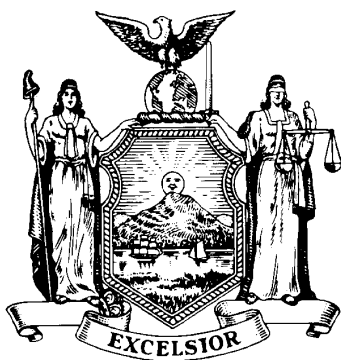


State of New York
Offices of the Inspector General



Investigation of Personal Allowance Accounts
Maintained by the New York State Office for People
With Developmental Disabilities

October 2016

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Inspector General

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EXECUTIVE SUMMARY

The following report details the findings of the New York State Inspector General in ten investigations of mismanagement of cash accounts maintained by the New York State Office for People With Developmental Disabilities (OPWDD) for the benefit of residents living in OPWDD facilities and group homes. A number of these investigations revealed thefts from residents' cash accounts, which are known as personal allowance accounts, by staff members entrusted with their care, as well as a lack of adequate accounting of and control over residents' funds. The investigations found that OPWDD fails to safeguard residents' personal allowance accounts and must therefore strengthen its policies and procedures to ensure residents' funds are used for proper purposes.

The Inspector General found that OPWDD, pursuant to state regulation, conducts annual audits of a percentage of personal allowance accounts. These mandated audits, which are conducted by the Business Office in each regional Developmental Disabilities State Operations Office (DDSOO)¹, are thorough and effective. In fact, many of the investigations discussed in this report were commenced based on findings of Business Office audits that exposed wrongdoing.

The Inspector General also found that residents' personal allowance accounts are reviewed and audited by OPWDD staff assigned to supervise facilities and group homes. However, these supervisory reviews and audits are superficial and often fail to identify thefts or deviations from required practice. This deficiency is due, in part, to OPWDD policy, which neglects to provide clear and uniform guidance on supervisory oversight of personal allowance accounts. Indeed, OPWDD's policy neither defines the scope, manner and frequency of supervisory reviews and audits, nor who is responsible for conducting them. Consequently, the Inspector General recommends that OPWDD promulgate statewide policy requiring periodic supervisory audits of residents' personal allowance accounts. At a minimum, this policy should clearly state how often the audits are required, who is responsible for conducting them, and the manner in which they will be conducted.

¹ In a recent restructuring, OPWDD changed the name of its regional offices that administer and oversee the direct delivery of services to individuals with disabilities, from Developmental Disabilities Services Offices (DDSO) to Developmental Disabilities State Operations Office (DDSOO). For purposes of clarity, the report will use the current term, Developmental Disabilities State Operations Office (DDSOO).

The Inspector General found that supervisors assigned to OPWDD facilities and group homes lack training on the management and review of residents' personal allowance accounts. OPWDD has no formal training program for these supervisors and the training is left to their immediate supervisors, who themselves may have had little training, or to Business Office staff within the context of their annual audits. Therefore, it is recommended that OPWDD provide training on the management and review of residents' personal allowance accounts to supervisory staff at the time of their initial appointment and periodically thereafter. In addition, the Inspector General recommends that OPWDD develop an audit checklist for supervisors setting forth specific areas to review and on which to report. These supervisory audits should be subject to review by the regional Business Offices.

The Inspector General further found that OPWDD's use of cash in residents' personal allowance accounts is vulnerable to exploitation, facilitates theft, and lends itself to poor accountability of funds. Therefore, the Inspector General recommends that OPWDD consider the feasibility of using bank or debit cards for residents' personal allowance accounts, and promulgate policy for the same. Bank and debit cards, which provide accurate transaction logs, will assist supervisors in their review of personal allowance accounts.

In addition, the Inspector General found that OPWDD does not have policies setting forth the processes for purchasing, recording and using gift cards for residents. Therefore, the Inspector General recommends OPWDD promulgate policy addressing the handling of gift cards. This policy should include a process to confirm the receipt of gift cards by the intended recipients.

The Inspector General also found that OPWDD allows meals to be purchased for residents using funds from the residents' personal allowance accounts. Although policy requires that a receipt be obtained from the vendor documenting the transaction, the investigation found that OPWDD staff created their own receipts for purported purchases, claiming they had lost the original receipts. These self-generated receipts, drawn up from a blank receipt book, were highly suspect and suggestive of fraud. They generally did not identify the vendor from whom the meals were purchased, among other things. The Inspector General recommends that OPWDD expressly preclude the use of self-generated receipts, which subvert the intent of the policy.

Lastly, the Inspector General found that one group home failed to follow OPWDD policy requiring purchases to be inventoried upon receipt by the home. Rather, it was found that

receipts for purchases were gathered at the end of each month and initialed by staff members, indicating they had been received. This deviation from policy undermines its purpose of ensuring purchased items are actually received at a residence. The Inspector General therefore recommends that OPWDD retrain employees on this policy, and require employees to conduct an inventory at the time of purchase, initial each receipt, and annotate on the receipt the date that the review occurred.

Of note, during the course of writing this compilation of prior investigations, allegations of the mismanagement of, and theft from personal allowance accounts continued to be received by the Inspector General. Additionally, OPWDD internal audits of residents' personal allowance accounts continue to reveal shortages. These allegations and audit findings underscore the ongoing deficiencies in OPWDD's oversight, policies and training with respect to personal allowance accounts, and the need for immediate corrective action.

In response to the Inspector General's report and findings, OPWDD advised it was committed to strengthening its policies and procedures to ensure residents' personal funds are used and accounted for in a proper manner, and would implement corrective actions including providing standardized training to supervisory staff on personal allowance accounts; researching the feasibility of the statewide use of debit cards for individuals' personal allowance accounts; issuing a policy on the process for purchasing, recording and using gift cards for individuals in its care; reinforcing current policy requiring an original receipt be obtained from a vendor to document meals purchased for individuals using their personal allowance funds, and; retraining staff on existing policy requiring purchases to be inventoried upon receipt in the home.

The Inspector General will continue to work with OPWDD to ensure compliance with the recommendations and implementation of corrective actions.

BACKGROUND

The New York State Office for People With Developmental Disabilities (OPWDD)

OPWDD was established in 1978 to provide and coordinate various services for New York citizens with developmental disabilities. These services, which are provided directly by OPWDD and indirectly through a network of nonprofit service providers, include long-term care, such as habilitation and clinical services, residential supports and services, and family support services, among others. OPWDD utilizes approximately 23,000 employees to provide these

services to approximately 128,000 New Yorkers with developmental disabilities in institutional and community settings.

OPWDD maintains six Developmental Disabilities State Operations Offices (DDSOOs), which administer and oversee the direct delivery of services to individuals with disabilities by state staff. Apart from services provided in institutional settings, OPWDD operates community-based Individualized Residential Alternatives (IRAs), and contracts with family care home providers, which provide care, room and board for individuals with disabilities. The IRAs and family care home providers are overseen by supervisors assigned to the individual DDSOOs.

Residents' Personal Allowance Accounts

Residents living in IRAs and family care home settings are entitled to personal allowance under New York State law. New York State regulations require that OPWDD “develop and implement policies and procedures to ensure safeguarding and accurate accounting of . . . personal allowance.”² OPWDD defines personal allowance as “that portion of income which is made available on a monthly basis to every person residing in a facility operated or certified by OPWDD which is intended for the personal expenditure by an individual.”³ Residents’ income is derived from numerous sources, including governmental benefits, work, family and friends.

Pursuant to federal law and regulations, New York State Social Services law and OPWDD regulations, residents have a right to manage their money in a way which reflects their preferences, choices and needs. The relevant federal regulation states, in pertinent part:

“The facility must ensure the rights of all clients. Therefore, the facility must . . . [a]llow individual clients to manage their financial affairs and teach them to do so to the extent of their capabilities.”⁴

OPWDD has promulgated policies on the management and handling of personal allowance accounts. These policies include the Personal Allowance Manual, which provides guidance to staff members managing residents’ funds, and the Business Office Manual – Cash Office Policy, which addresses the oversight and review of personal allowance funds. Additionally, each of the six DDSOOs has written guidelines regarding personal allowance accounts.

² 14 NYCRR 633.15(d)(1)

³ 14 NYCRR 633.15(b)(7)

⁴ 42 CFR 483.420(a)(4)

Pursuant to OPWDD regulations and policies, residents are assessed in their ability to manage money by a Personal Expenditure Planning Team. The assessment determines whether a resident can independently access and manage funds, the amount the resident can manage without documenting purchases through receipts, and the frequency with which funds are provided to the resident. If it is found that a resident does not have the ability to independently manage his or her funds, the agency and its staff are responsible for ensuring the proper use of the funds and assisting the resident with purchases utilizing personal allowance funds.

The Personal Expenditure Planning Team, with the involvement of the resident and his or her advocate, is required to create and maintain a Personal Expenditure Plan for each resident. This plan is designed to assist staff in making financial decisions consistent with the resident's capabilities, choices and preferences. Once formulated, the plan must be provided to the resident, his or her advocate, and the service coordinator, and included in the resident's record in the home. The Personal Expenditure Plan must be updated at least once a year to reflect the choices available to a resident, as well as financial limits, if necessary. When assisting residents with purchases, staff members must do so consistent with their plan. In all circumstances, the agency and its staff are responsible for safeguarding the residents' monies within their control.

The Personal Allowance Manual provides guidance as to potential content of a Personal Expenditure Plan. For example, the manual states, "The plan might include personal shopping or luxury items, entertainment, vacation, home and family visits, or other expenses."⁵ The policy manual also states that gift giving by a resident should be addressed in the Personal Expenditure Plan. According to the policy, the plan is "not set in concrete," and may be modified to reflect a change in a resident's personal preferences and choices.

When a resident is found to be unable to independently maintain a personal allowance account, the regional business offices will manage the account for the benefit of the resident, consistent with the resident's Personal Expenditure Plan. Purchases made from the account, depending on the amount of the purchase, require different levels of authorization. The Business Office Manual – Cash Office Policy states that only purchases at or below \$250 are approved within the resident's home. For greater expenditures, the authorization of a supervisory developmental assistant 3 (\$250.01 to \$500), treatment team leader (\$500.01 to \$1,000),

⁵ OPWDD Personal Allowance Manual 2016, Personal Expenditure Planning, p. 10.

developmental disabilities program specialist 4 (\$1,000.01 to \$2,000) or a deputy director (\$2,000.01 and above), is required.

Cash at the Residence

In addition to money held in resident accounts in the business offices, cash is maintained for the residents within their homes for day-to-day needs and incidental purchases. Pursuant to the Personal Allowance Manual, as of January 1, 2014, a maximum amount of \$210 in cash can be kept for each resident in the home. A number of OPWDD policies are relevant to management of cash held at the residence.

OPWDD staff within IRAs, and family care home providers are responsible for the on-site management and safeguarding of residents' personal allowance funds and cash in the home. IRAs are typically supervised by a developmental assistant 2, who also acts as a primary cash custodian responsible for administering the cash accounts. A developmental assistant 1 is assigned to an IRA as both an assistant supervisor and secondary cash custodian. All report to a developmental assistant 3, who supervises multiple IRAs and family care homes. The developmental assistant 3, in turn, reports to a treatment team leader.

The cash custodian is responsible for verifying the amount of personal allowance for each resident and the amount required to replenish the accounts within the homes. The Business Office provides the cash custodian with a check made payable to him or her in order to replenish these cash funds as needed. The cash custodian is required to cash the check, secure the funds in the home, maintain separate accounts for each resident, and keep a log recording all transactions for each resident's personal allowance account. OPWDD requires that the ledgers correctly reflect all deposits, withdrawals, and expenditures, and be balanced after each transaction. The ending balance must match the cash in the residence at any given time.

When staff purchase an item for a resident, or provide the resident with cash for his or her independent use, the staff member is required to remove the funds from the resident's account and make a notation in the resident's ledger reflecting the withdrawal. After a purchase is made, the staff member is required to attach the receipt documenting the spending to the resident's ledger, update the ledger to reflect the purchase, return any unused money to the resident's account, and initial the transaction in the ledger. The receipt must clearly indicate the item(s) purchased, the cost, the vendor, and the date of purchase. The cash custodian must verify that all

transactions are correct and appropriate, and receipts match expenditures. Once the custodian verifies the purchase, he or she is required to co-sign the receipt with the staff member that completed the purchase. An exception to the receipt requirement is a purchase by staff of a recreational item under \$15. Purchases of personal property and clothing are recorded in a ledger for each resident, which is signed by two staff members to verify the entry.

In practice, the primary cash custodian and secondary cash custodian maintain these cash funds in a secure location within the residences and are the only staff members with access to them. Additionally, a small amount of money is made accessible to all staff within a home by the cash custodian for each resident's daily needs. For example, a resident's Personal Expenditure Plan may note that the resident may carry \$5 to purchase snacks or drinks while at work or day programs. The cash custodians are responsible for ensuring that sufficient cash is available for each resident's use consistent with his or her Personal Expenditure Plan.

Cash held at the residence for the benefit of the residents is reviewed by both supervisory staff and the Business Offices. The Business Offices conduct internal audits of at least 25 percent of the residents' personal allowance accounts each year, on a random basis, to ensure proper use and management of the residents' funds. Although supervisory reviews were found to be deficient in many of the investigations cited in this report, reviews and audits conducted by the Business Office were comprehensive and resulted in meaningful findings, many of which became the bases for complaints that were properly reported by OPWDD to the Inspector General for investigation.

THE INSPECTOR GENERAL'S INVESTIGATION FOUND RESIDENTS' PERSONAL ALLOWANCE ACCOUNTS WERE PILFERED BY OPWDD EMPLOYEES

Beginning in late 2012, the Inspector General received a number of complaints related to the mismanagement of residents' personal allowance accounts in IRAs and family care homes. Specifically, the complaints alleged theft by employees of cash held in the homes for the benefit of the residents. This report addresses the Inspector General's findings in each of these cases and OPWDD's policies and practices related to managing and safeguarding cash at the residence. Of note, where theft of resident funds was found, their accounts were subsequently reimbursed by OPWDD.

The Lynn Knightner Investigation

In January 2013, the Inspector General received a complaint from OPWDD that its Western New York Business Office in Region 1 DDSOO had discovered questionable receipts during an audit of residents' personal allowance account ledgers at the Seneca Street IRA in the Town of West Seneca. Specifically, the Business Office auditors found receipts for the purported purchase of show tickets and food for residents, which appeared to have been altered or copied. After investigation, the Inspector General found that Lynn Knightner, a developmental assistant 2 assigned to the IRA, had stolen residents' personal allowance funds. As a result of the investigation, Knightner was arrested and pleaded guilty to Petit Larceny and Falsifying Business Records in the Second Degree. Knightner's plea required that she pay restitution to the victims and perform 100 hours of community service. Knightner was also terminated by OPWDD after a disciplinary hearing. Additionally, the secondary cash custodian at the Seneca Street IRA resigned after disciplinary charges were commenced.

By way of background, the Seneca Street IRA provides services, including room, care and board, for up to eight individuals with disabilities. Knightner was assigned to this IRA as both its supervisor and primary cash custodian. The IRA staff also included a developmental assistant 1, who was designated as the secondary cash custodian.

Knightner Purchased "How to Train Your Dragon Live Spectacular" Tickets for Her Family Using Resident Funds

The Inspector General's investigation revealed that Knightner stole cash from the personal allowance accounts of six residents and orchestrated a scheme by which it would appear to the unsuspecting eye that the residents had paid for and attended a live theatrical show.

On September 20, 2012, after requesting approval from OPWDD to buy six tickets for residents and three tickets for staff, Knightner purchased nine tickets to the "How to Train Your Dragon Live Spectacular" show at the First Niagara Center in Buffalo, New York. To pay for the tickets, Knightner withdrew \$28.25 separately from six resident cash personal allowance accounts, and used an OPWDD credit card to pay for three tickets for the staff members who would accompany the residents to the show. In total, Knightner used \$169.50 in resident funds and \$84.75 in OPWDD funds to pay for admission to this event.

According to the Seneca Street IRA residential notes, six residents attended the daytime showing of How to Train Your Dragon Live Spectacular on September 21, 2012. Additionally,

each of the resident's personal allowance ledgers reflected a \$28.25 withdrawal for the tickets, as well as a \$10 withdrawal for the purchase of a fiber optic dragon souvenir from the show. However, the investigation found that there was no daytime showing of "How to Train Your Dragon Live Spectacular" at the First Niagara Center in Buffalo on September 21, 2012. In fact, First Niagara advised that the tickets in question had all been redeemed on September 22, 2012, at a 7:00 p.m. showing.

When the Inspector General confronted Knightner with these inconsistencies during testimony under oath, she provided several alternate explanations of the circumstances surrounding the event. Knightner was initially adamant that the residents had attended the show, and provided as additional support the residents' supposed purchase of fiber optic dragon souvenirs at the show. Moreover, Knightner testified that two other staff members had attended the show with the residents as well. This claim, however, was denied by the other two staff members. Gaining no traction with this story, Knightner then claimed that the staff members decided not to attend the show, the tickets were never used, and Knightner had not reported this to OPWDD for fear of getting into trouble. When advised that the tickets had been redeemed on September 22, Knightner admitted she used all of the tickets to take her family to the show. In total, Knightner stole \$229.50 from resident accounts and an additional \$84.75 from OPWDD.

In addition to stealing money from the vulnerable population she was ostensibly caring for, Knightner further schemed to provide cover should the residents be questioned about their attendance at the live theatrical show. According to a staff member at the IRA who testified to the Inspector General, on the day the residents purportedly attended the live show, Knightner arrived at the IRA with a DVD in hand. The DVD, the movie version of "How to Train Your Dragon," was screened for the residents in the home that day, in lieu of attending the live show.

The investigation found that controls put in place by OPWDD to verify purchases at its IRAs failed in this instance. The staff member who annotated the IRA's residential notes, writing that the residents had attended the show on September 21, 2012, stated she was directed to do so by Knightner, and had done so, despite her knowing that this was false. Additionally, Knightner directed the secondary cash custodian to submit self-prepared receipts for the show souvenirs, and to withdraw \$10 from each of the six resident accounts for these purchases. If these staff members had properly followed policies regarding ledger entries and the duties and

responsibilities of the cash custodians, Knightner's actions might have been thwarted or quickly exposed.

Knightner Made Questionable Gift Card Purchases Using Resident Funds

A resident of an IRA or family care home may purchase gifts for others, including store and restaurant gift cards, when it has been determined the resident has the ability to independently manage his or her funds, and the resident's personal expenditure plan reflects this determination and authorizes gift purchases.

On November 8, 2012, Knightner purchased \$50 in Applebee's restaurant gift cards on behalf of each of two residents of the Seneca Street IRA. Knightner recorded her purchases for each of the two residents in the IRA's ledger, and the secondary cash custodian initialed the transactions. The ledger also reflected two additional purchases, each for \$50 in Applebee's gift cards, for two other residents on that date. These annotations too had been signed for by Knightner and initialed by the secondary cash custodian. However, the four receipts for supposed gift card purchases were in fact two original receipts and two copies of the same. Moreover, gift cards associated with an Applebee's promotional offer running at the time, which provided a bonus \$10 gift card for every \$50 in gift card purchases, were never located, and the personal expenditure plans for three of the four residents did not authorize gift purchases.

Applebee's advised the Inspector General that \$100 in gift cards were purchased on November 8, 2012 at the West Seneca Applebee's, \$20 in bonus gift cards had been awarded to the buyer, and all but one \$10 bonus gift card had been redeemed. After review of the IRA's vehicle logs, which revealed that only Knightner had utilized an IRA pool vehicle on that date, the Inspector General confronted Knightner. Knightner admitted she purchased \$50 in gift cards for each of two residents, which she claimed the residents were to give to family and friends, yet she provided no credible explanation for what became of the \$100 missing from the account of the other two residents, \$40 in bonus gift cards, or for the duplicate receipts. The secondary cash custodian testified to the Inspector General that Knightner had purchased gift cards at Applebee's on this date, and denied submitting the duplicate receipts.

As the primary cash custodian, Knightner was, at the very least, negligent in recording an additional \$100 in purported gift card purchases in the ledgers of two residents, a transaction documented solely on fraudulent photocopied receipts.

Questionable Meal Purchases Were Made by Knightner with Resident Funds, and Knightner and Others Were Reimbursed for Dubious Meals

Although meals eaten by residents within the home are covered by the provider, personal allowance funds may be used by residents to dine outside the residence. The Personal Allowance Manual provides “dining out” guidance for specialty foods and meals with family and friends, and requires that valid receipts be submitted for all meals. When residents dine out, accompanying staff are entitled to reimbursement of the cost of their meals, at rates set by OPWDD.

Despite this guidance on dining out, the Inspector General found that Knightner and the secondary cash custodian improperly managed funds from residents’ personal allowance accounts for meal expenditures. Specifically, Knightner and the secondary cash custodian failed to submit original receipts from restaurants where meals were purportedly purchased, and may have improperly debited residents’ accounts and obtained reimbursement for meals supposedly consumed by residents and staff, and obtained reimbursement for staff members not present at meals.

In a number of instances, the investigation found, Knightner and the secondary cash custodian submitted self-made generic receipts to reflect their purported purchase of meals for residents and staff, often using the justification that they had lost the original receipts. In fact, Knightner and the secondary cash custodian maintained a blank generic receipt book in the Seneca Street IRA for those many occasions when they “lost” original receipts. These self-generated receipts were not valid receipts as required by the Personal Allowance Manual.

For example, on four dates in 2012, Knightner and/or the secondary cash custodian submitted self-made receipts for purported dining out of residents and staff. On September 18, 2012, Knightner claimed seven residents and a number of staff ate at Pasquale’s Italian Restaurant in West Seneca, New York. Funds were withdrawn from the accounts of the seven residents and staff members were reimbursed for their supposed meals. As supporting documentation, Knightner submitted self-made receipts that listed only the amount and date of the meal. In the IRA’s petty cash log, Knightner listed the restaurant as Pasquale’s. However, several of the staff members listed by Knightner as attending the meal and receiving reimbursement testified to the Inspector General they had never been to Pasquale’s with residents from the IRA. Another staff member testified she never would have ordered the meal listed on the so-called receipt.

Three days later, on September 21, 2012, the secondary cash custodian claimed six residents and three staff members, including Knightner, ate at Anchor Bar, a restaurant in Buffalo. After submitting self-made receipts, each resident's account was debited \$13.65 for the price of his or her purported meal, and reimbursement was received by the three staff members. In testimony to the Inspector General, however, Knightner admitted she did not go to Anchor Bar with the residents. In fact, this was the date that Knightner initially claimed she had taken the IRA's residents to attend How to Train Your Dragon Live Spectacular, but later confessed this was a lie. The secondary cash custodian testified differently to events – she alleged meals had been purchased at Anchor Bar for residents and staff, but eaten at the IRA after one of the residents had a “behavior issue.”

On November 8, 2012, Knightner submitted self-made receipts for a dinner, supposedly attended by seven residents and six staff members. Oddly, the generic receipts, which did not list the restaurant, indicated the seven residents ordered the exact same meal. On December 11, 2012, the secondary cash custodian submitted self-made receipts for a dinner attended by seven residents and five staff members. Again, each resident purportedly ate the same meal, and their accounts were debited accordingly. The staff members too received reimbursement.

Given the aforementioned testimony and documentary evidence, Knightner and the secondary cash custodian's actions with respect to meal charges and reimbursements are called into question. Notably, their failure to submit original receipts reflecting their alleged meal purchases makes it difficult to conclusively confirm or refute their claims. However, it defies belief that Knightner and the secondary cash custodian “lost” receipts for at least 42 meals in an approximately three-month period. Moreover, it is problematic that a number of staff members for whom reimbursement was claimed do not recall attending the meals.

The Cheryl Collins Investigation – Theft of OPWDD Resident Gift Cards

On December 26, 2012, the New York State Police notified the Inspector General that Cheryl Collins, a developmental assistant 1 assigned to the Corning IRA in the Finger Lakes Region 1 DDSOO, had been arrested and charged with petit larceny for the theft of \$130 in gift cards from two residents of the IRA. The Inspector General investigated the circumstances surrounding the arrest and found that on December 11, 2012, the IRA's house manager/cash custodian authorized the purchase of Walmart gift cards on behalf of two residents of the Corning IRA. After the purchase, Collins stated she would mail the gift cards to the residents'

family members. Later that month, the house manager, during a conversation with the intended recipients of the gift cards, was advised they had not received them.

The house manager contacted Walmart, and upon learning that some of the cards had been redeemed on December 18, reported to the State Police that the gift cards had been stolen. A review by the State Police of Walmart video surveillance recordings revealed Collins had made personal purchases using the stolen gift cards. Collins was arrested, confessed to stealing six gift cards totaling \$130, of which she redeemed \$90, and returned two gift cards. Collins paid \$90 in restitution, her case was adjourned in contemplation of dismissal, and she resigned from OPWDD in lieu of termination.

The Christina Ruhmshottel Investigation – Theft of Resident Funds

In March 2015, the Inspector General was notified by OPWDD of a theft of resident funds by Christina Ruhmshottel, a direct support assistant employed at the Millbrook IRA in Dutchess County. According to OPWDD, in February 2015, Ruhmshottel completed a request for funds to replenish cash held at the IRA for residents. The Taconic Business Office in Region 4 DDSOO then issued a check to Ruhmshottel and mailed it to the IRA. Subsequently, it was discovered by OPWDD that the residents' accounts had not been credited. After a review by OPWDD of the IRA's records, it was determined that Ruhmshottel had received a number of checks for deposit into residents' personal allowance accounts, but had not done so.

Following a notification by OPWDD of the State Police, on May 8, 2015, Ruhmshottel was arrested. She pleaded guilty to Falsifying Business Records in the Second Degree on September 22, 2015, was sentenced to three years of probation, and ordered to pay restitution of \$1,570.89. Ruhmshottel also resigned from OPWDD, effective August 25, 2015.

The Maple Avenue IRA (Oakfield, New York) Investigation – Theft of Resident Funds

In August 2014, the Inspector General received a complaint from OPWDD that its Western New York Business Office in Region 1 DDSOO had conducted an annual audit of the Maple Avenue IRA, located in Oakfield, New York, and discovered that funds sent to the IRA for deposit into residents' personal allowance accounts were missing.

Upon investigation, the Inspector General found that in September 2013, the Western New York Business Office issued a check for \$825 to the IRA's cash custodian, for deposit into the cash accounts of several of the IRA's residents. The IRA's check register reflected the cash

custodian's receipt of the check on September 10, 2013, and the register and bank records listed the check as being cashed that same day. However, the residents' personal account ledgers did not list the receipt of cash, and the account balances were deficient.

When questioned by the Inspector General, the cash custodian denied stealing the money. She claimed she had cashed the check, and placed the money in a box in a drawer, intending to return later that day, place cash in each resident's account, and notate their ledgers. However, the cash custodian claimed that she did not return later, but took several days off from work. She testified that she did not recall what happened next with the cash. The cash custodian also testified to several deficiencies in the process that might have contributed to the shortfall, including that she was not a good bookkeeper, did not understand and did not receive training on how to maintain accounts, and that many people in the IRA had access to the cash.

Despite being unable to definitively determine what became of the cash, the Inspector General found that the cash custodian, at the very least, violated OPWDD policy by failing to secure the residents' cash funds. The cash custodian's statement that many people in the IRA had access to the residents' cash also shows that the IRA was violating OPWDD policy. In addition, the fact that the cash custodian purportedly never discovered that \$825 was not properly deposited into the residents' accounts in September 2013, reveals that she was either not reconciling the accounts, as was her responsibility, or was intentionally overlooking the deficits in each account. During the course of the investigation, the cash custodian retired from OPWDD, precluding any disciplinary action.

Additionally, the Inspector General found that the cash custodian's supervisors failed to adequately perform their duties. The Western New York DDSOO policies require that the supervisors of cash custodians are responsible for ensuring cash guidelines are followed, performing reviews every six months, and conducting monthly checks of daily financial summary sheets. Had this been done, the missing funds would have been discovered prior to the audit. In testimony to the Inspector General, however, the cash custodian's supervisor, a developmental assistant 3, claimed to have conducted a review of the IRA ledgers and accounts and failed to notice the \$825 discrepancy.

The treatment team leader too bears some responsibility for the failures of her subordinates. OPWDD policy states that the treatment team leader is responsible "for ensuring cash guidelines are followed, including cash custodian and developmental assistant 3 duties are

completed.” It is clear from the statements of both the cash custodian and the developmental assistant 3 that the treatment team leader failed to ensure that the cash guidelines were followed and that the cash custodian and developmental assistant 3 had completed their duties.

The Monroe Developmental Center Investigation – Improper Use of Resident Accounts

In July 2013, OPWDD reported to the Inspector General that the Finger Lakes Business Office in Region 1 DDSOO conducted an unannounced audit of the Monroe Developmental Center and discovered altered receipts. Specifically, OPWDD advised that its audit found receipts submitted by a staff member for residents’ purchases had the bottom portions torn off. The missing portion contained pertinent information, such as the date and method of payment.

The Inspector General reviewed the receipts at issue, as well as quarterly audits completed by the Monroe Developmental Center treatment team leader, and found no evidence of theft or missing funds. After obtaining sales records from the vendors who had issued the receipts, the Inspector General determined that the OPWDD staff member had used her personal credit card to make the purchases on behalf of residents and later reimbursed herself from the residents’ accounts.

Although no evidence of theft was uncovered, the Inspector General found the use of a non-agency credit card to purchase food and goods for residents is in violation of OPWDD’s policy and procedures. OPWDD prohibits its employees from engaging in the transfer or loaning of money with residents. Employees are not allowed to spend their personal funds and use residents’ personal allowance for reimbursement. Consistent with OPWDD policy, the Finger Lakes DDSOO expressly prohibits staff from using a personal credit card for resident purchases because the practice is considered borrowing and lending.

During the pendency of the investigation, the staff member retired, thereby precluding any disciplinary action.

The East Randolph IRA Investigation – Theft of Resident Funds

In June 2013, the Inspector General was advised by OPWDD that the Western New York Business Office in Region 1 DDSOO had conducted an audit of the East Randolph IRA, located in Cattaraugus County, which revealed that items valued at \$819.74 were missing from the IRA. Upon investigation, the Inspector General found that a direct support assistant assigned to the IRA used seven residents’ personal allowance funds to purchase items for herself. To cover up

her theft, the direct support assistant submitted receipts for the items as if they were purchased for the residents. However, the direct support assistant failed to record the items on each resident's "Personal Property List." Additionally, the items were not in the possession of the residents.

On April 23, 2013, the direct support assistant was arrested by the Cattaraugus County Sheriff's Office for these thefts. Subsequently, her case was resolved with an adjournment in contemplation of dismissal. The direct support assistant was also suspended from OPWDD and ultimately terminated.

The Taconic DDSOO Family Care Home Investigation – Improper Use of Funds and Deficient Oversight

In October 2013, OPWDD advised the Inspector General that its Taconic Business Office in Region 4 DDSOO had conducted an audit of a family care home and found the family care home provider had failed to post several months of personal allowance to the accounts of residents in her care, and was unable to provide receipts documenting purported purchases for the residents.

By way of background, OPWDD contracts with home care providers for the care, room and board of residents with developmental disabilities. An OPWDD home care liaison is responsible for monitoring the home to ensure the appropriate care of residents. At the time of the investigation, four individuals resided in this family care home. Much like the process for distributing resident funds to IRAs, OPWDD deposits with a home care provider a monthly allowance for each resident. OPWDD regulations restrict use of the allowance for residents' personal needs and activities, including dining out, entertainment, vacation, family visits, clothing and hobbies, among other things. Regulations prohibit use of the allowance to purchase items considered part of the room and board provided by the home, such as toiletries, including soap, shampoo, and bathroom tissue.

Similar to an IRA, the provider is required to maintain a ledger for each resident in which the receipt of monthly allowance and all expenditures are recorded. Receipts of all expenses are also required to be retained. In monthly visits to the home, the home care liaison is required to reconcile each resident's credits and debits, including a review of supporting documentation, to ensure that residents' funds are appropriately accounted for and used.

The Inspector General investigated this claim and found that the family care home provider used resident funds for improper purchases, including toiletries. The home care provider also failed to maintain required receipts to verify purchases she had made with residents' funds. In addition, the home care provider used her own money to purchase items for the residents, and then reimbursed herself with money from the residents' accounts, in violation of OPWDD policy. During the investigation, the provider withdrew from the family care home program.

The Inspector General also discovered deficiencies in the oversight of the family care home by the home care liaison. The home care liaison admitted to the Inspector General that during her visits to the home she did not always conduct the required checks, which include reviewing the residents' account ledgers and receipts, and observing the home care provider while he or she counts the cash in each resident's personal account. The home care liaison also admitted that although she was aware of irregularities in the use of the residents' funds, she failed to take the appropriate action. Had the home care liaison uncovered the misuse of funds at the onset, remedial actions could have prevented future abuse.

The Cleve Blake Investigation – Theft of Resident Funds

In April 2015, the Inspector General was advised by OPWDD that an audit conducted by the Hudson Valley Business Office in Region 4 DDSOO of the Echo Lake IRA, located in the Village of Briarcliff Manor, uncovered a series of suspicious purchases with resident funds. The purchases included items that were either not appropriate for the residents or could not be located at the IRA. An investigation by OPWDD and the Newcastle Police Department determined that Cleve Blake, the IRA's house manager, submitted numerous requests to the Hudson Valley Business Office for resident funds, purportedly to purchase items on behalf of residents. Once obtained, Blake purchased for his own use expensive sneakers, musical equipment, a recliner, clothing and home goods. As is required per policy, Blake submitted receipts for the purchases to the Business Office. Due to the unusual nature of the purchases, the Business Office commenced an audit of resident funds at the IRA and discovered \$7,399.53 in theft.

On July 1, 2015, following investigation by the Newcastle Police Department, Blake was arrested. He confessed to being solely responsible for the fraudulent purchases. Blake pleaded guilty to Attempted Petit Larceny on December 3, 2015. On April 7, 2016, Blake was sentenced

to a one-year conditional discharge and ordered to pay restitution in the amount of \$7,399.53. Blake was also terminated by OPWDD on September 30, 2015.

The Danika Dates Investigation – Theft of Resident Funds Through Use of Bank Cards

On January 9, 2015, OPWDD reported to the Inspector General that a number of Christmas gifts purchased on behalf of residents by an OPWDD employee at the Capital District Region 3 DDSOO Primer Court IRA were missing. OPWDD noted that the purchases had been made by Danika Dates, a developmental assistant, using residents' personal funds maintained on bank cards.

The Capital District DDSOO has implemented the use of bank cards that access personal allowance funds held by residents in their bank accounts. Pursuant to the Capital District DDSOO's personal allowance bank card policy, the card can be used for ATM and debit transactions. An electronic ledger is maintained to record all bank card transactions, and is similar to the ledgers used to manually record residents' cash transactions. The district's policy requires that a separate log be maintained for each resident, as well as bank statements and receipts. Transactions up to \$150 can be made by the IRA without the approval of the Business Office. Purchases over that amount require Business Office approval. According to the policy, bank cards can be used to withdraw cash "if absolutely necessary." Staff members are required to sign-out bank cards when using them, and obtain receipts for purchases or withdrawals.

After a monthly audit by the Primer Court IRA's developmental assistant 2 revealed suspicious ATM withdrawals, a more comprehensive review was conducted of the residents' bank statements, receipts and the e-ledgers, which found both cash and receipts were missing, and ledgers had not been completed.

The Inspector General and the Saratoga County Sheriff's Department investigated the matter and found that Dates stole residents' funds by improperly using their bank cards. In December of 2014, bank surveillance video revealed Dates made \$40 withdrawals at an ATM using the bank cards of three residents of the IRA. When confronted by investigators, Dates admitted to improperly using the debit cards and stealing funds from the residents. She was arrested, subsequently pleaded guilty to one count of Petit Larceny, and received a conditional discharge. Dates' employment at OPWDD was terminated on April 4, 2015.

The Corrine Alexander Investigation – Theft of OPWDD Funds by IRA Employee

In September 2014, OPWDD reported to the Inspector General that a preliminary audit found several suspicious purchases on a state credit card issued to Corrine Alexander, an OPWDD employee working in the Unger Road IRA, located in Town of Gowanda in the Western New York Region 1 DDSOO. Although the funds at issue in this investigation were not residents' personal allowances, they were funds earmarked to purchase food and dry goods for the residents of the IRA. Western New York DDSOO policy requires that when an employee makes such a purchase, another employee must inventory the items upon their receipt at the home to ensure that all the purchased items have been delivered. This employee then initials the receipts and the purchaser submits the receipts to the DDSOO Business Office.

The Inspector General investigated the questionable purchases by reviewing Alexander's credit card statements and her time and attendance records, and interviewing the residence supervisor and supervising developmental assistant 3. This review found that Alexander made a number of purchases that were not consistent with the intended use of the credit card and appeared to be personal. For example, Alexander purchased a pet's choke collar, barrettes, and a flat iron. The IRA does not have a pet, the residents are all males who do not use barrettes, and the IRA does not have a flat iron in its inventory. In addition, Alexander purchased on a number of occasions high-sugar cereals and other food products that were generally not eaten by the residents. The review also showed that Alexander made many of these purchases while she was off duty, which while unusual, is not precluded by OPWDD policy.

Alexander, who provided testimony to the Inspector General, initially denied purchasing any items for personal use. After being confronted with specific purchases, Alexander admitted she had wrongfully purchased approximately \$2,000 in food and goods, including a dog collar, barrettes, an iron, gravy, meat products, deli meats, breads and condiments. Following a referral by the Inspector General to the Erie County District Attorney's Office, Alexander was charged with Attempted Grand Larceny in the 4th Degree. She pleaded guilty to that charge on May 2, 2016. As part of her plea, Alexander has agreed to pay restitution totaling \$1,000. On July 25, 2016, Alexander was sentenced to a one-year conditional discharge. On July 13, 2016, OPWDD suspended Alexander, and on August 24, 2016, Alexander resigned from OPWDD.

The investigation also found that the Unger Road IRA failed to follow OPWDD policy with regard to inventorying purchases upon receipt by the IRA. The residence supervisor

advised that Alexander often submitted her receipts at the end of the month, and staff members would merely place their initials on all receipts. This failure to follow OPWDD policy clearly facilitated Alexander's theft.

FINDINGS AND RECOMMENDATIONS

OPWDD's Oversight, Policies and Training on Residents' Cash Accounts is Deficient

The investigation found deficiencies in OPWDD's oversight, policies and training with respect to cash accounts maintained in the residences on behalf of residents. These deficiencies facilitated the aforementioned cases of theft. In many cases, those entrusted with safeguarding the residents' funds — the cash custodians — were the ones who actually stole or mishandled the funds. Moreover, the supervisors responsible for monitoring cash custodians and resident accounts — treatment team leaders and developmental assistant 3s — failed to perform timely and meaningful reviews of the residents' accounts, thereby allowing for continued abuse. Therefore, the Inspector General recommends that OPWDD review and strengthen its internal controls related to residents' cash accounts.

OPWDD Lacks Clear and Uniform Policies Regarding Supervisory Review of Cash at the Residence

New York State regulations require that OPWDD develop and implement policies and procedures to ensure safeguarding and accurate accounting of personal allowance. To that end, OPWDD has promulgated policies describing the management and handling of residents' personal allowance funds. In general, these policies provide a sound framework for managing these funds. For example, OPWDD policy mandates that individual ledgers be maintained for residents' accounts reflecting all credits and debits and supported with receipts of transactions. This requirement is a necessary and invaluable tool that makes meaningful audits of the use of the funds possible. Many of the shortages in residents' personal accounts discussed in this report were discovered as a result of this required documentation and by the diligent audit work of the DDSOO Business Offices. It also enabled the Inspector General to uncover the thefts of resident funds and advance these cases to successful prosecutions. However, as evidenced by the cases discussed above, additional policies are needed to ensure that the funds in the homes are safeguarded and to deter future abuse.

The Inspector General’s investigations found that OPWDD lacks clear and uniform policies describing supervisory oversights of residents’ cash allowances. Although OPWDD’s Personal Allowance Manual requires a quarterly accounting of, among other things, cash at the residence, the policy is unclear as to who is responsible – the treatment team leaders or developmental assistant 3s - or the manner in which it will be conducted.

Moreover, each OPWDD region follows a different policy or practice regarding this accounting. For example, the Central New York DDSOO requires that the residence supervisor conduct a monthly review of resident cash accounts, and the treatment team leader conduct a quarterly audit. The Finger Lakes DDSOO, however, requires a residence supervisor conduct a monthly audit, and a treatment team leader ensure that a quarterly audit be done by at least of two of the following: the treatment team leader, the residence supervisor and/or a supervisor from another home. The Western New York DDSOO’s policy requires that a developmental assistant 3 perform a monthly review of expenditure ledgers, and conduct a semi-annual audit of the ledgers. In many cases, it is unclear what the assigned supervisors are responsible for reviewing and the scope of that review. Additionally, the policies appear to use the term “audit” and “review” interchangeably, while failing to define the scope of either.

The Inspector General recommends that OPWDD develop a clear and uniform statewide policy mandating systematic periodic audits of residents’ cash accounts. This policy should plainly state how often the audits are required, who is responsible for conducting them and the manner in which they will be conducted.

OPWDD Fails to Provide Adequate Training Regarding Personal Allowance Accounts

The Inspector General’s investigation found that OPWDD fails to provide adequate training to residence supervisors with respect to their oversight responsibilities of residents’ cash accounts. Indeed, a number of supervisors testified to the Inspector General that they lacked adequate training or guidance regarding the management and oversight of residents’ cash accounts, and did not understand their responsibilities. Specifically, the residence supervisors stated that when first promoted to this title, the only guidance they received regarding the management of residents’ cash accounts was by way of on-the-job training within the residence.

The Regional Coordinator for the Western New York, Finger Lakes, Central New York, and Broome DDSOO Business Offices reported to the Inspector General that efforts by the

regional Business Offices to train residence supervisors are limited due to staffing issues. The coordinator noted that the regional Business Offices provide some training to residence supervisors during their annual audits of 25 percent of the residences; however this training is informal and dependent upon the discretion of each Business Office auditor.

The investigation also found that the senior supervisors — developmental assistant 3s and treatment team leaders — who are generally responsible for the reviews and audits of resident cash accounts, have inadequate training regarding their management of these accounts and the manner in which to conduct the required reviews and audits. Much like the resident supervisors, the developmental assistant 3s and treatment team leaders testified to the Inspector General that they received little training with regard to their role in managing and reviewing resident accounts. Some reported that the regional Business Office provided them with a checklist of items to review or audit, while others followed no such checklist. The regional coordinator confirmed that a review/audit checklist was not utilized uniformly by the senior supervisors throughout OPWDD’s regions. He further described the audits by the senior supervisors as not conducted “in a serious manner” because only account balances, and not all transactions, are reviewed.

This lack of uniform, comprehensive training was evident in many of the cases discussed above, and allowed the abuse identified to occur undiscovered prior to the investigation. The Inspector General therefore recommends that OPWDD provide formal and consistent training to resident supervisors, especially when newly appointed to the position. Likewise, senior supervisors — developmental assistant 3s and treatment team leaders — should receive training on financial and audit policies and practices, with respect to resident cash accounts. Ensuring adequate training of staff members could prevent future theft from going undetected. Furthermore, the Inspector General recommends that OPWDD develop audit checklists for senior supervisors setting forth specific areas for review and on which to report. The checklists should be uniform and comprehensive, and assist the senior supervisors in identifying the scope of the review and the manner in which it will be conducted.

OPWDD’s Process for the Replenishment of Residents’ Cash Accounts Lacks Adequate Internal Controls and Facilitates Abuse.

The Inspector General’s investigation also found that OPWDD’s use of cash within the homes facilitated thefts by employees and resulted in poor accountability of funds. OPWDD

adds funds to resident cash accounts by having its regional Business Offices send a check made payable to the cash custodian of a home. The cash custodian is then responsible for cashing the check and placing cash in each of the resident's accounts. In two of the cases discussed above, this practice failed to replenish the residents' cash accounts. Christina Ruhmshottel, an IRA employee in the Taconic DDSOO region, merely cashed the checks and stole the money. The cash custodian at the Maple Avenue IRA in the Finger Lakes DDSOO region cashed a check intended to replenish residents' funds, and the money was never recovered.

OPWDD's current practice for replenishing resident cash accounts does not provide adequate internal controls and facilitates abuse. The Inspector General recommends that OPWDD consider the feasibility of the statewide or regional use of bank and debit cards linked to resident accounts. Some OPWDD regions, including the Capital District and the Finger Lakes DDSOO regions have implemented bank and debit card programs for resident accounts. For example, the Capital District DDSOO maintains a bank account with an associated bank card for each resident. As shown in the Dates case above, the use of bank and debit cards does not preclude theft. Dates misappropriated residents' bank and debit cards and used them to make withdrawals at an ATM and purchase food. However, the use of the cards was tracked and documented by the bank, and security video of the transactions was obtained. This provided auditors with additional reliable information to identify the misuse, and investigators with additional tools to prove criminal conduct. These tools not only assist in identifying and proving misuse but ultimately act as a deterrent to future misconduct.

OPWDD Lacks Policy on the Purchase of Gift Cards by or on Behalf of Residents

The Inspector General's investigation found that OPWDD lacked policy addressing the purchase of gift cards by or on behalf of residents, their inclusion in residents' Personal Expenditure Plans, and confirmation of the delivery of gift cards to intended recipients.

OPWDD's Personal Allowance Manual requires that each resident have a Personal Expenditure Plan, which should include "[g]ift giving." The manual also provides general guidelines as to when gift giving is appropriate. It states, in pertinent part, "[P]ersonal allowance money can't be used unless the individual will benefit in some way from the gift giving . . ."

The Inspector General reviewed a number of Personal Expenditure Plans and found that some did not address gift giving at all, while others did so only generally. Only one contained

specific mention of giving gift cards. In the absence of such guidance, the purchase of gift cards is left to the discretion of the OPWDD employees in the homes in instances where residents are unable to make financial decision themselves. Because gift cards, like cash, are easily stolen, and their users are difficult to identify, current OPWDD safeguards on their purchase and use are inadequate.

The investigation also found that OPWDD lacked policy requiring verification of the receipt of gifts, including gift cards, by the intended recipient. Without this internal control, there is a lack of accountability. This deficiency facilitated the theft of gift cards in at least two cases. As discussed above, the Inspector General found that an employee at the Corning IRA stole gift cards purchased with resident's funds and used them to make purchases for herself, rather than mailing them to the residents' friends and family. In addition, bonus gift cards obtained as part of the purchase of gift cards for residents at the Seneca Street IRA were not accounted for and not received by the intended recipients.

The Inspector General recommends OPWDD promulgate policy regarding the purchase of gift cards by or on behalf of residents. This policy should require that supervisory staff include gift card giving in residents' Personal Expenditure Plans where it is determined to be appropriate. Such a requirement will ensure that supervisors have reviewed the matter. Where gift card giving is determined to be appropriate, the names of potential recipients and their contact information should also be included. The Inspector General also recommends that OPWDD develop policy to ensure that senior supervisory staff members are aware of the purchase of gift cards and confirm their delivery. For example, policy could require that a supervisor purchasing a gift card notify a developmental assistant 3 or treatment team leader by memorandum or email when a gift card is delivered on behalf of a resident, and the senior supervisor contact the recipient to confirm delivery and document this confirmation.

Self-Generated Receipts Improperly Used to Document Purported Food Purchases

The Inspector General found that OPWDD allowed the use of self-generated receipts as evidence of meal purchases. The investigation found that Knightner and the secondary cash custodian at the Seneca Street IRA created numerous self-prepared receipts that purportedly reflecting meal expenditures, and submitted them with residents' personal allowance ledgers and petty cash ledgers. These receipts, which were handwritten from a blank receipt book, generally did not identify the vendor from which the meals were purchased, among other things.

Knichtner and the secondary cash custodian claimed they used these generic receipts when they lost the originals.

The Personal Allowance Manual expressly states that a resident's personal funds may be used for meals outside of the residence. However, a receipt to document the expenditure must be obtained listing the purchased item(s), cost, vendor, and the date of purchase. A self-generated receipt has little or no value in documenting a purchase and subverts the intent of the policy.

The Inspector General recommends that OPWDD expressly preclude the use of self-generated receipts as evidence of a purchase. Additionally, if a staff member loses or is otherwise unable to provide a required receipt, it is recommended that he or she be required to provide a written explanation of the circumstances. Frequent loss of receipts should lead to further inquiry and, where appropriate, discipline.

The investigation also found that one IRA failed to follow OPWDD policy with regard to inventorying purchases upon their delivery to the residence. Rather, it was found that receipts were submitted at the end of the month, and staff members would then initial them all. The Inspector General recommends that OPWDD require employees who confirm purchases to not only initial the receipt but annotate the receipt with the date that the review occurred.

Allegations of Personal Allowance Account Abuse Continued to be Received

During the writing of this compilation of prior investigations, allegations continued to be received by the Inspector General of the mismanagement of, and theft from personal allowance accounts maintained by OPWDD for the benefit of residents living in its facilities and group homes. For example, in early August 2016, OPWDD's Western New York Business Office advised that an audit of residents' personal allowance account ledgers at several IRAs uncovered a total of \$590 in missing funds, and an OPWDD audit of a Long Island IRA discovered a total of \$1,828.62 missing from residents' personal allowance accounts. These audit findings highlight the ongoing deficiencies in OPWDD's oversight, policies and training with respect to personal allowance accounts, and the need for immediate corrective action.

OPWDD'S RESPONSE TO THE INSPECTOR GENERAL'S REPORT AND FINDINGS

In response to the Inspector General's report and findings, OPWDD advised it was committed to strengthening its policies and procedures to ensure personal funds of the individuals entrusted to its care are used and accounted for in a proper manner, and would

implement the following corrective actions: (1) Provide standardized training on the management and review of individuals' personal allowance accounts to staff in supervisory positions at the time of their appointment with follow up at regular intervals; (2) Continue to research the feasibility of a statewide approach to implement the use of debit cards for individuals' personal allowance accounts and a policy on their use; (3) Issue a policy on the process for purchasing, recording and using gift cards for individuals in its care; (4) Consistent with existing policy regarding meals purchased for individuals using their personal allowance funds, reinforce the requirement of an original receipt from the vendor documenting the transaction. If a particular vendor does not supply a receipt, a process to verify the transaction will be developed; (5) Reinforce existing policy requiring purchases to be inventoried upon receipt in the home, and (6) Retrain/remind staff on the requirement to conduct an inventory at the time of purchase and to follow proper procedures.

The Inspector General will continue to work with OPWDD to ensure compliance with the recommendations and implementation of corrective actions.