIS) - Manages the medicaid, general disability assistance, and optional state supplemental benefits programs.
- Human Service Reporting System (HSRS) - Records human service treatment units.

In reviewing the application controls over these systems, we examined system documentation and interviewed system programmers, managers, and operators.

Outdated Data Processing Standards Manual

The office of information systems (OIS) is responsible for all aspects of data processing operations in the Department of Social Services. These include developing new information systems, data processing operations, operation of the data processing equipment, and maintenance of the software and hardware.

The OIS's data processing standards manual does not reflect the current organization of the office, hardware in use, software languages, or system development policy. The most recent revisions to the manual were made in February 1977.

The manual describes operations and procedures which are no longer performed. For example, the manual includes instructions for "punching" of keypunch cards which DSS no longer uses. The manual does not mention some programming languages currently used by DSS, or the programming standards to be followed with their use. The major client economic services system in use by DSS is written in *Natural* programming language. The manual has no mention of *Natural* as an approved programming language. Major changes to the DSS data processing organization, computer technology and procedures have been made in the past decade.

Good business practice dictates that an organization's written policies be kept current. The potential effects of outdated standards include the following:

- Training of new staff is more difficult when current written standards are not available, because actual policy must be provided piecemeal.
- Policies which are not written are less likely to be consistently followed than are written policies.
- Lack of current written policies makes performance evaluation difficult.

Recommendation

- 6 The office of information systems should revise its data processing standards manual to reflect current organization, policies, and technology.

Oversight of County Programs

Based on our request to study the agency's administrative costs relative to the extent of oversight, we answered the following questions:

- What does the state office do to oversee county DSS programs?
- How effective is state office oversight in ensuring good performance in the counties?
- How much does state oversight of county DSS programs cost?

We will answer each of these three questions in this chapter, following a brief description of the agency.

Overview of the Organization of DSS

For readers without prior knowledge of DSS, the functional overview of DSS, presented in Table 1.1 on page 3 will serve as a good background reference for the information in this chapter.

In FY 89-90, the DSS state office spent approximately \$74 million and distributed assistance payments of over \$437 million in South Carolina.

Economic services and human services, the two main program areas of DSS, each have four departments which operate at both the state and county level. Economic services is comprised of (1) economic support [AFDC (aid to families with dependent children) and food stamps], (2) medical support (medicaid), (3) work support, and (4) economic assessment and quality control, which is federally mandated to develop the state's error rates. Human services includes: (1) child protective and preventive services (CPPS), (2) adult services, (3) substitute care (foster care), and (4) program quality assurance.

Economic services also administers child support enforcement, which operates only from the state office. Human services also operates adoption and birth parent services, the state's adoption program, directly from the state office. We did not examine these programs, since they do not have county components. On the state level, \$36.4 million is devoted to administration, which includes the offices of the commissioner and deputy commissioners, personnel management, the treasurer, and planning. Two areas within administration with monitoring functions are the office of management consulting, responsible for the agency's

coordinated internal review system (\$375,000), and the division of internal audit (\$846,000).

State Office Oversight of County Programs

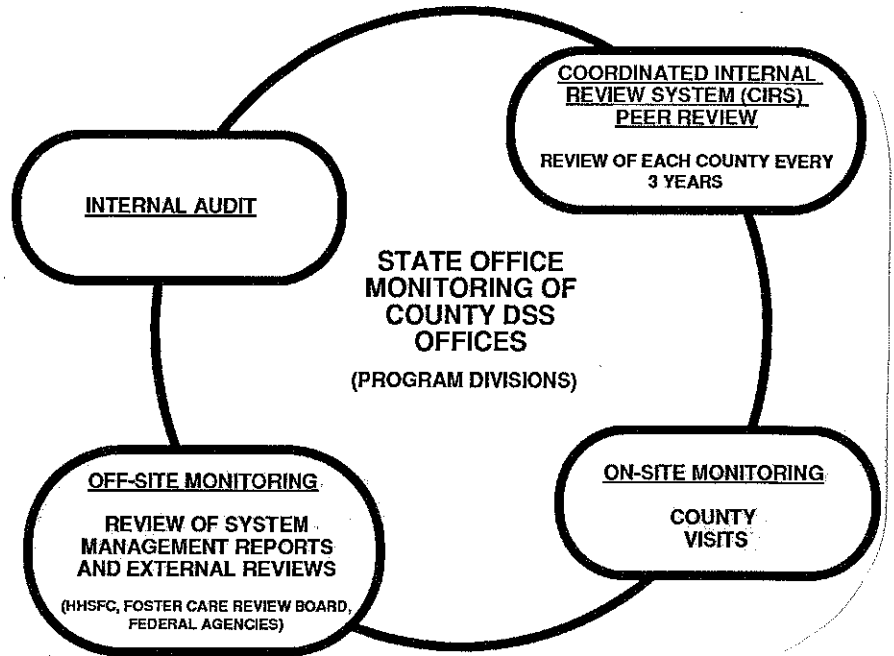
What does the state office do to oversee county programs?

We found that the DSS state office conducts four types of oversight activities, which are also presented in Graph 3.1:

- *The coordinated internal review system (CIRS)*, which reviews all county programs once every three years.
- *Visits to the counties*, or "*on-site monitoring*," which involves state office personnel traveling to the county offices to review cases and client files, to offer assistance to caseworkers and supervisors concerning policy implementation, and other related activities.
- *Review of management reports*, or "*off-site monitoring*," in which central office personnel review statistical and descriptive information concerning the county programs from the state office. Some reports are essentially statistical, and some are from other state and federal agencies, such as the Foster Care Review Board or the Federal Health Care Financing Administration.
- *The division of internal audit*, which operates as part of the CIRS process, emphasizing financial and operational matters. This office also audits central office departments, and answers special requests.

Three of these four activities, (CIRS, on-site monitoring and off-site monitoring) are conducted by economic and human services personnel, or "program consultants" in the state office.

Graph 3.1: State Office
Monitoring of County DSS Offices



Source: LAC review of DSS state office programs, FY 89-90.

Graphics by the Productivity Technology Center of the Division of Human Resource Management.

Effectiveness of State Oversight

How effective is state oversight?

We reviewed the preceding four categories of oversight and found that oversight in economic services is reasonably thorough. Significant improvement is needed in human services oversight to help ensure child protection.

The Coordinated Internal Review System (CIRS)

The Coordinated Internal Review System (CIRS) peer review serves as the agency's primary evaluation tool. Under CIRS, each county is reviewed every three years on a rotating basis.

The CIRS process is coordinated by the office of management consulting. Each of six participating divisions sends its own monitoring personnel to perform the division's portion of the CIRS review. Therefore (with the exception of the audit of county fiscal operations and food stamp programs performed by the internal audit department), the CIRS review is a peer review, and should not be relied upon by management or county board members as an independent program audit.

CIRS Should Improve Sampling Techniques

In evaluating compliance with child protective and preventive services (CPPS) statutes and policies during the CIRS review, consultants have not always drawn case samples which are representative of total county compliance and case work practice. Samples were not drawn independently by the reviewer, and the number of files reviewed has been too few to produce valid, reliable evidence of the county's performance.

We compared the results of our FY 89-90 CPPS case file reviews in seven counties to CIRS reviews for the same counties, conducted in FY 88-89 and FY 89-90. Our findings, based on larger, statistically representative samples, sometimes differed considerably from CIRS findings, as illustrated in Table 3.1. For example, in Allendale County, the CIRS report stated that no files reviewed, for which the allegations were substantiated, contained treatment plans. We found that 68% of the indicated cases had treatment plans. The CIRS report also stated that a

supervisor/worker conference was held prior to the case decision in 75% of the cases reviewed; we found 26% compliance.

We randomly selected 37 cases in Allendale County for review; the CIRS review sampled 8 cases in FY 89-90, 5 of which were chosen by Allendale County staff.

In its FY 89-90 review of Greenville County, the CIRS report stated that the child/victim was seen within 24 hours of the report in 100% of the cases reviewed; we found 81% compliance. The CIRS report also stated that 100% of the indicated cases reviewed contained treatment plans; we found that 83% contained treatment plans.

In Greenville County, we reviewed 61 randomly selected cases; CIRS reviewed 13 cases, 5 of which were selected by Greenville County staff.

A statistical sampling computer package was used for our case review in the eight sample counties. We reviewed 280 more FY 89-90 cases than CIRS reviews of the 7 county programs in FY 88-89 and FY 89-90.

Under CIRS, each county is reviewed once every three years, and CPPS does not visit the counties for monitoring purposes on a consistent basis between CIRS reviews (see Table 3.2 on p. 31). Therefore, small sample sizes, and samples which are not drawn independently by the reviewer, are not likely to be representative of all cases managed by the county and thus are not likely to produce valid, reliable results.

Recommendation

- 7 In conducting CIRS reviews, consultants should select random, independently drawn case file samples which statistically represent the total CIRS case population for the test period.

**Chapter 3
Oversight of County Programs**

Table 3.1: Comparison of Audit Council and CIRS Findings in Child Protective and Preventive Services (CPPS)

County ^c	Reviewer/FY ^a	Total CPPS Sample Size	Number of Sampled Files Selected by County for Review ^b	Percentage of Cases with Child Seen in 24 Hours	Percentage of Supervisor/Worker Conferences Prior to Case Decision	Percentage of Indicated Cases With Treatment Plans
Allendale	CIRS FY 89-90	8	5	100%	75%	0%
	Audit Council FY 89-90	37	0	74%	26%	68%
Charleston	CIRS FY 88-89	20	2	95%	100%	67%
	Audit Council FY 89-90	59	0	49%	34%	50%
Clarendon	CIRS FY 88-89	9	2	78%	67%	83%
	Audit Council FY 89-90	44	0	67%	31%	63%
Darlington	CIRS FY 88-89	10	2	100%	100%	80%
	Audit Council FY 89-90	54	0	98%	89%	89%
Greenville	CIRS FY 89-90	13	5	100%	92%	100%
	Audit Council FY 89-90	61	0	81%	82%	83%
Horry	CIRS FY 89-90	17	0	71%	40%	83%
	Audit Council FY 89-90	56	0	76%	51%	58%
Richland	CIRS FY 88-89	13	1	100%	N/A	N/A
	Audit Council FY 89-90	59	0	72%	50%	78%

^a Charleston, Clarendon, Darlington and Richland County CIRS case file reviews were not performed in the same year as the FY 89-90 LAC review. Although the information is not directly comparable for those counties, it is suggestive of differences in report findings.

^b CIRS cases were selected for review by county staff either as cases representative of quality child protective services practice and procedure, or because the records requested by CIRS reviewers could not be located by the county.

^c Greenwood County CIRS review not yet completed.

N/A Information not available or not addressed in CIRS report.

Sources: LAC FY 89-90 CPPS review findings, DSS FY 88-89 and FY 89-90 CIRS reports for the seven counties, and human services QA unit.

**CIRS Process Not
Timely: Reports an
Average of Six Months
Late**

As illustrated in Chart 3.1, the CIRS policy manual requires the CIRS draft report be transmitted to the county director within 30 days of the exit conference. The county director is allowed 15 days to comment, and the report is to be published within 45 days of the exit conference.

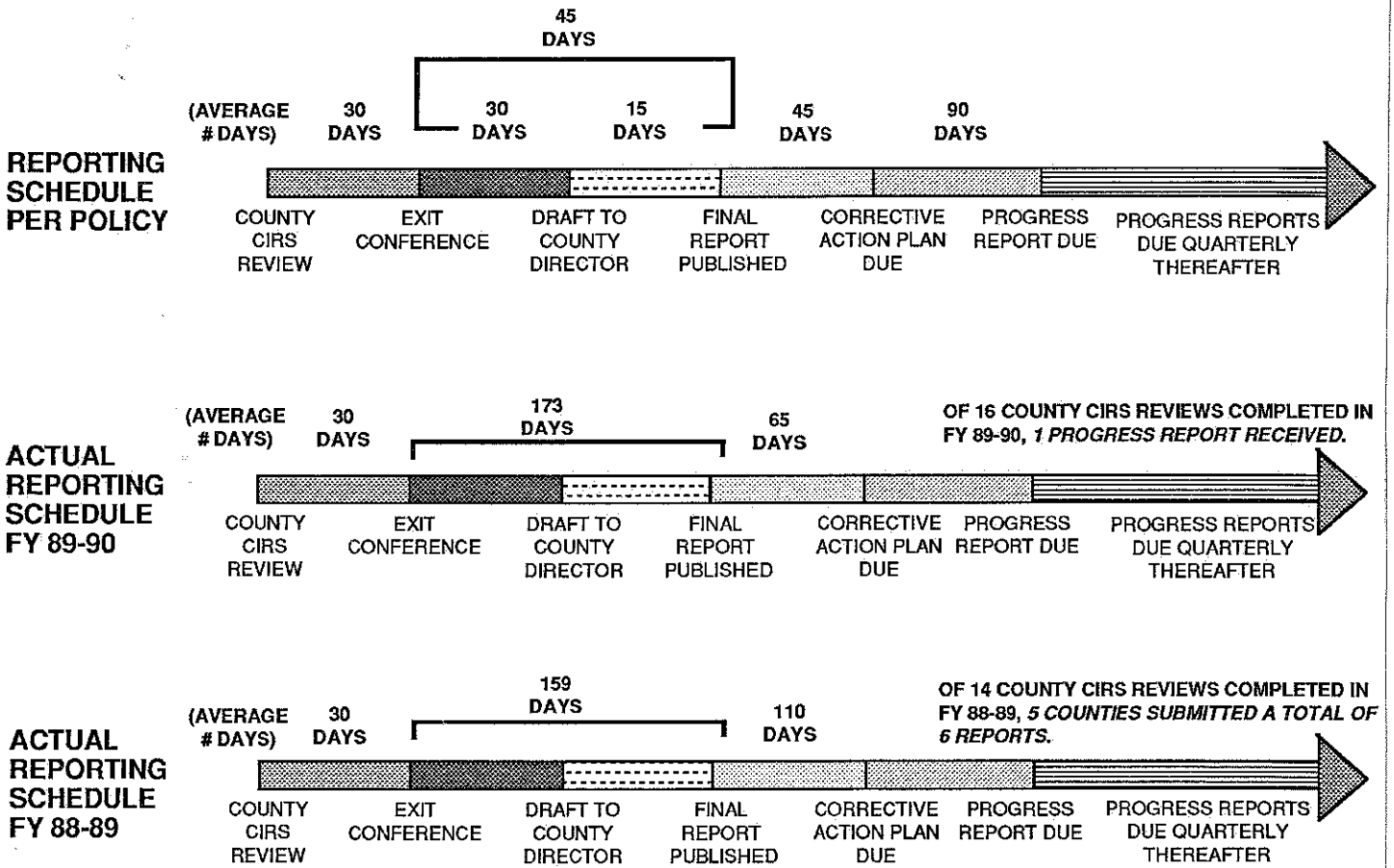
We found that 13 of the 16 county CIRS reviews completed during FY 89-90 were issued to county directors and boards an average of 164 calendar days (approximately 5.5 months) after the exit date. Three final reports were unpublished as of November 1990, an average of 215 days (approximately 7.2 months) after their exit dates.

**Corrective Actions Plans
From Counties More
Timely**

The CIRS process also requires corrective action plans and quarterly progress reports, which are continuous working documents for the county, updated with each CIRS review. According to policy, corrective action plans are due from the counties 45 days after the final report is issued, and progress reports on corrective action taken are due 90 days later, and quarterly thereafter.

As illustrated in Chart 3.1, whereas the state office became increasingly untimely in issuing FY 89-90 CIRS reports, county offices became more timely in submitting corrective action plans. Counties have submitted action plans for FY 89-90 CIRS reviews within an average of 65 days.

Chart 3.1: CIRS Reporting: Policy and Practice FY 88-89 and FY 89-90



Source: LAC

Graphics by the Productivity Technology Center of the Division of Human Resource Management.

**One Progress Report
Submitted for FY 89-90**

Progress reports, which outline progress toward corrective action plan goals, have not been submitted in a timely manner in accordance with policy. As of November 1990, one county had submitted a progress report in conjunction with the 16 county CIRS reviews completed during FY 89-90. In addition, of the 14 county CIRS reviews completed during FY 88-89, five counties had submitted six progress reports as of November 1990.

**State Office Required to
Monitor Progress**

Under "periodic monitoring," the CIRS policy manual requires the state office program divisions to monitor progress toward goals and objectives outlined in county corrective action plans. In addition, the policy manual states that written progress reports will be jointly developed by the county and the state office, and "in the case of county office reviews, the state office division responsible for the program . . . is ultimately responsible for submission of such reports."

For evaluation efforts to be effective, reports, action plans and progress reports must be issued in a timely manner.

Recommendations

-
- 8 All state office program divisions should monitor corrective action by counties and ensure that progress reports are submitted in accordance with policy.
 - 9 The office of management consulting should identify the causes of the delay in reporting and should issue CIRS reports in a timely manner.

On-Site Monitoring in Human Services Needs to be Strengthened

On-site monitoring is the second of four types of county program oversight activities performed by state office personnel we reviewed. We found that on-site monitoring in the human services programs is insufficient to ensure that policy is followed.

On-site monitoring involves visits to the counties to evaluate and improve the effectiveness of program operations and to ensure compliance with policy and statutes. We reviewed the on-site monitoring activities of four program areas within human services, and four program areas within economic services. Policies concerning visits to counties for monitoring purposes vary among program areas, such that no uniform feedback and evaluation is provided to the county offices. Table 3.2 summarizes the policy of each program for on-site monitoring, and reports the number of county monitoring visits actually made for FY 89-90.

Monitoring in Human Services

As shown in Table 3.2, child protective and preventive services (CPPS) personnel travel to the counties for monitoring and technical assistance on an "as-needed basis." CPPS visits the county at county request or when the state office determines a visit is needed. CPPS has a checklist, or formal review instrument, to follow during visits in which case files are reviewed; however, of 53 visits to the counties during FY 89-90, only 5 involved case file reviews. The majority of case file review occurs during the CIRS process every three years. According to CPPS officials, a visit report is issued to the county after each visit. During FY 89-90, CPPS issued 18 reports confirming the visits. Thirteen (28%) of 46 counties were not visited by CPPS personnel for monitoring purposes during FY 89-90.

Substitute care and adult services policies require state office personnel to visit each county quarterly and to issue a report to the county confirming areas addressed and recommendations made. Substitute care personnel review case files against a formal checklist. During FY 89-90, substitute care and adult services did not consistently visit the counties on a quarterly basis. Substitute care made 16 (9%) of the required visits and did not perform a quarterly monitoring visit for 33 (72%) of 46 counties. Adult services made 69 (38%) of its required quarterly monitoring visits and did not visit 6 counties.

**Chapter 3
Oversight of County Programs**

Table 3.2: FY 89-90 State Office Visits to Counties for On-Site Monitoring

Division/Number of Monitoring Personnel	Policy/Number of Visits Required	Actual Number of Visits	Counties not Visited in FY 89-90
Human Services			
Child Protective & Preventive Services 7 Monitoring Personnel	On an as-needed basis/as requested for crisis intervention.	32 Visit at county request. 21 Initiated by state office. 53 18 reports, confirming visit and any recommendations made, were issued (35%).	13 (28%) of 46 counties were not visited for monitoring purposes in FY 89-90 by CPPS personnel. ^a
Substitute Care 4 Monitoring Personnel	Quarterly/184 visits (4 visits X 46 counties)	16 (9%) A visit report was issued for 14 visits (88%).	33 (72%) of 46 counties did not receive any quarterly monitoring visits in FY 89-90.
Adult Services 3 Monitoring Personnel	Quarterly/184 visits (4 visits X 46 counties)	69 (38%) A visit report was issued for all visits.	6 (13%) of 46 counties did not receive any quarterly monitoring visits. (One of the three consultants was deployed to Hugo disaster relief, however).
Quality Assurance 15 Monitoring Personnel	Personnel visit each county every three years with CIRS. The CIRS process has been found to be untimely (see p. 27).		
Economic Services			
Economic Support (AFDC/food stamps) 12 Monitoring Personnel	Monthly/552 visits (12 visits X 46 counties)	407 (74%) A visit report was issued for 387 visits (95%).	All 46 counties were visited for monitoring purposes an average of 9 times each. (Monitoring personnel were also deployed to Hugo disaster duties.)
Medical Support (medicaid eligibility) 4 Monitoring Personnel	Yearly/46 visits (1 visit X 46 counties)	36 (78%) ^a A visit report was issued for all visits.	10 (22%) of 46 counties were not visited for monitoring purposes in FY 89-90. (All counties received an HHSFC compliance audit.)
Work Support 10 Monitoring Personnel	Bi-Monthly/66 visits (6 visits X 11 county target areas)	54 (82%) A visit report was issued for all visits.	All 11 county target areas were visited for monitoring purposes an average of 5 times each.
Quality Control 27 Monitoring Personnel	Federally mandated to develop error rates. QC reviews sampled AFDC, food stamps and medicaid cases on a monthly basis to develop the state-wide error rate.		

^a CIRS program reviews (see p. 24) were also included as monitoring visits for purposes of this determination.

In accordance with state law, DSS is required to supervise, administer and ensure compliance with the statutes in a uniform manner throughout the state. However, according to a DSS official in human services, the role of the state office is to conduct program development and enhancement activities. Compliance with state and federal laws and agency policy is seen as the responsibility of the county directors and the respective county boards. In addition, human services officials in the state office cite numerous other duties and lack of sufficient staff as the reason for not providing routine on-site visits.

According to human service officials, program divisions provide informal feedback to counties through the operation of policy and procedure committees, task forces, and periodic county supervisor meetings, as well as obtaining input on various program development initiatives. Approximately 16 DSS and CFAS committees are set up to provide informal feedback to county personnel, and state office personnel are active on approximately 56 external commissions, boards and associations. Examples include the Child Fatalities Review Committee, the HHSFC Family Preservation Committee, and the Child Welfare League of America. Appendix B provides each program division's major functions and responsibilities, program development initiatives, and committees set up for informal county feedback.

Monitoring in Economic Services

In contrast to human services, economic support personnel in economic services visit each county monthly, using a formal, comprehensive review instrument. This instrument requires personnel to review case files, quality control findings, county progress on recommended corrective action, management reports and training needs, among other issues. All areas covered are addressed in a report to the county, and personnel evaluations in economic support are based in part on the timeliness of the report, the contents covered and the number of required counties visited. During FY 89-90, economic support visited all 46 counties an average of 9 times each for monitoring purposes, and issued a comprehensive visit report confirming areas addressed, follow-up on prior issues, and any new recommendations made.

Medical support personnel visit each county yearly and perform comprehensive medicaid program reviews for counties requiring additional assistance. Medical support personnel also use a formal checklist for review and issue a visit report to the county. During FY 89-90, medical support personnel visited 36 of the 46 counties for

monitoring purposes; seven of the visits were for comprehensive medicaid program reviews.

The work support program currently operates in 26 counties, which have been grouped into 11 clusters, or "target areas", with one "lead" county to administer the program for each target area.

Work support personnel visit bi-monthly using a formal checklist, and issue a report to the lead county. During FY 89-90, all 11 county target areas were visited an average of 5 times each, and a report was issued for each visit.

DSS Required to Ensure Compliance Uniformly

Sections 43-1-80 and 43-1-90 of the South Carolina Code of Laws require DSS to supervise, administer and ensure compliance with the provisions of the statutes in a uniform manner throughout the state. To fulfill its responsibilities, DSS has recently committed to a quality process outlined by Philip Crosby, a management expert. According to Crosby, an agency must prevent problems before they occur by providing consistent feedback and evaluation through self-monitoring and audits.

Another management expert, Peter F. Drucker, recommends human service agencies create performance measurements, measure performance on a consistent basis through routine review and provide a feedback mechanism.

Staffing studies indicate county offices are understaffed (see p. 9); therefore, providing consistent feedback and evaluation to the counties is essential to ensure counties use their resources to operate in accordance with state and federal laws and agency policy.

Without effective on-site monitoring, weaknesses in county programs may be unobserved and uncorrected.

Recommendation

-
- 10 All state office program areas should routinely visit and evaluate county programs by reviewing case files and other pertinent data, using a checklist for the review, and documenting all evaluations through a report to the county.

Off-Site Monitoring Needs Strengthening in Four Program Areas

Off-site monitoring is the third of four types of county program oversight activities performed by state office personnel we reviewed. We found that off-site monitoring was not documented for four of seven program areas.

Effective off-site monitoring involves the routine review by state office program personnel of reports (statistical and/or descriptive) from county programs and external agencies, and routine, formal feedback from the state office to county program personnel concerning factors such as the quality, quantity and cost of services rendered, as well as compliance with state policy.

An April 1990 DSS Directive Memo (D90-55) states the role of the state office is to provide technical assistance and consultation to the county offices when deemed necessary by state office staff, after reviewing management data through off-site monitoring.

Of the eight program areas we reviewed, seven indicated they conduct routine off-site monitoring.¹ In four of these seven areas (child protective and preventive services [CPPS], substitute care, human services quality assurance, and medical support), we found no documentation of off-site monitoring and feedback. State officials in these areas indicated that the information is monitored for trends and statistics, and that the responsibility for monthly monitoring and initiating necessary corrective action is the responsibility of county supervisors.²

¹ Economic services quality control is federally mandated to develop error rates and does not review system reports for monitoring purposes.

² In accordance with medical support policy, state office personnel also re-review files reviewed by county supervisors in conjunction with a county self-monitoring process, the supervisory case review system. According to the director, medical support personnel use a checklist during the review and began retaining the checklist to document the review in September 1990.

In economic support, work support and adult services, formal reviews of management reports have been documented, as has timely feedback to the counties. Economic support and adult services personnel review management reports monthly, and discuss them in the periodic county visits. Work support monitors computer-generated information in preparation for its bi-monthly visit and addresses findings and recommendations in the visit report. In addition, economic support and work support use checklists in reviewing computer system reports.

In child protective and preventive services, which evaluates management information for trends and statistics, we found weaknesses in case management (see pp. 41-47), suggesting that inconsistent feedback and evaluation from the state office can contribute to a lack of adherence to state and federal laws, and agency policy in the counties.

Recommendation

- 11 All state office program areas should perform and document timely reviews of management reports, and provide timely and useful feedback to the counties.
-

The Division of Internal Audit

The fourth type of county program oversight activity we reviewed consists of audits performed by the DSS division of internal audit.

The DSS division of internal audit is responsible for internal audits/reviews of agency operations in the county and state office divisions. Its responsibilities include reviews of county administered programs such as foster care, emergency relief, protective services, commodities, project fair, food assistance programs and county administrative costs; reviews of county clerk of court offices contracted by DSS; and audits of federal assistance programs.

We found that the effectiveness of internal audit could be strengthened if the division reported directly to the board or the commissioner, and performed unannounced audits on areas it considers to be of high risk.

Internal Audit Does Not Report Directly to the Board or Commissioner

The DSS internal audit department does not report directly to the board or the commissioner, thereby creating the appearance of a lack of independence (see Appendix A).

This organizational structure could adversely impact the objectivity of the internal audit department in performing audits, reporting audit results, and on oversight effectiveness. The internal audit department reports to supervisors who are also in charge of other departments, subject to audit by the internal audit department. These supervisors may set the policies audited by internal audit. It is therefore possible for the department's supervisors to influence the auditors' objectivity and/or the effectiveness of the oversight function.

Generally accepted government auditing standards state:

In all matters relating to the audit work, the audit organization . . . should be organizationally independent . . . it is essential not only that auditors are, in fact, independent and impartial, but also that knowledgeable third parties consider them so To help achieve organizational independence, the audit organization should report the results of their audits and be accountable to the head or deputy head of the government entity and should be organizationally located outside the staff or line management function of the unit under audit.

In a survey of eight other southeastern states, we found that internal audit departments of seven social service agencies (Alabama, Georgia, Florida, Kentucky, Mississippi, Tennessee and Virginia) all report to the head or deputy head of the agency. North Carolina's social service agency is audited by the state auditor and does not have an internal audit department. We prepared a prototypical managerial structure which illustrates the proper reporting status for the internal audit department in Graph 2.2 (see p. 11).

Illinois, Texas, Michigan and Florida have passed legislation requiring all internal audit departments to report to the agency head. In addition, we found that six states (Florida, Tennessee, Texas California, Illinois and Washington) adopted for all state agencies the Institute of Internal Auditors' *Standards for the Professional Practice of Internal Auditing*, which require organizational independence.

In its report for the years ended June 30, 1988 and 1989, the State Auditor recommended the DSS internal audit department report to the state board.

Need for Unannounced Audits

The internal audit department does not conduct unannounced audits in high risk areas. Current policy requires the internal audit department to give seven days notice prior to performing an audit. County clerk of court offices are contracted by DSS to administer collection, disbursement and enforcement of child support payments and of related court orders. All county clerk of court audits conducted by the internal audit department during FY 88-89 cited internal control weaknesses. Our review indicates that unannounced audits are necessary for areas such as county clerk of court offices.

According to an internal audit report, at least \$8,620 was unaccounted for in one county. The report stated:

Our study and evaluation disclosed conditions . . . that we believe resulted in a significant cash shortage and contribute to a high risk in that future errors or irregularities in amounts that could be material may occur without being timely detected.

Another county clerk of court audit revealed that the cash balance could not be readily determined. The same audit also found several areas where the accounting practices and controls used were inadequate and did not meet generally accepted accounting principles.

Generally accepted auditing standards require that surprise counts of cash, petty cash and other areas of high risk be made at reasonable intervals by an internal auditor or other employee independent of the custodian.

Recommendations

- 12 The DSS board should require that the internal audit department report directly to the board or to the commissioner.
- 13 The DSS internal audit department should conduct surprise audits of county clerk of court offices and other areas they consider to be of high risk.

Cost of State Oversight

How much does state oversight cost?

In FY 89-90, DSS spent \$4.2 million on the monitoring activities of 97 employees. A breakdown of the \$4.2 million is presented in Table 3.3, along with Chart 3.2 which compares monitoring personnel with total other personnel in these areas.

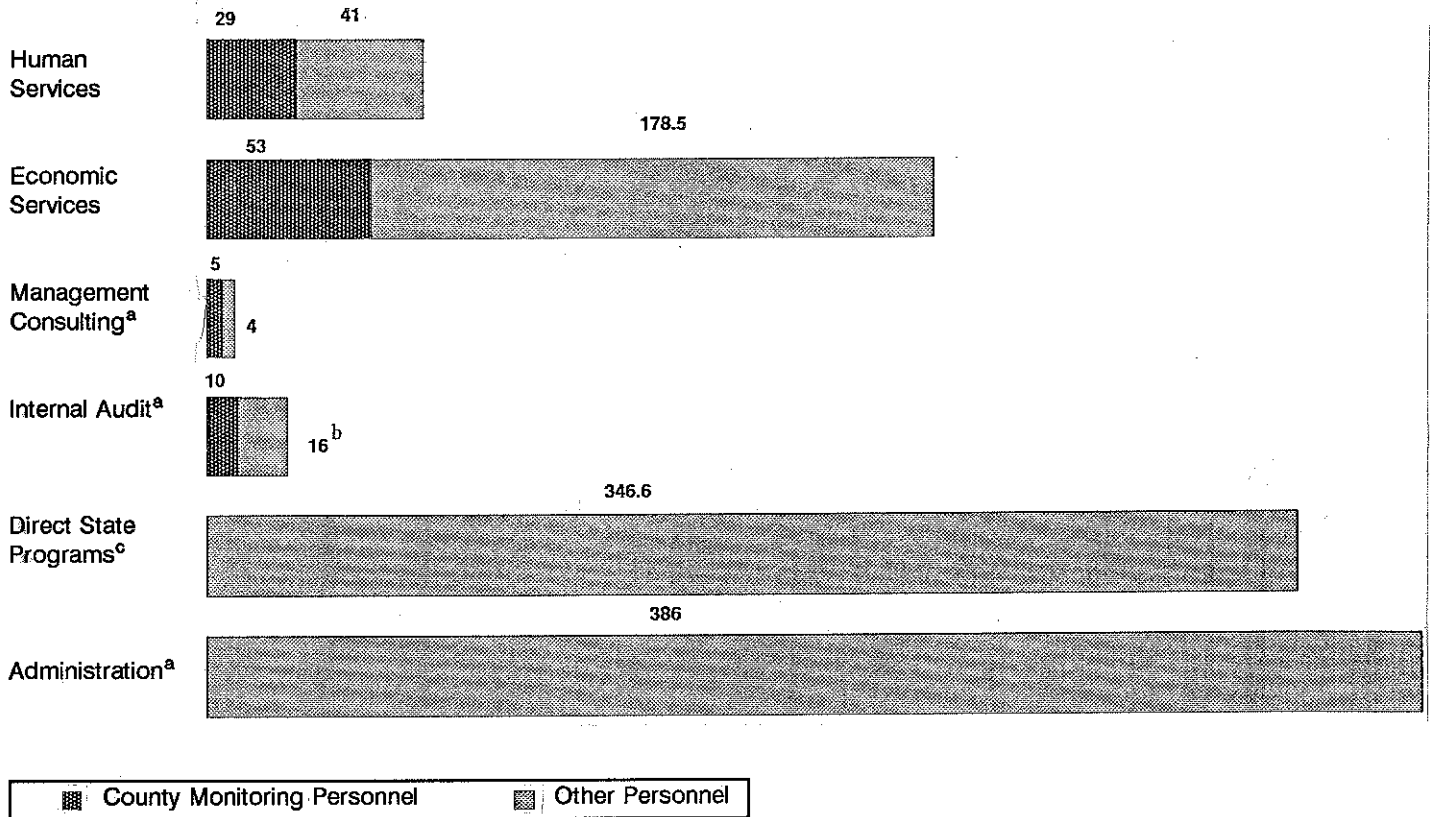
Table 3.3: DSS FY 89-90 Cost of State Oversight of County DSS Programs

State Office Divisions With Significant County Monitoring Activities	County Monitoring Personnel	FY 89-90 Monitoring Costs
Human Services	29	\$1 million
Economic Services	53	\$2.7 million
Management Consulting (CIRS)	5	\$263,000
Internal Audit	10	\$237,000
Total	97	\$4.2 million

Source: Information provided by DSS department officials.

As Table 3.3 shows, 82 of the 97 county monitoring personnel were located in the economic and human services areas. These areas employed 301 employees in FY 89-90. According to department officials, the economic and human services areas spent \$3.7 million in personnel and other operating costs on the monitoring activities of the 82 county monitoring personnel.

Chart 3.2: Comparison of County Monitoring and Other State-Office Personnel, FY 89-90



^a The office of management consulting under planning, management and support services, and the division of internal audit, under audits investigations and support services, are presented separately in this chart as departments with county monitoring functions. In the functional overview of DSS in Table 1.1 (see p. 3), these departments are included in the administration area.

^b Internal audit also employs 11 auditors to audit DSS central office divisions.

^c Direct state programs, child support enforcement and birth parent services, are presented in this chart to illustrate areas of human and economic services which deliver services directly from the state office and do not operate or have oversight activities in the counties.

Source: LAC

Graphics by the Productivity Technology Center of the Division of Human Resource Management.

Chapter 3
Oversight of County Programs

Child Protective and Preventive Services (CPPS)

Major Findings in CPPS

Is DSS adequately protecting children who are referred to DSS due to abuse or neglect in accordance with law and policy?

We found considerable evidence that DSS is not doing enough to protect children based on our FY 89-90 sample of 504 reports of abuse and neglect in eight counties. The most serious problems we identified were inadequate supervisory review of report decisions and overall report management. Also, caseworkers often did not contact alleged victims in emergency situations within two hours of receiving the report and in nonemergency situations sometimes did not contact alleged victims within 24 hours.

Methodology

We cover a range of issues relating to county operations in this chapter and chapters five and six. Our sample of eight county offices was comprised of three large, primarily urban counties (Charleston, Greenville, and Richland); and five primarily rural counties, three middle-sized (Horry, Darlington and Greenwood), and two small (Allendale and Clarendon). Our eight-county sample is geographically representative, and also representative in terms of participation (percent of population) in the AFDC and food stamp programs.

We reviewed randomly selected, representative child abuse and neglect reports in our eight-county sample, to assess:

- if supervisory review of caseworkers' work was adequate;
- if child protective services policy and statutory requirements were met in investigating allegations of abuse and/or neglect; and,
- if substantiated or "indicated" reports received proper case management, including assessment summaries and treatment plans, as documented in report files.

Of 504 reports in our sample, 208 (41%) were substantiated or "indicated," 218 (43%) were "unfounded" or not substantiated, 66 (13%) were not investigated, and 12 (2%) reports had no determination

documented in their files. Appendix C provides tables detailing the results of our child protective services review by county, including issues not discussed in this chapter.

Supervisory Review

Counties are required to document supervisory review of report decisions. We looked for evidence of agreement between a supervisor and a worker to determine whether the allegations were substantiated or not, which we term the report decision. Supervisors are responsible for ensuring that caseworkers follow other child protective services policies. The following table shows, by county, our findings regarding the adequacy of supervisory review which we defined as the presence of appropriate supervisory signatures or initials, or references in the caseworker's notes to conferences with the supervisor.

Table 4.1: Supervisory Review

County	Supervisory Agreement Prior to Decision ^a				Evidence of Adequate Supervisory Review ^b			
	Yes	Percent	No	Percent	Yes	Percent	No	Percent
Allendale	15	26%	42	74%	11	19%	47	81%
Charleston	22	34%	42	66%	22	42%	31	58%
Clarendon	21	31%	46	69%	9	13%	58	87%
Darlington	48	89%	6	11%	48	84%	9	16%
Greenville	53	82%	12	18%	45	69%	20	31%
Greenwood	35	70%	15	30%	42	84%	8	16%
Horry	37	51%	36	49%	35	45%	42	55%
Richland	33	50%	33	50%	42	64%	24	36%
Total	264	53%	232	47%	254	52%	239	48%

^a For this question, 8 reports lacked sufficient documentation to allow us to determine if a case decision was made.

^b For this question, 11 reports lacked sufficient documentation to allow us to determine if adequate supervisory review was done.

In 239 reports (48%), we found no evidence of adequate supervisory review; in 254 reports (52%), we did find such evidence. The counties varied widely on this question: 13% (9 of 67) of reports in Clarendon County evidenced adequate supervisory review, 19% (11 of 58) of reports in Allendale County evidenced such review, and in Darlington County, 84% (48 of 57 reports) evidenced supervisory review.

In deciding whether supervisory review was adequate, we weighted the following items heavily: evidence of supervisory approval of the report decision and, for indicated reports, the presence of a completed treatment plan. If a report was not investigated, supervisory review would also be determined to be inadequate.

Report Decisions

Of the 496 reports in our sample for which file documentation was adequate to determine if a report decision was made, 264 (53%) evidenced agreement between workers and their supervisors regarding the report decision. Conversely, in 232 (47%) of the reports, no evidence of discussion with a supervisor was documented in the file, prior to the report decision.

In comparing the counties for documentation of supervisory agreement with report decisions, documentation was present in 89% of Darlington County's files, 26% of Allendale County's files, and 31% of Clarendon County's files.

Investigations

Of reports reviewed for which file evidence was conclusive, we found evidence that 94% (464 of 493) of the investigations were started. While that is a high percentage, state law requires all reports of child abuse and neglect to be investigated. Five counties investigated 95% or more of their reports, and three counties (Darlington, Greenville and Greenwood) investigated all of their reports. However, Clarendon County did not investigate a relatively high number (12 of 66) of reports.

Required Contacts With Victims

We reviewed reports to determine if caseworkers made reasonable attempts to contact alleged victims of abuse and neglect within 24 hours, or, if the report was an emergency, within 2 hours. We found that overall, caseworkers did not respond immediately to emergency reports as required.

In emergencies, policy requires alleged victims to be contacted in 2 hours.

For 43% (75 of 176) of the reports considered to be emergencies, files documented contact, or attempted contact with the victim within 2 hours. Caseworkers contacted victims within 2 hours in 29 (46%) of 63 reports of alleged severe physical abuse. For those alleged sexual abuse reports defined as emergencies, caseworkers made contact with the victim in 23 (38%) of 61 reports.

Counties varied in their responses to emergency reports. In Greenwood County, caseworkers contacted alleged victims within 2 hours of receiving emergency reports in 71% of the reports reviewed. Horry and Charleston counties responded to emergency reports within 2 hours 27% and 26% of the time, respectively.

For reports meeting the DSS criteria of an emergency, policy 704.07.03 requires caseworkers to investigate them immediately, which has been defined by DSS as within 2 hours. Also, an April 19, 1989 contract between DSS and the Health and Human Services Finance Commission, which details child protection standards, requires DSS to contact children within two hours for situations judged to be emergencies. Emergencies include severe physical abuse, abandonment, sexual abuse where the perpetrator has access to the child, and reports from hospital emergency rooms regarding children under their care.

We reviewed whether caseworkers, not law enforcement, made contact with the alleged victims within two hours. Neither the law nor DSS policy states that caseworkers may ask law enforcement to make the contact for them. A DSS official stated that law enforcement may contact the victim instead of a DSS caseworker within the required two hours. While law enforcement officers should be able to identify when abuse or neglect has occurred in many cases, DSS caseworkers are professionally trained to identify and treat all types of child abuse and neglect.

In all cases, state law and DSS policy require alleged victims to be contacted in 24 hours.

For 75% (365 of 487) of the reports reviewed in which file documentation was sufficient to make a determination, the counties contacted, or made reasonable attempts to contact, alleged victims within 24 hours as required. Eighty-three percent of physical abuse and 86% of sexual abuse reports were investigated within 24 hours. The counties varied widely, in that 49% of all reports reviewed in Charleston County were investigated within 24 hours, while 98% of the reports in Darlington County were investigated within 24 hours.

Section 20-7-650 (c) of the South Carolina Code of Laws requires DSS to initiate thorough investigations of all reports within 24 hours. DSS policy 705.02 requires caseworkers to make arrangements for face-to-face contact with alleged abuse and neglect victims within 24 hours. Furthermore, DSS policy 705.03.02 states: "An investigation will be considered initiated when personal contact has been made with the involved child(ren)."

Required Contact With Caretakers

For those reports reviewed in which file documentation was sufficient to make a determination, most caretakers (80%) of alleged victims were seen or interviewed as required by DSS policy. The results ranged from Charleston County, in which 56% of the caretakers were seen or interviewed, to Darlington County, in which 95% were seen or interviewed. Seven reports in which a caretaker was neither seen nor interviewed in Charleston County involved allegations of sexual (3) and/or physical (4) abuse.

DSS policy 705.02 requires caseworkers to make arrangements for face-to-face contact with the alleged victim's caretaker unless the family cannot be located.

We also reviewed whether parents or caretakers, and alleged perpetrators were notified of report decisions as required by law and DSS policy (see Appendix C for results).

Timeliness of Report Decisions

For 361 (88%) of 408 reports, report decisions were made within the required 60 days. Ninety-six reports lacked either the date of the report or the date of the decision, and therefore, the timeliness of the decision could not be determined. Section 20-7-650(c) requires DSS to classify a report of abuse or neglect as indicated or unfounded within 60 days of receipt of the report.

The counties varied in timeliness of report decisions. Darlington and Greenwood counties made 100% of their report decisions within 60 days; whereas in Clarendon and Richland counties, 78% of their reports made decisions within the required time.

Case Management

We sought evidence of good management of those reports in which allegations of abuse and/or neglect had been substantiated. Three indicators we chose to define appropriate child protective services case management were the presence of (1) assessment summaries, (2) diagnostic statements, and (3) treatment plans in the files.

We found that assessment summaries were present in 76% of all substantiated, or indicated, reports in our sample, that diagnostic statements were present in 70% of the reports, and that some form of treatment plan was present in 72% of the reports.

DSS policy 706 describes the assessment process for indicated cases. It requires a diagnostic statement, or brief summary describing the problem's severity, duration and effects upon the family. Generally, the diagnostic statement is part of a larger document, the assessment summary, which summarizes pertinent facts and conclusions to the report. After the assessment process is completed, DSS policies 707 and 708 require caseworkers to write a treatment plan detailing services to the family, and goals to be achieved during the treatment phase.

Family Court Notified

In our sample, we identified 77 indicated reports for physical, mental or sexual abuse for which caseworkers should have notified the family court within one week. Of the 77 cases, 30 (39%) were actually referred as required. Section 20-7-650 (H) of the South Carolina Code of Laws

requires that the family court be notified within one week of the DSS decision to initiate services for physical, mental or sexual abuse cases.

It is the responsibility of the family court, once such a case has been referred, to determine whether the agency had reasonable cause and adequate proof to initiate protective services, and to determine whether the services offered are reasonable. These determinations cannot be made if such cases are not referred, or are not referred in a timely manner.

Recommendations

14 DSS child protective services supervisors should ensure that:

- They document their approval of report decisions;
- Assessment summaries and treatment plans are completed for all indicated reports;
- Investigations on emergency reports are begun within two hours of their receipt and that investigations for all other reports are begun within 24 hours;
- Decisions to substantiate or not substantiate reports of child abuse or neglect be made within the required 60 days; and,
- The family court is notified of cases indicated for physical, mental or sexual abuse within one week after the initiation of services.

15 The DSS board should seek legal advice to determine if contact by law enforcement officers, instead of caseworkers, within the required two hours for emergency reports of abuse and neglect fulfills the requirements of law and policy. Based on this advice, the board should make any necessary changes to policy to clarify under what circumstances, if any, law enforcement may make contact with alleged victims in place of DSS caseworkers.

Screened Out Reports

Do caseworkers make appropriate decisions when deciding whether to investigate reports received as child abuse or neglect?

No, our sample indicates caseworkers should have investigated nearly half of the reports they decided to "screen out." We reviewed 664 reports received by seven of the eight counties between March and July 1990 which were not investigated because they were screened out as child abuse or neglect allegations not appropriate or applicable for investigation. Reports must meet the statutory definition of abuse or neglect in order to be investigated by DSS. We found that 326 (49%) of the screened out reports did meet the definition of abuse and neglect and should have been investigated by the county DSS offices.

Methodology

We reviewed 664 screened out reports received by seven of the eight counties from March through July 1990. One county, Greenwood, did not have records of its screened out reports for 1990. Before deciding whether the reports should have been investigated, we first reviewed relevant statutes. Section 20-7-650 of the South Carolina Code of Laws states:

Within 24 hours of the receipt of a report of suspected child abuse or neglect, the agency shall commence an appropriate and thorough investigation to determine whether a report of suspected child abuse or neglect is "indicated" or "unfounded."

In accordance with DSS policy 704.09, the definitions of abuse and neglect as provided in §20-7-490 guided us in deciding whether the reports should have been investigated. State law does not address screening out reports of child abuse and neglect. Reasons given by the counties for not investigating a report which we concurred with included:

- The child resides in another county or state. However, the county receiving the report is responsible for referring the report to the correct jurisdiction.

- The worker lacked adequate information for locating the child and the family, *and* pursued all avenues without success in locating the family.

For 91 (14%) of the reports we reviewed, information was insufficient for us to determine whether they should have been investigated.

Reports Which Should Have Been Investigated

As the following table shows, 326 (49%) of the 664 reports we reviewed should have been investigated. The counties decided appropriately that 247 (37%) of the reports should not have been investigated. For those counties with more than ten screened out reports for the time period reviewed, Richland County had the highest percentage which should have been investigated, and Charleston County had the lowest. It is also notable that in comparing total numbers of screened out reports between counties, county size is not closely correlated to the relative number of reports. For example, Horry County had over four times as many screened out reports as Charleston County, even though Charleston County's population is 2.7 times as large as Horry's.

Table 4.2: Review of Decision to Screen Out Reports of Child Abuse and Neglect

County	Should Have Been Investigated		Should Not Have Been Investigated		Appropriateness of Screening Decision Cannot Be Determined		Total Reports	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Allendale	2	100%	0	0%	0	0%	2	100%
Charleston	14	40%	20	60%	0	0%	34	100%
Clarendon	3	50%	2	33%	1	17%	6	100%
Darlington	7	70%	3	30%	0	0%	10	100%
Greenville	125	44%	113	40%	46	16%	284	100%
Horry	70	48%	56	38%	20	14%	146	100%
Richland	105	58%	53	29%	24	13%	182	100%
Total	326	49%	247	37%	91	14%	664	100%

Source: LAC review of seven counties' screened out reports, March through July 1990.

The following are some examples of reports which should have been investigated by DSS because they met the statutory definition of abuse or neglect:

- Caseworkers received a referral from a North Carolina social services office regarding a family that had moved to South Carolina. The North Carolina caseworkers, who had been investigating the case for two months, stated that they "felt very strongly that the child . . . was being molested by her father." Evidence presented to South Carolina DSS caseworkers included a report that seven school officials witnessed the child exhibiting inappropriate sexual behavior at various times. However, the South Carolina caseworkers made no attempt to contact the family or start an investigation because the child had denied to the North Carolina caseworkers that she was abused sexually.
- DSS received a report that two children, ages five and six, were living in a condemned house. The caseworker did not investigate the report stating "no allegation" was made.
- A person reported to DSS that she observed a mother "pounding" her daughter on the back. The caseworker stated that the reason the case was not taken was because there were "no bruises" on the child.
- Three children under seven years old were reported not to be fed or dressed properly. The oldest son allegedly was beaten with a belt almost every night. Instead of contacting the children, as required, the caseworker telephoned the landlord, who said she knew of no maltreatment. The caseworker decided not to investigate.

Reasons Given for Screening Out Reports

We also examined reasons workers gave on the report forms for deciding to screen out the reports. DSS policy 704.09 requires workers to give reasons for screening out reports. However, for 105 (13%) of the reports, workers gave no reason. Inappropriate reasons given by workers for screening out reports included:

- Caseworker questioned the veracity of the person making the report of child abuse or neglect (74 reports). Workers are required by law to determine whether the report is true through an investigation of the allegation. It is not their responsibility to assess whether the reporter is truthful before deciding to investigate a report. In one

case in which veracity was questioned, a caseworker screened out a report regarding a 13-year-old alleged to be a prostitute with her mother's knowledge and consent. Other inappropriate reasons workers gave for not investigating reports of child abuse and neglect were that the people making the reports were "drunk," "sounded effeminate," and were an "ex-spouse."

- Caseworker considered the allegation vague or not specific (123 reports). However, we found that many allegations considered by workers to be vague were specific enough to warrant an investigation. For example, a report stated that a father physically abused the mother in the children's presence, hit the children in the head, and drank and used drugs regularly. The report was screened out because the caseworker believed there was "no specific allegation."
- Caseworkers referred reports to local law enforcement agencies, without investigating the reports (15 reports). It is appropriate for DSS caseworkers to seek the assistance of law enforcement, but DSS is charged by law to investigate all reports of child abuse or neglect it receives.
- Caseworkers cited a lack of information to begin an investigation without making sufficient efforts to obtain further information to locate the child and family (29 reports).

Mandated Reporters

We also reviewed how caseworkers responded to reports made by "mandated" reporters. Section 27-7-510 requires health care professionals, school teachers and counselors, day care workers, and law enforcement officers (including court officials) to report suspected cases of child abuse and neglect to DSS. Reports by these professionals accounted for 37% of the screened out reports we reviewed. *Of the 326 reports which should have been investigated, 55 were reported by health care professionals, 26 were reported by law enforcement, 24 were reported by school employees, and 3 were reported by day care workers.*

Supervisory Review of the Screening Decision

We reviewed evidence of supervisory review for all screened out reports and, in particular, those which should have been investigated. DSS policy 704.07.02 requires child protective services supervisors to review and approve all reports which are not accepted for investigation.

As shown in the following table, we also found documentation of timeliness of supervisory review of screened out reports to be a problem. Although DSS policy does not specify the time frame within which approval must be given, state law requires investigations to begin within 24 hours of receiving the report, which we used as a reasonable time period for making the screening decision. Data on timeliness was limited because for those reports where supervisory approval was noted, the approval was usually not dated. In most counties, supervisory review occurred within one day of receiving the report. However, in Richland County, supervisors approved 33 (36%) of 93 screened reports more than eight days after they were received.

Table 4.3: Supervisory Review of Screened Out Reports by County

Counties	Total Reports	Total Reports Without Supervisory Review		Total Reports Without Date of Supervisory Review	
		Number	Percent of Total Reports	Number	Percent of Total Reports
Allendale	2	1	50%	1	50%
Charleston	34	14	41%	22	65%
Clarendon	6	4	67%	5	83%
Darlington	10	5	50%	8	80%
Greenville	284	5	2%	280	99%
Horry	146	24	17%	142	97%
Richland	182	16	9%	85	47%
Total	664	69	10%	543	82%

Source: LAC seven-county review of screened out reports, March through July 1990.

Screening Out: Law and Policy

State statutes do not address the screening out process, but are clear in requiring DSS to investigate all reports meeting the statutory definitions of child abuse and neglect. While DSS policy and officials confirm that the statutory definition guides the screening process, the counties may be inappropriately applying a DSS policy which does not pertain to the screening process which gives them more reasons for screening reports.

DSS policy 704.08, which directly precedes the policy on screening reports but does *not* apply to the screening process, is titled "Assessing Reporter Motivation." The policy states that caseworkers should attempt to establish the veracity and credibility of the persons making reports as an important step in validating the report. As part of determining veracity, workers should assess if the person making the report is inebriated, angry, or has anything to gain by making the report. Because reasons given by caseworkers for screening out reports included drunkenness, "bad faith," and other behaviors leading the workers to question the veracity of the person making the report, it appears some caseworkers have incorrectly applied the reporter motivation policy to the screening out process.

DSS policy does not address controls in the screening process, other than requiring supervisory approval of decisions to screen out reports. However, policy does *not* require counties to:

- Record screened out reports on DSS standard report intake forms. Forty-one percent of the screened out reports we reviewed were not recorded on standard forms. Therefore, types of information gathered from the people making the reports were inconsistent.
- Require supervisors to sign and date the screened out report form indicating approval of the decision to screen the report. Also, policy does not set a deadline for supervisory review.
- Maintain screened out reports for any period of time. One county had no screened out reports for us to review from 1990 because they did not keep them. Therefore, counties can destroy the reports as soon as a supervisor approves the decision, preventing oversight of the screening process.
- Report screened out data to the state office. Such information as numbers and typologies of reports and reasons for screening them would be useful to the state office in overseeing the screening activities of the counties.

- Policy also does not require the state office to review screened out reports as part of its coordinated internal review system (CIRS) process, or any other audit activity.

Conclusion

Our review indicates that a substantial number of allegations of child abuse and neglect are not investigated as a result of the screening out process. Controls are lacking in oversight and documentation, and the only control required, supervisory review, is sporadic and sometimes untimely in practice. The public has less assurance that children are protected by the state when reports of abuse and neglect are not always investigated as required by law.

Recommendation

- 16 DSS should clarify to the counties the circumstances under which reports of child abuse and neglect may and may not be screened out as required by the statutory definition of child abuse and neglect. DSS should implement policies requiring counties to:
- Record screened out reports on standard forms;
 - Require supervisors to sign and date screened out report forms within 24 hours of receiving the report;
 - Maintain screened out reports for one year;
 - Report data on screened out reports, including numbers, typologies, reasons for screening, and reporter type to the state office for oversight; and,
 - DSS should also implement a policy requiring the state office to audit screened out reports in the counties on a regular and unannounced basis.

County Foster Care Licensing Review

Introduction

Does DSS adequately protect foster children through its screening and licensing of foster parents?

No. DSS does not require background checks for foster parents and does not ensure that all foster parents meet training, fire, and health requirements.

Also, licenses have not always been renewed on time and the counties should work to reduce the number of temporary and irregular licenses issued.

We sampled 219 files in eight counties (Allendale, Charleston, Clarendon, Darlington, Greenville, Greenwood, Horry, and Richland) for FY 89-90. Areas reviewed included training, fire and health inspections, police and child protective services checks, type of license issued, and the length of time temporary and irregular licenses were in effect.

As of June 1990, the Department of Social Services listed 2,125 licensed family foster homes. The eight counties in the sample represented 34% (730 homes) of the state's licensed family foster homes.

Background Checks

DSS has not required criminal background checks on foster parent applicants. Also, the agency does not require applicants to be checked against the DSS central registry for indicated cases of child abuse and neglect. Therefore, foster care workers may not know whether applicants have convictions for such crimes as assault, drunk driving, and selling or using illegal drugs, or if they have abused or neglected children in the past.

Criminal Checks

Beginning in July 1990, the department began a three-month test on a policy requiring criminal background checks for newly hired employees for 54 types of DSS positions. These positions include executive assistants, business associates, budget analysts and personnel specialists. DSS

officials explained that no background checks are done for foster parent applicants because they have no funds to pay the \$10 fee charged by the State Law Enforcement Division per check, and it would be unfair to ask foster parents to pay it.

Adoptive parent applicants must submit to criminal background checks before they receive approval to adopt. Also, other state agencies charged with residential care of children require criminal background checks. The Continuum of Care requires a background check for every individual under contract who provides service to a continuum client. The Department of Mental Health (DMH) requires background checks on all employees. The department is linked to the computer system at the South Carolina State Law Enforcement Division (SLED) which is the source for the checks. Therefore, DMH can do checks without paying the \$10 fee.

The \$10 fee for the checks does not go to SLED to cover its operating costs; rather, all fees are deposited in the General Fund. Since the fees are not used to cover SLED's costs, a fee waiver for foster parent background checks would allow DSS to request the checks without requesting additional funding for them.

The department could also reconsider its priorities for background checks. Foster parents' actions, which are largely unsupervised by DSS, directly impact the health and safety of their foster children. Personnel specialists and many other positions chosen by DSS for background checks do not have such a responsibility for children's lives.

Note: In its December 1990 meeting, the DSS board approved staff recommendations for requiring SLED checks for foster parents. DSS is in the process of negotiating an agreement with SLED.

Central Registry Checks

DSS also has not required foster care workers to check foster parent applicants against their central registry for indicated cases of child abuse and neglect. This computerized information is readily available in each county office; however, of eight counties that we reviewed, five checked applicants against the registry on a regular basis. Also, of the 219 foster parent files we reviewed, 36 (16%) contained documentation of central registry checks. DSS should determine whether indicated cases of abuse and neglect exist before granting licenses to foster parents.

Recommendations

- 17 The General Assembly may wish to consider waiving the fee for background checks for DSS so that DSS can have background checks done on all current foster parents and all future foster parent applicants.
- 18 If the fee waiver is not granted, the department should ensure that background checks are completed on all current foster parents and future foster parent applicants. The department could achieve this by either discontinuing employee background checks and using those funds, or by pursuing an agreement with the Department of Mental Health for the checks to be done at little or no charge.
- 19 DSS should implement a policy requiring counties to check all current and future foster parents against the central registry for indicated cases of child abuse and neglect.

Training

The eight counties we reviewed have not consistently enforced foster parent training requirements as mandated by South Carolina law. We sampled 219 foster parent licensing files in the eight counties and found that 62% (136 of 219) of the foster parents who received licenses since January 1982 did not receive the required ten hours of pre-service training prior to licensure. Further, 56% (123 of 219) of the foster parents did not always receive the required five hours annual training prior to relicensure. Tables 5.1 and 5.2 show the number of foster parents who have completed pre-service and annual training requirements.

DSS Regulation 114-5-50(h) states that before a standard license is issued:

Foster parents must have a minimum of ten hours of appropriate foster care pre-service training prior to licensure. . . . The foster parent will subsequently be required to complete five (5) hours training prior to annual relicensure. . . .

Without enforcement of training requirements, assurance that children in foster care are provided adequate care is decreased.

Table 5.1: Completion of Pre-service Training Requirements by Foster Parents

County	Pre-Service Training Completed		Pre-Service Training Not Completed		Exempt From Training ^a	
	Number	Percent	Number	Percent	Number	Percent
Allendale	0	•	10	91%	1	9%
Charleston	18	47%	14	37%	6	16%
Clarendon	3	20%	11	73%	1	7%
Darlington	1	5%	11	52%	9	43%
Greenville	5	14%	23	62%	9	24%
Greenwood	0	•	17	85%	3	15%
Horry	0	•	35	100%	0	•
Richland	21	50%	15	36%	6	14%
Total	48	22%	136	62%	35	16%

^a Homes where children are placed with relatives are exempt from training requirements.

Source: LAC eight-county sample of family foster parent licenses in effect June 1990.

Table 5.2: Completion of Annual Training Requirements by Foster Parents

County	Annual Training Completed		Annual Training Not Completed		Exempt From Training ^a	
	Number	Percent	Number	Percent	Number	Percent
Allendale	0	•	9	82%	2	18%
Charleston	18	47%	17	45%	3	8%
Clarendon	8	53%	6	40%	1	7%
Darlington	2	10%	19	90%	0	•
Greenville	13	35%	20	54%	4	11%
Greenwood	12	60%	4	20%	4	20%
Horry	4	11%	31	89%	0	•
Richland	16	38%	17	41%	9	21%
Total	73	33%	123	56%	23	11%

^a Homes where children are placed with relatives are exempt from training requirements.

Source: LAC eight-county sample of family foster parent licenses in effect June 1990.

Recommendation

20 DSS should enforce foster parent pre-service and annual training requirements.

Fire and Health Inspections

The eight counties have not adequately enforced state regulations requiring fire and health inspections of family foster homes. Table 5.3 shows that of 219 foster parent licensing files sampled, 41% (89 of 219) had not received a fire inspection. Also, 21% (45 of 219) of homes had not received a health inspection. DSS staff cited problems in obtaining the cooperation of local, county, and state fire inspection authorities in some counties. Instead of enforcing requirements, DSS has issued temporary and irregular licenses when requirements are not met.

Table 5.3: Fire and Health Inspections by County

County	Total License Files Reviewed	Licenses With No Fire Inspections		Licenses With No Health Inspections	
		Number	Percent	Number	Percent
Allendale	11	7	64%	3	27%
Charleston	38	7	18%	11	29%
Clarendon	15	4	27%	5	33%
Darlington	21	8	38%	1	5%
Greenville	37	3	8%	4	11%
Greenwood	20	7	35%	1	5%
Horry	35	28	80%	14	40%
Richland	42	25	60%	6	14%
Total	219	89	41%	45	21%

Source: LAC eight-county sample of family foster parent licenses in effect June 1990.

DSS Regulation 114-5-50 (I-1.c) states: "There shall be an inspection by such City or County Fire Department authorities who are required or permitted to inspect and enforce fire regulations."

Further, DSS Regulation 114-5-50 (I-1.d) requires ". . . an inspection by such health authorities who are required or permitted to inspect and enforce health and sanitation regulations."

Without fire and health inspections, there is less assurance that foster homes meet standards for fire, health and sanitation. Also, children in foster care are not assured of adequate protection against hazards in the home.

Recommendation

-
- 21 DSS should work to reduce substantially the number of family foster homes which have not received fire and health inspections.
-

License Renewal

Our sample of foster parent files in eight counties showed that family foster home licenses were not always renewed on time. Of 219 foster parent files sampled, 20% (44 of 219) had licenses that were renewed after their one-year expiration date had passed (see Table 5.4).

Table 5.4: Licenses Not Renewed on Time by County

County	Total Licenses	Licenses Not Renewed on Time	
		Number	Percent
Allendale	11	1	9%
Charleston	38	10	26%
Clarendon	15	2	13%
Darlington	21	12	57%
Greenville	37	5	14%
Greenwood	20	2	10%
Horry	35	9	26%
Richland	42	3	7%
Total	219	44	20%

Source: LAC eight-county sample of family foster parent licenses in effect June 1990.

DSS Regulation 114-5-50 (L-1) states "No license shall be effective for more than one year from the date of issuance and shall be annually renewed from such date."

Home visits and evaluations by caseworkers when licenses are renewed are required to ensure that family foster homes maintain minimum standards of care. Without annual review, these standards might not be met, thereby lowering the quality of care provided to children in foster care.

Recommendation

22 DSS should ensure that foster parent licenses are renewed on time.

Temporary and Irregular Licenses

Both statewide and in our eight-county sample, more than half of the family foster homes had either temporary or irregular licenses, indicating that the homes had deficiencies in areas such as health and fire safety requirements, and foster parent training. Further, we found that a significant number of the temporary and irregular licenses in our eight county sample were held for longer than one year.

According to DSS information, of 2,125 licenses DSS issued statewide as of June 1990, 37% (780 of 2,125) were temporary licenses and 16% (347 of 2,125) were irregular licenses. In the eight counties we reviewed, 39% (282 of 730) of the licenses were temporary licenses, 18% (132 of 730) were irregular licenses, 38% (275 of 730) were standard licenses, and 6% (41 of 730) were issued for children who were placed with relatives.

Our sample of 219 files showed that 22% (17 of 77) of the temporary licenses were in effect for more than 1 year. Also, we found that 40% (25 of 62) of the irregular licenses were in effect between 1 and 3 years, and 3% (2 of 62) of the irregular licenses were in effect for more than 3 years (see Table 5.5).

Table 5.5: Length of Time Temporary and Irregular Licenses Held

County	Temporary Licenses			Irregular Licenses		
	0-6 Months	6-12 Months	> 1 year	0-1 Year	1-3 Years	> 3 Years
Allendale	2	5	0	2	2	0
Charleston	4	5	4	6	1	0
Clarendon	1	3	0	3	4	0
Darlington	0	6	3	1	0	0
Greenville	2	5	3	2	1	0
Greenwood	6	0	7	0	0	0
Horry	1	10	0	7	13	0
Richland	3	7	0	14	4	2
Total	19	41	17	35	25	2
Percentage of Total Licenses	25%	53%	22%	57%	40%	3%

Source: LAC eight-county sample of family foster parent licenses in effect June 1990.

DSS Regulation 114-5-50 (D-3) states:

A Temporary license shall be issued when a foster family does not comply with all licensing requirements. There is, however, an expectation that noted discrepancies shall be corrected within a six-month period or the Temporary license may be revoked. A Temporary license cannot be issued two consecutive years for the same discrepancies unless extenuating circumstances are involved as determined by the agency.

State regulation does not limit the length of time that an irregular license can be held.

Instead of ensuring that licensing requirements for homes with deficiencies are corrected so that standard licenses can be issued, DSS frequently issues temporary and irregular licenses.

Types of License Deficiencies

In reviewing temporary and irregular license deficiencies, we found that a lack of fire inspections was the most frequently occurring deficiency. Eighty-two percent (63 of 77) of temporary licenses reviewed in the eight counties listed no fire inspection as a reason for issuing the nonstandard license. Seventy-three percent (56 of 77) of the temporary licenses in the eight counties listed no health inspection as a reason for the temporary license. For irregular licenses in the eight counties, 81% (50 of 62) were issued because fire inspections were not done, and 31% (19 of 62) were issued because health inspections were not done. Table 5.6 shows the categories of deficiencies present in homes with temporary and irregular licenses in our eight-county sample.

The purpose of fire inspections is to identify such deficiencies as inadequate exits/escapes, lack of smoke detectors, improper storage of flammable materials, insufficient heating/ventilation systems, and electrical inadequacies. Health inspections determine if the fresh water system is sufficient, if refuse and toxic substances are stored and disposed properly, and if lead-based paint is present where young children reside. Training deficiencies occur when pre-service (initial ten hours) and/or annual (five hours annually) training is not completed. Temporary and irregular licenses can also be issued when proof of medical check-ups for all members of a foster family has not been provided to DSS.

Note: In its December 1990 meeting, the DSS board approved a motion that all irregular and temporary foster parent licenses be brought to standard by

March 1991. However, as of March 4, 1991, not all foster homes had standard licenses and a DSS staff person could not estimate when, or if, all homes would have standard licenses.

Table 5.6: Temporary Foster Home Licenses by Deficiency^a

County	Deficiency as Percent of All Temporary Licenses				Deficiency as Percent of All Irregular Licenses			
	Fire	Health	Training	Medical	Fire	Health	Training	Medical
Allendale	100%	100%	100%	100%	50%	25%	100%	•
Charleston	61%	77%	31%	31%	71%	86%	•	29%
Clarendon	100%	75%	•	50%	100%	29%	•	14%
Darlington	11%	11%	100%	•	100%	100%	•	•
Greenville	100%	100%	40%	60%	•	•	33%	•
Greenwood	92%	62%	54%	85%	•	•	•	•
Horry	100%	100%	100%	64%	85%	30%	60%	5%
Richland	100%	60%	30%	40%	90%	15%	15%	5%
Total ^b	82%	73%	58%	53%	81%	31%	32%	8%

^a More than one deficiency may be cited as a reason for issuing a nonstandard license.

^b Total reflects percent for eight counties.

Source: LAC eight-county review of a sample of family foster parent licenses in effect June 1990.

Recommendation

- 23 DSS should reduce the number of family foster homes which have temporary and irregular licenses.

Issue for Further Study: State Plan for Special Needs Children Needed

The cost of residential placements for special needs children has increased from \$600,000 in FY 85-86 for 19 children, to a projected \$11 million in FY 90-91 for 414 children.³ Such special placements are necessary when a child's emotional, behavioral and/or medical problems are too severe for placement in the traditional foster care programs.

Although the cost of residential placements for special needs children is shared by DSS and six other state agencies, DSS projects a budget deficit in its program of \$6.1 million for FY 90-91. DSS also projects that by FY 92-93, 687 children will require special needs placement at a cost of \$20 million.

Most special needs children (approximately 86%) are served in South Carolina, at an estimated average cost of \$38,500 a year; approximately 14% are placed in out-of-state programs, at an average cost of \$49,000 per year. Placements generally range from \$44/day for small group homes and \$59/day for therapeutic foster care, to \$300/day for "medical-model" treatment, according to a DSS official. The cost-effectiveness, in terms of outcome, of the various placement alternatives is not known.

Six state agencies (the Continuum of Care for Emotionally Disturbed Children, the Children's Case Resolution System, and the Departments of Mental Health, Mental Retardation, Education, and Youth Services) share the cost with DSS of residential placement for the majority of these special needs children. In addition, according to a Health and Human Services Finance Commission (HHSFC) official, the HHSFC is attempting to secure federal medicaid reimbursement for part of the residential treatment expense for this group.

³ Sixty-five of the 280 special needs placements, as of January 1991, were clients of the Continuum of Care for Emotionally Disturbed Children and some others were on the Continuum's waiting list. According to a Continuum official, the Continuum has a client caseload of approximately 300, with 320 children on a waiting list.

As of January 1991, DSS estimated that adolescents from 13 to 17 made up 77% of those served in specialized residential treatment. The causes for the increase in the number of older, difficult-to-place adolescents have not been identified definitively by DSS. However, the causes are thought to include growing drug and alcohol use, the breakdown of families and of extended families, and the trend toward de-institutionalization and release of adolescents from the Departments of Mental Health and Youth Services facilities. Seventy-five to 80% of special needs children have a history of being sexually or physically abused, according to DSS officials.

A 1989 study by the Florida Auditor General provides one indication of the potential seriousness of the problem. This study found that most foster parents are not prepared to serve and do not wish to serve children and adolescents with behavior, medical or developmental problems. However, it was found that such children and adolescents made up the *majority* of the foster care population in Florida.

With seven agencies involved and significant budget deficits projected, a comprehensive state plan for special needs children is needed. Such a plan would provide reliable information on the future needs and placement costs for these children, in addition to addressing the issues of cause and prevention. Since an 82% growth (from \$11 million to \$20 million) in the cost of residential placements is projected in two years, this plan should address cost-effective placement for each type of special needs child.

Recommendation

24 The General Assembly may wish to consider requesting that the Human Services Coordinating Council conduct an assessment of the special needs foster care population, including:

- causes of the problem, and characteristics of the present and the future special needs population;
- suitability and cost-effectiveness of present placements;
- alternatives for cost-effective management of the future special needs population; and
- a realistic approach to prevention.

Licensing of Private Foster Care Facilities

Does DSS license all private foster care facilities in the state?

No, all private foster care facilities in the state are not required to be licensed. As a result, the state has not inspected two private foster care facilities, with approximately 58 children, to ensure that they meet the minimum standards required of all other foster care homes and institutions.

Section 20-7-2240 of the South Carolina Code of Laws exempts certain types of foster care facilities from licensure, including child welfare agencies existing on March 9, 1956, and operating under a governing board representing an established religious denomination. Also exempted are rescue missions, or other similar charitable institutions, organized before May 8, 1959, for the purpose of providing temporary care and custody of children and any other needy persons and operating under a local board of trustees.

DSS does not keep track of the number of children placed in unlicensed private facilities. Based on information provided by the Foster Care Review Board, two unlicensed facilities serve approximately 58 children.

Foster care facilities are licensed to help protect the health, safety, and welfare of foster children. Foster children should be assured of receiving at least a minimum quality of care wherever they are placed. Therefore, we find no adequate justification for exempting some facilities from licensing requirements. According to their FY 88-89 Annual Report, the South Carolina Foster Care Review Board has, for four years, supported amending the law to require that all child-caring facilities be licensed. DSS and the South Carolina Association of Children's Homes have, for several years, supported legislation to require licensing of all residential child care facilities. Also, seven of nine southeastern states surveyed, Alabama, Georgia, Kentucky, Louisiana, North Carolina, Tennessee, and Virginia, require that all private foster care facilities be licensed.

Florida, like South Carolina, exempts some foster care facilities from licensing. Mississippi does not require private foster care facilities to be licensed.

Recommendation

- 25 The General Assembly may wish to consider amending §20-7-2240 to delete exemptions to licensure requirements for foster care facilities in South Carolina.

Foster Parent Survey

What are foster parents' attitudes concerning the foster care system in South Carolina?

We surveyed a sample of current and former foster parents in eight counties: Allendale, Charleston, Clarendon, Darlington, Greenville, Greenwood, Horry, and Richland.

We randomly sampled 156 current foster parents from a March 1990 list of current foster parents for the eight counties reviewed. We also surveyed all 88 former foster parents who left the program in FY 89-90 in the eight counties. The survey yielded a 53% (82 of 156) response rate from current foster parents, and a 28% (25 of 88) response rate from former foster parents. Survey results are reported in Appendices D and E.

Foster Home Placements

A significant number of current and former foster parents stated that DSS does not give descriptive, realistic information about each child when placement is made in a foster home, as shown in Table 5.7

Table 5.7: Adequacy of Information Given at Time of Placement

Realistic Information	Current Foster Parents	Former Foster Parents
	Percent ^a	Percent ^a
Always Given	22%	26%
Usually Given	18%	22%
Sometimes Given	49%	26%
Never Given	12%	26%

^a Represents percent of those responding to the question.

Source: 1990 LAC current and former foster parent survey for eight counties.

Some respondents commented that DSS caseworkers may feel that if complete, descriptive and realistic information about a child is given, placement might be difficult or refused. Some stated that caseworkers purposely do not share information about children being placed in a foster home.

One respondent stated that DSS had given them a foster child who previously had been a patient in a hospital psychiatric ward for trying to kill his parents. DSS did not inform the foster parents of this. Another foster parent criticized DSS for placing a child with them who had a history of stealing cars; the foster parents did not learn of the car-stealing until after the child had stolen and wrecked their car.

Special Needs Placements

Responses to questions regarding foster children with special needs possibly indicate a need for DSS to provide more training for foster parents with special needs children. Special needs children are defined as children who are emotionally disturbed, have multiple problems, or children needing special medical attention. Twenty-nine percent of current foster parents with special needs children and 38% of former foster parents with special needs children stated that they had received additional training.

Communication Between DSS and Foster Parents

About one-half of the current and former foster parents stated they did not feel they were adequately informed of their rights as foster parents and of the types of funds and assistance available. One respondent, who had been a foster parent for two years, stated she had just recently learned of the clothing allowance for foster children. In addition, a number of the respondents stated there was not good communication between foster parents and DSS child caseworkers after a foster child was placed in their home.

A significant number of foster parents indicated that children often came to them without sufficient clothing. Also, most of those who received clothing allowances did not receive them at the time of placement. Foster parents reported that several weeks or months may have passed before they received clothing allowances and medicaid cards.

Foster Parent Recruitment and Training

We asked foster parents several questions related to recruitment and training. As Table 5.8 shows, 40% of current foster parents were recruited by friends or relatives, and 34% listed "other" reasons for how they became interested in the foster parent program. Twenty-nine percent of former foster parents were recruited by friends or relatives, and 33% listed "other" reasons for how they became interested in the program. Most survey respondents agreed that foster parent training was adequate, although a significant number did not complete the required pre-service and annual training.

Table 5.8: How Foster Parents Became Interested in Foster Care

Recruiting Influence	Current Foster Parents	Former Foster Parents
	Percent	Percent
Current/Former Foster Parent	12%	17%
Church/School Meeting	6%	4%
Booths/Exhibits	•	•
Media	5%	17%
Pamphlets/Brochures	1%	•
Posters/Billboards	1%	•
Friend/Relative	40%	29%
Other	34%	33%

Source: 1990 LAC current and former foster parent survey for eight counties.

Foster Parent Retention

According to results of the survey of former foster parents, a significant proportion of foster parents left the program because of factors at least partially within the control of DSS. Respondents cited inadequate board payments, communication problems with the department and social workers, the long wait for assistance for children placed in their home (this included board payments, medicaid cards, and clothing allowances for children), and a lack of appreciation.

Foster Care Board Rates

Are foster care board rates comparable to those in other southeastern states?

No, in reviewing foster care board rates in ten southeastern states, we found that overall, South Carolina's rates are low compared to other southeastern states. Monthly foster care board payments reimburse foster parents for the expense of caring for a foster child. This payment is not a salary. Rather, it is a reimbursement to the foster parent(s) for food, clothing, shelter, school expenses, and incidentals for the foster child. The following table, based on a survey by the American Public Welfare Association, compares board rates for the ten southeastern states.

Table 5.9: Foster Care Basic Monthly Board Rates, July 1989.

State	Age 2	Rank	Age 9	Rank	Age 16	Rank
Alabama	\$181	9	\$202	9	\$213	9
Florida	\$286	2	\$286	2	\$360	1
Georgia	\$300	1	\$300	1	(tie)\$300	4
Kentucky	\$250	3	\$266	5	\$304	3
Louisiana	\$234	4	(tie)\$267	3	(tie)\$300	4
Mississippi	\$145	10	\$165	10	\$175	10
North Carolina	\$215	6	\$215	6	\$215	8
South Carolina	\$182	8	\$209	8	\$275	6
Tennessee	\$213	7	\$213	7	\$250	7
Virginia	\$228	5	(tie)\$267	3	\$337	2
Southeastern Average	\$223	•	\$239	•	\$273	•

Source: American Public Welfare Association, Washington, D.C.

Board payments in South Carolina are \$41 below the southeastern monthly average for 2-year olds, and \$30 below the southeastern monthly average for 9-year olds. However, for 16-year olds, South Carolina board payments are \$2 above the southeastern monthly average.

The United States Department of Agriculture (USDA) estimates average costs for raising children from newborn to age 18 based on actual expenditures for food, clothing, housing, education, transportation, and medical expenses. For each region of the country, the USDA estimates six cost levels for raising a child from birth to age eighteen. The following table compares the six cost averages for the south to FY 89-90 South Carolina board rates.

Table 5.10: Estimated Cost of Raising a Child in the South,^a June 1989.

Monthly Cost Level	Age 2	Age 9	Age 16
Moderate Urban	\$414	\$483	\$596
Low Urban	\$269	\$294	\$365
Economy Urban	\$194	\$220	\$263
Moderate Rural/Nonfarm	\$413	\$479	\$600
Low Rural/Nonfarm	\$266	\$293	\$361
Economy Rural/Nonfarm	\$166	\$192	\$235
SC DSS 89-90 Board Rates	\$182	\$209	\$275

^a South defined to include: Alabama, Arkansas, Delaware, Florida, Georgia, Kentucky, Louisiana, Maryland, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee, Texas, Virginia, and West Virginia.

Source: USDA, Agricultural Research Service, Hyattsville, MD.

The South Carolina FY 89-90 board rate is higher than the USDA economy rural/nonfarm average for all three age groups, and is also higher than the economy urban rate for age 16. The South Carolina rate is lower than the other cost averages for all age groups.

South Carolina's board rates are based on a study completed for DSS in 1983. A department official stated that for each subsequent year, the rates have been adjusted for the previous year's inflation as determined by the U.S. Department of Commerce. The costs determined by the study were based on the 1982 USDA estimates of the cost for raising a child.

We surveyed 156 current and 88 former foster parents in eight sample counties. A significant number of the respondents felt that foster care board rates offered by DSS were not adequate (see Appendices D and E).

DSS officials stated that the agency has been losing foster homes to private foster care agencies with larger budgets, and that DSS board payments are too low.

Responsiveness of County Offices and Staffing Issues

In this chapter, we answered three questions relating to county office efficiency:

- To what extent do the county offices use volunteers and paraprofessionals?
- Are telephones answered responsively?
- Does caseworker turnover contribute to problems in providing quality services?

Limited Use of Volunteers

To what extent are volunteers used in the counties, specifically in areas which would assist clients directly and free caseworkers to concentrate on essential duties?

We found limited use of volunteers in our sample of eight counties. We also concluded that yearly volunteer statistics reported by the state office are overstated.

Of the eight counties in our sample, all except Charleston County have volunteer services programs. Richland County employs a full-time volunteer services coordinator. In the remaining six counties, caseworkers, supervisors and other personnel act as county volunteer services coordinators in addition to their other job duties.

The monthly volunteer services reports we reviewed showed little or no use of some volunteer activities which could be used to ease caseworkers' caseloads. Most volunteers and volunteer hours reported were for Title XIX and XX client transportation. Volunteers who transport clients are reimbursed for mileage by the HHSFC. Volunteer hours reported for client transportation accounted for 19% of total volunteer hours reported for FY 89-90. Volunteers were not used as parent aides, nor to provide homemaker services, legal services or rehabilitation. Appendices F and G summarize FY 89-90 monthly volunteer services reports for six counties (Charleston and Horry counties did not submit reports).

For other FY 89-90 volunteer activities, the number of volunteers and hours served was insignificant. These activities included baby sitting, family to family volunteers, clerical work, emergency services, friendly visitors and medical services.

Recruitment Efforts

In comparing volunteer recruitment efforts, as shown in Table 6.1, we found that four of seven counties have not conducted a volunteer needs assessment or survey to identify volunteer needs, and no county keeps a log of calls or correspondence from potential volunteers. Also, two of the seven counties do not follow up on volunteer inquiries, and three counties do not use the media for recruitment efforts. Furthermore, two counties do not actively recruit in the business community for volunteers, services, or for donation of items, such as clothing and furniture, needed by clients.

Table 6.1: Department of Social Services Comparison of County Volunteer Programs, July - September, 1990

Recruitment Efforts	County ^a							Total Yes
	Allendale	Clarendon	Darlington	Greenville	Greenwood	Horry	Richland	
Needs Assessment Done	Yes ^b	No	No	Yes ^b	No	No	Yes	3
Follow Up On Needs Assessment	Yes ^b	N/A	N/A	Yes ^b	N/A	N/A	No	2
Used Media For Recruitment	Yes	No	No	Yes	No	Yes	Yes	4
Volunteer Logs Kept	No	No	No	No	No	No	No	0
Follow Up On Volunteer Inquiries ^b	Yes	Yes	Yes	Yes	No	No	Yes	5
Recruitment in the Business Community	Yes ^b	Yes	Yes	Yes	Yes ^b	No	No	5

^a Charleston County does not have a volunteer services program.

^b No documentation available for review; responses based on statements made by volunteer service coordinators.

Source: LAC questionnaire completed by volunteer service coordinators in each county.

The DSS *Volunteer Administration Handbook* recommends that county offices identify and prioritize a list of client needs which volunteers might be able to provide. Two county volunteer services coordinators stated they had implemented surveys to assess volunteer needs and had followed up on the surveys, although documentation was not available to us. In another county, 18 volunteer services surveys were returned to the full-time volunteer services coordinator, but the coordinator did not follow up on them.

None of the counties reviewed maintained a log of calls or correspondence from potential volunteers; however, one volunteer service coordinator emphasized the need for a pool of volunteers to call in emergency situations, such as sitting with a child in the hospital. A log or notebook, containing the names, addresses and phone numbers of individuals who respond to DSS recruitment efforts for volunteers, would provide a pool of persons to contact. In some counties which use the media for recruitment efforts, ads stressed the need for medicaid drivers, without soliciting for other specific types of volunteers.

According to the DSS *Volunteer Administration Handbook*, research indicates that properly trained and supervised volunteers can effectively perform many social services. Effective use of volunteers could free caseworkers to spend more time on crucial duties. Staffing studies indicate county offices are understaffed; therefore, using volunteers wherever possible would maximize departmental resources in meeting client needs.

Recommendations

- 26 Each county volunteer services coordinator should conduct a volunteer needs assessment in each program and administration area, and ensure that volunteers are recruited and used for activities with the greatest need.
- 27 DSS volunteer coordinators should keep a log of incoming calls and other inquiries from potential volunteers, and should follow up on all inquiries from potential volunteers.
- 28 County offices should use the media for volunteer recruitment and should stress the need for volunteers in areas in addition to medicaid transportation.

- 29 Volunteer services coordinators should actively recruit in the business community for volunteers, services and donations of items needed, such as food, furniture and clothing.
-

Volunteer Statistics

In our review of volunteer services, we found that volunteer statistics reported for the six counties are overstated in three ways:

- Individuals who serve on advisory committees required by policy or statute are included as volunteers. County board members are counted as advisory committee volunteers by some counties, and guardians ad litem are counted as DSS volunteers by one county.

Volunteer hours by advisory committee and board members and guardians ad litem accounted for 57% of total volunteer hours reported for FY 89-90. The 25,000 guardian ad litem hours reported by one county accounted for 53% of all reported volunteer hours for the counties.

Some of these boards and committees are required by state law and agency policy, and do not serve to assist the client directly or to reduce the load of the caseworker. In addition, guardians ad litem, who represent children in family court cases, are court-appointed and volunteer through the South Carolina guardian ad litem program.

- According to a department official, the state office compiles the annual report by totaling each county monthly report; therefore, if one person volunteered every month for 12 months, that individual would be counted as 12 volunteers as opposed to one.

Each monthly report lists the number of volunteers and hours served that month. An individual who volunteers monthly will be listed as a volunteer on each monthly report, and will be shown as more than one volunteer on the annual report. According to the county volunteer services coordinators, volunteers normally serve more than one month, and medicaid transporters may serve for several years.

- In some cases, two or more volunteer hours are reported for individuals who donate cash, clothing, furniture and other gifts.

Based on the monthly reports of the 6 counties, an average of 30 individuals per county earned an average of 53 volunteer service hours per month for donations. Donations for food, clothing, furniture and

other gifts accounted for 3,811 hours of total volunteer hours reported during FY 89-90.

These practices give an unrealistic picture of the number of volunteers and volunteer hours involved in assisting the client directly, or reducing the work load of the caseworker.

Recommendations

-
- 30 DSS should discontinue counting boards, advisory committees and guardians ad litem as volunteers.
 - 31 In totalling the annual number of volunteers, DSS should discontinue counting individuals more than once if they volunteer for two months or more.
 - 32 DSS should discontinue assigning two or more volunteer hours to individuals who donate cash, clothing, furniture and other gifts.

Issue for Further Study: Use of Paraprofessionals in Human Services

To what extent are paraprofessionals used in the counties, specifically in areas which would allow caseworkers to concentrate on professional duties?

In seven of the eight counties we reviewed, the human services programs employed one or more paraprofessionals in FY 89-90 (see Table 6.2). Greenville County reported no paraprofessionals in human services. Statewide, we found that the state office encourages the use of human services paraprofessionals, allocating 46 part-time paraprofessional positions to the counties in FY 89-90. Greater use of paraprofessionals in the human services area could result in significant cost savings and increased effectiveness of caseworkers.

Paraprofessionals are defined as workers with less education than professional caseworkers, who are assigned tasks requiring entry level skills and competence.

Table 6.2: Department of Social Services Paraprofessional Use in Human Services, Eight Sample Counties FY 89-90

County ^a	Number of Paraprofessionals	Description of Duties
Allendale ^b	1	Maintains client records, assists in supervision of child/parent visitation, transports foster care children, and performs foster home licensing duties.
Charleston	2	Provide transportation for CPPS children.
Clarendon	3	Serve as adult services personal care aides: perform in-home care to medicaid-eligible intermediate or skilled-level care patients authorized by Community Long Term Care.
Darlington	2	Assist in supervision of child/parent visitation, transport clients to appointments, report observations while visiting clients' homes, provide case management for day care.
Greenwood	2	Maintain client records, assist in supervision of child/parent visitation, enter information in case records (such as case narratives and time logs), transport clients to appointments, obtain documents and background information for caseworkers.
Horry	2	Assist with intakes, investigations and assessment; obtain client records; transport clients; arrange appointments; deliver legal documents; file completed court documents; report observations made during contact with clients.
Richland	11	Observe parent/child visitation; provide transportation; coordinate appointments to therapy, evaluation, and medical facilities; assist in preparation for foster care review board; go on home visits with foster care children; assist in teaching and/or carrying out the tasks of the treatment plan; collect information from collateral contacts; obtain medical, mental health and school records; complete correspondence, dictations, summaries, etc.

^a Greenville county reported no paraprofessional use in human services.

^b Allendale county also used one professional, a certified CPPS worker retired from another county, to assist in CPPS investigations.

Source: Documents obtained from county DSS officials.

According to human services officials, the agency has been unable to hire professional staff at a rate equal to the annual increase in caseload size. DSS FY 89-90 updates to the Omni staffing study (see p. 9) indicated the county human services offices were understaffed by 335 caseworkers. In response, human services initiated the "differential staffing pattern project," which, in part, provided paraprofessional staff to the counties. The project is fully state funded and has become a recurring budget appropriation. In FY 88-89 and FY 89-90, DSS allocated paraprofessional hours based on county size; in FY 89-90 DSS allocated an average of 23 hours per week to each county, and paid paraprofessional employees \$5.70 an hour. For FY 90-91, the positions will be allocated by each

county's need for caseworkers, as established by updates to the Omni staffing study.

Paraprofessional duties have been established by human services and are reflected in Table 6.2. However, the extent to which paraprofessionals could be used to allow professional caseworkers to conduct their work more efficiently and effectively is not known. This would require an elaboration of the workload analysis, as done by the 1985 Omni staffing study; the Omni study did not analyze the use of paraprofessionals in human services.

Potential Savings

A DSS official in human services estimates that up to 25% of the county caseworkers' tasks could be performed by paraprofessionals. According to DSS budgeting and cost allocation figures, the total human services caseworker budget was approximately \$23 million in FY 89-90, for 824 caseworkers. As stated above, the updated Omni study shows a need for 335 additional full-time caseworkers in human services.

If only 10% (82) of the county caseworkers were replaced by paraprofessionals through attrition, a savings of \$1.3 million could be realized each year. In addition, if 10% (34 caseworkers) of the projected need for 335 caseworkers were hired as paraprofessionals, an additional savings of \$557,000 a year could be realized, should DSS county human services offices be fully staffed.

By hiring paraprofessionals to perform the entry-level skills and tasks described in Table 6.2, caseworkers can use their time more effectively, concentrating on essential, professional social work duties.

Recommendations

- 33 The DSS human services division should update the Omni staffing study to include a workload analysis of professional and paraprofessional personnel duties in the county human services programs.
- 34 DSS should continue to identify tasks for and encourage the use of paraprofessionals.

Telephone Survey

Are telephones answered responsively?

Yes, most counties answered calls on the first or second attempt in our survey of responsiveness. We evaluated the responsiveness of the eight county offices in our sample in a telephone survey during March and April 1990. Each office was called a total of 30 times over the 8-week test period, at staggered times during the day.

Responsiveness was defined as answering the telephone in a ten-minute time period; if the first call was not answered in seven rings, another call was immediately placed. If the first call was busy, another call was placed five minutes later. If the second call was busy, a third would be made five minutes after the second.

We also evaluated courtesy by rating the response on the following scale:

- (1) very discourteous/rude/extremely cold and off-putting
- (2) mildly rude/somewhat cold/discouraging
- (3) neutral/flat/expressionless/toneless
- (4) pleasant/courteous/encouraging
- (5) extremely friendly/anxious to help/very warm

The questions we asked were devised to approximate typical questions a DSS office might receive such as, "Where do I go to apply for food stamps?"; "Can a single person apply to be a foster parent?"; and "Can you tell me what I have to do to get medicaid?" We did not evaluate the accuracy or completeness of the responses to the questions which were asked.

Survey Results

As Table 6.3 shows, across all eight counties, two-thirds of the calls were answered on the first attempt; most calls (210 of 240, or 87.5%) were answered in the ten-minute period. Notable among the counties were two counties (Clarendon and Darlington) with only 1 (3.3%) of 30 calls unanswered, each. In these two cases, the calls were disconnected, rather than unanswered, but they were considered to be unanswered if the caller was disconnected.

Richland County DSS did not answer 12 (40%) of the 30 calls; 10 calls of the 12 were unanswered, and 2 were disconnected. We concluded that Richland County met our definition of "unresponsive," significantly differing from the other seven counties in the sample. Richland County DSS officials stated that phones were not always answered because of a defect in the phone system. They stated that when phone lines are busy, they still appear to ring to the caller.

Table 6.3: Results of Telephone Survey to Selected DSS County Offices (30 Calls to Each Office)

County	Calls Answered				Unsuccessful Calls ^a	
	On First Attempt		On Second or Third Attempt		Number	Percent
	Number	Percent	Number	Percent		
Allendale	16	53%	10	33%	4	13%
Charleston	21	70%	6	20%	3	10%
Clarendon	24	80%	5	17%	1	3%
Darlington	28	93%	1	3%	1	3%
Greenville	15	50%	10	33%	5	17%
Greenwood	19	63%	8	27%	3	10%
Horry	24	80%	5	17%	1	3%
Richland	12	40%	6	20%	12	40%
Total All Offices	159	66%	51	21%	30	13%

^a Either the phone was busy in three tries, unanswered in two, seven-ring tries, or the caller was disconnected.

Source: 1990 LAC telephone survey of eight county DSS offices.

Courtesy

Average courtesy ratings ranged from 2.9 to 3.4. Clarendon County, with an average courtesy rating of 3.4 and Allendale and Greenwood Counties at 3.2, were the highest scoring counties. As we had defined a lack of courtesy as ratings below 3.0, and as the three ratings which were below

3.0 were very close to 3.0, it is our opinion that the counties were reasonably courteous in responding to telephone inquiries.

Five auditors placed these calls, and rated responses. While reasonable efforts were made to help ensure consistency in rating responses, the ratings were, by their nature, subjective.

Caseworker Turnover

Does caseworker turnover contribute to problems delivering quality services?

We concluded that county caseworker turnover is comparable to turnover for other types of state employees. An official at the Department of Human Resource Management (DHRM) concurred that DSS caseworker turnover was not significantly higher than turnover for other state employees. For FY 86-87 through FY 88-89, we found some difference between DSS caseworker turnover and turnover for DSS employees located in the state office. Also, caseworker turnover was somewhat higher than turnover for all DSS employees, and was somewhat higher than the turnover for all state employees for that time period.

The following tables detail the caseworker turnover comparisons. In Table 6.4, we defined turnover to include promotions or transfers resulting in different job responsibilities within the same agency, as well as jobs taken outside of the agency. Therefore, when employees remained in the same agency, their former caseloads would be reassigned to other caseworkers causing a temporary disruption in service to the clients. In Table 6.5, we restricted the turnover rates to employees leaving the agency where they were employed.

Table 6.4: Turnover for Employees Leaving All Positions^a

Type of Employee	FY 86-87	FY 87-88	FY 88-89
DSS Caseworkers	29%	31%	30%
DSS State Office Employees	20%	20%	28%
All DSS Employees	23%	23%	24%
State Employees ^b	22%	23%	23%

^a Defined as all employees who left their positions for different jobs, including those who stayed in the same agency.

^b Excluding unclassified legislative and judicial employees.

Source: DSS Office of Personnel Management and Human Resource Management Division.

Table 6.5: Turnover for Employees Leaving Their Agencies^a

Type of Employee	FY 86-87	FY 87-88	FY 88-89
DSS Caseworkers	12%	14%	13%
DSS State Office Employees	8%	11%	9%
All DSS Employees	9%	11%	10%
State Employees ^b	12%	13%	13%

^a Defined as only those employees who left the agencies where they were employed.

^b Excluding unclassified legislative and judicial employees.

Source: DSS Office of Personnel Management and Human Resource Management Division.

Chapter 6
Responsiveness of County Offices and Staffing Issues

Appendices

DSS Revenues and Expenditures FY 86-87 Through FY 90-91

	FY 86-87	FY 87-88	FY 88-89	FY 89-90 ^a	FY 90-91 ^a
Revenues					
State General Fund	\$86,006,172	\$84,904,911	\$94,429,591	\$105,463,414	\$106,920,556
Federal Funds	317,451,971	309,533,467	315,313,282	388,011,574	396,742,236
Other Funds	7,524,087	9,215,915	9,583,610	9,751,679	14,940,430
Total	\$410,982,230	\$403,654,293	\$419,326,483	\$503,226,667	\$518,603,222
Expenditures					
Administrative	\$25,601,940	\$38,389,667	\$41,091,527	\$40,740,695	\$41,137,386
Social Services Program	40,884,945	41,840,025	51,251,098	60,522,383	64,774,128
Benefit Payment Program	327,198,192	306,973,120	308,597,518	379,946,925	396,813,020
Employee Benefits	15,266,372	16,451,461	17,743,589	21,277,899	25,878,688
Nonrecurring Appropriations	2,030,781	0	642,751	738,765	0
Total	\$410,982,230	\$403,654,293	\$419,326,483	\$503,266,667	\$518,603,222
Major Budget Categories					
Personal Services	\$76,038,785	\$80,300,397	\$88,871,028	\$96,518,638	\$101,493,720
Other Operating Expenses	24,307,862	27,477,378	26,867,135	27,523,300	32,129,589
Special Items	700,037	639,682	189,553	670,896	615,000
Permanent Improvements	0	0	5,322	0	0
Public Assistance Payments	284,660,435	268,313,527	270,562,076	342,087,322	343,220,173
Aid to Subdivisions	7,977,958	10,501,848	14,445,029	14,409,847	17,299,600
Employee Fringe Benefits	15,266,372	16,451,461	17,743,589	21,277,899	23,845,140
Nonrecurring Appropriations	2,030,781	0	642,751	738,765	0
Total	\$410,982,230	\$403,654,293	\$419,326,483	\$503,266,667	\$518,603,222
Number of Employees	4,193	4,226	4,471	4,584	4,689

^a Estimated

Source: S.C. Budget Documents, Budget and Control Board.

Major Functions of DSS Divisions, Program Development Activities, and Internal Committees for County Benefit

Division	General Functions	Major Program Development Activities	Internal Committees for County Benefit
Human Services			
Child Protective and Preventive Services	<ul style="list-style-type: none"> •Assigning and monitoring initial child protection responsibility. •Planning, developing, and implementing policies and programs. •Measuring effectiveness of existing child protection programs. •Establishing and monitoring a statewide central registry for child abuse and neglect. •Receiving and investigating reports of institutional abuse and neglect. •Administering federal child abuse and neglect funds. •Licensing of day care facilities. 	<ul style="list-style-type: none"> •Model for Casework Practice •Internal Case Review System •Outcome Measures/Critical Success Factors 	<ul style="list-style-type: none"> •Child Fatalities Review Committee •Committee for Competency Based Training •Quarterly regional supervisors' meetings •Children, Family and Adult Services (CFAS) Advisory Committee
Substitute Care	<ul style="list-style-type: none"> •Interpreting federal guidelines. •Planning developing, implementing and monitoring program policies and procedures. •Providing technical assistance and policy interpretation to counties. •Monitoring the Foster Care Tracking System. •Administering the Interstate Compact on the Placement of Children. •Licensing of foster homes. 	<ul style="list-style-type: none"> •Model for Casework Practice •Internal Case Review System •Outcome Measures/Critical Success Factors •Early Reunification Project 	<ul style="list-style-type: none"> •DSS Foster Care Corrective Action Task Force •Advisory Committee for Competency Based Training •Quarterly regional supervisors' meetings •CFAS Advisory Committee
Adult Services	<ul style="list-style-type: none"> •Planning, developing and implementing policies and programs for individuals 18 or older. •Providing consultation and technical assistance to county offices. 	<ul style="list-style-type: none"> •Risk Assessment Model •Internal Case Review System •Computerization of Adult Services Central Registry 	<ul style="list-style-type: none"> •Adult Services Task Force •Fair Hearing Committee •Quarterly regional supervisors' meetings •CFAS Advisory Committee
Program Quality Assurance	<ul style="list-style-type: none"> •Coordinating the CIRS peer review for human services. •Providing training, technical assistance and consultation to counties. •Maintaining the Human Services Recording System. •Monitoring and negotiating contracts, processing payments and developing budgets. 	<ul style="list-style-type: none"> •Internal Case Review System •CFAS Automated Information System •Outcome Measures/Critical Success Factors 	<ul style="list-style-type: none"> •CFAS Advisory Committee (to allow county directors and supervisors from all program areas to provide input on policies prior to implementation).

**Appendix B
Major Functions of DSS**

Division	General Functions	Major Program Development Activities	Internal Committees for County Benefit
Economic Services			
Economic, Administrative and Management Support ("Economic Support")	<ul style="list-style-type: none"> •Ordering, allocating and reconciling \$60 million in food stamp inventories. •Compiling and completing federal financial accountability reports. •Developing and disseminating policies and procedures. •Planning, implementing, administering, evaluating and directing the operation of the service delivery systems for AFDC, Food Stamps and special food assistance economic support programs. •Providing technical assistance and consultation to county offices. •Investigating and responding to client inquiries and complaints. •Assuring computer system meets federal, state and user requirements. 	<ul style="list-style-type: none"> •Client History Information Profile (CHIP) System •Dual AFDC/Food Stamps Manual •Professional Academy for Self-Sufficiency (PASS) •IVA/IVD Referral System •Supervisory Case Review System •Implemented full mail issuance of food stamps 	<ul style="list-style-type: none"> •Policies and Procedures Review Committee •Quality Improvement Advisory Committee (formerly Managing for Results Task Force Corrective Action Committee) •Six Million Dollar Club •County Director's Advisory Committee •TEFAP Advisory Committee •County Director's Meetings
Medical Support	<ul style="list-style-type: none"> •Developing, implementing, monitoring and evaluating policies and procedures for approximately 17 medicaid programs. •Providing technical assistance and training. •Monitoring agency compliance with federal and state performance standards. •Developing and monitoring contracts. 	<ul style="list-style-type: none"> •Automation of access to DHEC and child support data necessary for medicaid eligibility determination. •Supervisory case review system •Expansion of contracted outstationed eligibility staff. •Program Performance Standards 	<ul style="list-style-type: none"> •Medicaid Planning Task Force •Policies and Procedures Review Committee •Quality Improvement Advisory Committee •HHSFC/DSS Corrective Action Committee
Work Support	<ul style="list-style-type: none"> •Developing, implementing and monitoring policies, procedures and programs. •Coordinating services of other agencies to help clients attain employment and/or necessary skills. •Providing technical assistance and training. •Transferring data to the responsible federal agency. •Developing and monitoring contracts. 	<ul style="list-style-type: none"> •Work Support JAS (Jobs Automated System) •Work Support and JOBS tracking systems •Tracking system interface with CHIP system •Transitional Child Care •Alternate Educational Resources 	<ul style="list-style-type: none"> •State Business and Industrial Advisory Committee •Community-based Advisory Councils •Bimonthly county supervisor's meetings •Policies and Procedures Review Committee •Quality Improvement Advisory Committee
Economic Assessment and Quality Control	<ul style="list-style-type: none"> •Measuring the validity/accuracy of the state's caseloads. •Evaluating AFDC, food stamp, and medicaid programs to develop error rates. •Developing statistics for use by the program areas. 	<ul style="list-style-type: none"> •Developing and implementing self-sufficiency staffing standards. •Quality Improvement process to assist in reducing error rates. •Professional Academy for Self-Sufficiency 	<ul style="list-style-type: none"> •County Director's Advisory Comm. •County Director's Meetings •Policy and Procedure Review Committee •Quality Improvement Advisory Committee •Medicaid Corrective Action Committee •\$6 Million Club •CHIP Policy Review Committee •Medicaid Planning Task Force

Source: LAC review of FY 89-90 DSS Annual Report and information provided by program areas.

Selected Results of Eight County Child Protective Services File Review

Contact Was Made With Alleged Victim

County	If Emergency, Within Two Hours				Within 24 Hours			
	Yes	Percent	No	Percent	Yes	Percent	No	Percent
Allendale	9	53%	8	47%	43	74%	15	26%
Charleston	5	26%	14	74%	26	49%	27	51%
Clarendon	13	43%	17	57%	44	67%	22	33%
Darlington	10	43%	13	57%	56	98%	1	2%
Greenville	12	48%	13	52%	52	81%	12	19%
Greenwood	10	71%	4	29%	40	82%	9	18%
Horry	7	27%	19	73%	57	76%	18	24%
Richland	9	41%	13	59%	47	72%	18	28%
Total	75	43%	101	57%	365	75%	122	25%

Source: LAC Review of FY 89-90 CPPS Case Files.

Notification of Investigation Results

County	Parents/Caretakers Notified				Alleged Perpetrator Notified			
	Yes	Percent	No	Percent	Yes	Percent	No	Percent
Allendale	26	45%	32	55%	25	43%	33	57%
Charleston	47	73%	17	27%	45	70%	19	30%
Clarendon	31	46%	36	54%	30	45%	37	55%
Darlington	51	89%	6	11%	50	88%	7	12%
Greenville	56	86%	9	14%	52	80%	13	20%
Greenwood	49	98%	1	2%	42	84%	8	16%
Horry	63	82%	14	18%	60	78%	17	22%
Richland	56	85%	10	15%	53	80%	13	20%
Total	379	75%	125	25%	357	71%	147	29%

Source: LAC Review of FY 89-90 CPPS Case Files.

Appendix C
Selected Results of Eight County Child Protective Services File Review

Indicated Report Files: Results of Review

County	Presence in File of Assessment Summary				Presence in File of Diagnostic Statement ^a				Presence in File of Treatment Plan			
	Yes	Percent	No	Percent	Yes	Percent	No	Percent	Yes	Percent	No	Percent
Allendale	15	68%	7	32%	14	64%	8	36%	15	68%	7	32%
Charleston	17	85%	3	15%	17	85%	3	15%	10	50%	10	50%
Clarendon	9	26%	26	74%	8	23%	27	77%	22	63%	13	37%
Darlington	18	95%	1	5%	17	89%	2	11%	17	89%	2	11%
Greenville	27	93%	2	7%	27	93%	2	7%	24	83%	5	17%
Greenwood	18	82%	4	18%	18	82%	4	18%	21	95%	1	5%
Horry	34	89%	4	11%	31	82%	6	16%	22	58%	16	42%
Richland	21	91%	2	9%	14	61%	9	39%	18	78%	5	22%
Total	159	76%	49	24%	146	70%	61	29%	149	72%	59	28%

^aOne indicated report was not applicable for this question.

Source: LAC Review of FY 89-90 CPPS Case Files.

Former Foster Parent Survey, Selected Results June 1990

1 How many years were you a foster parent in South Carolina?

Up to 1 year - 6 (25%)
 1 - 3 years - 10 (42%)
 3 - 6 years - 4 (17%)
 > 6 years - 4 (17%)
 Average years as foster parent - 3.7

2 How did you become interested in the foster parent program?

a Current/Former Foster Parent - 4 (17%)
 b Church/School Meeting - 1 (4%)
 c Booths/Exhibits - 0
 d Media - 4 (17%)
 e Pamphlets/Brochures - 0
 f Posters/Billboards - 0
 g Friend/Relative 7 (29%)
 h Other (Please specify) 8 (33%)

3 How many total foster children did you keep during the time you were a foster parent?

<u>Number of Children</u>	<u>Foster Parent Response</u>
0 - 2	10 (40%)
3 - 6	6 (24%)
7 - 12	4 (16%)
13 - 20	3 (12%)
> 20	2 (8%)

Average number of children - 8

4 Did you feel that training for foster parents was adequate?

Yes - 20 (80%) No - 5 (20%)

5 Did you complete your initial foster parent training of ten hours before your first foster child was placed in your home?

Yes - 18 (72%) No - 7 (28%)

6 Did you always complete the required five hours per year follow-up training?

Yes - 11 (46%) No - 8 (33%) Not Applicable - 5 (21%)

- 7 Were you given descriptive, realistic information about each child when placement was made in your home (medical, school, behavioral, developmental, social, etc.)?
Always - 6 (26%) Usually - 5 (22%) Sometimes - 6 (26%) Never - 6 (26%)
- 8 If you had any special needs foster children (emotionally disturbed, or children needing special medical attention, etc.), were you notified before placement in your home that the children had special needs?
Yes - 12 (52%) No - 3 (13%) Not Applicable - 8 (35%)
- 9 If you had any special needs foster children, was additional training regarding those special needs provided to you?
Yes - 5 (24%) No - 8 (38%) Not Applicable - 8 (38%)
- 10 How often were foster children provided with clothing at the time they were placed in your home?
Always - 2 (11%) Usually - 2 (11%) Sometimes - 5 (28%) Never - 9 (50%)
- 11 Were you given a clothing allowance for children placed in your home?
Always - 2 (11%) Usually - 2 (11%) Sometimes - 4 (22%) Never - 10 (56%)
If yes, was an allowance provided at the time of placement?
Yes - 0 No - 10 (100%)
- 12 What was the longest period of time [before a caseworker contacted you]?
1.0 month average
- 13 Do you feel that DSS adequately informed you of your rights as a foster parent and of the type(s) of funds and assistance you were entitled to receive?
Yes - 12 (57%) No - 9 (43%)
- 14 Did you feel that there was good communication between you and DSS child caseworkers after each child was placed in your home?
Yes - 14 (67%) No - 7 (33%)

15 When foster children were placed with you, were medicaid cards for the children transferred from the previous foster parent to you?

Always - 10 (45%) Usually - 2 (9%) Not Applicable - 4 (18%)
Sometimes - 1 (5%) Never - 5 (23%)

If medicaid cards were not always transferred, how soon after placement were the cards usually provided?

Right away - 2 (50%)
Within the first 2 months - 1 (25%)
Between 2 and 6 months - 1 (25%)
More than 6 months - 0

What was the longest amount of time you had to wait for a medicaid card for foster children?

Right away - 3 (43%)
Within the first 2 months - 3 (43%)
Between 2 and 6 months - 1 (14%)
More than 6 months - 0

16 Did you feel that the amount of money you received for foster care board payments was adequate?

Yes - 9 (43%) No - 12 (57%)

17 How soon after placement did you usually begin to receive board payments?

Within 1 month - 14 (74%)
> 1 month, but < or = 3 months - 5 (26%)
> 3 months, but < or = 6 months - 0
> 6 months - 0

18 Would you be interested in being a foster parent again?

Yes - 10 (50%) No - 10 (50%)

Current Foster Parent Survey, Selected Results June 1990

1 How many years have you been a foster parent in South Carolina?

Up to 1 year - 19 (23%)
 1 - 3 years - 22 (27%)
 3 - 6 years - 14 (17%)
 > 6 years - 27 (33%)
 Average years as foster parent - 5.6

2 How did you become interested in the foster parent program?

a Current/Former Foster Parent 10 (12%)
 b Church/School Meeting 5 (6%)
 c Booths/Exhibits 0
 d Media 4 (5%)
 e Pamphlets/Brochures 1 (1%)
 f Posters/Billboards 1 (1%)
 g Friend/Relative 33 (40%)
 h Other 28 (34%)

3 How many total foster children have you kept since you have been a foster parent?

<u>Number of Children</u>	<u>Foster Parents Response</u>
0 - 2	25 (30%)
3 - 6	16 (20%)
7 - 12	15 (18%)
13 - 20	8 (10%)
> 20	18 (22%)
Average number of children - 21	

4 Do you feel that training for foster parents is adequate?

Yes - 56 (76%) No - 18 (24%)

5 Did you complete your initial foster parent training of ten hours before your first child was placed in your home?

Yes - 51 (64%) No - 29 (36%)

6 Have you always completed the required five hours per year follow-up training?

Yes - 57 (74%) No - 10 (13%) Not Applicable - 10 (13%)

- 7 Were you given descriptive, realistic information about each child when placement was made in your home (medical, school, behavioral, developmental, social, etc.)?
Always - 16 (22%) Usually - 13 (18%) Sometimes - 36 (49%) Never - 9 (12%)
- 8 If you have ever had any special needs children (emotionally disturbed, multi-problemmed, or children needing special medical attention, etc.), were you notified before placement in your home that children had special needs?
Yes - 31 (44%) No - 26 (37%) Not Applicable - 13 (19%)
- 9 If you have ever had any special needs children, was additional training regarding those special needs given to you?
Yes - 15 (21%) No - 36 (51%) Not Applicable - 20 (28%)
- 10 How often were foster children provided with clothing at the time they were placed in your home?
Always - 9 (12%) Usually - 7 (9%) Sometimes - 42 (55%) Never - 18 (24%)
- 11 Have you received a clothing allowance for children placed in your home?
Always - 10 (13%) Usually - 9 (12%) Sometimes - 37 (49%) Never - 19 (25%)
If yes, was an allowance usually provided at time of placement?
Yes - 6 (9%) No - 58 (91%)
- 12 What is the shortest period of time after placement of a child in your home before a caseworker was assigned to the child and that caseworker contacted you?
0.2 months average
What was the longest period of time?
0.5 months average
- 13 Do you feel that DSS adequately informed you of your rights as foster parents and of the type(s) of funds and assistance you are entitled to receive?
Yes - 36 (49%) No - 38 (51%)

14 Do you feel that there was good communication between you and DSS child caseworkers after each child was placed in your home?

Yes - 51 (73%) No - 19 (27%)

15 When foster children were placed with you, were medicaid cards for the children transferred from the previous foster parent to you?

Always - 22 (29%) Usually - 13 (17%) Not Applicable - 9 (12%)
Sometimes - 11 (15%) Never - 19 (25%)

If medicaid cards were not always transferred, how soon after placement were cards usually provided?

Right away - 40 (49%)
Within the first 2 months - 32 (39%)
Between 2 and 6 months - 7 (9%)
More than 6 months - 3 (4%)

What is the longest amount of time you had to wait for a medicaid card for a foster child?

Right away - 34 (41%)
Within the first 2 months - 25 (31%)
Between 2 and 6 months - 18 (22%)
More than 6 months - 5 (6%)

16 Do you feel the amount of money you receive for foster care board payments is adequate?

Yes - 18 (24%) No - 56 (76%)

17 How soon after placement did you usually begin to receive board payments?

Within 1 month - 40 (49%)
> 1 month, but < or = 3 months - 38 (46%)
> 3 months, but < or = 6 months - 2 (2%)
> 6 months - 2 (2%)

Number of Volunteers FY 89-90 Monthly Average By County

Activity	Allendale	Clarendon	Darlington	Greenville	Greenwood	Richland	Average
Baby-Sitting	-	-	-	.08	-	-	.01
Family to Family	-	-	-	2.33	-	-	.39
Parent Aide	-	-	-	-	-	-	-
Commodity Distribution	-	-	-	-	-	-	-
Emergency Services	-	.33	-	-	-	-	.06
Excursion	-	-	-	.25	-	-	.04
Food Stamps	-	-	-	-	-	-	-
Friendly Visitor	.17	-	-	.08	-	-	.04
Home Services	-	-	-	-	-	-	-
Meal Preparation ^a	-	-	58.67	-	-	-	9.78
Payee Agent	-	-	-	-	-	-	-
Legal Services	-	-	-	-	-	-	-
Medical Services	-	-	-	.33	-	-	.06
Religious Services	-	-	-	-	-	-	-
Professional Services	.92	-	-	-	-	-	.15
Rehabilitation	-	-	-	-	-	-	-
Fund Raiser	-	-	-	1.67	-	-	.28
Entertainment	-	-	-	-	-	20.42	3.40
Recreation	-	-	-	8.83	-	-	1.47
Special Projects	1.08	-	-	-	-	.58	.28
Phones	-	-	-	-	-	-	-
Transportation ^b	4.67	9.42	-	.17	-	2.17	2.74
Tutor	-	-	-	-	-	-	-
Clerical	.42	-	-	.08	-	1.92	.40
Event Sponsor	-	-	-	3.75	-	-	.63
Richland ^c	-	-	-	-	-	5.51	.92
Paraprofessionals	-	-	-	-	-	.17	.03
Total	7.25	9.75	58.67	17.58	-	30.76	20.67

^a All volunteers in Darlington County perform duties for the local meals-on-wheels program.

^b Transportation for medicaid patients.

^c Richland represents categories such as work support and information and referral for Richland County.

Source: FY 89-90 Department of Social Services county monthly volunteer service reports.

Number of Volunteer Hours FY 89-90 Monthly Average by County

Activity	Allendale	Clarendon	Darlington	Greenville	Greenwood	Richland	Average
Baby-Sitting	-	-	-	2.33	-	-	.39
Family to Family	-	-	-	29.00	-	-	4.83
Parent Aide	-	-	-	-	-	-	-
Commodity Distribution	-	-	-	-	-	-	-
Emergency Services	-	3.46	-	-	-	-	.58
Excursion	-	-	-	2.58	-	-	.43
Food Stamps	-	-	-	-	-	-	-
Friendly Visitor	2.13	-	-	.17	-	-	.38
Home Services	-	-	-	-	-	-	-
Meal Preparation ^a	-	-	250.58	-	-	-	41.76
Payee Agent	-	-	-	-	-	-	-
Legal Services	-	-	-	-	-	-	-
Medical Services	-	-	-	.67	-	-	.11
Religious Services	-	-	-	-	-	-	-
Professional Services	8.50	-	-	-	-	-	1.42
Rehabilitation	-	-	-	-	-	-	-
Fund Raiser	-	-	-	4.42	-	-	.74
Entertainment	-	-	-	-	-	32.50	5.42
Recreation	-	-	-	33.67	-	-	5.61
Special Projects	.67	-	-	-	-	58.33	9.83
Phones	-	-	-	-	-	-	-
Transportation ^b	188.88	513.40	-	1.83	-	58.92	127.17
Tutor	-	-	-	-	-	-	-
Clerical	5.75	-	-	.33	-	53.33	9.90
Event Sponsor	-	-	-	16.50	-	-	2.75
Richland ^c	-	-	-	-	-	167.17	27.86
Paraprofessionals	-	-	-	-	-	5.33	.89
Total	205.92	516.85	250.58	91.50	-	375.59	240.07

^a All volunteers in Darlington County perform duties for the local meals-on-wheels program.

^b Transportation for medicaid patients.

^c Richland represents categories such as work support and information and referral for Richland County.

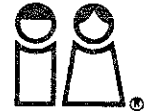
Source: FY 89-90 Department of Social Services county monthly volunteer service reports.

Agency Comments



JAMES L. SOLOMON, JR.

COMMISSIONER



**South Carolina
Department of Social Services**

P.O. Box 1520
Columbia, South Carolina 29202-1520

April 29, 1991

George L. Schroeder, Director, Legislative Audit Council
400 Gervais Street
Columbia, SC 29201

Dear Mr. Schroeder:

This is respectfully submitted as part of this Agency's response to the Limited Scope Review dated May 1991. These remarks, limited to the foremost finding, do not represent official action by the State Board, but are my own.

It has been said to me often, during the past two years, that DSS has too many State Office administrators and not enough program people in the County offices. The LAC verifies this perception by comparing us to similar operations, and by determining that we are 119 central administrative positions top-heavy. Currently facing rising client demands and falling resources, it is my opinion that this Agency must shift expenditures from the State Office to our clients and to employees in direct contact with these clients. The current genre of management literature says that American business is pursuing "excellence" by inverting pyramidal, authoritarian structures, and by focusing more on providing ample resources to motivated, trained, empowered front-line employees. DSS should take a cue from this trend, especially considering the amount invested in the Quality Process, via Philip Crosby and Associates.

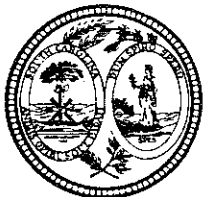
Grateful the General Assembly requested this Audit, and commending the LAC Staff for the clarity and insight of its findings, it is my fervent hope that the DSS Board will enact policies to alleviate the problems reported.

Very truly yours,


David E. Landholt, Chairman, DSS State Board

South Carolina Board of Social Services

THE REVEREND DAVID E. LANDHOLT CHAIRMAN AT-LARGE COLUMBIA	DOLORES S. GREENE MEMBER FIRST DISTRICT CHARLESTON	DR. OSCAR P. BUTLER, JR. MEMBER SECOND DISTRICT ORANGEBURG	BETTY C. DAVENPORT MEMBER THIRD DISTRICT ANDERSON	JOHN K. EARLE MEMBER FOURTH DISTRICT GREENVILLE	DR. AGNES H. WILSON MEMBER FIFTH DISTRICT SUMTER	PHILLIP P. CAMPBELL MEMBER SIXTH DISTRICT DARLINGTON
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JAMES L. SOLOMON, JR.
COMMISSIONER

South Carolina 
Department of Social Services
P.O. Box 1520
Columbia, South Carolina 29202-1520

May 1, 1991

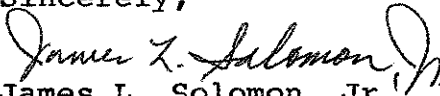
Mr. George Schroeder
Director
Legislative Audit Council
400 Gervais Street
Columbia, South Carolina 29201

Dear Mr. Schroeder:

Enclosed is the Department of Social Services Board approved response to the Limited Scope Review of the Legislative Audit Council report.

We appreciate your giving us the opportunity to comment.

Sincerely,

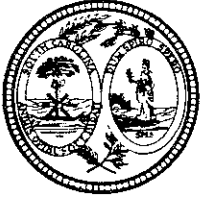

James L. Solomon, Jr.
Commissioner

JLSjr/m

Enclosures

South Carolina Board of Social Services

THE REVEREND DAVID E. LANDHOLT CHAIRMAN AT-LARGE COLUMBIA	DOLORES S. GREENE MEMBER FIRST DISTRICT CHARLESTON	DR. OSCAR P. BUTLER, JR. MEMBER SECOND DISTRICT ORANGEBURG	BETTY C. DAVENPORT MEMBER THIRD DISTRICT ANDERSON	JOHN K. EARLE MEMBER FOURTH DISTRICT GREENVILLE	DR. AGNES H. WILSON MEMBER FIFTH DISTRICT SUMTER	PHILLIP P. CAMPBELL MEMBER SIXTH DISTRICT DARLINGTON
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JAMES L. SOLOMON, JR.
 COMMISSIONER

South Carolina 
Department of Social Services

P.O. Box 1520
 Columbia, South Carolina 29202-1520
 May 1, 1991

Mr. George Schroeder
 Director
 Legislative Audit Council
 400 Gervais Street
 Columbia, South Carolina 29201

Dear Mr. Schroeder:

Thank you for the opportunity to review the final draft of the limited-scope review of the Department of Social Services. We have attached our final comments to be included with this letter in the final report.

As we have previously stated we appreciate the professional manner in which the members of your staff conducted this review. We agree in principle with many of your recommendations. However, as you will note from our comments there are areas of the review where we feel that the methodology for a particular component is inappropriate and therefore does not validate the conclusion reached. Therefore, in our opinion the recommendations flowing from the related conclusion are not valid.

With respect to human services we note that since 1984 various human services components of DSS have been reviewed by the following entities:

- (1) The American Humane Association (1984);
- (2) The Children's Coordinated Cabinet (1984);
- (3) The Legislative Audit Council (1985);
- (4) The Child Fatalities Oversight Committee (1986);
- (5) The General Assembly as part of the Adoptions Merger Debate (1986)
- (6) USC (evaluation of Foster Care (1986)); and
- (7) Foster Care Task Force (1989)

In addition the Agency passed Federal 427 audits in 1986 and 1989. As a result of these studies and audits, DSS has implemented over 100 recommendations designed to improve the effectiveness of the DSS human services delivery system.

Further, the Department has recently undergone a self-study and three (3) on-site reviews as a part of its efforts to meet the accreditation standards of the Council on Accreditation of Services for Families and Children, Inc. A decision on the accreditation of the DSS human services programs is expected in late June or early July 1991.

We cite the above to demonstrate our commitment to quality client human services; and note that the LAC conclusions in the limited-scope review are in several instances not consistent with those of the Accrediting Council.

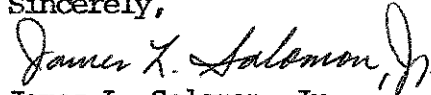
South Carolina Board of Social Services

THE REVEREND DAVID E. LANDHOLT CHAIRMAN AT-LARGE COLUMBIA	DOLORES S. GREENE MEMBER FIRST DISTRICT CHARLESTON	DR. OSCAR P. BUTLER, JR. MEMBER SECOND DISTRICT ORANGEBURG	BETTY C. DAVENPORT MEMBER THIRD DISTRICT ANDERSON	JOHN K. EARLE MEMBER FOURTH DISTRICT GREENVILLE	DR. AGNES H. WILSON MEMBER FIFTH DISTRICT SUMTER	PHILLIP P. CAMPBELL MEMBER SIXTH DISTRICT DARLINGTON
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Similarly, we believe that functional differences in the states in the comparison group do serious injury to the conclusion that DSS is "top-heavy" in the State Office. We believe that our response validates our position. We do note however, that as a result of our ongoing "Quality Improvement Process" we have determined that certain State Office functions could be more effectively performed in service delivery areas. A plan for addressing this issue will soon be considered by the State Board. Further, the 1991-92 Appropriations Bill now being considered by the South Carolina General Assembly directs that eighty-eight (88) State positions be deleted at DSS. Complying with this directive and transferring certain functions to service delivery areas (with corresponding personnel) will essentially render the "top-heavy" issue moot.

We appreciate this opportunity to comment on the results of the IAC review. More detailed comments on the respective section of the review are attached.

Sincerely,



James L. Solomon, Jr.
Commissioner

JLSjr/m

Enclosures

DSS COMMENTS ON THE FINAL DRAFT OF THE LIMITED-SCOPE
LEGISLATIVE AUDIT COUNCIL REVIEW OF THE
SOUTH CAROLINA DEPARTMENT OF SOCIAL SERVICES

I. Central Office Issues

Administrative Structure (Top-Heavy Comparison Methodology Not Sound)

Comparing states with a similar organizational structure by simply comparing the ratio of the perceived administrative staff to service delivery staff is not a valid method for measuring the "top-heaviness" of a central office. Each state is different with respect to a number of variables including the density of its population, its geographic area, the levels of functioning of newly hired staff, the literacy level of its client population, the size of the client population and the specific services provided clients. Accordingly, we contend that Alabama is the only state in the comparison group to which South Carolina equitably compares. **Indeed, is there any southern state that can be equitably compared with New York in anything.**

However, even Alabama DSS and South Carolina DSS are substantially different with respect to the services provided its clients. Alabama's non AFDC Medicaid eligibility functions are performed by an agency different from the one to which S.C. DSS was compared; Alabama DSS does not operate a Child Care Food Program (S.C. DSS does); Alabama DSS does not operate its data processing activities (S.C. DSS does) and Alabama DSS does not operate a print shop (S.C. DSS does).

When due consideration is given to the above functions operated at the S.C. DSS central office that are not operated at the Alabama DSS, we believe that South Carolina DSS compares favorably with Alabama (which ranks second among the states in the comparison group).

Current Plan for Moving Certain Central Office Functions to County Offices

As a result of the DSS ongoing "Quality Improvement Process" consideration is being given to moving certain central office functions (and positions) that could perform more effectively at the county levels to local service delivery areas. Transfer of the identified functions from the State Office will be accomplished through attrition.

Meeting County Staffing Standards Through Transfer of Positions
From the Central Office to County Offices is Not Feasible

Meeting County staffing standards through transfer of positions from the central office to county offices is not feasible since only those positions (and functions referenced above) will be available for transfer for the following reasons:

- (1) Legislatively mandated reductions in Agency positions (88 State positions which translates into at least 132 total positions when Federal match is considered) will have to be absorbed in the State Office, (since counties are seriously understaffed);
- (2) Furthermore, even if 119 positions were to become available in the State Office for transfer to county offices, only 119 positions (not 162) could be transferred. As you know, only the General Assembly may authorize new permanent positions. Therefore, even if \$2.5 million were available it could only be used to purchase the number of positions available for transfer (119 not 162), unless the General Assembly authorized DSS another 43 positions; and
- (3) Finally, the Agency is incurring a significant deficit, (approximately \$4 million) in its "Residential Treatment" line item (funds used to provide residential treatment to children with severe emotional and behavioral problems). Also, an additional \$2.3 million deficit is expected to occur in the AFDC line item, due to increases in the AFDC caseload. Accordingly, any funds freed up in the DSS budget must be used first, to address these deficits (which are expected to continue for several years). Therefore, if positions were available in the State Office to address the county staffing shortage (which there are not) there would be no money in the DSS budget to fund them. Therefore, they could not be used to meet the county staffing needs.

The above clearly establishes that the IAC recommendations to address DSS county staffing shortages through transfers of positions from the State Office are not feasible. Further, given the requirement by the General Assembly that DSS eliminate 88 positions, this issue is now moot. However, we will continue to study this issue and take appropriate action.

Extra Managerial Level

We generally agree that the Executive Assistant level in the DSS organizational structure could be eliminated. However, given our organizational structure (two levels of policy boards and two levels of board CEO's the Commissioner and County Directors) the current State Office management structure has proven to be effective. We are, however, committed to the elimination of this management level through attrition. (It should be noted that elimination of the Executive Assistant level could result in more deputy level staff.)

No Plan Addressing OMNI Study Recommendations

The review is correct in concluding that DSS did not publish a formal plan for addressing OMNI State Office study recommendations and that the State Office staffing analysis has not been updated. However, the study has been used (and will continue to be used) in making staffing decisions in the State Office. It should be noted that changes in program functions resulting from changes in law and the addition of new programs make it difficult to compare the OMNI State Office staffing recommendations to current staffing levels. **However, DSS will update the State Office staff analysis and continue to use it in making staffing decisions.**

Federal Reimbursement of \$62,000 Lost

This finding has been cited in several audits since 1986. It has been publicized in the media and discussed publicly, as well as before the State DSS Board. **Further, since there have been no further audit exceptions of this nature since 1986, we maintain that DSS is following proper contract procedures.**

DSS Administrative Costs Higher than Southeastern Average

DSS had provided the LAC with data that show that 23.1% of the 21.8% AFDC administrative cost and 12.1% of the 19.1% Food Stamp administrative cost consist of data processing (operations and systems development) costs. These data also show that during the referenced FY 88-89; 69.3% in Food Stamp costs and 63.5% in AFDC cost (of the 19.1% and 21.8% administrative cost respectively) were in county operations. In the State Office only

8.0% in Food Stamp cost and 5.6% in AFDC (of the 19.1% and 21.8% respectively) were in direct administrative cost. Here again in the comparison group the methodology appears inappropriate. While DSS will continue its attempt to lower administrative AFDC and Food Stamp costs, such costs at DSS are not currently excessive.

State Office Efforts to Reduce Error Rates

We appreciate your recognition of the extent and the effectiveness of efforts to reduce error rates.

Data Processing Controls

The various technical standards, procedures and guidelines for operation of the Office of Information Resource Management (IRM) are presently contained in a variety of documents. An internal IRM project was initiated approximately eighteen months ago to assemble all pertinent and supporting data into a single document. A preliminary draft of this document is currently under review. The document referenced in the IAC recommendation will be finalized by September 1, 1991.

State Oversight of County Programs

Minimum scope of work and documentation standards will be used for all elements of the CIRS review. The CIRS report should be issued in a timely manner. This will provide consistency of the reviews between counties. In addition, strict procedures will be established to centralize the monitoring and reporting of corrective action plans and subsequent program reports.

On pages 24-27 in the IAC Review, the IAC found that CIRS should improve sampling techniques. While we will examine alternatives designed to improve sampling techniques, we do believe there remains confusion over the finding on page 25 that samples in the CIRS process "are not drawn independently by the reviewer." The CIRS process for selecting a sample is as follows:

The county department draws two cases in each program that they believe reflect "good practice." The balance of the sample is independently drawn by State Office staff.

On page 32 of the IAC Review in the first paragraph, the information contained therein needs to include additional information to complete the public's understanding of the State Office role.

The State Office provides information with procedures for all state and federal laws, agency policy and regulations, thus enabling the counties to meet all compliance components. In addition, State Office provides program review, consultation, technical assistance, revision updates, etc., which allow the Agency to consistently adapt to change.

DSS Required to Ensure Compliance Uniformity:

The IAC findings on state oversight in human services equate State Office responsibility with DSS responsibility to: "supervise, administer and ensure compliance with the provisions of the statutes in a uniform manner throughout the state". While state office DSS does have this responsibility, the county DSS offices share the same responsibility. Further, in human services the Family Court, Guardian Ad Litem, Foster Care Review Board, Health and Human Services Finance Commission and the Federal Government all conduct regular reviews of DSS compliance as a means of ensuring compliance quality and uniformity.

However, in accordance with the DSS commitment to ensure quality client services recommendations # 10 and # 11 will be implemented.

The Division of Internal Audits

Given that some third parties (not in DSS) may not consider the DSS audit function to be organizationally independent the internal audit department will be required to report directly to the Commissioner. Further, surprise audits will be conducted whenever this is deemed advisable.

II. Program Issues:

Chapter 4: Child Protective and Preventive Services (CPPS)

Investigations; Case Management and Screened Out Reports

Required Contacts with Victims

On page 45 of the IAC review reference is made to DSS policy 705.03.02 with only a portion of the policy being quoted. The policy is as follows:

705.03.02 - Initiated Contacts

An investigation will be considered initiated when personal contact has been made with the involved child(ren). If the worker is unable to see the child (re: child hospitalized in another county), an investigation may be initiated by:

1. Personal contact with the parent, guardian or other person responsible for the child(ren)'s care and welfare.
2. Documenting attempted personal contact with the parent, guardian, or other person responsible for the child(ren)'s welfare which was unsuccessful, such as incomplete directions or the family was not at home when an unannounced visit occurred.
3. In educational neglect cases, phone contact must be made with the child who is the subject of the report or phone contact must be made with collateral persons having personal firsthand knowledge of the child's condition, situation or background.

Unsuccessful personal contact does not end the investigation. It is expected that the worker will pursue making contact with the parents/guardians.

Supervisory Review, Investigations and Case Management:

The Department has implemented a Model for Casework Practice. The procedures delineated in this model encompass all aspects of recommendation # 14. These activities will be monitored through agency monitoring functions. Further, we will recommend that the DSS Board seek the advice suggested in recommendation # 15.

Screened Out Reports:

The Model for Casework Practice provides for the recording, supervision and signature review as well as maintaining screened out reports. Effective execution of this model will ensure the implementation of recommendation # 16.

Chapter 5: County Foster Care Licensing Review Background Checks; Training; Fire Inspections; Temporary and Irregular Licenses

The DSS State Board has adopted a seven point foster care plan which includes requirements for criminal checks and central registry checks of foster parents. This plan also addresses pre-service and annual training requirements, ensures a fire inspection before the home is licensed, ensures timely health inspections and the timely renewal of foster home licenses. These actions have significantly reduced the number of family foster homes with temporary and irregular licenses.

Issue for Further Study: State Plan for Specials Needs Children

DSS supports the recommendation that a state plan for special needs children is imperative and is working with other involved agencies to address this issue.

Licensing of Private Foster Care Facilities

DSS supports the recommendation that the Legislature consider amendments to current legislation to delete exemption of licensure requirements for foster care facilities in South Carolina.

Responsiveness of County Offices and Staffing Issues

Limited Use of Volunteers

The Department concurs with and will implement the LAC recommendations for improving its volunteer programs.

Issue for Further Study: Use of Paraprofessionals in Human Services

DSS has for a number of years recognized the advantages of more use of paraprofessionals in human services. Funds to implement the comprehensive use of paraprofessionals in human services have been requested during each of the last three years. However, the requested funding has not been provided. Efforts will continue to increase the use of such paraprofessionals. The Department is in the process of updating the County OMNI Staffing Study to determine the task appropriate for paraprofessionals in the human service program. This report will be completed by July 1, 1991.

Legislative Audit Council

400 Gervais Street
Columbia, SC 29201
(803)253-7612
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