

# AUDIT REPORT



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

## **Follow-up Audit Report on the Processing of Clients' Permanent Housing Applications by the HIV/AIDS Services Administration of the Human Resources Administration**

*ME07-055F*

**June 29, 2007**



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 Gentleman:

In accordance with the responsibilities of the Comptroller contained in Chapter 5, § 93, of the New York City Charter, my office has audited whether the HIV/AIDS Services Administration (HASA) of the Human Resources Administration (HRA) implemented the seven recommendations made in the *Audit Report on the Processing of Clients' Permanent Housing Applications by the HIV/AIDS Services Administration of the Human Resources Administration* (ME02-116A), issued on June 30, 2003.

HASA is the primary mechanism within HRA that is responsible for expediting access to the essential benefits and social services needed by persons living with AIDS and HIV-related illnesses and their families. HASA provides social, vocational, and financial services to eligible individuals and their families, including permanent and transitional housing to those who are homeless or potentially homeless. We audit programs such as this to ensure that City agencies efficiently and effectively meet their program objectives.

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 [audit@Comptroller.nyc.gov](mailto:audit@Comptroller.nyc.gov) or telephone my office at 212-669-3747.

Very truly yours,

A handwritten signature in black ink, appearing to read "William C. Thompson, Jr.", written in a cursive style.

William C. Thompson, Jr.

WCT/ec

**Report: ME07-055F**

**Date: June 29, 2007**

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

**Follow-up Audit Report on the Processing of Clients'  
Permanent Housing Applications by the HIV/AIDS Services  
Administration of the Human Resources Administration**

**ME07-055F**

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**AUDIT REPORT IN BRIEF**

This audit determined whether the HIV/AIDS Services Administration (HASA) of the Human Resources Administration (HRA) implemented the seven recommendations made in the *Audit Report on the Processing of Clients' Permanent Housing Applications by the HIV/AIDS Services Administration of the Human Resources Administration* (ME02-116A), issued on June 30, 2003. HASA is the primary mechanism within HRA that is responsible for expediting access to the essential benefits and social services needed by persons living with AIDS and HIV-related illnesses and their families. HASA provides social, vocational, and financial services to eligible individuals and their families, including permanent and transitional housing to those who are homeless or potentially homeless.

The previous audit report concluded that HASA was not efficient in processing clients' applications for permanent housing. The audit found that case managers at HASA field centers did not track the progress of permanent housing applications filed with the Housing Unit. The audit also concluded that HASA did not comply with its own time frames for processing requests for financial assistance for clients who had secured a valid lease or letter of intent to rent.

**Audit Findings and Conclusions**

Of the seven recommendations made in the previous audit, HASA has implemented one, partially implemented three and did not implement three.

HASA revised and updated its procedures manual to better identify the major steps in the process of placing clients in permanent housing, the responsibilities of key staff members and supervisors, and the maintenance of important documents. In addition, HASA has updated its computer systems to allow case managers, housing specialists, and management to better track the progress of applications from the date of application to placement. However, there is a lack of evidence on the computer systems that the case managers scheduled any of the client interviews with permanent housing providers, as required in the HASA procedures manual. Furthermore, while the Eligibility Unit appears to be making decisions on financial assistance

requests within five working days and approved payments are issued within 30 calendar days, the field centers are not consistently providing the requests to the Eligibility Unit within three working days, as required by the HASA procedures manual. Finally, HASA has improved the timeliness of its processing of financial assistance packages. However, the packages that we reviewed still lacked essential documents.

### **Audit Recommendations**

To address the issues that still exist, we recommend that HASA:

- Program the HASA Web to provide information on the scheduling of client interviews with housing providers.
- Endeavor to obtain more timely communication between providers and housing specialists on the results of interviews.
- Ensure that the field centers maintain signed copies of clients' housing applications.
- Identify the causes for delays in forwarding completed requests for housing-related financial assistance to the Eligibility Unit and develop strategies to ensure that the packages are forwarded to the Eligibility Unit within three working days.
- Ensure that case managers, eligibility specialists, supervisors and center directors adequately review requests for housing-related financial assistance to ensure that all required forms, including signed and dated request forms and client receipts, are completed and maintained by HASA.

### **Agency Response**

In its written response to our draft report, HRA officials disagreed with several of the audit's findings but agreed with all of the audit's recommendations.

## INTRODUCTION

### **Background**

The mission of the Human Resources Administration is to help individuals and families achieve and sustain their maximum degree of self-sufficiency. To fulfill this mission, HRA provides a broad range of programs and services, including support services for individuals with AIDS and HIV-related illnesses. The HIV/AIDS Services Administration is the primary mechanism within HRA that is responsible for expediting access to the essential benefits and social services needed by persons living with AIDS and HIV-related illnesses and their families.

HASA provides social, financial, and vocational services to eligible individuals and their families. Its services cover home care and homemaking, financial and medical support, and family case management. HASA also provides housing assistance, including permanent and transitional housing, to those who are homeless or potentially homeless.

HASA clients can apply and may be deemed eligible to receive rental assistance, broker fees, and establishment of home or moving grants. In addition, supportive housing is provided through contracts with community-based organizations (CBOs). The CBOs are responsible for primary case management and other required services to clients and their families.

HASA provides three types of supportive housing models: Congregate, Scatter-Site I and Scatter-Site II Housing. Congregate Housing offers intensive on-site case management, support groups, and mental health and substance-abuse counseling services. Clients live collectively with shared facilities, such as bathrooms and kitchens. Scatter-Site Housing offers non-emergency housing for single adults and families. These apartments allow clients to be placed in housing throughout the five boroughs. Case-management services and home health care are available to clients through the CBO. Scatter-Site I apartments are leased to the CBO; Scatter-Site II apartments are leased to the clients.

Through the Independent Housing program, clients are able to obtain private-market or New York City Housing Authority (NYCHA) apartments on their own with some assistance from case managers. Under the Scatter-Site II and Independent Housing programs, the clients may apply for rental assistance.

The HASA ServiceLine determines the medical eligibility of applicants and makes referrals to services provided throughout the city. Clients approved for HASA services by the ServiceLine are assigned to one of the 12 field centers in the five boroughs. Case managers are responsible for assessing the client's specific housing needs, discussing the types of housing resources available, and assisting the client with the completion of an on-line Non-Emergency Supportive Housing Application through its HASA Web computer system. The system is used to access any information regarding the status of the application.

The HASA Housing Unit is responsible for the processing and referral of a housing application upon receipt from the case manager. Housing specialists review the application and electronically refer it to the first housing provider selected on the application. Housing

specialists can refer up to three applications for each provider vacancy. During Fiscal Year 2006, clients were able to select up to six supportive-housing providers on one application. Providers inform the specialists of the results of the interviews through weekly faxes.

According to the HASA *Quarterly Performance Report*, as of June 2006, HASA had 31,007 active client cases, with 23,974 of them receiving rental assistance. There were 4,365 clients housed in Congregate, Scatter-Site I and Scatter-Site II Housing in June 2006.

On June 30, 2003, our office issued an *Audit Report on the Processing of Clients' Permanent Housing Applications by the HIV/AIDS Services Administration of the Human Resources Administration* (ME02-116A). The audit report concluded that HASA was not efficient in processing clients' applications for permanent housing. The audit found that case managers at HASA field centers did not track the progress of permanent housing applications filed with the Housing Unit. The audit also concluded that HASA did not comply with its own time frame for processing requests for financial assistance for clients who had secured a valid lease or letter of intent to rent. The audit found that only 14 (44%) of the 32 financial assistance request packages for the sampled clients were processed by HASA within the required five business days.

### **Objective**

The objective of this audit was to determine whether HASA has implemented the seven recommendations made in the New York City Comptroller's earlier report, *Audit Report on the Processing of Clients' Permanent Housing Applications by the HIV/AIDS Services Administration of the Human Resources Administration* (ME02-116A, issued June 30, 2003).

### **Scope and Methodology**

The period covered by this audit was July 1, 2005, through June 30, 2006 (Fiscal Year 2006).

To determine the implementation status of the recommendations, we interviewed the Director of Planning, MIS and Quality Assurance; the Director of Housing; the Director of Eligibility; the two Deputy Directors of Field Operations; and the Center Directors at five sampled field centers: Amsterdam (Manhattan), Brownsville (Brooklyn), Kingsbridge (Bronx), Queensboro (Queens), and Staten Island. These five field centers represented the centers with the largest number of housing applications in their respective boroughs in Fiscal Year 2006. In addition, we reviewed relevant documentation, including the *Client Referral & Placement Procedure for Non-Emergency Supportive Housing & NYCHA* (the HASA procedures manual), as well as Local Law No. 49 of 1997 (creation of HASA), Local Law No. 32 of 2005 (HASA reporting requirements), Local Law No. 50 of 2005 (housing application process for HASA clients) and Local Law No. 51 of 2005 (creation of housing referral and placement system for HASA clients).

To assess HASA's efficiency in processing clients' housing applications, a HASA housing database list of the permanent housing applications that clients completed during Fiscal Year 2006 was obtained on October 31, 2006. According to the list, 6,596 clients completed 8,738 applications. Clients needed to complete more than one application if they were unable to obtain housing at one of the six providers they selected on the first application. For the five sampled centers, 3,558 clients completed 4,661 applications. We then randomly selected a sample of 61 clients at the five sampled centers who completed permanent housing applications. (Fifty of the 61 clients completed applications at the field centers; 11 clients completed applications at the ServiceLine and were then directed to case managers at one of the sampled field centers.) The 61 clients completed 96 permanent housing applications. For the 96 applications, we attempted to determine whether the housing applications were referred to providers, whether interviews were scheduled with these providers, and whether HASA accurately recorded the outcome of each application.

To determine whether HASA improved its timeliness in processing client requests for housing-related financial assistance, Case By Case Financial Assessments (CBCFA) packages were reviewed for the 22 clients who requested such assistance in our sample of 61 clients. We determined whether the CBCFA packages contained the required documents and assessed whether decisions to approve or deny the requests for financial assistance were made within the required time frames. We used case file documents and HASA Web information to calculate timeliness.

As part of our review of controls, we assessed the reliability of HASA Web data, through which the HASA staff can obtain access to HASA housing, CBCFA, and related databases. We first obtained and reviewed program specifications written by HASA Management Information System personnel. We then obtained the October 31, 2006 list of all the permanent housing applications for Fiscal Year 2006 that HASA recorded on the HASA Web. Tests were conducted to determine the reliability of HASA Web data. For the 53 of the 61 sampled clients for whom files were available, client identification information on the HASA Web was compared to the hard-copy case files at the five field centers. Finally, client identification data in ten additional randomly selected case files from the Queensboro center were compared to the data available on the HASA Web on these cases.

The results of the above tests, while not statistically projected to their respective populations, provide a reasonable basis to assess whether HRA implemented the recommendations made in the previous report.

This audit was conducted in accordance with generally accepted government auditing standards (GAGAS) and included tests of records and other auditing procedures considered necessary. This audit was performed in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

## **Discussion of Audit Results**

The matters in this report were discussed with HRA officials during and at the conclusion of this audit. A preliminary draft report was sent to HRA officials on May 4, 2007, and was discussed at an exit conference held on May 18, 2007. We submitted a draft report to HRA officials on June 1, 2007 with a request for comments. We received a written response from HRA officials on June 20, 2007. In its response, HRA officials disagreed with several of the audit's findings but agreed with all of the audit's recommendations.

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

## RESULTS OF FOLLOW-UP AUDIT

Of the seven recommendations made in the previous audit, HASA has implemented one, partially implemented three, and did not implement three.

HASA revised and updated its procedures manual to better identify the major steps in the process of placing clients in permanent housing, the responsibilities of key staff members and supervisors, and the maintenance of important documents. In addition, HASA has updated its computer systems to allow case managers, housing specialists, and management to better track the progress of applications from the date of application to placement. However, there is a lack of evidence on the computer systems that the case managers scheduled any of the client interviews with permanent housing providers, as required in the HASA procedures manual. Furthermore, while the Eligibility Unit appears to be making decisions on financial assistance requests within five working days and approved payments are issued within 30 calendar days, the field centers are not consistently providing the requests to the Eligibility Unit within three working days, as required by the HASA procedures manual. Finally, HASA has improved the timeliness of its processing of financial assistance packages. However, the packages that we reviewed still lacked essential documents.

### **Previous Finding:** “Case Managers Do Not Track Progress of Applications”

The previous audit found that HASA Case Managers at the 12 HASA field centers followed up on only 10 (7%) of the 142 housing applications that they submitted to the Housing Unit. By not following up on clients’ applications, case managers were failing in their duty to clients to help ensure that the Housing Unit was working to secure apartments for them. In addition, we found that the HASA procedure manual did not give clear direction on how the placement process should function and the roles that the various parties (centers, case managers, Housing Unit) played in it.

***Previous Recommendation #1:*** “More fully develop the HASA procedures manual so that the housing placement process, and the roles that various HASA units play in the process, are clearly defined. At a minimum, the manual should identify the key stages in the placement process, the responsibilities of all parties at those stages, the maintenance of key documents, and the controls to ensure that the process operates as intended.”

***Previous HASA Response:*** “We agree with this recommendation. As stated above, HASA is revising its policy and procedures manual as well as the Supported Housing Unit staff manual to address the concerns disclosed in the audit report. These manuals will detail staff responsibilities, and indicate the documents to be used in the new process. The revised documents, guidelines, and directories relating to supported housing will be placed on the Agency FileNet System which is readily available to field staff from their desktop PC’s. Finally, a comprehensive housing training program will begin on July 1, 2003, for all staff involved in placing our clients in supported housing.”

**Current Status:      IMPLEMENTED**

HASA's procedures manual was revised in July 2003 and updated in February 2006. The manual identifies the major stages in the placement process, the responsibilities of key staff members and supervisors, and the maintenance of important documents. In terms of the previous finding that field center case managers did not track the progress of permanent housing applications, the manual requires case managers to follow up on applications after submitting them to the HASA Housing Unit. The manual states that within two working days of the housing applications being sent to the Housing Unit, case managers must follow up on the status of the application by accessing the HASA Web or by telephoning Housing Unit staff. The manual instructs case managers to check the status of the application at least once a week thereafter. If an application was referred to a housing provider, the case manager should contact the provider to schedule an interview with the client. We discuss HASA's implementation of these procedures in the next section of this report.

**Previous Finding: "HASA Procedures Do Not Adequately Govern the Placement Process"**

The previous audit found that HASA procedures did not ensure that the Housing Unit notified its field centers on the status of client applications for permanent housing or that case managers scheduled interviews between clients and housing providers. In addition, HASA procedures provided no guidance on case-file maintenance. HASA was unable to locate 16 of the 120 case files requested.

***Previous Recommendation #2:*** "Ensure that HASA management develops monitoring tools to track the housing placement process. The monitoring tools should be designed to identify areas where improvement is needed; management should then develop strategies to initiate corrective measures in those areas."

***Previous HASA Response:*** "We agree with this recommendation. As stated above, HASA implemented a new computer system in June 2003 that provides field management staff with access to the Supported Housing Unit database. This system also allows management to track the process and identify areas where improvement is needed."

**Current Status:      PARTIALLY IMPLEMENTED**

In addition to updating its procedures manual to provide more guidance on the duties and responsibilities of staff members involved in the permanent housing process, HASA has updated its computer systems to allow case managers, housing specialists, and management to better track the progress of applications from the date of application to placement. Since the previous audit, HASA has initiated the HASA Web system. The system provides case managers, supervisors, and center directors access to HASA housing, CBCFA, and other related databases.

However, there is a lack of evidence on the HASA Web that the case managers scheduled any of the client interviews with permanent housing providers, as required in the HASA

procedures manual. In fact, the system provides no information concerning the scheduling of client interviews with providers. Depending on the circumstances, often either the housing provider contacts the client directly or the client initiates contact with the provider. In some instances, the housing specialist may assist in scheduling the interview. However, if the case manager does not schedule the interview and is not informed of the date and time of the interview, he or she will be unable to take an active role in ensuring that the client attends the interview and is treated fairly by the provider during the interview. As stated in the previous report, case managers at the field centers have primary responsibility for ensuring that their clients' housing needs are met. Thus, it is important that they know when a client has been scheduled for an interview with a provider.

The housing providers inform the specialists of the results of the interviews through weekly faxes. Although this issue was not raised in the previous audit, we believe that more timely communication between providers and housing specialists on the results of interviews would allow the specialists to refer clients to the next provider choice on their application in a more timely manner.

The HASA procedures manual also requires the maintenance of signed permanent housing applications in the client files. This is an important record by which the client attests to the accuracy of the information presented in the application. However, we were unable to locate 8 of the 61 client files in our sample at the five field centers. Moreover, signed housing applications were not maintained in 29 (55%) of the remaining 53 client files.

Due to the fact that HASA created the HASA Web, yet has still not ensured that case managers actively participate in the scheduling of client interviews with providers, we consider this recommendation to have been partially implemented.

***HRA Response:*** "HRA agrees with this finding. Regarding case managers knowing when a client has been scheduled for an interview with a provider, an enhanced version of the online permanent housing application, released in April 2007, allows providers to input the times and dates of upcoming client intake interviews. The case manager, in the instances in which the interview was scheduled by the housing unit at HASA administration, will be aware of the pending interview and can work directly with the client to ensure his/her attendance. Additionally, HASA will revise its procedures to reflect that HASA staff, other than case managers, who are involved in a client's case have the ability to schedule housing intake interviews. In all instances, though, the case manager will be aware of an impending interview via HASA Web.

"This enhanced version of the online permanent housing application also allows providers to input the results of intake interviews as they occur. HASA now has real-time information on the outcome of interviews rather than relying on weekly summations via fax.

"Regarding the maintaining of signed applications, HASA is currently exploring the feasibility of electronic signature pads so that the signed application will reside in an

online, retrievable environment. As is current practice, the client would continue to receive a copy of the signed application.”

**Previous Finding:** “Only 44 Percent of Financial Assistance Request Packages Receive a Decision Within Mandated Time Frame”

The previous audit found that only 14 (44%) of the 32 financial-assistance request packages that the field centers completed for sampled clients received a decision from HASA within the required five business days. In addition, there was no evidence that a request form for emergency assistance was completed as required for 13 of the 32 packages.

If a client needs financial assistance to pay expenses, HASA requires that a CBCFA package be prepared. CBCFAs are also prepared for clients who need financial assistance. The client’s case manager is responsible for preparing the CBCFA package and submitting it to his or her supervisor. Within 48 hours of completing the package, a center liaison forwards the package to a HASA CBCFA eligibility specialist. If the requested financial assistance is approved, HASA will issue a check to the appropriate party—usually the landlord. According to the HASA procedures manual, the CBCFA decision process should take no more than five business days.

The previous audit also found that 13 (41%) of the 32 CBCFA packages reviewed did not have signed and dated Request for Emergency Assistance for An Active Public Assistance Case (form W145N). In addition, in 23 (72%) of the 32 packages, there was no evidence that HASA had given clients a receipt for their document submissions, as required.

***Previous Recommendation #3:*** “Ensure that CBCFA packages are processed in a more timely manner and that key events related to the processing are documented in the case files. These events should include, at a minimum, the dates that the packages are forwarded to CBCFA coordinator, the dates packages are returned, and any other significant events that affect the timely processing of the packages.”

***Previous HASA Response:*** “We agree with this recommendation. During our own internal review in October 2002, HASA identified similar areas of concern with the Case By Case Financial Assessment (CBCFA) process to those disclosed in the audit report. By early December 2002, HASA had changed the entire process. One of these changes was to allow many more of the CBCFAs to be approved by the Center Directors. This has reduced the decision time as well as the time required for the actual benefit issuance. The revised process incorporates most of the recommendations made by the audit. This includes more timely processing, better review and control of the process at the center level, and more effective communication between case managers and their supervisory staff. This new process has resulted in many benefits being issued on the same day as the decision.”

**Current Status:** PARTIALLY IMPLEMENTED

Our review of the 43 housing-related CBCFA requests made by the 22 clients in our current sample revealed that, while the Eligibility Unit appears to be making decisions on CBCFA requests within five working days and approved payments are issued within 30 calendar days, the field centers are not consistently providing CBCFA requests to the Eligibility Unit within three working days, as required by the HASA procedures manual.<sup>1</sup>

In order to process CBCFA requests and track timeliness, each CBCFA package must include among its supporting documents a Request for Emergency Assistance for An Active Public Assistance Case (form W145N) or a Request for Emergency Assistance or Additional Allowance (form W137A), which must be signed and dated by the client and the appropriate HASA staff. HASA begins to track the timeliness of its processing of a CBCFA request when the client provides all necessary documents related to the request.

For the 43 CBCFA requests in our review, the field centers provided to the Eligibility Unit the CBCFA packages for 26 (60%) of them after the required three days. Based on our review of case file documents and HASA Web information, the field centers forwarded these packages between 1 and 22 working days after the client provided all necessary documents. Nevertheless, once the completed CBCFA packages were received by the Eligibility Unit, decisions were made on all 43 housing-related CBCFA requests in our sample within the required five working days as per the HASA procedures manual. HASA officials stress that the more important standard is the requirement that clients receive either the benefit check or a notice that the request was not approved within 30 calendar days of filing a complete request for assistance. HASA approved 38 of the 43 requests and issued payments within the required 30-day time frame for each of them.

***HRA Response:*** “HRA disagrees with this finding. The guideline of three working days for the submission of the CBCFA packet was designed and implemented during an era when the CBCFA process and the timeliness of issued benefits was a more paper intensive process. The objective of instituting a submission time frame was to encourage staff to get the process moving as quickly as possible on the front end to ensure that there would be adequate time to complete the process for the issuance of benefits within the mandated 30 days. As HASA’s performance in CBCFA processing greatly improved over the years it has become less consequential as to when the ‘parts’ of the process are completed as long as the multiple steps are completed within the 30-day timeframe.

“HASA has completed a draft of revised CBCFA related procedures that is currently being reviewed by senior staff. The new version will likely place a lessened emphasis on achieving mandated intermediary time frames and will focus more on ensuring that the 30-day timeframe is achieved.”

***Auditor Comment:*** Although HRA states that it “disagrees with this finding,” HRA’s disagreement is not with our finding but with its own criterion on which our finding is

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<sup>1</sup> The HASA procedures manual states that the case manager has 24 hours to complete the CBCFA package, and the center has an additional 48 hours to provide the package to the Eligibility Unit.

based. HRA does not provide evidence to dispute the finding that 60 percent of the CBCFA requests we reviewed were not provided to the Eligibility Unit within three working days of the client providing all necessary documents, as required by the HASA procedures manual. Rather, HRA states that it is considering lessening its emphasis on “intermediary time frames” such as this. While HRA may decide to revise its three-working-day standard for providing CBCFA requests to the Eligibility Unit, we believe that monitoring adherence to intermediary time frames can help ensure compliance with the 30-calendar-day standard for issuing benefits.

***Previous Recommendation #4:*** “Ensure that supervisors of the case managers and eligibility specialists as well as center directors adequately review the CBCFA packages to ensure that all required documentation is present and complete.”

***Previous HASA Response:*** “We agree with this recommendation and have already taken steps to implement it. As described in our response to Recommendation #3 above, by early December 2002, HASA had changed the entire CBCFA process. One of these changes was to allow many more of the CBCFAs to be approved by the Center Directors, resulting in more timely processing, better review and control of the process at the center level, and more effective communication between case managers and their supervisory staff.”

**Current Status:** NOT IMPLEMENTED

While HASA has improved the timeliness of its processing of CBCFA packages, the packages that we reviewed still lacked essential documents. Our review of 22 client files with 43 CBCFA housing-related requests for financial assistance revealed that many of the 43 CBCFA packages lacked such documents.

To comply with Local Law 49 of 1997, HASA is required to track the timeliness of the CBCFA process from the date the client requests a particular service or benefit to the time that the benefits are issued. As stated above, in order to process the request and track timeliness, each CBCFA package must include among its supporting documents a W145N or W137A Request for Emergency Assistance form, which must be signed and dated by the client and the appropriate HASA staff.

Our review of the 43 CBCFA requests for financial assistance revealed that 20 (47%) of the 43 packages lacked signed and dated W145N or W137A forms.

In addition to documents certifying the client request for financial assistance, each CBCFA package must contain a signed and dated Receipt for Documents Required to Establish Eligibility for Benefits and Services form (this is also known as the Client Receipt). A signed and dated copy of the Client Receipt either indicates that the client has provided all necessary documents or identifies any additional information or documents needed to complete the application.

Our review of 43 CBCFA requests for financial assistance revealed that 18 (42%) of the 43 request packages did not contain a completed, signed, and dated Client Receipt. (On May 24, 2007, HASA officials told us that it is not required to provide Client Receipts to Scatter-Site II clients. Six of the 18 cases in which signed and dated Client Receipts were unavailable involved Scatter-Site II clients. However, HASA officials did not provide any written procedures that noted this exception.) Incomplete CBCFA packages indicate that the supervisors and center directors are still not reviewing the packages to ensure that they are complete. Furthermore, these documents are important to ensure a timely processing of the request and to demonstrate a clear record supporting the eligibility decision.

**HRA Response:** “HRA disagrees with this finding. Regarding the lack of essential documents in the CBCFA packages, many CBCFA requests exceed the dollar amounts that can be approved at the center level and are sent to HASA administration for its review and decision. A dedicated staff person ensures that all CBCFA packages coming to administration contain all essential and required documentation. CBCFA packages are routinely denied or returned to the centers for completion or for re-creation for lack of documentation. HASA assumes then that the records that were reviewed in this audit were for requests that were reviewed and approved at the center level.

“In order to ensure that documents are stored in the case records for all CBCFAs, regardless of amount or approval location, HASA plans to:

- Review the specific case records that were reviewed by this audit and identify what the causes were for the missing documentation.
- Re-issue CBCFA packet guidelines to staff to remind them of the required documentation.
- Provide reinforcement training during HASA’s Supervisory Skills Training to reinforce the procedures regarding the maintenance of properly signed forms for the CBCFA packet.
- Further automate the CBCFA process whereby electronic forms will replace paper forms and client signatures on forms will be stored electronically in the case record, via signature pads.”

**Auditor Comment:** Although HRA states that it “disagrees with this finding,” HRA provides no evidence to support its position. In fact, HRA states that it “plans to review the specific case records that were reviewed by this audit and identify what the causes were for the missing documentation.” Accordingly, our finding remains.

**HRA Response:** “Regarding the missing client receipts in the CBCFA packages, the issuance of Client Receipts is a cornerstone of the interaction between the client and the staff person that attests to the receipt of required documents and/or the request for other needed documents.

- Since the Client Receipt is incorporated into virtually every case manager-client contact, HASA is confident that the clients in this audit did receive receipts. The deficiency is more likely attributable to case managers failing to

insert a copy of the receipt into the case records. To correct this deficiency, HASA plans to: Review the specific case records that were reviewed by the audit and identify what the causes were for the missing documentation.

- Re-issue Client Receipt guidelines to staff to remind them of the proper required documentation.
- Create the Client Receipt as an electronic E form which will:
  - Automatically retain every receipt created
  - Capture the client’s signature as evidence of the transaction
  - Further standardize the overall case record maintenance
  - Eliminate the need for workers to create copies for a paper case record
  - Facilitate a more uniform case record standard.”

**Auditor Comment:** HRA does not provide any evidence to support its position that it “is confident that the clients in this audit did receive receipts.” Copies of client receipts were missing from many case files and, therefore, we can not be assured that receipts were provided to the clients. Accordingly, our finding remains.

**HRA Response:** “Also, HASA notes that six of the 18 receipts were for Scattered-site II clients. As directed by Local Law 49, HASA provides clients with receipts. It does not, as a matter of practice, provide receipts to a Scattered-site II vendor acting on behalf of a client. On that basis, these six receipts are not missing because they were not provided to these Scattered-site II vendors.”

**Auditor Comment:** As previously stated, HASA officials did not provide any written procedures that noted this exception. Accordingly, our finding remains.

**Previous Recommendation #5:** “Ensure that supervisors and/or directors track the timeliness in processing CBCFA packages. For packages that are not processed in a timely manner, directors should identify the causes for the delays and develop strategies to address those causes.”

**Previous HASA Response:** “We agree with this recommendation and have instituted tracking of the timeliness of the processing of these packages at all levels, as described above.”

**Current Status:** PARTIALLY IMPLEMENTED

HASA uses the HASA Web to track the timeliness of the processing of the CBCFA packages. The HASA Web provides certain key dates that identify the status of the CBCFA request. The “Case Dates” section of the system provides the following fields:

- **Start Date:** The date that the client makes the initial request for financial assistance.
- **Case Manager Sign-off Date:** The date that the case manager signs off to indicate that the package is complete.

- **Date In:** The date that the Eligibility Unit receives the CBCFA package from the field center.
- **Approval Date:** The date that the CBCFA eligibility specialist approves or denies the financial request.
- **Single Issuance Benefit Date:** The date that the benefits, if approved, are issued. HASA has 30 calendar days to issue the benefits from the date that the client files a complete request for assistance.

Case managers and center directors are able to use these fields in the HASA Web to track the progress of CBCFA requests. It appears that the Eligibility Unit is making decisions on CBCFA requests within five working days and that approved payments are issued within 30 calendar days. However, as stated previously, the centers are not consistently providing completed CBCFA requests to the Eligibility Unit within three working days. For those requests that the field centers did not forward to the Eligibility Unit within three working days, there is no indication that the cause of the delays was identified and steps taken to address it.

***HRA Response:*** “HRA disagrees with this finding. For reasons stated in the response above regarding timeliness (the three day deadline) guidelines, it is now less consequential as to when the ‘parts’ of the process are completed as long as the multiple steps are completed within the 30-day timeframe. HASA has completed a draft of revised CBCFA related procedures that is currently being reviewed by senior staff. The new version will likely place a lessened emphasis on achieving mandated intermediary time frames and will focus more on ensuring that the 30-day timeframe is achieved.”

***Auditor Comment:*** As previously stated, while HRA may decide to revise its three-working-day standard for field offices to provide CBCFA requests to the Eligibility Unit—a standard that the audit shows was often not met—we believe that monitoring adherence to intermediary time frames can help ensure compliance with the 30-calendar-day standard for issuing benefits.

***Previous Recommendation #6:*** “Ensure that W145Ns are completed in a timely manner. The forms should be completed when clients bring in the required documentation for the financial assistance request, as HASA procedures require.”

***Previous HASA Response:*** “We agree with this recommendation and have taken steps to ensure the timely and complete processing of the CBCFA package. Effective October 2002, once the client provides the required documentation, the W145N is signed and included in the CBCFA package.”

**Current Status:** NOT IMPLEMENTED

As stated previously, the completion of the W145N or W137A Request for Emergency Assistance form and the CBCFA package, as well as the forwarding of the request and package

to the Eligibility Unit, are often not accomplished within three working days, as required by HASA procedures.

***Previous Recommendation #7:*** “Ensure that clients sign and date the W145Ns and are given a receipt for documents submitted, as HASA procedures require.”

***Previous HASA Response:*** “We agree with this recommendation and have taken steps to ensure that forms W145N are completed properly and that clients are provided with a receipt. In September 2002, intensive training was provided to staff to highlight the importance of providing clients with a receipt. Since then, ongoing training has reinforced the importance of this requirement.”

**Current Status:** NOT IMPLEMENTED

As stated previously, many of the case files we reviewed lacked signed and dated W145N or W137A Request for Emergency Assistance forms, as well as signed and dated Client Receipts.

***HRA Response:*** “HRA agrees with this finding. In order to ensure that documents are stored in the case records for all CBCFAs, regardless of amount or approval location, HASA plans to:

- Review the specific case records that were reviewed by this audit and identify what the causes were for the missing documentation.
- Reissue CBCFA packet guidelines to staff to remind them of the required documentation.
- Provide reinforcement training during HASA’s Supervisory Skills Training to reinforce the procedures regarding the maintenance of properly signed forms for the CBCFA packet.
- Further automate the CBCFA process whereby electronic forms will replace paper forms and client signatures on forms will be stored electronically in the case record, via signature pads.”

## **RECOMMENDATIONS**

To address the issues that still exist, we recommend that HRA:

1. Program the HASA Web to provide information on the scheduling of client interviews with housing providers.

***HRA Response:*** “HRA agrees with this recommendation. An enhanced version of the online permanent housing application, released in April 2007, allows providers to input the times and dates of upcoming client intake interviews. The case manager, in the instances in which the interview was scheduled by the housing unit at HASA

administration, will be aware of the pending interview and can work directly with the client to ensure his/her attendance.”

2. Endeavor to obtain more timely communication between providers and housing specialists on the results of interviews.

***HRA Response:*** “HRA agrees with this recommendation. An enhanced version of the online permanent housing application, released in April 2007, allows providers to input the results of intake interviews as they occur. HASA now has real-time information on the outcome of interviews rather than relying on weekly summations via FAX.”

3. Ensure that the field centers maintain signed copies of clients’ housing applications.

***HRA Response:*** “HRA agrees with this recommendation and HASA is currently exploring the feasibility of electronic signature pads so that the signed application will reside in an online, retrievable environment. As is current practice, the client would continue to receive a copy of the signed application. In addition, in order to ensure that documents are stored in the case records for all CBCFAs, regardless of amount or approval location, HASA plans to:

- Reissue CBCFA packet guidelines to staff to remind them of the required documentation.
- Provide reinforcement training during HASA’s Supervisory Skills Training to reinforce the procedures regarding the maintenance of properly signed forms for the CBCFA packet.
- Further automate the CBCFA process whereby electronic forms will replace paper forms and client signatures on forms will be stored electronically in the case record, via signature pads.”

4. Identify the causes for delays in forwarding completed CBCFA packages to the Eligibility Unit and develop strategies to ensure that the packages are forwarded to the Eligibility Unit within three working days.

***HRA Response:*** “HRA agrees with this recommendation. HASA has completed a draft of revised CBCFA related procedures that is currently being reviewed by senior staff. The new version will likely place a lessened emphasis on achieving mandated intermediary time frames and will focus more on ensuring that the 30-day timeframe is achieved.”

5. Ensure that case managers, eligibility specialists, supervisors and center directors adequately review the CBCFA packages to ensure that all required forms, including signed and dated financial assistance request forms and client receipts, are completed and maintained by HASA.

***HRA Response:*** “HRA agrees with this recommendation. In order to ensure that documents are stored in the case records for all CBCFAs, regardless of amount or approval location, HASA plans to:

- Review the specific case records that were reviewed by this audit and identify what the causes were for the missing documentation.
- Reissue CBCFA packet guidelines to staff to remind them of the required documentation.
- Provide reinforcement training during HASA’s Supervisory Skills Training to reinforce the procedures regarding the maintenance of properly signed forms for the CBCFA packet.
- Further automate the CBCFA process whereby electronic forms will replace paper forms and client signatures on forms will be stored electronically in the case record, via signature pads.”



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June 19, 2007

Mr. John Graham  
The City of New York  
Office of The Comptroller  
1 Centre Street  
New York, N.Y. 10007-2341

**Re: Follow-up Audit Report on the  
Processing of Clients' Permanent Housing  
Applications by the HIV/AIDS Services  
Administration of the Human Resources  
Administration ME07-055F**

Dear Mr. Graham:

We have received and reviewed the referenced draft report of your follow-up audit of the HIV/AIDS Services Administration Processing of Clients' Permanent Housing Applications.

Attached please find the agency's responses to those findings and recommendations that appeared in the original audit and that your current review has determined are either partially or not implemented.

**Auditors' Previous Finding:**

**HASA Procedures Do Not Adequately Govern the Placement Process"**

The previous audit found that HASA procedures did not ensure that the Housing Unit notified its field centers on the status of client applications for permanent housing or that case managers scheduled interviews between clients and housing providers. In addition, HASA procedures provided no guidance on case file maintenance. HASA was unable to locate 16 of the 120 case files requested.

**Auditors' Previous Recommendation #2:**

Ensure that HASA management develops monitoring tools to track the housing placement process. The monitoring tools should be designed to identify areas where improvement is needed; management should then develop strategies to initiate corrective measures in those areas.

**Agency's Previous Response:**

We agree with this recommendation. As stated above, HASA implemented a new computer system in June 2003 that provides field management staff with access to the Supported Housing Unit database. This system also allows management to track the process and identify areas where improvement is needed.

**Audit's Current Status: PARTIALLY IMPLEMENTED**

In addition to updating its procedure manual to provide more guidance on the duties and responsibilities of staff members involved in the permanent housing process, HASA has updated its computer systems to allow case managers, housing specialists, and management to better track the progress of applications from the data of application to placement. Since the previous audit, HASA has initiated the HASA Web system. The system provides case managers, supervisors, and center director's access to HASA housing, CBCFA, and other related databases.

However, there is a lack of evidence on the HASA WEB that the case managers scheduled any of the client interviews with permanent housing providers, as required in the HASA procedures manual. In fact, the system provides, no information concerning the scheduling of client interviews with providers. Depending on the circumstances, often either the housing provider contacts the client directly or the client initiates contact with the provider. In some instances, the housing specialist may assist in scheduling the interview. However, if the case manager does not schedule the interview and is not informed of the date and time of the interview and is treated fairly by the provider during the interview. As stated in the previous report, case managers at the field centers have primary responsibility for ensuring that their clients' housing needs are met. Thus, it is important that they know when a client has been scheduled for an interview with a provider.

The housing providers inform the specialists of the results of the interviews through weekly faxes. Although this issue was not raised in the previous audit, we believe that more timely communication between providers and housing specialists on the results of interviews would allow the specialists to refer clients to the next provider choice on their application in a timelier manner.

The HASA procedures manual also requires the maintenance of signed permanent housing applications in the client files. This is an important record by which the client attests to the accuracy of the information presented in the application. However, we were unable to locate 8 of 61 client files in our sample at the five field centers. Moreover, signed housing applications were not maintained in 29 (55%) of the remaining 53 client files.

Due to the fact that HASA created the HASA Web yet has still not ensured that case managers actively participate in the scheduling of client interviews with providers, we consider their recommendation to have been partially implemented.

**Agency's Response To Current Status:**

HRA agrees with this finding. Regarding case managers knowing when a client has been scheduled for an interview with a provider, an enhanced version of the online permanent housing

application, released in April 2007, allows providers to input the times and dates of upcoming client intake interviews. The case manager, in the instances in which the interview was scheduled by the housing unit at HASA administration, will be aware of the pending interview and can work directly with the client to ensure his/her attendance. Additionally, HASA will revise its procedures to reflect that HASA staff, other than case managers, who are involved in a client's case have the ability to schedule housing intake interviews. In all instances, though, the case manager will be aware of an impending interview via HASA Web.

This enhanced version of the online permanent housing application also allows providers to input the results of intake interviews as they occur. HASA now has real-time information on the outcome of interviews rather than relying on weekly summations via fax.

Regarding the maintaining of signed applications, HASA is currently exploring the feasibility of electronic signature pads so that the signed application will reside in an online, retrievable environment. As is current practice, the client would continue to receive a copy of the signed application.

#### **Auditors' Previous Finding:**

#### **Only 44 Percent of Financial Assistance Request Packages Receive a Decision Within Mandated Time Frame"**

The previous audit found that only 14 (44%) of the 32 financial-assistance request packages that the field centers completed for sampled clients received a decision from HASA within the required five business days. In addition, there was no evidence that a request form for emergency assistance was completed as required for 13 of the 32 packages.

If a client needs financial assistance to pay expenses, HASA requires that a CBCFA package be prepared. CBCFAs are also prepared for clients who need financial assistance. The client's case manager is responsible for preparing the CBCFA package and submitting it to his or her supervisor. Within 48 hours of completing the package, a center liaison forwards the package of a HASA will issue a check to the appropriate party—usually the landlord. According to the HASA procedures manual the CBCFA decision process should take no more than five business days.

The previous audit also found that 13(41%) of the 32 CBCFA packages reviewed did not have signed and dated Request for Emergency Assistance for an Active Public Assistance Case (form W145N). In addition, in 23 (72% of the 32 packages, there was no evidence that HASA had given clients a receipt for their document submissions, as required.

#### **Auditors' Previous Recommendation #3:**

Ensure that CBCFA packages are processed in a timelier manner and that key events related to the processing are documented in the case files. These events should include at a minimum, the dates packages are returned, and any other significant events that affect the timely processing of the packages.

#### **Agency's Previous Response:**

We agree with this recommendation. During our own internal review in October 2002, HASA identified similar areas of concern with the Case By Case Financial Assessment (CBFCA) process to those disclosed in the audit report. By early December 2002, HASA had changed the entire process. One of these changes was to allow many more of the CBCFAs to be approved by the Center Directors. This has reduced the decision time as well as the time required for the actual benefit issuance. The revised

process incorporates most of the recommendations made by the audit. This includes more timely processing, better review and control of the process at the center level, and more effective communication between case managers and their supervisory staff. This new process has resulted in many benefits being issued on the same day as the decision.

**Audit's Current Status: PARTIALLY IMPLEMENTED**

**Our review of the 43 housing-related CBCFA requests made by the 22 clients in our current sample revealed that, while the Eligibility Unit appears to be making decisions on CBCFA requests within five working days and proved payments are issued within 30 calendar days, the field centers are not consistently providing CBCFA requests to the Eligibility Unit within three working days, as required by the HASA procedures, manual. \***

**In order to process CBCFA requests and track timeliness, each CBCFA package must include amount its supporting documents a Request for Emergency Assistance for An Active Public Assistance Case (form W145N) or a Request for Emergency Assistance or Additional Allowance (form W137A), which must be signed and dated by the client and the appropriate HASA staff. HASA begins to track the timeliness of its processing of a CBCFA request when the client provides all necessary documents related to the request.**

**For the 43 CBCFA requests in our review, the field centers provided to the eligibility Unit the CBCFA packages for 26 (60%) of them after the required three days. Based on our review of case file documents and HASA Web information, the field centers forwarded these packages between 1 and 22 working days after the client provided all necessary documents. Nevertheless, once the Eligibility Unit reviewed the completed CBCFA packages, decisions were made on all 43 housing-related CBCFA requests in our sample within the required five working days as per the HASA procedures manual. HASA officials stress that the more important standard is the requirement that clients receive either the benefit check or a notice that the request was not approved within 30 calendar days of filing a complete request for assistance. HASA approved 38 of the 43 requests and issued payments within the required 30-day time frame for each of them.**

**Agency's Response To Current Status:**

HRA disagrees with this finding. The guideline of three working days for the submission of the CBCFA packet was designed and implemented during an era when the CBCFA process and the timeliness of issued benefits was a more paper intensive process. The objective of instituting a submission time frame was to encourage staff to get the process moving as quickly as possible on the front end to ensure that there would be adequate time to complete the process for the issuance of benefits within the mandated 30 days. As HASA's performance in CBCFA processing greatly improved over the years it has become less consequential as to when the "parts" of the process are completed as long as the multiple steps are completed within the 30-day timeframe.

HASA has completed a draft of revised CBCFA related procedures that is currently being reviewed by senior staff. The new version will likely place a lessened emphasis on achieving mandated intermediary time frames and will focus more on ensuring that the 30-day timeframe is achieved.

**Auditors' Previous Recommendation#4:**

**Ensure that supervisors of the case managers and eligibility specialists as well as center directors adequately review the CBCFA packages to ensure that all are required documentation is present and complete.**

**Agency's Previous Response:**

We agree with this recommendation and have already taken steps to implement it. As described in our response to Recommendation #3 above, by early December 2002, HASA had changed the entire CBCFA process. One of these changes was to allow many more of the CBCFAs to be approved by the Center Directors, resulting in more time processing, better review and control of the process at the center level, and more effective communication between case managers and their supervisory staff.

**Audit's Current Status: NOT IMPLEMENTED**

While HASA has improved the timeliness of its processing of CBCFA packages, the packages that we reviewed still lacked essential documents. Our review of 22 client files with 43 CBCFA housing-related requests for financial assistance revealed that many of the 43 CBCFA packages lacked such documents.

To comply with Local Law 49 of 1997, HASA is required to track the timeliness of the CBCFA process from the date the client requests a particular service or benefit to the time that the benefits are issued. As stated above, in order to process the request and track timeliness, each CBCFA package must include among its supporting documents a W145N or W137A Request for Emergency Assistance form, which must be signed and dated by the client and the appropriate HASA staff.

Our review of the 43 CBCFA requests for financial assistance revealed that 20 (47%) of the 43 packages lacked signed and dated W145N or W137A forms.

In addition to documents certifying the client request for financial assistance, each CBCFA package must contain a signed and dated Receipt for Documents Required to Establish Eligibility for Benefits and Services form (this is also known as the Client Receipt). A signed and dated copy of the Client Receipt either indicates that the client has provided all necessary documents or identifies any additional information or documents needed to complete the application.

Our review of 43 CBCFA requests for financial assistance revealed that 18 (42%) of the 43 requests packages did not contain a completed, signed, and dated Client Receipt. (On May 24, 2007, HASA officials told us that it is not required to provide client Receipts to Scatter-site II clients. Six of the 18 cases in which signed and dated Client Receipts were unavailable involved Scatter-site II clients. However, HASA officials did not provide any written procedures that noted this exception.) Incomplete CBCFA packages indicate that the supervisors and center directors are still not reviewing the packages to ensure that they are complete. Furthermore, these documents are important to ensure a timely processing of the requests and to demonstrate a clear record supporting the eligibility decision.

**Agency's Response To Current Status:**

HRA disagrees with this finding. Regarding the lack of essential documents in the CBCFA packages, many CBCFA requests exceed the dollar amounts that can be approved at the center level and are sent to HASA administration for its review and decision. A dedicated staff person ensures that all CBCFA packages coming to administration contain all essential and required

documentation. CBCFA packages are routinely denied or returned to the centers for completion or for re-creation for lack of documentation. HASA assumes then that the records that were reviewed in this audit were for requests that were reviewed and approved at the center level.

In order to ensure that documents are stored in the case records for all CBCFAs, regardless of amount or approval location, HASA plans to:

- Review the specific case records that were reviewed by this audit and identify what the causes were for the missing documentation.
- Re-issue CBCFA packet guidelines to staff to remind them of the required documentation.
- Provide reinforcement training during HASA's Supervisory Skills Training to reinforce the procedures regarding the maintenance of properly signed forms for the CBCFA packet.
- Further automate the CBCFA process whereby electronic forms will replace paper forms and client signatures on forms will be stored electronically in the case record, via signature pads.

Regarding the missing client receipts in the CBCFA packages, the issuance of Client Receipts is a cornerstone of the interaction between the client and the staff person that attests to the receipt of required documents and/or the request for other needed documents.

- Since the Client Receipt is incorporated into virtually every case manager-client contact, HASA is confident that the clients in this audit did receive receipts. The deficiency is more likely attributable to case managers failing to insert a copy of the receipt into the case records. To correct this deficiency, HASA plans to:  
Review the specific case records that were reviewed by this audit and identify what the causes were for the missing documentation.
- Re-issue Client Receipt guidelines to staff to remind them of the proper required documentation
- Create the Client Receipt as an electronic E form which will:
  - Automatically retain every receipt created
  - Capture the client's signature as evidence of the transaction
  - Further standardize the overall case record maintenance
  - Eliminate the need for workers to create copies for a paper case record
  - Facilitate a more uniform case record standard.

Also, HASA notes that six of the 18 receipts were for Scattered-site II clients. As directed by Local Law 49, HASA provides clients with receipts. It does not, as a matter of practice, provide receipts to a Scattered-site II vendor acting on behalf of a client. On that basis, these six receipts are not missing because they were not provided to these Scattered-site II vendors.

**Auditors' Previous Recommendation #5:**

**Ensure that supervisors and/or directors track the timeliness in processing CBCFA packages. For packages that are not processed in a timely manner, directors should identify the causes for the delays and develop strategies to address those causes.**

**Agency's Previous Response:**

We agree with this recommendation and have instituted tracking of the timeliness of the processing of these packages at all levels, as described above.

**Audit's Current Status: PARTIALLY IMPLEMENTED**

HASA used the HASA Web to track the timeliness of the processing of the CBCFA packages. The HASA Web provides certain key dates that identify the status of the CBCFA request. The "Case Dates" section of the system provides the following fields.

- **Start Date:** The date that the client makes the initial request for financial assistance.
- **Case Manager Sign –off Date:** The date that the case manager signs off to indicate that the package is complete.
- **Date in:** The date that the Eligibility Unit receives the CBCFA package from the field center.
- **Approval Date:** The date that the CBCFA eligibility specialist approves or denies the financial request.
- **Single Issuance benefit Date:** The data that the benefits, if approved, are issued. HASA has 30 calendar days to issue the benefits from the date that the client files a complete request for assistance.

Case managers and center directors are able to use these fields in the HASA Web to track the progress of CBCFA requests. It appears that the eligibility Unit is making decisions on CBCFA requests within five working days and that approved payments are issued within 30 calendar days. However, as stated previously, the centers are not consistently providing completed CBCFA requests to the eligibility unit within three working days. For those requests that the field centers did not forward to the Eligibility Unit within three working days, there is no indication that the cause of the delays was identified and steps taken to address it.

**Agency's Response To Current Status:**

HRA disagrees with this finding. For reasons stated in the response above regarding timeliness (the three day deadline) guidelines, it is now less consequential as to when the "parts" of the process are completed as long as the multiple steps are completed within the 30-day timeframe. HASA has completed a draft of revised CBCFA related procedures that is currently being reviewed by senior staff. The new version will likely place a lessened emphasis on achieving mandated intermediary time frames and will focus more on ensuring that the 30-day timeframe is achieved.

**Auditors' Previous Recommendation #6:**

**Ensure that W145Ns are completed in a timely manner. The forms should be completed when clients bring in the required documentation for the financial assistance request, as HASA procedures require.**

**Agency's Previous Response:**

We agree with this recommendation and have taken steps to ensure the timely and complete processing of the CBCFA package. Effective October 2002, once the client provides the required documentation, the W145N is signed and included in the CBCFA package.

**Audit's Current Status: NOT IMPLEMENTED**

As stated previously, the completion of the W145N or W137A Request for Emergency Assistance form and the CBCFA package, as well as the forwarding of the request and package to the Eligibility Unit, are often not accomplished within three working days, as required by HASA procedures.

**Agency's Response To Current Status:**

HRA disagrees with this finding. For reasons stated in the response above regarding timeliness (the three day deadline) guidelines, it is now less consequential as to when the "parts" of the process are completed as long as the multiple steps are completed within the 30-day timeframe. HASA has completed a draft of revised CBCFA related procedures that is currently being reviewed by senior staff. The new version will likely place a lessened emphasis on achieving mandated intermediary time frames and will focus more on ensuring that the 30-day timeframe is achieved.

**Auditors' Previous Recommendation #7:**

**Ensure that clients sign and date the W145Ns and are given a receipt for documentation submitted, as HASA procedures require.**

**Agency's Previous HASA Response:**

We agree with this recommendation and have taken steps to ensure that forms W145N are completed properly and that clients are provided with a receipt. In September 2002, intensive training was provided to staff to highlight the importance of providing clients with a receipt. Since then, ongoing training has reinforced the importance of this requirement.

**Audit's Current Status: NOT IMPLEMENTED**

As stated previously, many of the case files we reviewed lacked signed and dated W145N or W137A Request for Emergency Assistance forms, as well as signed and dated Client Receipts.

**Agency's Response To Current Status:**

HRA agrees with this finding. In order to ensure that documents are stored in the case records for all CBCFAs, regardless of amount or approval location, HASA plans to:

- Review the specific case records that were reviewed by this audit and identify what the causes were for the missing documentation.
- Re-issue CBCFA packet guidelines to staff to remind them of the required documentation.
- Provide reinforcement training during HASA's Supervisory Skills Training to reinforce the procedures regarding the maintenance of properly signed forms for the CBCFA packet.
- Further automate the CBCFA process whereby electronic forms will replace paper forms and client signatures on forms will be stored electronically in the case record, via signature pads.

## RECOMMENDATIONS IN CURRENT REVIEW:

To address the issues that still exist, we recommend that HRA:

### Auditors' Recommendation # 1:

**Program the HASA Web to provide information on the scheduling of client interviews with housing providers.**

### Agency's Response:

HRA agrees with this recommendation. An enhanced version of the online permanent housing application, released in April 2007, allows providers to input the times and dates of upcoming client intake interviews. The case manager, in the instances in which the interview was scheduled by the housing unit at HASA administration, will be aware of the pending interview and can work directly with the client to ensure his/her attendance.

### Auditors' Recommendation # 2:

**Endeavor to obtain more timely communication between providers and housing specialists on the results of interviews.**

### Agency's Response:

HRA agrees with this recommendation. An enhanced version of the online permanent housing application, released in April 2007, allows providers to input the results of intake interviews as they occur. HASA now has real-time information on the outcome of interviews rather than relying on weekly summations via FAX.

### Auditors' Recommendation # 3:

**Ensure that the field centers maintain signed copies of clients' housing applications.**

### Agency's Response:

HRA agrees with this recommendation and HASA is currently exploring the feasibility of electronic signature pads so that the signed application will reside in an online, retrievable environment. As is current practice, the client would continue to receive a copy of the signed application. In addition, in order to ensure that documents are stored in the case records for all CBCFAs, regardless of amount or approval location, HASA plans to:

- Re-issue CBCFA packet guidelines to staff to remind them of the required documentation.
- Provide reinforcement training during HASA's Supervisory Skills Training to reinforce the procedures regarding the maintenance of properly signed forms for the CBCFA packet.
- Further automate the CBCFA process whereby electronic forms will replace paper forms and client signatures on forms will be stored electronically in the case record, via signature pads.

### Auditors' Recommendation # 4:

**Identify the causes for delays in forwarding completed CBCFA packages to the Eligibility Unit and develop strategies to ensure that the packages are forwarded to the Eligibility Unit within three working days.**

**Agency's Response:**

HRA agrees with this recommendation. HASA has completed a draft of revised CBCFA related procedures that is currently being reviewed by senior staff. The new version will likely place a lessened emphasis on achieving mandated intermediary time frames and will focus more on ensuring that the 30-day timeframe is achieved.

**Auditors' Recommendation # 5:**

**Ensure that case managers, eligibility specialists, supervisors and center directors adequately review the CBCFA packages to ensure that all required forms, including signed and dated financial assistance request forms and client receipts, are completed and maintained by HASA.**

**Agency's Response:**

HRA agrees with this recommendation. In order to ensure that documents are stored in the case records for all CBCFAs, regardless of amount or approval location, HASA plans to:

- Re-issue CBCFA packet guidelines to staff to remind them of the required documentation.
- Provide reinforcement training during HASA's Supervisory Skills Training to reinforce the procedures regarding the maintenance of properly signed forms for the CBCFA packet.
- Further automate the CBCFA process whereby electronic forms will replace paper forms and client signatures on forms will be stored electronically in the case record, via signature pads.

Should you have any questions concerning this matter, please contact Hope Henderson, the Director of the Bureau of Audit Coordination at (212) 331-6019.

Sincerely,



Holly E. Brown

CC:  
Commissioner R. Doar  
R. Esnard  
P. Glasc