

Community Programs Review

April 7, 2014

Office of the City Auditor

The Office of the City Auditor conducted this project in accordance with the International Standards for the Professional Practice of Internal Auditing

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Executive Summary

The Office of the City Auditor's (OCA) 2013 Annual Work Plan included a review of internal and City-funded external community programs to determine if the mandates of the programs overlap. We estimate that the City of Edmonton allocates more than \$120 million annually to fund community programs. Duplicate or overlapping programs can result in an inefficient use of taxpayer funds.

This audit had two objectives:

Objective 1: To determine whether appropriate controls exist to ensure that community programs do not duplicate one another.

Objective 2: To determine whether there are opportunities for administrative efficiencies.

Overall we found that the funding of community programs is being well managed. The following summarize our observations.

- The risk of creating new programs which duplicate or overlap existing ones is sufficiently mitigated. A number of existing community programs shared the same objectives, services, and recipients. However, each of those programs was sufficiently differentiated to be a separate program.
- 2. There is a low risk of recipients 'double-dipping' between grant programs due to current practices. These current practices are not documented.
- 3. There is a risk that organizations that receive funds directly from Council may receive funds for the same purpose through a community program.
- 4. The Administration is currently implementing new technology to improve the management of grant information and the efficiency of their processes.

We made one recommendation that current practices be documented to ensure consistent application across programs and that rules be created to define program eligibility across the City. This page intentionally left blank

Community Programs Review

1 Introduction

The Office of the City Auditor's (OCA) 2013 Annual Work Plan included a review of internal and City-funded external community programs to determine if the programs' mandates overlap. As duplication and overlap are often perceived as indicators of inefficiency, we established the following objectives to determine whether the City's community programs are structured and delivered in a manner that provides good value.

Objective 1: To determine whether appropriate controls exist to ensure that community programs do not duplicate one another.

Objective 2: To determine whether there are opportunities for administrative efficiencies.

2 Background

The term 'community program' has a variety of definitions within the City. For this review, a community program was defined as any social enterprise, program, organization, or agency that has social, charitable, or community-based objectives that provide benefit to a specific, defined demographic or target group.

The City's total investment in community programs cannot be easily determined for a number of reasons. Program costs are distributed across all City departments and can be recorded as either expenditures (e.g., grant funds paid) or reductions in revenue (e.g., offered discounts) depending on the program. We estimate that the City allocates more than \$120 million per year for community programs with a variety of purposes including arts and heritage, social service/community development, multicultural, and recreation/amateur sports.

Our estimate is based on the information contained in the following two reports that were produced in 2012.

• In January 2012, the OCA issued a report on the administration of grants.¹ The report showed that approximately \$91 million in grants were awarded in 2010.

¹ Grant Administration Audit, report dated January 16, 2012. (<u>http://www.edmonton.ca/city_government/documents/11331_Grant_Administration.pdf</u>)

In November 2012, the Community Services department report on funding sources for non-governmental facilities² was received by Executive Committee. The report showed that the City forgave space rent revenue and property taxes in excess of \$30 million in addition to the grant funding provided. The report identifies some large "Flagship" (e.g., Art Gallery of Alberta, Citadel Theatre, and Winspear Centre) organizations that receive more than a million dollars through a combination of tax forgiveness and grants.

The majority of community programs are administered by Community Services. There are, however, grant, subsidy, discount and rebate programs that are administered by other departments across the City.

In November 2013, Administrative Directive A1460 – *Grants and Other City Contributions* was approved. The purpose of this directive is to establish consistent practices in the administration of grant programs and other contributions to ensure accountability, effective oversight, and reporting of outcomes achieved.

3 Risk, Scope and Audit Criteria

3.1 Key Risks

We identified three key risks based on the number of community programs, the costs of the programs, and the decentralized administration of programs.

- 1. Program Creation/Maintenance Programs could be created or could evolve to duplicate other programs. This would reduce efficiency and increase organizational costs.
- 2. Evaluation of Applications Program documentation and processes may not be integrated, which could result in applicants receiving similar benefits for the same purpose from multiple programs.
- 3. Information Management Applicant and program information may be inconsistent or poorly managed, which could increase the risk of financial loss.

3.2 Scope

We recognize that our definition of a community program is very broad. We chose to use such a broad definition to ensure that no community programs were inadvertently excluded from review due to unique or unknown characteristics. In order to manage the scope of this audit, we excluded the following:

1. One-time funded special events and major capital projects that are administered by the City. The risk of duplication of these activities is low.

² Facility Funding Strategy for Civic Partners and Other External Organizations (<u>http://sirepub.edmonton.ca/sirepub/cache/2/kapqutzggx0ppcd4bkbotmn3/18416702112014092103576.P</u> <u>DF</u>)

- 2. Programs that are offered to the general population. To benefit from a community program, the recipient was typically required to submit an application and meet specific qualifications.
- 3. Rent and tax forgiveness programs.
- 4. Programs administered by the Edmonton Public Library or Edmonton Police Service.

Evaluation of the effectiveness of the individual programs in achieving their mandates was also out of scope as this was covered in the OCA's *2012 Grant Administration Audit* report.

3.3 Audit Criteria

We developed the following criteria to assess how effectively the City mitigates program risks.

- The process for creating or changing a community program mandate incorporates an internal and external environmental scan for existing programs with similar mandates.
- Existing community program mandates are coordinated with one another and don't unnecessarily overlap.
- The community program application/assessment criteria and processes provide assurance that recipients are not benefiting from multiple programs.
- Administrative processes are consistent and consolidated across the corporation (i.e., centralized information management, consistent application process, etc.).

4 Methodology

We asked Departments to provide information about the community programs operated by their branches. In total, the Administration identified 42 community programs they believed fit our definition. These include grant programs, discounts on services, rebate programs, and direct services. We do not believe this set of 42 programs is a comprehensive list of community programs, but it was sufficient to achieve our audit objectives. A list of the 42 programs is provided in Appendix I.

The information collected for each program included the objectives, services, and the recipients or beneficiaries of the program. It also included information about the funding/delivery method and any other programs or services with which the program was coordinated. We analysed this information to identify programs where there was the greatest potential for duplication or overlap. We used the following three characteristics in our assessments:

• The **objective** of the program was roughly defined as the social 'cause' that the program was intended to address.

- The service was the methods or activities of the program used to meet the objective.
- The **recipient** was the individual or organization that received benefit from the program.³

In our review of the 42 community programs, we identified 11 different program objectives, 10 different types of services provided, and 9 different recipient types. These are identified in Table 1.

Table 1,	Program	Characteristics
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Objectives	Services	Recipients
 Animal Welfare Arts & Culture Community Building/ Development (Geographic) Multicultural Ethnic Diversity Recreation Leisure Social Social Services Low Income Environmental Sports Safety Special Interest Group Support 	 Housing /Home Improvement Education Business Development / Improvement Counseling Support Group Travel/Transportation Food Social Leisure Recreation Employment Core Operational/Administrative Support Facility/Equipment Support 	 Men Youth Seniors Women Children or Families Aboriginals Businesses Community Groups Non-Profit Organizations

There are 990 unique combinations of these characteristics. We identified 802 of the possible combinations in the 42 community programs. Some programs have a

Example 1

The Community Investment Operating Grant program has a mandate to provide operating subsidies to non-profit organizations that have social services, multicultural, or recreation/amateur sport mandates. This program has 44 unique combinations of objectives/services/recipients making it one of the programs with the broadest mandates. considerably broader mandate than others, serving multiple objectives and offering a variety of services to many different recipients. Other programs serve very narrow objectives, offering a single service to a single recipient group. Example 1 illustrates one of the programs with a broad mandate.

The different combinations of objectives, services, and recipients were analyzed to identify the most common combinations. Programs with broad mandates have the greatest potential of overlap. We checked these to ensure they were in the sample we selected for further review.

³ Recipients were coded as both direct recipients and, in some cases, indirect recipients. This was intentional in order to help us understand who was actually served by the community program in cases where services were delivered by a third party organization.

5 Observations and Recommendations

Community programs that share the same mandate (i.e., objectives, services, and recipients) have a higher risk of duplication or overlap. Fifteen of the 42 programs we analyzed share mandates or have broad mandates. We considered these programs to have a higher risk of duplication or overlap and selected them for further analysis. These programs share one or more of the following three mandates.

- 1. They provide housing/home improvement services to low income individuals.
- 2. They provide core funding or core services to non-profit organizations to support Arts and Culture (excluding Community Leagues.)
- 3. They are social services programs that provide education or personal development services to both individuals and organizations.

The 15 higher risk programs⁴ selected for further analysis are summarized in Table 2.

	Combination 1	Combination 2	Combination 3
Objective	Low Income	Arts & Culture	Social Services
Service	Housing/Home Improvement	Core Funding	Education/ Personal Development
Recipient	Individuals (Women, Men, Seniors, Families)	Organizations (excluding Community Leagues)	All Recipients
Programs	Cornerstones I Cornerstones II	Emerging Immigrant and Refugee Communities Grant Program*	 Family & Community Support Services (FCSS) Grant*
	 CO2RE – HOPE Program Energy Efficiency Rebates Homeward Trust 	 Edmonton Heritage Council (EHC)/ Living Local Arts & Heritage in 	 Neighbourhood Revitalization Matching Fund and Small
	 Homeward Trust Foundation Edmonton Grant City of Edmonton Social 	 Neighbourhoods Grants Community Investment Operating Grant 	 Sparks* Emerging Immigrant and Refugee Communities Grant
	Housing Debt and Subsidies Program	Charitable Organization Reduced Waste Disposal Rate	 Abilities in Action
		Edmonton Arts Council (EAC) Community Investment Grants	 Sustainable Food Edmonton (City Farm) Community Gardens

Table 2, Higher Risk Program/Mandate Combinations

* Denotes a higher risk program with a broad mandate.

The results of our review of these programs are summarized in the following sections.

⁴ The Emerging Immigrant Grant program appears under combination 2 and combination 3 as it addresses both mandates.

5.1 Duplicate Community Programs

Duplicate programs are those that provide the same service to the same recipients for the same purpose.

5.1.1 Review of Existing Programs

The only program duplication included in the 15 programs listed in Table 2 was Cornerstones I and Cornerstones II secondary suite funding. This duplication was a deliberate choice to sustain two distinct programs in order to comply with external funding requirements. No other programs identified in the sample sets were considered to be duplicates.

Based on our review, the risk that existing community programs inadvertently duplicate one another has been effectively managed.

5.1.2 Review of Program Creation/Change

Based on our research, one of the key controls to prevent the duplication of programs is a full internal and external review of existing programs prior to creating new programs or changing existing programs.

We found that community programs are conceived and created for a variety of reasons, the most common being in response to an under-served need in the community. We were advised that a comprehensive program review process takes place before a new program is created or an existing program is changed. We reviewed documentation for

nine projects/ programs initiated over the past five years to determine the type of reviews that were completed. The documents we reviewed demonstrated that a comprehensive review process was in place that includes an analysis to determine if a gap exists or if other programs exist that could fill the need.

The risk of program duplication is sufficiently managed.

Other factors that mitigate the risk of duplicate program creation include:

- 1. The low volume of programs which are created.
- 2. Portfolios of programs with similar outcomes or services are typically consolidated within individual departments, branches, and sections with extensive knowledge of the subject matter.

Based on the results of our review we believe the risk of creating a program that duplicates an existing program is appropriately managed.

5.2 Overlapping Programs

Overlapping programs provide a similar service to the same recipients to achieve a similar objective. Overlap can occur within a community program (e.g., between grants)

or between community programs. This could lead to double-dipping if a recipient qualified for multiple grants for the same purpose.

5.2.1 Grant Review

We reviewed the list of organizations and individuals who received grants in 2012 from the Community Investment Operating Grant, Emerging Immigrant & Refugee Community Grant, and Neighbourhood Revitalization Grant programs. We did not find any recipients who could be perceived as 'double-dipping' in that they receive funds from multiple community programs for the same purpose.

We identified a number of grants provided to Neighbourhood Revitalization recipients who might have also been eligible to receive funding under the Emerging Immigrant and Refugee Community Grant program. This was not due to community program mandate overlap, but because projects initiated by the community can legitimately meet the eligibility criteria of two distinct community programs.

We also reviewed a list of over 300 grants totalling approximately \$3 million. We were only able to identify three awards that could be questioned. These awards were for less than \$20,000 in total with two of them being under \$5,000. The three awards were for

non-profit organizations (dance societies) that received funding from the Community Investment Operating Grant instead of the Arts/Festivals Operating Grant. We were advised that these groups identified themselves as "recreational or cultural" dance groups on their applications, therefore, qualifying under the Community Investment

There is a low risk of recipients 'double-dipping' from available grants.

Operating Grant. If these groups had self identified as performance-based, they would have qualified for an Arts/Festivals Operating Grant.

In accordance with the Community Investment Operating Grant Guide, the applicants only applied for and received funding from one program even though they may have qualified for funding from either.

Based on our review, we believe the current controls have minimized the risk of recipients receiving grants for the same purpose from multiple programs.

5.2.2 Process Review

A key control to manage the risk of applicants receiving funding from multiple programs for the same purpose is the coordination of similar programs. For this review, programs were considered to be coordinated when, in the mandate or application documents, there was a clear indication of how one program interacted with another.

Grants within a Community Program

We found that grant programs were coordinated when they were created together as a complementary set (e.g., Community Investment Operating Grants) or because they shared the same intended outcomes (e.g., Cornerstones). We identified programs which have explicit rules in place to prevent a recipient from incorrectly receiving multiple grants from the same community program.

For example, the Community Investment Operating Grant Guide contains a clear statement indicating that an organization may only receive one grant from this program. There are also instructions for applicants to identify the grant for which they are eligible within the program.

Between Community Programs

In order to provide organizations with the greatest opportunity to benefit from various community programs and funding opportunities, the following undocumented practices currently exist:

- 1. Applicants may apply to any program for which they meet the criteria. There are no restrictions on applications.
- 2. Applicants receiving funding from an operating grant program are also eligible to apply for a grant for qualifying projects under a different community program.
- 3. There are no restrictions on accessing community programs that are not grantbased (e.g., rebates, discounts). For example, an organization may receive grant funding in addition to a discount on waste disposal fees and property tax benefits.
- 4. Organizations that receive operating or project funds directly from Council remain eligible to receive benefits from community programs, including grant funding for the same purpose.

These practices, while addressing community needs, increase the risk of double-dipping. As we found no evidence of double-dipping, we believe that this risk has been managed through informal communication practices. These Current practices prevented potential double-dipping; however, these practices are not documented.

practices rely on reviewers being aware of applicants applying for or receiving funds from other operational areas across the corporation. This awareness is achieved through informal communication only between reviewers within and between branches of Community Services. Although the informal practices have been effective at preventing double-dipping, there is a risk that these may not be effective in the event of staffing changes where new employees may not have the experience to identify potential double-dipping or the internal relationships to bring attention to questionable applications.

The lack of formal documentation defining the eligibility of applicants to receive multiple grants for the same purpose increases this risk. Currently when reviewers are aware of

multiple applications, the applicant is requested to choose one or would be offered the one with the higher dollar amount. However, this practice is undocumented.

Additionally, there are no documented guidelines that define the relationships between programs. While the informal practices that occur within Community Services may be effective at preventing double-dipping within the majority of grant programs, there are no practices or guidelines to prevent double-dipping with programs administered in other departments or through Council.

We believe current practices and informal review guidelines need to be documented to increase applicant awareness of expectations, ensure that all reviewers are applying the same rules, and ensure that effective communication among reviewers across the organization is taking place.

Organizations that receive funds directly from Council are not restricted from receiving additional funds for the same purpose through a grant program.

Recommendation 1 – Document Internal Review Guidelines

The OCA recommends that the Community Strategies and Development Branch Manager:

- Formalize the current practices and guidelines used by Community Services to prevent recipients from double dipping and;
- Create and document procedures that define applicants' eligibility to receive benefits from different sources within the City.

Management Response and Action Plan

Accepted

Action Plan:

Community Services agrees with the recommendation and has initiated documentation of current practices and drafting of guidelines to both define eligibility for applicants who receive grants from various City sources and to prevent duplication. This will be accomplished by enhancing eligibility information for applicants and improving written procedures for staff' to ensure effective, consistent administration of applications.

Planned Implementation Date: June 2014

Responsible Party: Manager, Community Strategies and Development

5.3 Community Program Management

Community Services reviews over 1,800 grant applications each year and allocates approximately \$30 million in funding. These are typically grant programs in which eligible individuals or organizations apply to the City for funding for a variety of purposes. This section of the report is focused on the effectiveness of administration

and information management of the grant programs in the Community Services department.

Community Services Department uses a number of different approaches and practices to determine grant eligibility and evaluate applications. Example 2 provides an overview of three different processes.

Example 2

Risk Based

The Emerging Immigrant and Refugee Community Program has an evaluation process for grants under \$5,000 which is streamlined and has a minimal number of controls. There is a separate evaluation process for grants over \$5,000 which has a more intense evaluation process with significantly more controls. This segregation increases the efficiency of the process for high volume/low risk grants, while providing stronger controls for grants where the financial risk is higher.

Formula Based

The amounts awarded under the Community Operating Investment Grants program are determined using an objective formula. The formula is based on the applicant's income from the prior year, the number of qualified applicants, and funding in the program budget. Financial Services and Utilities department staff participates in evaluating the applications. This structure allows for a fair, transparent evaluation process and reduces the risk that applications may be evaluated incorrectly.

Subjective/Outcome Based

Community Services staff work closely with applicants to develop ideas and projects that can be eligible for funding through either the Neighbourhood Revitalization program and/or the Emerging Immigrant and Refugee Community Grant program. Applications are evaluated based on their potential contribution towards the achievement of the City's strategic objectives. This helps to ensure that the programs are achieving their objectives and builds leadership capacity in the community.

The similarities among various community programs suggest there may be opportunities to share best practices, resources, and expertise by consolidating administrative functions. However, the differences between the programs need to be considered to determine if increasing administrative efficiency would result in a loss in program effectiveness by reducing community support and the number of eligible applications.

For example, both the Emerging Immigrant and Refugee Community program and Neighbourhood Revitalization program can fund similar projects to support different objectives. These programs involve a collaborative application and project development process between the applicant and City staff to ensure project success. This outcomebased approach supports the development of capacity, competencies, and leadership skills in the community. Combining the administrative functions could reduce the coaching and support available to applicants and, therefore, the effectiveness of the program in achieving its outcomes. The evaluation processes employed by Community Services demonstrates that they understand the need to balance administrative efficiency with program effectiveness. Based on discussions with management and staff, we believe they will continue to monitor this balance as new programs are introduced or existing programs are changed.

Information Management

The management of information is an activity which, if not performed well, can result in a decrease in administrative efficiency and effectiveness and an increase in financial risk through misallocated funds. We noted that program information is not consolidated across the City and with organizations that provide grants on behalf of the City (e.g., Edmonton Arts Council).

When we discussed this with Community Services staff, they advised us that a Customer Relationship Management (CRM) project was initiated in 2010 and that a new information management system would be

completed and implemented in 2014.

Upon completion, Community Services expects to be able to administer grants more efficiently through the automation and workflow processes that are part of the new technology. They also expect that the use of the system will be extended beyond the current set of grants. The realization of these Improvements to grant information management are currently being addressed through the implementation of new technology.

benefits will be a significant step forward for consolidating community program information across the organization, which can help improve decision making and service delivery. More details on this project and its benefits have been provided in Appendix II.

6 Conclusion

The first objective of this audit was to determine whether appropriate controls exist to ensure that community programs do not duplicate one another. In our opinion, there is a very low risk of program duplication. However, we recommended that current practices be documented to ensure consistent application across programs and that formalized procedures be created to define program eligibility across the City.

The second objective of this audit was to determine whether there are opportunities for administrative efficiencies. As part of their project to implement new information management technology, Community Services has identified a comprehensive list of expected efficiencies prior to this audit (Appendix II). They have begun the implementation of the technology with the expected efficiencies to be realized upon completion.

We thank management and staff from all departments who provided us with information we requested during this audit. We particularly acknowledge the support and cooperation of Community Services Department management and staff.

Appendix I – Submitted Community Programs

Program Name

Community Services

- 1. Neighbourhood Revitalization
- 2. Emerging Immigrant and Refugee Community Grant Program
- 3. Wicihitowin Circle of Shared Responsibilities annual operating funding
- 4. Vision for Age Friendly Edmonton annual operating funding
- 5. REACH Edmonton Council
- 6. Institute for the Advancement of Aboriginal Women annual operating funding
- 7. Community League Grant Program
- 8. Community Investment Travel Grant
- 9. Seniors Centres Investment Program
- 10. Leisure Access Program
- 11. City of Edmonton Family and Community Support Services (FCSS)
- 12. Community Investment Grant
- 13. Universiade 83 Foundation Grant
- 14. Edmonton Seniors Coordinating Council
- 15. Edmonton Sports Council annual operating funding
- 16. Edmonton Heritage Council annual operating funding
- 17. Edmonton Federation of Community Leagues annual operating funding
- 18. Edmonton Chamber for Voluntary Organizations annual operating funding
- 19. Edmonton Arts Council annual operating funding
- 20. Edmonton Aboriginal Business & Professional Association annual operating funding
- 21. Community Gardens
- 22. Community League Infrastructure Program
- 23. Community Facility Partner Capital Grant
- 24. Africa Centre Annual Funding
- 25. Sustainable Food Edmonton City Farm
- 26. Relentless Outreach to the Homeless/Violence Reduction Plan
- 27. Capital City Clean Up
- 28. Prevent Another Litter Subsidy
- 29. Animal Rescue Fund
- 30. Edmonton Humane Society Funding Agreement

Corporate Services

31. Abilities in Action

Financial Services & Utilities

32. Charitable Organization Reduced Disposal Rate

Program Name

Sustainable Development

33. Facade Improvement Program

- 34. Development Incentive Program
- 35. City of Edmonton Social Housing Debt and Subsidies Program
- 36. CO2RE Home Energy Efficiency
- 37. Brownfield Grant Program
- 38. Annual Grant to Homeward Trust Edmonton
- 39. Cornerstones II
- 40. Cornerstones I Affordable Housing Program

Transportation Services

- 41. Subsidized Transit Fares and Fare Programs
- 42. ETS Stuff-a-Bus

Appendix II – System Implementation Benefits

The goal of the Funding Management Application project is to provide the business with an automated enterprise-based solution that supports the full grant and funding management life cycle.

Current State	Future State	Impact
There is no computerized application that allows funding management workflow to be electronically tracked.	A new system will be created that will enable COE staff, or community partners to replace manual processes.	It will become much easier and more efficient for funding to be tracked and managed electronically.
No current online application submission process and application information manually entered into a system.	Applicants will be able to submit electronically and have data inputted into the system automatically.	It will make it much easier for potential applicants to apply electronically. External users will also be more appreciative of City's efforts to simplify the application process.
Only hard copy submission and storage of additional documents.	Applicants will be able to attach supporting documents using the system and stored electronically.	This will make it easier for applicants to submit applications electronically.
Review committee uses hard copies of application packages to assess applications and tabulate grant awards.	Review committee can access applications via the web, tabulate assessments, and make allocations electronically.	Allowing the review committee to access, view, discuss and process allocations electronically will make the allocation process more efficient, and with less paper.
Manual and hard copy tracking of grant payments and other inventory items	Tracking of payments and inventory of items are done electronically and automatically.	This will create a more streamlined, and efficient method of tracking payments. This will improve the time it takes funding managers and administrators to complete reports.
Manually compiling census and contact data from multiple systems	Input data from other systems to administrate and calculate grant awards automatically including aggregating census information by a variety of admin areas in SLIM.	Acquiring this data electronically and geographically, will save funding administrators hours of calculating work by providing the correct figure instantly.
Manually aggregating data and creating reports across funding programs and work units.	System to produce a variety of reports on demand based upon variables requested by user.	Creating reports across funding programs upon demand greatly reduces the amount of time and effort to create reports.
Applicant unable to track the progress of their requested support	Applicant is able to log onto the system and view progress of submission(s).	Applicant (public) is able to make status inquiries on their own, without going through a timely process of contacting the City.
Community Partners and the public are unable to access funding award information.	Applicant and community partners able to log onto system and view grant award information.	Answers to applicant and public questions will be quicker and easier to obtain; hence, a more content public.
Community Partners, with service agreements to administer specified funding programs, are not able to access the system efficiently (to input and receive data).	Community partners will be able to use the funding management system themselves.	A more efficient and content group of community partners is realized.