



CITY OF NEW YORK OFFICE OF THE COMPTROLLER BUREAU OF MANAGEMENT AUDIT WILLIAM C. THOMPSON, JR., COMPTROLLER

Audit Report on the Controls of the Human Resources Administration's Bureau of Eligibility Verification over the Investigation of Cash Assistance Applicants

MH09-059A

June 26, 2009



THE CITY OF NEW YORK OFFICE OF THE COMPTROLLER 1 CENTRE STREET NEW YORK, N.Y. 10007-2341

WILLIAM C. THOMPSON, JR. COMPTROLLER

To the Citizens of the City of New York

Ladies and Gentlemen:

In accordance with the responsibilities of the Comptroller contained in Chapter 5, §93, of the New York City Charter, my office has audited the controls of the Human Resources Administration (HRA) Bureau of Eligibility Verification (BEV) over the investigation of cashassistance applicant to determine whether BEV is processing and investigating cash-assistance applications in a timely and effective manner in accordance with established procedures.

BEV is responsible for conducting eligibility reviews of applicants to ensure that only eligible persons receive cash assistance. It assesses eligibility by conducting in-depth interviews, background checks, and home visits. Audits such as this provide a means of ensuring that BEV operated in an efficient manner and in accordance with established procedures.

The results of our audit, which are presented in this report, have been discussed with HRA officials, and their comments have been considered in preparing this report. Their complete written response is attached to this report.

I trust that this report contains information that is of interest to you. If you have any questions concerning this report, please e-mail my audit bureau at <u>audit@Comptroller.nyc.gov</u> or telephone my office at 212-669-3747.

Very truly yours,

William C. Thompson, Jr.

WCT/ec

Report: MH09-059A Filed: June 26, 2009

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The City of New York Office of the Comptroller Bureau of Management Audit

Audit Report on the Controls of the Human Resources Administration's Bureau of Eligibility Verification over the Investigation of Cash Assistance Applicants

MH09-059A

AUDIT REPORT IN BRIEF

The New York City Human Resources Administration's (HRA) mission is to enhance the quality of life for all City residents by providing temporary assistance to eligible individuals and families in New York City to help them lead independent and productive lives. Family Assistance (FA) provides cash assistance to families and Safety Net Assistance (SNA) provides cash assistance to single adults or couples without children. FA clients can receive cash assistance for up to five years, and SNA clients can receive cash assistance for up to two years as long as their eligibility status is verified each year.

Requests for cash assistance are initiated at any one of HRA's 26 Job Centers. Applicants who apply for FA or SNA cash assistance must receive a decision from the Job Centers within 30 and 45 calendar days, respectively, from the date the application is filed at the Job Centers. As required by New York State Social Services Law §132, HRA's Bureau of Eligibility Verification (BEV) is responsible for conducting eligibility reviews of applicants to ensure that only eligible persons receive cash assistance. BEV assesses eligibility by conducting in-depth interviews, background checks, and home visits.

This audit determined whether BEV is processing and investigating cash assistance applications in a timely and effective manner in accordance with established procedures.

Audit Findings and Conclusions

BEV is generally processing and investigating cash assistance applications in a timely and effective manner and in accordance with established procedures. For the sampled 92 cases, 34 cases were denied, 30 cases valued at \$130,190.93 were accepted, and 28 cases valued at \$69,134.56 were accepted with a reduced budget. Our review found that face-to-face interviews were conducted within the required 17-day timeframe. Although BEV does not have a time standard by which it must make its recommendations to Job Centers, BEV generally made its recommendations within the 30- or 45-day timeframe in which HRA is required to render cash assistance decisions to applicants. The audit also found that the Job Centers' final decisions for cash assistance benefits generally corresponded with the recommendations made by BEV, and applications requiring field visits were performed by two investigators at all times.

However, while we were able to obtain relevant information to perform tests for all 92 cases from HRA's databases, BEV was unable to find nine hard-copy files, despite several requests within a three-month period. As a result, we could not determine whether the applicants actually submitted the required documentation that they were asked to bring as evidence of eligibility.

Audit Recommendations

The audit recommended that BEV should:

- Make every effort to maintain all hard-copy case files containing the client's verification documents upon which its recommendation is based. BEV officials should continue to look for the nine missing files that we cited.
- Ensure that all required home visits are conducted by field investigators and that the results of those visits are entered in MAPPER.

HRA Response

In their response, HRA officials agreed with the audit's recommendations.

INTRODUCTION

Background

The mission of the New York City Human Resources Administration (HRA) is to enhance the quality of life for all City residents by providing temporary assistance to eligible individuals and families in New York City to help them lead independent and productive lives. Family Assistance (FA) provides cash assistance to families and Safety Net Assistance (SNA) provides cash assistance to single adults or couples without children. In both instances, cash assistance may consist of a basic grant allowance, home energy allowance, a supplemental home energy allowance, and a shelter allowance. Guidelines of the New York State Office of Temporary & Disability Assistance (OTDA) set a maximum amount for each allowance category that varies according to family size.¹ (See Appendix I for federal income eligibility requirements and Appendix II for the amounts that can be allocated.) FA clients can receive cash assistance for up to five years, and SNA clients can receive cash assistance for up to two years as long as their eligibility status is verified each year.

Requests for cash assistance are initiated at any one of HRA's 26 Job Centers. According to New York State OTDA guidelines, applicants who apply for FA or SNA cash assistance must receive a decision from the Job Centers within 30 and 45 calendar days, respectively, from the date the application is filed at the Job Centers. Therefore, the Bureau of Eligibility Verification (BEV) must complete its verification process within these timeframes.

Once the client's information is obtained at the Job Center, the information is entered into the MAPPER² system, an office interview with BEV is scheduled. Interviews with BEV personnel must be scheduled within 17 calendar days of applicants submitting their cash assistance requests, as required by HRA. As required by New York State Social Services Law, §132, BEV is responsible for conducting eligibility reviews of applicants to ensure that only eligible persons receive cash assistance. BEV assesses eligibility by conducting in-depth interviews, background checks, and home visits.

Prior to the scheduled appointment, the client's information is uploaded into the City's Automated Listing of Eligibility Requirements Tracking System (ALERTS)³ database. ALERTS creates an electronic case folder for each client.

The office interview consists of a face-to-face interview with a BEV interviewer. It requires that the applicant bring in original documents including driver's license, signed lease, rent receipts, and social security cards for review.

¹ Chapter 2, Section B & D, of the New York State Office of Temporary & Disability Assistance Guidelines.

 $^{^{2}}$ MAPPER (Maintaining and Preparing Executive Reports) is a system maintained by HRA and, among other things, is used to schedule and track both FA and SNA cases referred to BEV. This system interfaces with other State and City social service systems so as to preclude the possibility of the applicant making duplicate request for assistance.

³ ALERTS is a pre-eligibility case management system that collects collateral data from various social service systems maintained by State and City agencies e.g., the Welfare Management System (WMS). Electronic case folders are then created and used by BEV interviewer during an interview with an applicant.

The home visit is conducted by two field investigators at the applicant's residence (including those who are living in homeless shelters) to verify the information previously provided at the in-house interview, such as the accuracy of the home address and the number of household occupants. In instances where a field visit is conducted and the client is not home, the investigator is required to leave a notice under the door of the residence informing the client that another visit will be conducted on the next business day between the hours of 10 a.m. and 5 p.m. If a second home visit finds that the client is not at home, a second notice is left requesting that the client immediately call BEV's telephone bank to schedule a mutually acceptable date. During Fiscal Year 2008, BEV had a roster of approximately 800 employees, including internal interviewers, supervisors, field investigators and administrative staff.

When the verification process is completed; BEV can make one of the following recommendations to the Job Center:

- Accept: The applicant's information was verified and a recommendation is made to provide cash assistance. BEV's recommendation does not include a dollar amount.
- Reduce Budget: The applicant's information indicates that cash assistance is needed, but the client's needs do not require all the benefits that fall under the cash allowance category. BEV's recommendation does not indicate the reduced dollar amount; rather, it indicates what requested benefit is not required.
- Deny: The applicant does not qualify for cash assistance, or the information provided is false, e.g., the client has excess income, provides a false social security number, or fails to cooperate with BEV.

BEV's recommendations are submitted to the Job Center electronically via the MAPPER system. In all cases, the final decision on the cash amounts approved is the responsibility of the Job Centers.

According to information from MAPPER, during Fiscal Year 2008, BEV processed 225,873 cash assistance cases.⁴ Of those, 56,936 (25 percent) applicants were accepted, 45,387 (20 percent) applicants were accepted with a reduced budget, 120,607 (53 percent) applicants were denied,⁵ and 24 cases were closed. For the remaining 2,919 (1 percent) applicants, there was no information on MAPPER concerning the outcome of BEV's recommendation.

⁴ Auditors were provided a file that contained a total of 273, 109 cases processed by BEV. Upon review, we determined that 47,236 cases were duplicates and were, therefore, excluded from the population. Thus, reducing the population to a total of 225,873 cases.

⁵Cash assistance applicants denied benefits have the option to request a fair hearing with an administrative law judge of the New York State Office OTDA to appeal such determinations. Those issues were addressed in an *Audit Report on the Timeliness of HRA's Implementation of Fair Hearing Decisions on Public Assistance and Food Stamp Cases*, #ME05-066A, issued June 27, 2005.

During Fiscal Year 2008, HRA's disbursements to cash assistance clients, including FA and SNA, totaled \$1.2 billion.⁶ However, HRA does not track the outcome (i.e., disbursements) for those clients referred to BEV for investigation, so we are unable to determine the proportion of this amount that is related to BEV's efforts.

Objective

The objective of this audit was to determine whether BEV is processing and investigating cash assistance applications in a timely and effective manner in accordance with established procedures.

Scope and Methodology

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

The period covered in this audit was July 1, 2007 through June 30, 2008 (Fiscal Year 2008).

To obtain an understanding of the objectives, responsibilities, and laws governing the BEV process for cash assistance, we reviewed and used as criteria:

- New York State Social Service Law, Article 5, Title 1 §132,
- Part 35 of the New York City Rules and Regulations,
- BEV "Operating Procedure for Family Assistance and Safety Net Applications," issued July 19, 2007,
- BEV "The New BEV Automated System," issued May 1997, and
- HRA "ALERTS Undercare Operating Procedures," issued January 28, 2008.

We interviewed HRA and BEV officials responsible for overseeing the BEV program, including the Assistant Deputy Commissioner of BEV and the Executive Director of BEV. A walkthrough of BEV's facility was conducted on August 6, 2008 to obtain an understanding of the program operations and the job responsibilities of various personnel.

We observed the BEV client interview process, which begins with the client being logged in by the receptionist and ends with an interview and a review of the client's documents by a BEV interviewer. To determine whether applicants are assigned to the next available BEV

⁶ Determinations to issue cash assistance benefits are also done by the individual Job Centers located

throughout the five boroughs without being referred to BEV. These types of cases usually involve clients on fixed income or cases where there is an immediate need, e.g. homelessness.

interviewer equitably, without any bias, we observed the intake process on August 27, 2008, at the intake interview desk where the applicant is logged in by the receptionist. We observed whether the receptionist accesses ALERTS to verify the applicant's appointment date, checks photo identification, and assigns the next available interviewer. In addition, we observed a demonstration of the use of the ALERTS case-folder system to enter client data during the interview process.

HRA provided a file obtained from MAPPER listing 225,873 cash assistance applications processed in Fiscal Year 2008. To determine the accuracy and reliability of this data, we randomly selected a sample of 50 cash assistance cases and compared the information on MAPPER to that on ALERTS. We then compared the information from the same 50 cash assistance cases to the associated hard copy files at BEV. Conversely, we judgmentally selected a separate sample of 50 cash assistance cases from the hard copy files at BEV and compared the data to the information maintained in MAPPER.

A randomly selected sample of 92^7 cases (30 FA cases and 62 SNA cases) was selected from a population of 225,873 cases processed by BEV from January 2008 through June 2008. Of the 92 cases, 34 cases were denied, 30 cases valued at \$130,190.93 were accepted, and 28 cases valued at \$69,134.56 were accepted with a reduced budget. These clients received cash assistance ranging from approximately \$61 to \$18,500 per year.

The following tests were performed on our sampled cases:

- We calculated the number of calendar days that had elapsed from the time the client came to the Job Center to the date when the applicant had a face-to face interview with a BEV employee to determine whether the interview took place within the required 17 calendar days.
- The case files were reviewed to determine whether each client's case folder contained photocopies of all the required back-up documentation to justify BEV's recommendations to provide, deny, or reduce cash assistance. These included driver license, lease, rent receipts, utility bills, immigration papers, social security cards, etc.
- To determine whether BEV completed the verification process for the 30 FA cases within 30 calendar days and the 62 SNA within 45 calendars days, we calculated the number of calendar days that elapsed from the date the client came to the Job Center to the date BEV made a recommendation to the Job Center. We also reviewed the *Temporary Assistance Source Book* for the New York State's Office of Temporary & Disability Assistance to verify that HRA time requirements were in compliance with State standards.
- To determine whether BEV's recommendations to accept, deny, or reduce the cash assistance were in agreement with the Job Centers' final decisions, we compared the

⁷ We initially selected 102 case files for review. However, it was determined that 10 case files were destroyed by BEV because the applicant failed to appear for the scheduled face-to-face interview. Therefore, our sample was reduced to 92 cases for testing purposes.

decision codes entered in MAPPER by both the Job Center and BEV. If there were differences or discrepancies, we made inquiries at BEV and requested that it provide to us the justification for each discrepancy.

To determine whether BEV conducted home visits according to its own procedures, we reviewed information on MAPPER for 40 of the 92 cases in our sample that required home visits. We reviewed the data to see whether a team of two investigators conducted the home visits, as required, and reviewed the results of the home visits. In addition, for the eight instances in which a field visit was conducted and the client was not home, we reviewed the files to see whether a notation was made in the files, a copy of the notice that the investigator is required to leave under the door of the client's residence was left, and a subsequent visit was conducted.

The results of the tests, while not projected to their representative populations, provided us reasonable basis for us to assess BEV controls over the processing of cash assistance recipients.

Discussion of Audit Results

The matters covered in this report were discussed with HRA and BEV officials during and at the conclusion of this audit. A preliminary draft report was sent to HRA and BEV officials on April 15, 2009, and was discussed at an exit conference held on April 27, 2009. On May 7, 2009, we submitted a draft report to HRA officials with a request for comments. We received a written response from HRA officials on May 22, 2009. In their response, HRA officials agreed with the audit's findings and recommendations, stating that they were "pleased to see that the report acknowledges that BEV performs the processing and investigating of cash assistance applications in a timely and effective manner and that it does so in accordance with established procedures."

The full text of HRA's response is included as an addendum to this report.

FINDINGS AND RECOMMENDATIONS

BEV is generally processing and investigating cash assistance applications in a timely and effective manner and in accordance with established procedures. For the sampled 92 cases, 34 cases were denied, 30 cases valued at \$130,190.93 were accepted, and 28 cases valued at \$69,134.56 were accepted with a reduced budget. Our review found that:

- Face-to-face interviews were conducted within the required 17-day timeframe. BEV does not have a time standard by which it must make its recommendations to Job Centers. However, BEV generally made its recommendations within the 30-day and/or 45-day timeframe in which HRA is required to render cash assistance decisions to applicants.
- Folders contained the documents that are required to verify the client's identity and appeared to adequately support the determination of eligibility for cash assistance.
- The Job Centers' final decisions for cash assistance benefits generally corresponded with the recommendations made by BEV. For those cases where they did not match, BEV officials provided reasonable explanations for the differences of opinion.
- Applications requiring field visits were performed by two investigators at all times. In instances where an applicant was not home when the field visit was performed, the investigators left a notice informing the client that a subsequent visit would be made on the next business day, and a subsequent visit took place.

The following sections of this report discuss our findings in more detail.

Timeliness Standards Were Generally Met

Based on our review, we determined that a scheduled face-to-face interview was conducted for the 92 cases in our sample within the required 17-day timeframe. According to our test, the interviews took place within a range of 4 days to 17 days from the date the case was referred by the Job Centers to BEV. The average number of days it took for the scheduled interview was 8 days.

HRA has no time requirement for BEV to submit its recommendations to the Job Centers apart from the overall time requirement that the Job Centers must render their decisions to FA and SNA applicants within 30 and 45 days, respectively, of receiving their applications.

We found that for 27 (90 percent) of the 30 FA cases, BEV made its recommendations to the Job Centers within the 30-calendar day timeframe. The average number of days between the date that the Job Centers received an FA application and the date that BEV made its recommendation was 20 days—an average of 7 days from case initiation date to BEV interview date, and an average of 13 days from interview date to the date that BEV makes its recommendation. For two of the FA cases, BEV exceeded HRA's 30-calendar day window by 5 and 6 days. For the remaining FA case ALERTS lacked the recommendation date. Therefore, we could not determine whether BEV made its recommendation within the established timeframe.

For 61 (98 percent) of the 62 SNA cases, BEV made its recommendations to the Job Center within the 45-calendar day timeframe. The average number of days between the date that the Job Centers received an SNA application and the date that BEV made its recommendation was 17 days—an average of 9 days from case initiation date to BEV interview date, and an average of 10 days from interview date to the date that BEV makes its recommendation. For the remaining SNA case, BEV exceeded its 45-calendar day timeframe by 11 days.

Table I, following, shows the breakdown of BEV's recommendations for the 92 sampled cases and the amount of cash assistance issued.

Table I

<u>Results of the 92 Cash Assistance</u> Cases for which Benefits Were Issued

| Case Recommendation | Number of Cases | % | Total Cash Assistance Approved by the Job Center |
|--------------------------------|-----------------|------|---|
| Accepted | 30 | 33% | \$130,190.93 |
| Accepted with a Reduced Budget | 28 | 30% | \$69,134.56 |
| Denied | 34 | 37% | N/A |
| Totals | 92 | 100% | \$199,325.49 |

Controls over Document Review and Verification Is Generally Adequate

The documentation maintained in the case files for 83 (90 percent) of the 92 sampled cases provided reasonable assurance that BEV reviewed relevant documents to ensure the eligibility of the clients and the basis on which its recommendations were made. Table II, following, has a breakdown of BEV's recommendation for the 83 cases for which hard-copy documents were found.

Table II

| Case Recommendation | Number of Cases | % | Total Cash Assistance Approved by the Job Center | | | |
|-----------------------------------|-----------------|------|---|--|--|--|
| Accepted | 29 | 35% | \$119,759.12 | | | |
| Accepted with a Reduced Budget | 28 | 34% | \$69,134.56 | | | |
| Denied | 26 | 31% | N/A | | | |
| Totals | 83 | 100% | \$188,893.68 | | | |

Results of BEV's Eligibility Verification For 83 Cases for which Hard-Copy Documents Were Found

Documentation in the case files included copies of the client's social security card, birth certificates, proof of immigration status, rental leases, and utility bills. The documentation appeared to support the determinations of eligibility that were made. The remaining 9 cases, hard-copy documents, could not be reviewed since the files could not be found.

Of the 83 cash assistance cases that were readily available at the BEV site, the files were appropriately maintained in individual case folders and filed alphabetically according to the client's name. These hard-copy files are kept in a secured area where current cases are stored in file cabinets for the current calendar year. Cases processed for previous years are stored at HRA's Bush Terminal storage facility in Brooklyn.

In addition to the hard-copy files, case information for each client is maintained electronically on ALERTS, which is HRA's electronic case-folder filing system. This system allows easy access to case records without having to obtain the hard-copy files. The client's information entered in ALERTS, allows a detailed work-up of the client's personal background. The BEV interviewer uses the ALERTS screen as guidance during the interview to ensure that all required questions are answered and required documents are brought in.

Hard Copy Documentation Not Found

BEV was unable to find the hard-copy files for 9 (10 percent) of the 92 cash assistance cases reviewed. Table III, following, has a breakdown of BEV's recommendation as indicated in ALERTS and MAPPER for the nine cases for which hard-copy documents were not found.

Table III

Results of BEV's Eligibility Verification For Nine Cases for which Hard-Copy Documents Were Not Found

| Case Recommendation | Number of Cases | % | Total Cash Assistance Approved by the Job Center |
|------------------------|-----------------|------|---|
| Accepted | 1 | 11% | \$10,431.81 |
| Denied | 8 | 89% | N/A |
| Totals | 9 | 100% | \$10,431.81 |

While we were able to review information for these cases on ALERTS and MAPPER for our tests, we were unable to determine whether the client actually submitted copies of the required documentation that they were asked to bring to the BEV interview. As of April 6, 2009, BEV officials have yet to provide an explanation for the missing files. This was of concern to us since the cases reviewed were current (processed between January and June 2008) and should still have been readily available at BEV

We brought the matter of the missing hard-copy files to the attention of BEV officials at the exit conference held on April 27, 2009. They have since reported that of the 12 hard-copy files that were initially missing, 3 were found. As of May 4, 2009, nine hard copy files are still not accounted for.

Recommendation

1. BEV should make every effort to maintain all hard-copy case files containing the client's verification documents upon which its recommendation is based. BEV officials should continue to look for the nine missing files that we cited.

HRA Response: HRA agreed and stated that "no hard copy files should be unaccounted for. Three of the nine files cited in the recommendation were located after the audit and provided to the auditors. We will continue to search for the others. The files became misplaced when BEV relocated within the same building. Increased care will be taken in the future to safeguard against the situation being repeated."

BEV Recommendations Matched The Job Centers' Final Decisions

Of the 92 cash assistance cases reviewed, 81 of BEV's recommendations matched the Job Centers' final decisions. For the remaining 11 cases, while BEV's recommendations did not match the Job Centers' final decision, BEV officials were able to provide plausible explanations. For instance,

- In one case the client was accepted by BEV with a reduced budget. However, the Job Center decided to decline benefits to the client due to the client's failure to complete the required employment asset information form.
- In a second case, the client was accepted by BEV with a reduced budget. The Job Center subsequently discovered that the client had earned income that was not reported to BEV during the interview process. Therefore, the client exceeded the income eligibility limits set by the New York State OTDA and was denied.
- In a third case, the client was denied by BEV. However, the Job Center went ahead and approved the client's benefits since it was determined that this was an emergency assistance case.

Procedure for Home Visits Were Followed

We found evidence that home visits were attempted in 98 percent of the sampled cases in which a home visit was required. Additionally, all of the sampled home visit attempts were conducted in accordance with BEV's procedures.

As stated previously, home visits are required to be conducted by a team of two field investigators. If the client is not home, a notice is left, either informing the client that another visit will be conducted or, if this is the second attempt, requesting that the client contact BEV to schedule a mutually acceptable date. The results of the interview are recorded in the client's hard copy file and in ALERTS.

A review of the 92 sampled cash assistance cases revealed that 40 required home visits. Of the 40, home visits were attempted in 39(98%) of them. Of the 39, home visits were successfully made in 38 cases. For 28 cases, home visits were performed on the first attempt and for 10 cases, the home visits were performed in two or more attempts. The case files indicated that a notice was left under the door of the client's residence by the field investigator.

Hard-copy files were not available for the one remaining cash assistance case requiring a home visit. As a result, we had to rely on information entered in ALERTS to determine whether field investigators performed the scheduled home visit. For this one case, entries made in ALERTS stated that field investigators made one visit to the client's residence and discovered that the client did not reside at the address on record. The case was then denied since there were no additional addresses listed.

Recommendation

2. BEV should ensure that all required home visits are conducted by field investigators and that the results of those visits are entered in MAPPER.

HRA Response: HRA agreed and stated that "two field investigators will conduct home visits whenever such visits are required. The results of these visits will be entered into MAPPER as required by BEV procedures."

Adequate Control over the Use of ALERTS by BEV Employees

Based on our review, we found that the control over the use of ALERTS was adequate. We found that ALERTS is accessible to a limited number of BEV employees who have access to certain screens, depending on the users' needs. For instance, a BEV interviewer has security clearance to access the system to enter case notes during the interview process. However, the interviewer does not have access to make changes to a case once a supervisor reviews and makes a recommendation on the case.

In addition, BEV employees who work with client files are assigned unique identifications and individual passwords to access the system. These passwords must be changed every six months.

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May 27, 2009

Robert Doar Commissioner

Human Resources Administration Department of Social Services Office of Constituent Services and Policy Improvement

Jane Corbett Executive Deputy Commissioner

180 Water Street New York, NY 10038

212 331 5500

Mr. John Graham, Deputy Comptroller Audits, Accountancy & Contracts The City of New York Office of the Comptroller 1 Centre Street New York, NY 10007-2341

> Re: Audit Report on the Controls of the HRA's Bureau of Eligibility Verification over the Investigation of Cash Assistance Applicants MH09-059A

Dear Mr. Graham:

We have reviewed the referenced draft audit report on the Human Resources Administration's (HRA) Bureau of Eligibility Verification (BEV) over the Investigation of Cash Assistance Applications – MH09-059A, which was prepared the New York City Comptroller's Office. The efficient processing and investigating of cash assistance applications is of great importance to the successful achievement of the overall mission of HRA. Consequently we were very pleased to see that the report acknowledges that BEV performs these functions in a timely and effective manner and that it does so in accordance with established procedures.

Following are our specific responses to the recommendations contained in the draft report.

Auditor's Recommendation #1:

BEV should make every effort to maintain all hard-copy case files containing the client's verification documents upon which its recommendation is based. BEV officials should continue to look for the nine missing files that we cited.

Agency's Response:

HRA agrees that no hard copy files should be unaccounted for. Three of the nine files cited in the recommendation were located after the audit and provided to the auditors. We will continue to search for others. The files became misplaced when BEV relocated within the same building. Increased care will be taken in the future to safeguard against the situation being repeated.

Auditor's Recommendation #2:

BEV should ensure that all required home visits are conducted by field investigators and that the results of those visits are entered in MAPPER.

Agency's Response:

HRA agrees that two field investigators will conduct home visits whenever such visits are required. The results of these visits will be entered into MAPPER as required by BEV procedures.

It is the goal of HRA to provide services to our clients, who are among the most vulnerable of New York's citizens, in the most effective and efficient manner possible while adhering to all applicable policies, rules and directives. We trust that the corrective actions detailed above will ameliorate the conditions cited in this draft report. Should you have any questions regarding this matter, please contact Hope Henderson, Director of the Bureau of Audit Coordination at (212) 331-4660.

Sincerely,

Jane Quitt

Jane Corbett

Cc: Commissioner R. Doar P. M. Smith P. Jenik