



State of New Jersey

PHILIP D. MURPHY
Governor

SHEILA Y. OLIVER
Lt. Governor

OFFICE OF THE STATE COMPTROLLER
P.O. BOX 024
TRENTON, NJ 08625-0024
(609) 984-2888

KEVIN D. WALSH
Acting State Comptroller

September 24, 2020

Ms. Elizabeth Rossell, Chairwoman
Burlington County Board of Social Services
795 Woodlane Road
Mount Holly, NJ 08060

Mr. James Rhodes, Chairman
Camden County Board of Social Services
600 Market Street
Camden, NJ 08102

Ms. Linda G. Smith, Chairwoman
Passaic County Board of Social Services
80 Hamilton Street
Paterson, NJ 07505

Re: Follow-Up Report - Controls Over the Administration of the General Assistance Program

Dear Ms. Rossell, Mr. Rhodes, and Ms. Smith:

On May 14, 2015, we issued an audit report, *Controls Over the Administration of the General Assistance Program*,¹ in which we made recommendations to address various identified weaknesses. Pursuant to *N.J.S.A. 52:15C-1 et seq.*, we have conducted a review of the audited entities to assess the implementation of the recommendations contained in our initial audit. Our findings and conclusions are set forth below.

Background, Scope, and Objective

Our initial audit evaluated controls over the administration of the Work First New Jersey General Assistance Program at three selected county welfare agencies: Burlington County Board of Social Services (Burlington), Camden County Board of Social Services (Camden), and Passaic County Board of Social Services (Passaic) (collectively “agencies”). In our 2015 audit, we identified control weaknesses in the areas of eligibility determination, enrollment in work activities, and support for Emergency Assistance payments.

¹Available at: https://www.nj.gov/comptroller/news/docs/general_assistance_audit_report.pdf

Our follow-up review objective was to determine if the agencies have implemented the nine recommendations contained in our initial audit report.

Summary Conclusion

None of the agencies submitted corrective action plans as required by *N.J.A.C. 17:44-2.8(a)*. During our follow-up review, we inquired about the corrective actions taken by the agencies and verified whether those actions were implemented as discussed below.

We found that each of the agencies have made significant progress in implementing the recommendations set forth in our initial audit report. Of the six audit recommendations applicable to Burlington, five were implemented and one was not implemented. Camden implemented all seven audit recommendations. Of the seven audit recommendations applicable to Passaic, six were implemented and one was not implemented.

We urge Burlington and Passaic to continue their efforts to comply fully with the recommendations not yet implemented.

Status of Initial Audit Recommendations

Recommendation 1

Burlington, Camden, and Passaic should retain support for initial income verification checks and at the time of each redetermination.

Status: Implemented – Burlington, Camden, and Passaic

During our initial audit, we found that all three agencies lacked the required income documentation to support the determination of a claimant's eligibility for General Assistance. During our follow-up review, Burlington provided us with its written instructions and training material that it distributes to its staff. These materials stress the agency's requirement that it retain supporting documentation of income verification during the initial application and again during the redetermination process. Camden implemented the use of a checklist for its staff. The checklist also includes the requirement that the agency retain supporting documentation for income verification at the initial application and again during the redetermination process. Passaic advised us that it had implemented an imaging system in 2017 that allows documents to be scanned and stored electronically.

We judgmentally selected a sample of case files from each agency and verified that the case files include supporting documentation for income verification during the initial applications and at the time of each eligibility redetermination.

Recommendation 2

In accordance with the Division of Family Development policy, Burlington, Camden, and Passaic should retain evidence that a search of drug convictions for applicants was conducted in order to prevent payments to ineligible individuals.

Status: Implemented – Burlington, Camden, and Passaic

During the initial audit, we found that some case files from all three agencies did not include evidence of a search of whether an applicant was convicted of a drug offense. During our follow-up review, Burlington provided us with its written instructions to its staff that stresses the agency's requirement to maintain documentation of its check for a claimant's possible drug convictions in the agency's case files. As part of Camden's implemented checklist, it also includes the requirement that the agency maintain documentation of its inquiry regarding claimants' possible drug convictions. Passaic advised us that it had implemented an imaging system in 2017 that allows documents to be scanned and stored electronically.

We judgmentally selected a sample of case files from each agency and verified that the agencies retained supporting documentation of their check for claimants' possible drug convictions.

Recommendation 3

Passaic County should ensure that complete case files exist for all recipients.

Status: Implemented – Passaic

During the initial audit, Passaic could not provide us with two case files. During our follow-up review, Passaic advised us that it had implemented an imaging system in 2017 that allows documents to be scanned and stored electronically. Passaic provided all requested case files and we verified that they contained all required supporting documentation.

Recommendation 4

Burlington, Camden, and Passaic should seek guidance from the Division of Family Development on how to interpret N.J.A.C. 10:90-18.6 regarding convictions for drug distribution crimes.

Status: Implemented – Burlington and Camden

Not Implemented – Passaic

During the initial audit, we found that the agencies and the Division of Family Development (Division) had different interpretations of what constitutes a disqualifying drug distribution-related conviction pursuant to N.J.A.C. 10:9-18.6. During our review, Burlington and Camden advised us that they sought and obtained guidance from the Division on the correct interpretation of

N.J.A.C. 10:90-18.6. Passaic informed us that it never formally contacted the Division, but “gained a better understanding” of the regulation when it discussed the issue during a meeting concerning a separate matter with a Division representative.

We verified that both Burlington and Camden obtained guidance from the Division regarding the interpretation of *N.J.A.C. 10:90-18.6*. Passaic did not provide us evidence of its discussion with the Division, nor evidence that it is complying with the Division’s interpretation of the regulation.

Recommendation 5

Burlington should pursue potential recoveries for General Assistance overpayments in accordance with N.J.A.C. 10:90-3.21.

Status: Not Implemented – Burlington

During the initial audit, we found that Burlington did not seek recovery of General Assistance overpayments. During our review, Burlington informed us that it recovers overpayments on Emergency Assistance cases. Burlington stated that it cannot pursue recovery of overpayments related to the General Assistance program because the State of New Jersey has not provided adequate funding.

County welfare agencies are generally required to recover overpayments of benefits, except in certain circumstances, in accordance with *N.J.A.C. 10:90-3.21*. We found that Burlington did not take any action to recover General Assistance overpayments. Burlington recognized in its response that the county is required to seek recovery of overpayments, but claimed that it has not received adequate funding to pursue overpayments. This is an unsatisfactory response. Nothing permits Burlington to disregard mandatory components of the General Assistance Program. Burlington remains in violation of *N.J.A.C. 10:90-3.21*. We urge Burlington to take appropriate action to fully implement our recommendation in compliance with state regulations.

Recommendation 6

Burlington, Camden, and Passaic should ensure that individuals required to be in a work activity are referred to a work activity.

Status: Implemented – Burlington, Camden, and Passaic

During the initial audit, we found that all three agencies did not have procedures to ensure that they meet their statutory requirement to refer clients for work activities. During our follow-up review, Burlington stated that it provides a notice to the client of their mandatory participation in a work activity. Camden’s implemented checklist includes the requirement that its staff ensure timely work activity referrals. Passaic explained that it uses a new state database system that

allows county welfare agencies to monitor recipients' eligibility, including satisfaction of work activity requirements. The system identifies recipients that may have become ineligible for General Assistance and informs a case worker to address the issue.

We judgmentally selected a sample of case files from each agency and verified that those individuals required to be in a work activity were referred to a work activity.

Recommendation 7

Burlington, Camden, and Passaic should ensure that case files contain documentation to support recipients' unemployable status.

Status: Implemented – Burlington, Camden, and Passaic

During the initial audit, we found that all three agencies lacked documentation in case files to support a recipient's deferral from the General Assistance work requirement. During our follow-up review, Burlington stated that it provided additional guidance to its staff regarding proper case file management and maintenance of required documentation. Camden's implemented checklist includes the requirement that its staff maintain supporting documentation of a recipient's deferral from the work requirement. Passaic advised us that it had implemented an imaging system in 2017 that allows documents to be scanned and stored electronically.

We judgmentally selected a sample of case files from each agency and verified that they maintained supporting documentation of a recipient's deferral from the General Assistance work requirement.

Recommendation 8

Camden and Passaic should ensure that all required documents necessary to establish a recipient's eligibility, as well as payment forms authorizing Emergency Assistance payments, are completed and maintained in the case files.

Status: Implemented – Camden and Passaic

During the initial audit, we found that Camden and Passaic authorized Emergency Assistance payments despite a lack of supporting documentation. During our follow-up review, Camden stated that a newly-implemented case management tracking system provides improved communications between its departments and has improved the tracking of case files. Passaic advised us that it had implemented an imaging system in 2017 that allows documents to be scanned and stored electronically.

We judgmentally selected a sample of case files from each agency and verified that the agencies

completed and maintained all required documentation necessary to establish a recipient's eligibility for Emergency Assistance, as well as payment forms authorizing Emergency Assistance payments.

Recommendation 9

Camden should ensure that current shelter vendors are approved by the Division of Family Development prior to housing recipients at the shelter.

Status: Implemented – Camden

During the initial audit, we found that Camden issued payments to a shelter that was not approved by the Division. During our follow-up review, Camden informed us that it had stopped housing recipients in unapproved shelters.

We verified that Camden only housed recipients in shelters that were approved by the Division.

Reporting Requirements

We provided a draft copy of this report to the Burlington County Board of Social Services, Camden County Board of Social Services, and Passaic County Board of Social Services for their review and comment. Burlington County Board of Social Services and Camden County Board of Social Services provided their response, which was considered in preparing our final report and is attached as Appendix A. Passaic County Board of Social Services declined to submit a formal response.

By statute, we are required to monitor the implementation of our recommendations. To meet this requirement, Burlington and Passaic county officials must report periodically to our office advising what additional steps they have taken to address the unresolved issues in this report. Burlington and Passaic are required to report on the status of their corrective action plans within nine months of this final report. We will continue to monitor their progress.

We thank the management and staff of the agencies for the courtesies and cooperation extended to our auditors during this review.

Sincerely,

KEVIN D. WALSH
ACTING STATE COMPTROLLER

By: 

Yvonne Tierney, Director
Audit Division

- c: Carole Johnson, Commissioner, Department of Human Services
- Natasha Johnson, Assistant Commissioner, Department of Human Services
- Charles SanFilippo, Director, Burlington County Board of Social Services
- Tom Pullion, Freeholder Deputy Director, Burlington County
- Eve Cullinan, Administrator, Burlington County
- Christine Hentisz, Director, Camden County Board of Social Services
- Carmen G. Rodriguez, Freeholder Liaison, Camden County Board of Social Services
- Ross Angilella, Administrator, Camden County
- Anthony DeSimone, Director, Passaic County Board of Social Services
- Carol Cuadrado, Vice Chairwoman, Passaic County Board of Social Services
- Cassandra Lazzara, Freeholder Director, Passaic County
- Anthony J. DeNova, III, Administrator, Passaic County

APPENDIX A - AUDITEE RESPONSE



BURLINGTON COUNTY BOARD OF SOCIAL SERVICES
BURLINGTON COUNTY HUMAN SERVICES FACILITY
795 WOODLANE ROAD, SUITE 100
MOUNT HOLLY, NEW JERSEY 08060-3335
609-261-1000
FAX 609-261-0463

CHARLES SANFILIPPO
DIRECTOR

Mr. Kevin D. Walsh, Acting State Comptroller
Office of the State Comptroller (OSC)
P.O. Box 024
Trenton, NJ 08625
August 17, 2020

Re: Follow-Up Report-Controls Over the Administration of the General Assistance Program

Dear Mr. Walsh,

The Burlington County Board of Social Services (BCBSS) is in receipt a copy of the above mentioned report.

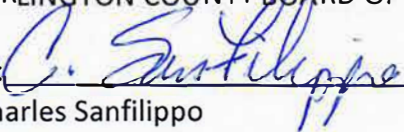
Please consider this correspondence as the formal response from the BCBSS:

Program Eligibility:

NJ State Audit Recommendation: #5: Burlington County should pursue potential recoveries for General Assistance overpayments in accordance with N.J.A.C. 10:90-3.21.

BCBSS response: The BCBSS concurs that the collection of all overpayments, when applicable, should be pursued and wishes to resume doing so. However, the State of New Jersey has not provided adequate funding to the BCBSS to pursue overpayments related to the GA program. The BCBSS has prioritized its limited resources to focus on the processing of applications and the servicing of the needy residents of Burlington County.

Sincerely yours,
BURLINGTON COUNTY BOARD OF SOCIAL SERVICES

By: 
Charles Sanfilippo
Director



Making It Better Together

CHRISTINE HENTISZ
DIRECTOR

LAUWANA MARTIN
DEPUTY DIRECTOR

ALETHA R. WRIGHT
ADMINISTRATION BUILDING
600 MARKET STREET
CAMDEN, NEW JERSEY 08102-1255
TEL. 856-225-8800
FAX. 856-225-7797
ccbss-info@camdenbss.org

BOARD OF SOCIAL SERVICES

August 13, 2020

Kevin D. Walsh
Acting State Comptroller
Office of the State Comptroller
P.O. Box 024
Trenton, NJ 08625

Re: Follow up Report – Controls Over the Administration of the General Assistance Program

Dear Mr. Walsh,

Please accept this letter as Camden County Board of Social Services' response to the draft copy of the audit findings report provided regarding this agency's administration of the General Assistance Program. In reading the draft it was noted that Camden County Board of Social Services corrected all deficiencies found during the 2015 audit.

We appreciate the opportunity to show the progress we made and will continue to administer the General Assistance program based on state regulations.

If you have any questions, or need any additional information, please feel free to reach out to me.

Sincerely,

A handwritten signature in black ink, appearing to read "Christine Hentisz".

Christine Hentisz
Director

CC: Jim Rhodes, Chairman (via email)
Lauwana Martin, Deputy Director (via email)