



DEPARTMENT FOR THE AGING / STATE COMPTROLLER

2 LAFAYETTE STREET  
New York, New York 10007 - 1392  
(212) 442-1100

Herbert W. Stupp  
Commissioner

97 AUG -6 AM 9:20

STATE COMPTROLLER

August 4, 1997

Honorable Carl McCall  
State Comptroller  
AE Smith State Office Building  
Albany, New York 12236

Re: Audit Report of the New York City  
Department for the Aging's  
Monitoring of Services to the Elderly  
Provided by Contract Agencies

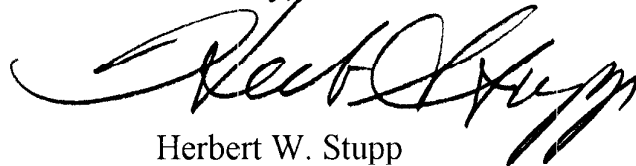
Report Number: 96-N-8

Dear Comptroller McCall:

The attached Agency Implementation Plan is submitted in response to your audit report dated May 9, 1997. The Department concurs with your recommendations, except #12 and #17.

If you have any further questions, please contact Ted Taberski, Director of the Bureau of Administration and Budget at (212) 442-1061.

Sincerely,



Herbert W. Stupp

Attachment

**NEW YORK CITY DEPARTMENT FOR THE AGING  
AUDIT IMPLEMENTATION PLAN**

***Audit Number 96-N-8***

***Recommendation # 1: Ensure that health code violations and other health-related deficiencies in senior centers are corrected in a timely manner.***

DFTA will continue every effort to ensure full compliance with the NYC health code. However, physical changes in sites that are owned by NYC Housing Authority must be done by NYCHA. Likewise, physical changes in sites that are owned or leased by NYC must be done or negotiated by the Department of Citywide Administrative Services and the Department of Design and Construction.

***Recommendation # 2: Ensure senior center cooks have a food protection certificate.***

Cooks are required to obtain the food protection certificate, but are not required to have a valid certificate before starting the job. The Department of Health (DOH) conducts the required class and makes a limited number of slots available for DFTA contractors' employees. DFTA is limited by DOH class scheduling and by total available slots.

***Recommendation # 3: Ensure that senior centers obtain the required Place of Assembly permit, arrange for regular fire inspections, and install fire extinguishers and exit lights, where required, and maintain them in working order.***

DFTA will continue every effort to ensure full compliance with applicable fire codes and Place of Assembly permit requirements. However, NYCHA and sites owned or leased by NYC have the same restrictions as #1, above.

***Recommendation # 4: Require senior centers to have written procedures for accident, medical and fire emergencies.***

***Recommendations # 5: Ensure that senior centers maintain all of their public areas properly.***

***Recommendation # 7: Ensure that home care agencies perform required quarterly supervisory contacts and periodic unannounced supervisory visits.***

**NEW YORK CITY DEPARTMENT FOR THE AGING  
AUDIT IMPLEMENTATION PLAN**

***Audit Number 96-N-8***

***Recommendation # 9: Ensure that home care agencies maintain a copy of the service plan for each client.***

***Recommendation # 10: Ensure that supervisors of home care workers have the requisite qualifications.***

***Recommendation # 11: Ensure that case management agencies complete and retain assessments and referral forms for seniors receiving in-home services.***

***Recommendation # 13: Ensure that agencies verify staff qualifications.***

***Recommendation # 14: Ensure that senior centers register participants and maintain necessary registration.***

***Recommendation # 15: Ensure that senior centers perform the required annual updates for seniors receiving congregate meals; and that they assess applicants for home-delivered meals properly, reassess such current clients promptly, and see that both groups meet eligibility requirements for the service.***

***Recommendation # 16: Ensure that agencies provide adequate monitoring and technical support for case assistance and counseling services to ensure that logs are completed properly, files have all required forms, reports, and information, and supervisory reviews are performed and documented.***

***Recommendation # 18: Ensure that program officers and nutritionists perform the required monitoring visits and prepare assessment reports, including documenting follow-up efforts made to determine whether agencies have corrected deficiencies.***

***Recommendation # 21: Ensure that congregate meal contributions are counted jointly by a staff person and either a participant or agency supervisor. Document the joint count by having each sign the daily record.***

The preceding recommendations all relate to improved enforcement of DFTA standards, required of all centers and assessed annually. Our automated Program Assessment System (PAS) now ensures that all standards are addressed in the assessment process. PAS also provides an automated tracking system for following up areas of non-compliance.

**NEW YORK CITY DEPARTMENT FOR THE AGING  
AUDIT IMPLEMENTATION PLAN**

***Audit Number 96-N-8***

***Recommendation # 6: Require agencies to document the units of service actually being delivered, and justify any deviation from the contracted services levels. Verify that contracted services are being delivered.***

Service documentation is a DFTA standard, required of all providers and assessed annually. Justification of negative deviation from contracted service levels is required of contractors and followed up by DFTA staff. Verification of actual delivery is accomplished through DFTA site visits and the DFTA audit.

***Recommendation # 8: Ensure that home care agencies perform all required drug tests of their employees, and provide guidelines to contractors regarding the substances for which employees should be tested.***

DFTA will follow the drug testing guidelines established for NYC's Work Experience Program (WEP).

***Recommendation # 12: Ensure that case management and home care services are carried out independently.***

This separation may be effective, but is not the only acceptable program model.

***Recommendation # 17: Consider using a Citywide waiting list to effectively reallocate resources to communities and individuals who need them.***

Potential reallocation of resources is better accomplished by tracking cumulative actual use of services, identifying reasons for areas providing services at less than projected levels and identifying areas with documented need for additional services. With this information, DFTA can reallocate resources among contracts. A waiting list of specific names, valid only on the day on which it is generated, adds little to this process.

**NEW YORK CITY DEPARTMENT FOR THE AGING  
AUDIT IMPLEMENTATION PLAN**

***Audit Number 96-N-8***

***Recommendation # 19: Ensure that the home delivered meal contribution envelopes contain the recipient's name and collection date, or the recipient signs a form indicating the amount contributed; and that there is follow up by contacting the clients for whom envelopes or contribution amounts and signatures are missing.***

DFTA will review contribution guidelines to see if more effective procedures can be put into place that guarantee actual receipt of contributions given while adhering to federal requirements of the voluntary nature of contributions.

***Recommendation # 20: Investigate when the amount of contributions reported for home delivered meals is unreasonable in relation to the number of meals served.***

DFTA will review contribution guidelines to see if more effective procedures can be put into place.