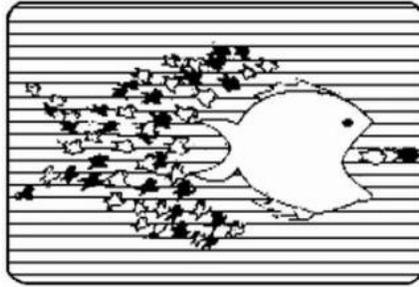


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August 22, 2014

Our File: 5278

Russ Jones, Auditor General
Office of the Auditor General
8 Bastion Square
Victoria, BC, V8V 1X4

Re: Request for Performance Audit of the Ministry of Social Development and Social Innovation's Integrated Case Management System

1. Overview of request

For several weeks in April and May of this year, the Ministry of Social Development and Social Innovation's ("MSDSI") Integrated Case Management system ("ICM") experienced widespread problems, and the system was either shut down completely or operating on greatly reduced basis. As MSDSI now utilizes the ICM to administer virtually all income assistance and disability benefits services for people in need, the outages created significant hardship for Ministry clients.

As a result of these recent problems, we are writing to request that your office conduct a performance audit of the ICM in order to determine whether MSDSI has sufficient contingency plans in place for the next time the ICM experiences widespread outages. We make this request on behalf of the BC Coalition of People with Disabilities, Downtown Eastside Women's Centre, First United Church Community Ministry Society, Kettle Friendship Society, Okanagan Advocacy & Resource Society, Together Against Poverty Society, Vancouver South Presbytery of the United Church of Canada, and Wilson Heights United Church Advocacy Program.

Our client organizations provide services each year to thousands of low-income people who rely on income assistance and disability benefits under MSDSI's Employment and Assistance legislation as an income source of last resort. Many people who access services through these organizations have disabilities, speak English as a secondary language, have dependent children, have limited education, and cannot afford computers and telephones. As MSDSI's program criteria and administrative procedures can be difficult to understand, many people who require services from MSDSI seek assistance with navigating MSDSI's system from these organizations.

The ICM also contains information regarding programs administered by the BC Ministry of Children and Family Development. While this request for a performance audit focuses on the effects of the ICM outages on MSDSI clients and the need to prevent widespread problems in the future, in our view MCFD should also be required to have appropriate contingency plans in place should significant problems with the ICM materialize in the future.

2. Outline of specific problems experienced as a result of the ICM outages

According to the provincial government's website, the ICM is a partnership between MSDSI, the Ministry of Children and Family Development ("MCFD"), and the Ministry of Technology, Innovation and Citizens' Services ("MTICS"). The ICM is a "modern technology platform that provides better tools for workers to manage information and provide services to citizens accessing critical social services including the BC Employment and Assistance Program, the Employment Program of British Columbia, the Child Care Subsidy Program and Child and Family Services." The website further states that:

ICM has been developed in response to the repeated calls over the years to improve information sharing across government to support better outcomes for British Columbians who need government services and assistance. It is intended to ensure critical case information remains safe, secure and accessible to protect and support the citizens of British Columbia.

The ICM technology is stable and secure, and the software platform provides the flexibility to make changes as needed to meet ongoing business requirements. Because this project represents a significant change for staff, it is being introduced in phases. This phased approach also allows for management of risk and keeps the project on track.

Source: <http://www.integratedcasemanagement.gov.bc.ca/>

We understand that to date, the provincial government has spent roughly \$200 million on the ICM.

Beginning around April 29, 2014, the ICM experienced significant technical problems for several weeks. The ICM was shut down almost completely until May 8th, was partially down for another week after that, and then experienced intermittent outages and delays until the end of May. During this time, it became apparent that MSDSI did not have sufficient backup systems in place when the outages began in April that would allow the Ministry to provide uninterrupted services to people in need of income assistance and disability benefits.

Once the outages started, MSDSI scrambled to put contingency plans in place, and after the news of the ICM shutdown became widely known, on May 8th the Ministry put ICM service advisories on its website. As far as we are aware, prior to this MSDSI did not notify applicants, clients, or advocates at community service organizations that there were widespread problems with the ICM. We contacted MSDSI to ask about the status of the ICM, and staff responded to

our request. MSDSI then continued to update the service advisory online and began providing updates to the welfare advocacy community directly.

During this time, many clients who were applying for or receiving income assistance and disability benefits had great difficulty accessing MSDSI services and benefits. Some of the problems experienced by new applicants, clients and advocates on their behalf included the following:

- MSDSI staff were not able to access information about clients, consistently or at all. As a result, MSDSI staff were unable to assist many clients with their requests;
- MSDSI staff were unable to issue cheques to many clients as the cheque processing system is linked to the ICM, and MSDSI did not have a fully functioning manual cheque issuing system. However, some MSDSI staff were able to issue cheques manually quite soon after the ICM problems started, while others were not. In our view, the Ministry should grant staff the ability to issue cheques manually in the event of further ICM technical problems;
- MSDSI clients and their advocates were not able to access documents held by MSDSI that they needed, such as Monthly Nutritional Supplement applications, Medical Equipment Request and Justification forms, and Persons with Disability forms;
- MSDSI clients had limited or no access to the following services and benefits:
 - eligibility assessments for people who had an immediate need for income assistance;
 - crisis grants for things such as rent, food and energy utilities payments to avoid cut-offs;
 - shelter and support payments;
 - bus passes; and
 - security deposits;
- MSDSI clients and their advocates who called the Ministry's Automated Telephone Inquiry line at 1 866 866-0800 ("ATI") were not able to get through to workers, and were not able to leave a call back number;
- Some advocates were told by Ministry staff on the ATI that due to the ICM crash, MSDSI could only address "crisis" issues. However, the staff did not have a clear definition of what constituted a "crisis", and this resulted in arbitrary decision making about access to services;
- During the ICM shutdown, advocates at the Downtown Eastside Women's Centre ("DEWC") received about double the number of requests for emergency food, clothing and shelter assistance. Some clients advised the DEWC that when they asked MSDSI staff for a crisis grant to purchase items, they had been told to ask the DEWC for items such as medical supplies, over the counter products such as feminine hygiene and

incontinence products, cough syrup, vitamins, allergy medication and eye drops, as well as furniture, linens, and bus tickets. The DEWC has limited resources and while the organization was able to provide some assistance, the DEWC was not able to meet all these additional requests from clients in the midst of the ICM crash;

- MSDSI staff were unable to upload to the ICM documents faxed by clients and advocates, including authorization to release information forms allowing MSDSI to speak with advocates about clients' files and documents regarding eligibility for various benefits. This resulted in further delays for clients needing benefits, as some clients and advocates were told that it would take up to 5 business days for these documents to be processed;
- Reconsideration and appeal deadlines were affected as materials relating to these processes were not sent out by MSDSI in time; and
- When service through the ICM was restored, many faxes containing information related to applications and appeals that had been sent to MSDSI by clients and advocates appeared to have gone missing, and the requests contained in those faxes were not acted on by MSDSI staff.

Just over a week after the technical problems became widespread, MSDSI posted service advisories to its website, with the last update being posted on May 21, 2014.

It was clear that many MSDSI staff were very frustrated that the ICM was not working properly and that there was little they could do to assist clients. We appreciate that frontline MSDSI staff are not responsible for procuring and setting up the ICM, and that many of them did try to assist clients and advocates during the outages.

We understand that prior to the June, 2014 general income assistance cheque issue date of May 28, 2014, MSDSI was able to fix a number of the problems related to the ICM. With some exceptions, the June cheque issue went smoothly. However, we were advised that the ICM was again down on Friday, May 30, 2014.

We are concerned by the ongoing technical problems with the ICM, and the delays that these problems are causing for people who rely on income assistance and disability benefits as their only source of income. Welfare recipients are already living on survival rates. System failures like this make their circumstances even more precarious. The Ministry needs to ensure that there is some way to protect clients from the risks associated with an integrated electronic service delivery model.

In order to ensure that the Ministry is fully prepared for problems with the ICM in the future, we request that your office conduct a performance audit of the ICM system to determine whether an appropriate contingency plan is in place should the ICM system experience significant technical problems in the future. According to the "Work in Progress" page on your website, your office is already undertaking an IT audit of the ICM, and as such, staff at your office likely already have considerable familiarity with the system.

3. Other issues with the ICM

We view the ICM outages as the latest, and most egregious, example of the ICM's failure to deliver high quality and efficient services to British Columbians in need.

The ICM and associated changes at MSDSI including the closure of offices, lack of assigned workers to client files, lack of face-to-face services, and increased reliance on providing services through the ATI and internet, are creating even more institutional barriers to income assistance than have existed in the past. Many people who are in need of income assistance and disability benefits cannot afford phones, computers and internet access.

Despite these larger problems, at this time we are only requesting that the Auditor General conduct an audit of MSDSI's contingency planning, as we want to ensure that regardless of whether the ICM is experiencing technical difficulties, the Ministry will have backup systems in place to meet the needs of people who require income assistance in order to pay for their most basic needs.

4. Conclusion

As a result of the problems outlined above, we request that your office conduct a performance audit of MSDSI's ICM system as part of your ongoing review of IT issues related to the ICM.

I will be away from the office starting on August 26, 2014, returning to work on September 25, 2014. During my absence, please contact Lobat Sadrehashemi, another lawyer here at the BC Public Interest Advocacy Centre, at Lobat@bcpiac.com or on her cell at 604-374-4860. If you would like to speak with representatives of our client organizations to discuss the ICM problems in more detail, we would be happy to make those arrangements.

Thank you very much for considering our request.

Sincerely,

BC Public Interest Advocacy Centre

Sarah Khan
Barrister & Solicitor

- c. (via fax) The Honourable Don McRae, Minister of Social Development and Social Innovation
(via email) Client organizations