



FOLLOW-UP REVIEW • REPORT NUMBER 22-01 • JULY 2022

## Adult Protective Services

**Actions have been taken to address audit findings**

Greg S. Griffin | State Auditor  
Leslie McGuire | Director



**DOAA**

Georgia Department  
of Audits & Accounts



## Performance Audit Division

Greg S. Griffin, State Auditor  
Leslie McGuire, Director

### Why we did this review

The follow-up review was conducted to determine the extent to which Adult Protective Services (APS) addressed recommendations from our February 2020 performance audit (Report #18-08).

The performance audit evaluated the extent to which mandatory reporters were reporting cases/allegations; APS had sufficient resources to investigate reports of abuse, neglect, and exploitation; and APS's interventions addressed elder abuse, neglect, and exploitation.

### About APS

APS is administered by the Division of Aging Services within the Department of Human Services. APS receives and investigates allegations of abuse, neglect, and exploitation of adults with disabilities and older adults. APS conducts investigations to determine whether the allegations of abuse, neglect, and exploitation are true, as well as identify any risks or unmet needs that a victim may possess and try to mitigate them. During fiscal year 2021, APS received 31,768 reports of abuse, neglect, and exploitation; accepted 21,048 for investigation; and completed 23,462 investigations. APS is funded primarily with state funds and had a budget of \$22.2 million in fiscal year 2022.

## Adult Protective Services

### Actions have been taken to address audit findings

#### What we found

Since our 2020 performance audit, APS has taken several steps to address report findings. APS expanded its outreach to law enforcement, increased training for staff and law enforcement, and revised its intake policies. APS also increased staff access to information regarding victims' eligibility for APS services and participation in state benefits.

#### *Outreach to Mandated Reporters*

Our 2020 performance audit found that underreporting of abuse, neglect, and exploitation of vulnerable adults limited APS's ability to serve victims and prevent future occurrences. APS did not receive reports of all occurrences due to underreporting by mandated reporters and other persons or entities that would have knowledge of such instances.

APS improved its outreach to ensure mandated reporters are aware of their responsibility to report, as described below.

- APS developed a standard training guide, which staff currently use when conducting outreach to mandated reporters.
- APS increased the number of At-Risk Adult Crime Tactics (ACT) specialists in law enforcement. ACT specialists are trained to recognize different types of abuse, understand the role of APS and other regulatory agencies, and identify available resources to support those affected.
- APS added targeted outreach efforts to the performance criteria for evaluating supervisors and managers.

#### *Case Intake Policies and Decisions*

The performance audit found that APS policies and business processes could put victims at risk for continued harm. At the time, the policies did not consider the amount of time from receipt of a report to a report being accepted in determining how long a victim may have to wait to receive a visit from an investigator. APS decisions on whether to accept a case for

investigation appeared inconsistent or incorrect; as a result, some victims did not receive services as quickly as the allegations warranted.

To improve the intake process, APS established a standard of promptness of one business day between incident report date and resolution date. APS revised its intake policies to reflect this standard and trained Central Intake staff on the new policy. To ensure intake decisions are appropriate and consistent in determining whether incident reports are accepted for investigation, APS audits intake incident reports quarterly, which helps identify training needs for intake staff. APS also revised the decision field in its data system to accurately capture why decisions are made and trained Central Intake staff to ensure justification for decisions is properly documented.

### ***Victim Services***

In 2020, we found there was limited communication and coordination between APS and law enforcement. Without coordination, victims of abuse, neglect, or exploitation incidents (which may also be criminal offenses) may not obtain the full scope of services they require. Additionally, at the time of our performance audit, APS based case closure on completing the investigation rather than ensuring services were provided.

To ensure victims receive services, APS created a standard guide for staff to train law enforcement on their role, resources available, and their responsibilities as mandated reporters. In March 2020, APS began providing staff refresher training on ongoing case management and service referral policies. APS also trained caseworkers to follow up on the appropriate service referrals before case closure.

### ***Investigation Process***

The original report found that investigators have limited access to informational tools that could enable them to efficiently conduct investigations. APS did not provide access to information resources that would allow investigators to more readily locate the victim, research their history, and determine their eligibility for state resources. As a result, investigators were required to conduct their own research, which could delay services.

APS increased access to informational tools by granting all supervisors access to Accurant, which is a web-based program APS uses to obtain addresses and known family members for victims. APS is also conducting a legal review to determine whether staff can obtain direct access to Georgia SHINES and Georgia Gateway. Currently, APS investigators can use Georgia SHINES to obtain information related to services victims have received and history of their contact with the Division of Family and Child Services. Investigators can use Georgia Gateway (the state's integrated system for determining eligibility across multiple benefit programs) to locate victims and determine whether they have a disability that qualifies them for APS intervention.

***APS's Response:*** APS agreed with the current status as presented in the following table.

***GBI's Response:*** GBI agreed with the current status of Finding #7 as presented in the following table and noted that it will continue to prioritize crimes against at-risk adults.

The following table summarizes the findings and recommendations in our 2020 report and actions taken to address them. A copy of the 2020 performance audit report (#18-08) may be accessed at: [APS Performance Audit Report](#).

## Adult Protective Services Follow-Up Review, July 2022

Original Findings/Recommendations	Current Status
<p><b>Abuse, neglect, and exploitation of vulnerable adults is underreported, limiting APS's ability to serve victims and prevent future occurrences.</b></p> <p>We recommended that APS improve its outreach to law enforcement, as well as other mandated reporters, to ensure that they are aware of their legal responsibility to report.</p> <p>We also recommended that DHS periodically analyze reporter data to identify types of reporters or areas of the state to target outreach efforts.</p> <p>We recommended that the General Assembly consider expanding O.C.G.A. § 30-5-4 to statutorily require agencies that work with vulnerable adults or regulate the financial industry to report relevant occurrences to APS.</p>	<p><b>Partially Addressed</b> – APS has developed a standard training guide for conducting outreach and increased training for law enforcement and other mandated reporters. APS analyzes mandated reporter data quarterly to target its outreach efforts. However, the General Assembly has not amended O.C.G.A. § 30-5-4 to require state agencies to report relevant occurrences to APS.</p> <p>APS reported that it developed a standard training guide for conducting outreach to mandated reporters and incorporated targeted outreach efforts into the performance criteria used to evaluate supervisors and managers. Additionally, the Forensic Special Initiatives Unit (FSIU) implemented At-Risk Adult Crime Tactics (ACT) training, which resulted in an increased number of ACT Specialists in law enforcement. FSIU also provided refresher training for mandated reporters and Facility At-Risk Adult Crime Training specifically for medical personnel and home health providers.</p> <p>APS enhanced its database to require Central Intake staff to identify mandated reporter type when known and trained staff to ensure this data is recorded properly. APS currently analyzes mandated reporter data quarterly and uses it to identify the types of reporters and areas of the state to target its outreach efforts.</p> <p>The General Assembly has not passed legislation to expand O.C.G.A. § 30-5-4 to statutorily require state agencies that work with vulnerable adults or regulate the financial industry, such as Georgia Vocational Rehabilitation Agency, to report relevant occurrences to APS.</p>

## Adult Protective Services Follow-Up Review, July 2022

Original Findings/Recommendations	Current Status
<p><b>APS's policies related to intake may result in investigators' delayed contact with victims.</b></p> <p>We recommended that APS establish a policy that addresses the time between incident report submission and Central Intake's acceptance or rejection.</p> <p>We also recommended that APS monitor the amount of time between the incident report and the face-to-face visit to ensure that victims are served in a timely manner.</p> <p>We recommended that APS consider changing its business hours to allow for the ability to review and respond to cases in a more timely manner.</p>	<p><b>Partially Addressed</b> – APS has taken steps to improve timeliness by establishing a standard of promptness, revising the intake policy, and creating a report that summarizes data for managers to monitor timeliness and provide coaching. However, APS has not changed its business hours.</p> <p>APS reported that it established a standard of promptness of one business day between the incident report date and resolution date. APS also reported that it revised the intake policy to include this standard and trained all Central Intake staff on the new policy. In March 2020, APS created a report summarizing data for managers to monitor the standard of promptness of incident resolution and coach staff based on the results.</p> <p>In addition, APS developed a report that summarizes data on the standard of promptness from intake to the date of initial face-to-face contact with the client. APS trained managers to use the report to monitor the timeliness of face-to-face visits each month. According to APS staff, this report also provides information to help management identify options to improve outcomes for the standard of promptness.</p> <p>APS reported that the COVID-19 pandemic limited its ability to meet the standards of promptness for making initial face-to-face contact with clients and completing investigations. This resulted in a backlog of cases without in-person contact until July 2020, when staff began making limited in-person contact. APS reported improving its performance for meeting the 45-day requirement for completing investigations from 13% of cases in July 2020 to 56% of cases in January 2022.</p> <p>APS Central Intake continues to only accept live calls from 8 a.m. to 5 p.m. Monday to Friday. DHS reported that it has not received funding for the additional staff needed to extend its business hours.</p>



## Adult Protective Services Follow-Up Review, July 2022

Original Findings/Recommendations	Current Status
<p><b>APS lacks a systematic process to ensure intake decisions are appropriate.</b></p> <p>We recommended that APS continue to improve its monitoring process to ensure consistency in determining whether a reported incident is accepted for investigation. This could include using an intake script.</p> <p>We recommended that APS improve controls over incidents reported via the web to improve the quality of the data captured.</p> <p>We also recommended that APS ensure all decisions are documented and provide sufficient justification for the reason.</p> <p>We also recommended that APS improve training for Central Intake staff regarding the process for categorizing reported incidents as priority vs. standard and justifying such decisions.</p>	<p><b>Fully Addressed</b> – APS began auditing reported incidents and quarterly and revised the intake script. APS also improved controls over web reporting and required Central Intake staff to document the reason for referral determinations for all intakes. Finally, APS improved training for Central Intake staff.</p> <p>To improve monitoring, DHS Division of Aging Services Program Integrity staff began conducting quarterly audits of reported incidents. The first audit in September 2020 established a baseline for continued improvements. APS could not conduct additional audits due to staff turnover; however, APS resumed these audits in January 2022. Additionally, APS revised its intake script by providing additional if/then scenarios and directions for navigating the intake system. APS also reported that it revised the Central Intake review guide and created a review assessment tool to generate reports based on Central Intake incident reports.</p> <p>APS completed planned enhancements to its online tool for reporting incidents to improve the quality of the data captured. The enhancements included highlighting cases in which telephone reporting is recommended and providing instructions for completing the web-based report. APS also trained DHS call center staff, who serve as backup to live calls, to use the web-based reporting tools. APS reported response times to online reports improved from 31 hours to 6 hours and 28 minutes since incorporating the enhancements.</p> <p>To ensure the reason for decisions is documented, APS revised the intake decision field in its database to capture why decisions are made. Central Intake staff are now required to use the field to document the reason for referral determinations for all intakes. Supervisors can review this information to identify training needs for intake staff. Supervisors also currently utilize live-call reviews and second level case reviews to monitor intake decisions.</p>

## Adult Protective Services Follow-Up Review, July 2022

Original Findings/Recommendations	Current Status
	<p>APS also improved training for Central Intake staff, which is now targeted, ongoing, and based on performance improvement needs. For example, APS reported that it began requiring an annual refresher training on the intake policy in February 2020. In March 2020, APS began using case record review findings to identify policies or intake topics for bimonthly training.</p>
<p><b>Improved coordination between APS and law enforcement is needed to ensure that victims of abuse, neglect, and exploitation are provided services they need.</b></p> <p>We recommended that APS conduct outreach, especially to law enforcement, on its responsibilities to victims of adult abuse, neglect, or exploitation, as well as tools and resources available to address abuse, neglect, or exploitation.</p>	<p><b>Fully Addressed</b> – APS improved its coordination with law enforcement by conducting trainings that focus on APS’s role and list resources available to law enforcement.</p> <p>APS reported that it created a standard guide to train law enforcement on APS’s role and list available resources, such as Temporary Emergency Respite Funds and the Georgia Abuse, Neglect, Exploitation app. APS also continues to participate in Multi-Disciplinary Teams, which provide a multi-agency, multi-partnered approach to assessing, investigating, prosecuting, and reviewing abuse cases involving elder persons, adults with disabilities, and long-term care facility residents.</p>
<p><b>Case closure is based on completing the investigation, which includes referring for services, rather than ensuring services are provided.</b></p> <p>We recommended that APS consider changing its policy to ensure that services are in place prior to case closure. This may include using ongoing services more frequently, requiring investigators to follow up with victims and service providers regarding referrals, or developing a process to follow up on closed cases when the victim was referred to services but the services had not been received at the time of case closure.</p>	<p><b>Fully Addressed</b> – APS provided staff refresher training on case management and service referral before case closure. APS plans to use grant funds to provide clients case management services. APS also uses multiple assessments to monitor the risk for abuse, neglect, or exploitation.</p> <p>After February 2020, APS determined existing policies were adequate to ensure that services are in place prior to case closure. APS provided staff refresher training on ongoing case management and service referral policies and trained caseworkers to follow up on the appropriate service referrals before case closure.</p>

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<p>We also recommended that APS should consistently document the results of its assessments of a victim's risk for abuse, neglect, or exploitation and whether the risk has changed. We recommended that APS monitor the results of the assessments to identify the need for additional resources or training.</p>	<p>APS is using Victims of Crime Act grant funding to provide case management and direct services for clients who have been victims of crimes but might normally be on a waitlist for assistance. The grant also funds a Temporary Emergency Respite Funds unit that assists individuals displaced due to no fault of their own. APS plans to use a portion of funds from the Coronavirus Response and Relief Supplemental Appropriations Act of 2021 and the American Rescue Plan Act of 2021 to contract for case management services.</p> <p>APS now uses two assessments during its investigations. Staff complete the Determination of Need – Revised (DON-R) at the beginning of the investigation and use the comprehensive risk assessment during the investigation and at case closure. If changes occur in the alleged victim's circumstances during the investigation, APS requires staff to complete another DON-R. APS retrained all staff on how and when to utilize assessment tools and trained supervisors on the case review process.</p>
<p><b>APS could improve the investigative process by providing investigators with additional informational tools.</b></p> <p>We recommended that APS ensure investigators have sufficient information regarding victims' eligibility for APS services and participation in state benefits. This may include providing increased access to investigation tools such as Accurant, Georgia SHINES, and/or Georgia Gateway.</p> <p>We recommended that APS obtain a subscription inventory of services that can be accessed by investigators.</p> <p>We recommended that APS ensure that investigators are aware of Emergency Relocation Funds' availability and criteria for utilization</p>	<p><b>Fully Addressed</b> – APS renewed its contract for the statewide inventory of community services and expanded staff access to Accurant, a web-based program for obtaining contact information and known family members for victims. APS also increased training to ensure investigators are aware of the availability of Emergency Relocation Funds and the criteria for utilization.</p> <p>APS currently provides all supervisors access to Accurant for investigations. APS is conducting legal review to determine whether it can securely provide staff direct access to Georgia SHINES and Georgia Gateway. Currently, APS investigators can use Georgia SHINES to identify information related to services victims received and history of contact with the Division of Family and Child Services. Investigators use Georgia Gateway to locate victims and determine whether they have a disability that qualifies them for APS intervention.</p>



## Adult Protective Services Follow-Up Review, July 2022

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	<p>DHS reported that it renewed its contract to use Empowerline Pro, which gives investigators access to a statewide inventory of community services and healthcare providers for the elderly and disabled community. APS trained field staff to use Empowerline Pro in May 2020 and provides ongoing technical support. APS also provides user credentials for Empowerline Pro when onboarding new employees.</p> <p>To ensure investigators are aware of Emergency Relocation Funds (ERF), APS began providing training during biannual meetings for supervisors and managers as well as new employee training. In May 2020, APS developed an online guide for ERF training and as a resource for supervisors and managers to reinforce ERF policies and procedures. In July 2020, APS created an online survey to determine staff training needs and has begun using a post-assessment to determine the effectiveness of the training. APS uses the results to modify ERF training as needed.</p>
<p><b>The Georgia Bureau of Investigation (GBI) did not utilize an increase in fiscal year 2016 state appropriations for its intended purpose of eight additional GBI agents to specialize in elder abuse cases.</b></p> <p>We recommended that the General Assembly determine whether it should continue to fund eight agents for elder abuse investigations.</p>	<p><b>Fully Addressed</b> – Since our 2020 report, the General Assembly has continued GBI’s funding for agents to specialize in elder abuse investigations.</p> <p>GBI reported that the sole agent assigned to the Crimes Against At-Risk Adults unit continues to develop trainings for GBI’s at-risk adult specialists, as well as local and state law enforcement. The specialists attend mandatory in-service training annually to remain current on issues that affect how these cases are investigated. GBI reported that this training has reduced the variance in the number of individuals arrested on criminal and other associated charges across counties.</p> <p>To formalize collaborative efforts to prevent and detect elder abuse, GBI and DHS entered a memorandum of understanding that created the Crimes Against Disabled Adults and Elderly Taskforce in 2021. Through this taskforce, GBI and DHS will develop and implement comprehensive training and outreach programs for entities that interact with elders. DHS provides Forensic Special Initiatives Unit staff to GBI for this effort.</p>

7 Findings	<div>5 Fully Addressed</div> <div>2 Partially Addressed</div> <div>0 Not Addressed</div> <div>0 No Recommendations</div>
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