

Mayor's Office of Children & Family Success (MOCFS) Response

Case # 24-0023-I

REPORT FRAUD, WASTE AND ABUSE

HOTLINE: 443-984-3476/800-417-0430 EMAIL: OIG@BALTIMORECITY.GOV WEBSITE: OIG.BALTIMORECITY.GOV

This public synopsis is only a summary of a more comprehensive report of investigation submitted to the appropriate City management official



October 17, 2024

Isabel Mercedes Cumming, Inspector General
City Hall, Suite 635
100 N. Holliday Street
Baltimore, MD 21202

RE: OIG Case# 24-0023-1

Dear Inspector General Cumming,

I am writing to provide an official response to your letter dated September 26, 2024 regarding OIG Case# 24-0023-1. In line with the findings of the report, MOCFS has created internal controls and process improvements to prevent a future occurrence of erroneous application approvals. Please see the actions taken below.

Creation of Standard Operating Procedures

- In collaboration with BCIT, MOCFS created an SOP for the Water4All application approval process on February 3, 2024 (Exhibit A). An updated SOP was created to include using gross income instead of net and requiring social security cards for all minors on the application. The original and updated Water4All (W4A) SOPs were submitted to OIG ([REDACTED]) on February 17, 2024 and September 4, 2024.
- A second update to the W4A SOP was issued on October 2, 2024 (Exhibit B). Notable updates include:
 - o W9s are only required for tenants on a master meter
 - o Human Service Workers are only permitted to *submit* applications, *not approve*
 - o CAP managers are permitted to approve applications amounting up to \$1700. Applications amounting to greater than \$1700 are sent to W4A Manager, [REDACTED] for review.
 - o Any approvals for amounts greater than \$4,000 require a DPW audit.
 - o The W4A system now has an alert for a file about to receive more than one credit in a rolling calendar year. Managers should thoroughly review all case materials and qualifications and decide if the second credit should be approved or declined.

Enhanced PH protection

- A PII SOP (Exhibit C) was created in February 2024 to define and outline PII handling best practices. There is also an accompanying Disposal of PII form (Exhibit D) that all W4A staff must sign and date confirming their understanding of the policy.

- At outreach events, use of paper applications has been suspended. Instead, constituents are encouraged to scan the QR code to access the application portal.
- At the CAP centers, W4A paper applications are entered into the system and materials are uploaded within 48 hours. Papers are subsequently shredded immediately.

Staff Training

- W4A staff had a meeting on September 12, 2024 at the Southeast CAP center location. The W4A application SOP was reviewed at this meeting along with staff Q&A about the procedures.
- The next W4A staff meeting will be held virtually on October 30, 2024 to review the latest updated SOP.
- SOPs will continue to be reviewed at W4A staff meetings to ensure all staff are well-informed of the process and can ask questions.

Application System

- The W4A Manager will conduct a quarterly review of system authority levels for associates and managers to ensure proper authorization levels have been assigned.
- The W4A applications were rewritten/reprinted to provide enhanced and more direct messaging (ex: email is REQUIRED)
- The W4A system now creates an alert for a file that is about to receive more than one credit in a rolling calendar year.
- The contract with application portal partner BEAM has not been renewed. The W4A platform has since been relaunched inhouse through Workday. This new system gives 99% of approved applications a credit on their DPW water bill. Only 1% (master meter tenants) will receive a live check. This provides greater assurance that water bills are paid, and funds are not diverted for another purpose as could happen with a check.
- We began working with DPW to conduct audit reports on selected cases in June 2024. As of today, we have submitted 50 audits and 11 have been completed and decisioned "NOT TO PAY". The audit results were based on leaks, repairs not completed, and usage discrepancies. Those credits equated to approximately \$141,400.

MOCFS leadership will continue to examine our approval process practices across all BCCAP programs to determine areas of vulnerability and create the necessary policies and procedures to address such weaknesses. I would like to thank OIG and BCIT for their support and collaboration as we corrected this matter, and we will continue to make ourselves available should any additional action be required.

Sincerely,

A handwritten signature in cursive script that reads "Debra Y. Brooks".

Dr. Debra Brooks
Executive Director, MOCFS

cc: Honorable Brandon M. Scott, Mayor
Honorable Ebony M. Thompson, City Solicitor
Faith Leach, Chief Administrative Officer
Simone Johnson, Deputy City Administrative Officer
Marvin James, Mayor's Chief of Staff
