

November 2021  
PE 21-12-646

## PERFORMANCE REVIEW

# BUREAU OF SENIOR SERVICES

### AUDIT OVERVIEW

The Bureau of Senior Services Should Continue the Process of Consolidating Regional Aging and Disability Resource Centers to One Statewide ADR Center to Annually Free Between \$225,000 to \$305,000 for Other Services

A Seven-year Accumulation of Nearly \$354,000 of Unexpended Appropriations for ADR Centers Remains Idle Because the Bureau Has No Spending Authority to Use It, and the Accountability of State Funds Granted to ADR Centers Is Inadequate

Eight County Senior Citizen Centers Generally Meet Federal Accessibility Guidelines for Most Requirements

The Bureau of Senior Services' Website Needs Modest Improvements Overall to Enhance User-Friendliness and Transparency



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November 15, 2021

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The Honorable Brandon Steele  
House of Delegates  
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Dear Chairs:

Pursuant to the West Virginia Performance Review Act, we are transmitting the Performance Review of the *Bureau of Senior Services*. The issues covered herein are “*The Bureau of Senior Services Should Continue the Process of Consolidating Regional Aging and Disability Resource Centers to One Statewide ADR Center to Annually Free Between \$225,000 and \$305,000 for Other Services,*” “*A Seven-year Accumulation of Nearly \$354,000 of Unexpended Appropriations for ADR Centers Remains Idle Because the Bureau Has No Spending Authority to Use It, and the Accountability of State Funds Granted to ADR Centers is Inadequate,*” “*Eight County Senior Citizen Centers Generally Meet Federal Accessibility Guidelines for Most Requirements,*” and “*The Bureau of Senior Services’ Website Needs Modest Improvements Overall to Enhance User-Friendliness and Transparency.*”

We transmitted a draft copy of the report to the *Bureau of Senior Services* on August 13, 2021. We held an exit conference on August 23, 2021. We received the agency response on November 8, 2021. If you have any questions, please let me know.

Sincerely,

Handwritten signature of John Sylvia in black ink.  
John Sylvia

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**Joint Committee on Government and Finance**



# CONTENTS

Executive Summary ..... 7

Issue 1: The Bureau of Senior Services Should Continue the Process of Consolidating Regional Aging and Disability Resource Centers to One Statewide ADR Center to Annually Free Between \$225,000 to \$305,000 for Other Services..... 11

Issue 2: A Seven-year Accumulation of Nearly \$354,000 of Unexpended Appropriations for ADR Centers Remains Idle Because the Bureau Has No Spending Authority to Use It, and the Accountability of State Funds Granted to ADR Centers Is Inadequate .....27

Issue 3: Eight County Senior Citizen Centers Generally Meet Federal Accessibility Guidelines for Most Requirements .....33

Issue 4: The Bureau of Senior Services’ Website Needs Modest Improvements Overall to Enhance User-Friendliness and Transparency .....39

## List of Tables

Table 1: Appropriations, Actual Expenditures for ADR Centers, and the Number of ADR Centers FY 2010 through FY 2021 ..... 14

Table 2: Bureau of Senior Services Select ACL Federal Grants Summary ..... 18

Table 3: ADR Center Contact Methods FY 2019 .....25

Table 4: ADR Center Appropriations and Expenditures FY 2015 through FY 2021 .....28

Table 5: ADR Center Grant Recipients and Amounts Received FY 2015 through FY 2021 .....29

Table 6: ADR Center Grants with Budgeted Administration Costs Exceeding Ten Percent FY 2015 through FY 2019.....31

Table 7: Americans with Disabilities Checklist .....34

Table 8: Bureau of Senior Services Website Evaluation Score .....39

Table 9: Bureau of Senior Services Website Evaluation Score .....40

## List of Maps

Map 1: Grant County .....19

Map 2: Kanawha County .....20

Map 3: Marion County .....21

Map 4: Mercer County .....21

## List of Figures

Figure 1: Distance from Each ADR Center to Nearest Senior Center .....22

Figure 2: Distance from Each ADR Center to Nearest DRS Office.....23

Figure 3: Distance from Each ADR Center to Nearest DHHR Office.....23

Figure 4: Distance from Each ADR Center to Nearest Veterans Assistance Office.....24

List of Appendices

Appendix A: Transmittal Letter .....43  
Appendix B: Objectives, Scope and Methodology .....45  
Appendix C: Aging and Disability Resource Network Offices .....49  
Appendix D: Website Criteria Checklist and Points System ..... 51  
Appendix E: Agency Response .....55

## EXECUTIVE SUMMARY

The Performance Evaluation and Research Division within the Office the Legislative Auditor conducted a performance review of the Bureau of Senior Services (Bureau) pursuant to West Virginia Code 4-10-8. The objectives of this audit were to assess how the Bureau responded to the recommendations made in Issue 1 of the January 2014 PERD report. An additional objective was to the assess general compliance with the Americans with Disabilities Act checklist of 8 of 55 county senior centers in February and March of 2020. Finally, the evaluation includes a review of the Bureau’s website for user-friendliness and transparency

### Frequently Used Acronyms

AAA- Area Agency on Aging

ACL – Administration for Community Living (federal)

ADA – Americans with Disabilities Act

ADR Center – Aging and Disability Resource Center

PERD – Performance Evaluation and Research Division

### Report Highlights:

#### **Issue 1: The Bureau of Senior Services Should Continue the Process of Consolidating Regional Aging and Disability Resource Centers to One Statewide ADR Center to Annually Free Between \$225,000 to \$305,000 for Other Services**

- The Bureau responded to the 2014 recommendation by consolidating 10 ADR Centers into 4, freeing \$510,000 annually for other services.
- The four regional ADR Centers provide long-term support and service information, referrals, and counseling primarily through the telephone and the State does not need walk-in locations to serve the public.
- Consolidating the 4 remaining ADR Centers into 1 would provide an annual cost savings between \$225,000 to \$305,000 without reducing services.
- The federal ACL assertion that one ADR Center would not be able to fulfill grant outcomes is a misunderstanding of the recommendation to consolidate the ADR Centers.

#### **Issue 2: A Seven-year Accumulation of Nearly \$354,000 of Unexpended Appropriations for ADR Centers Remains Idle Because the Bureau Has No Spending Authority to Use It, and the Accountability of State Funds Granted to ADR Centers Is Inadequate**

- From FY 2015 through 2021, the Legislature appropriated a total of \$2,975,000 in lottery monies specifically to the Senior Citizens Fund in line-item appropriations to run the four ADR Centers.
- Of this total, an accumulated amount of \$353,956 is unexpended and remains idle in the Senior Citizen Lottery Fund because the Bureau has no authority to spend it.
- The Bureau distributes the appropriated monies as grants; however, it does not enforce some terms of the grant agreements when it awards excess administrative costs to grantees.

- As allowed, ADR Centers that received more than \$50,000 in state grants each year submit substitute financial reports to account for how the grants were spent. However, the documentation does not provide adequate accountability of how state grants were spent.

### **Issue 3: Eight County Senior Citizen Centers Generally Meet Federal Accessibility Guidelines for Most Requirements**

- There are possible physical barriers in some senior centers to independently accessing dining, but the senior centers made accommodations so seniors could dine.
- Senior centers handicap parking, entrances, hallways, offices, and elevators generally met ADA standards at all senior centers.
- Most of the senior centers did not meet the requirements for signs or service counters.

### **Issue 4: The Bureau of Senior Services' Website Needs Modest Improvements Overall to Enhance User-Friendliness and Transparency**

- The Bureau's website scores high in user-friendliness. However, additional features should be considered to further improve user-friendliness including standardized updates and readability.
- The Bureau's website could benefit from additional transparency features such as a general email contact address, an online complaint form, an online freedom of information submission form, relevant graphics such as maps, agency performance measures, and website update status.

## **PERD's Response to the Agency's Written Response**

PERD received the Bureau's response to the draft copy of the review on November 8, 2021. The Bureau's response can be seen in Appendix E. In Issue 1 PERD concluded that consolidating the regional ADR Centers would provide an annual cost savings of state lottery dollars of between \$225,000 to \$305,000 without reducing services. The Bureau's response provides no explanation as to its reason(s) for concluding it cannot handle the calls. The agency response further ignores the audit findings and discusses an entirely different system never discussed or envisioned in the audit. PERD reiterates that a properly staffed ADR Center, located within the Bureau itself, is more cost-effective than answering those same calls from multiple sites where a substantial portion of the lottery dollars are being used to support the operations of the host Area Agency on Aging.

In Issue 2, the seven-year accumulation of unexpended appropriations is not the result of the number and locations of ADR Centers as the agency states. This accumulation all occurred with an unchanging number of ADR Centers. Furthermore, PERD is concerned with the rest of the agency's response to the finding of this issue. First, the agency never addresses the finding of the inadequate accountability of state grant funds. While as stated in the audit, grantees themselves are likely meeting statutory requirements, the Bureau has given no indication that it will gain more assurances over the use of the monies it was appropriated and for which it is thus ultimately responsible. Second, the Bureau's response leads PERD to ask if the



Bureau is saying there would not be an accumulation of funds had it and the grantees been monitoring the grantees spending. Given the grantees receive monies from the Bureau as reimbursement, not only should the Bureau be aware of exactly how much money it has disbursed but whether the money is being used to support operating the ADR Center only. Third, the Bureau does not agree that a seven-year accumulation of unexpended appropriations, routinely awarding excess administrative costs, and having imprecise cost categories that make concluding how funds were used combined with insufficient documentation improbable. Instead, the Bureau states it will revise budgets and allocations rather than right-size its funding request and be diligent and thorough in its grant monitoring.

The agency's response to Issue 3 indicates it will leave any and all action to the county senior centers and the Area Agencies on Aging. PERD reiterates that the Bureau, as the state agency on aging, should assume responsibility to provide guidance and assistance to county senior centers as they strive to maintain handicap accessibility.

In Issue 4 PERD found that the Bureau could incorporate some elements to enhance transparency of the website. The Bureau does not agree with our findings that it should incorporate elements on its website because it has a links to documents that contain the recommended information, other websites, and has made some changes since the website evaluation occurred. The agency is missing the point that a website user may not know that information the user wants is contained within any given document. Further redirecting a website user to another website to navigate is neither transparent or user-friendly.

## Recommendations

1. *The Bureau of Senior Services should further consolidate the regional ADR Centers from four to one, and administer the counseling, referral, and information services in-house if consolidating these would not result in an offsetting loss of federal grant funds.*
2. *The Legislature should consider reducing the line-item appropriation for the ADR Centers appropriately as the ADR Centers are consolidated if consolidating the ADR Centers would not result in an offsetting loss of federal grant funds.*
3. *The Legislature should consider further reducing the line-item appropriation to operate the ADR Centers.*
4. *If the ADR Centers are not closed, the Bureau of Senior Services should enforce the terms of awarded grant agreements and develop a plan for funding that more directly benefits senior citizens.*
5. *The Legislature should consider expiring the unexpended line-item appropriations for the ADR Centers through supplementary appropriation in order to re-purpose them.*
6. *The Legislature should consider amending W. Va. Code §12-4-14 to provide clear accountability when an audit is substituted for the required report.*

7. *The Bureau of Senior Services should review the accessibility of the county senior citizen centers and provide guidance and assistance as necessary and feasible.*
  
8. *The Bureau should consider incorporating the core website elements identified by the legislative auditor to enhance the transparency of the website.*

## ISSUE 1

### **The Bureau of Senior Services Should Continue the Process of Consolidating Regional Aging and Disability Resource Centers to One Statewide ADR Center to Annually Free Between \$225,000 to \$305,000 for Other Services**

#### **Issue Summary**

In January 2014, the Performance Evaluation and Research Division (PERD) recommended that the Bureau of Senior Services (Bureau) consider consolidating the 10 Aging and Disability Resource Centers (ADR Centers) into 1 call center to be located in the Bureau's Charleston office. PERD determined that the ADR Centers were primarily functioning as call centers because most requests for long-term care information and referrals were done through the telephone or online, and walk-in clients were a small percentage of client contact. Since the 2014 audit, the Bureau consolidated 10 regional ADR Centers into 4, and, as a result, funding for the ADR Centers dropped from \$935,000 to \$425,000, which annually freed funds for other services. This current audit reiterates that the remaining four regional ADR Centers should be consolidated into one Bureau-operated ADR Center that serves the entire state to further free funds. The regional ADR Centers still primarily provide information, referrals, and counseling through telephone calls, and they are in proximity to other local and state agencies that provide the same information. PERD estimates that one Bureau-operated statewide ADR Center would free up between \$225,000 to \$305,000 in lottery funds for the Legislature to make available annually for other services it deems beneficial to citizens of the state (W. Va. Code §29-22-18). However, officials of the federal Department of Health and Human Services' Administration for Community Living (ACL) stated that further consolidation may result in the loss of federal grant funds. PERD recognizes that the loss of federal grant funds could offset any state funding savings. Thus, PERD recommends that the Bureau seek to further consolidate the four ADR Centers if this would not result in a loss of federal granting funding.

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*The regional ADR Centers still primarily provide information, referrals, and counseling through telephone calls.*

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*An ADR Center can be an entity, network, or consortium set up by a state as part of its system of long-term care, to provide a coordinated and integrated system for older individuals and individuals with disabilities, and the caregivers of older individuals and individuals with disabilities.*

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### **The Four Regional Aging and Disability Resource Centers Are Providing Services That Are Offered by Several Other Community Service Providers in Close Proximity**

The ADR Centers are providing services for the aged and disabled populations that multiple nearby service providers offer. According to the federal Older Americans Act, an ADR Center can be an entity, network, or consortium set up by a state as part of its system of long-term care, to provide a coordinated and integrated system for older individuals and individuals with disabilities, and the caregivers of older individuals and individuals with disabilities. ADR Centers are part of the federal ACL's

No Wrong Door system. No Wrong Door is a collaborative effort of the ACL, the Centers for Medicare and Medicaid Services (CMS), and the Veterans Health Administration. It builds on the ADR Centers' program and the CMS' Balancing Incentive Program to support a state's efforts to streamline access to long-term services and support options for older adults with disabilities. West Virginia's State Plan on Aging indicates it has begun to refer to the ADR Center's as the ADR Network. The State Plan on Aging further states:

*A crucial component in the strength of the Bureau's foundation looking forward is the continual cultivation of close and cooperative relationships with the West Virginia Department of Health and Human Resources (DHHR), the Department of Veteran's Assistance, Herbert Henderson Office of Minority Affairs, Centers for Independent Living (CIL), Rehabilitation Services, Developmentally Disabled and the disability community. These connections allow us to deliver quality services and bring together new opportunities to our Aging and Disability Resource Network (ADRN) and the balance of our Aging Network. We also continue to develop and refine a seamless, no wrong door approach to access services for all West Virginia seniors and disabled. . . . The SHIP statewide toll-free number (877-987-4463) is answered by trained counselors located at the Bureau and within the Aging and Disability Resource Network throughout the state. Additionally, counselors are located in County Aging Programs locations. SHIP counselors also provide assistance in applying for programs to help with Medicare premiums and co-pays. [emphasis added]*

West Virginia's four regional ADR Centers are in Dunbar, Fairmont, Petersburg, and Princeton. A map of the four ADR Center regions in West Virginia is in Appendix C. Three of the ADR Centers, Dunbar, Petersburg, and Princeton are co-located within the offices of three of the State's four Area Agencies on Aging (AAA). These three AAAs have daily operational control of the ADR Centers. The Northwestern AAA based in Wheeling does not operate an ADR Center. The ADR Center serving the 12 West Virginia counties in Region I is in Fairmont. The Region VIII Planning & Development Council AAA in Petersburg which serves 15 counties in Region III, ran the Fairmont ADR Center from FY 2015 through the first part of FY 2017. Since that time, the Metro AAA in Dunbar has run this center. The ADR Center in Dunbar, in addition to serving the 15 counties in Region II, serves the entire state through a toll-free telephone number. The AAAs are one part of a nationwide network of organizations also created by the Older Americans Act for the purpose

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*Three of the ADR Centers, Dunbar, Petersburg, and Princeton are co-located within the offices of three of the State's four Area Agencies on Aging (AAA).*

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*The ADR Center in Dunbar, in addition to serving the 15 counties in Region II, serves the entire state through a toll-free telephone number.*

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of developing a comprehensive and coordinated plan that assures seniors have access to needed services and programs. These AAAs will continue to operate, providing services in their communities even without a co-located ADR Center.

Every West Virginia county has a senior center and fifty-four counties have a Department of Health and Human Resource (DHHR) office. Additionally, the Division of Rehabilitation Services, and the Department of Veterans Assistance have offices in 26 and 15 counties respectively. Originally, senior centers were to administer Older Americans Act programs; however, their role has expanded to include the administration of Medicaid programs, state-supported programs such as the Legislative Initiative for the Elderly programs, as well as local initiatives. These senior centers also have counselors specifically trained to help seniors through the State Health Insurance Program, a program that aids Medicare beneficiaries by supplying one-on-one counseling via telephone or in-person. With multiple entities that provide similar services, including the AAAs themselves, not only within close proximity of the ADR Centers but in more counties, the cost of operating the regional ADR Centers cannot be justified by their role in the No Wrong Door initiative.

In PERD's 2014 evaluation of the Bureau, it was recommended that the Bureau provide the services from 1 call center rather than the then 10 ADR Centers. When the Bureau commissioner was asked during the 2014 audit if he believed that the ADR Centers duplicate services by other service providers, he stated:

*The services provided by ADRCs are duplicate services. The services they provide are also provided by County Aging programs . . . .<sup>1</sup>*

He also added that the AARP Hotline, Family Resource Centers, and Community Action Agencies provide many of the same services. Since the services are duplicative, this prompts the question of efficiency and effectiveness. When the commissioner was asked if he believed that the ADR Centers were effective and efficient, he responded:

*ADRC's are effective in providing information and referral services, but it is not efficient in that those same services are and can be provided less costly and at the local level, through existing provider agencies.*

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*These AAAs will continue to operate, providing services in their communities even without a co-located ADR Center.*

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*Every West Virginia county has a senior center and have counselors specifically trained to help seniors through the State Health Insurance Program, a program that aids Medicare beneficiaries by supplying one-on-one counseling via telephone or in-person.*

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<sup>1</sup> The Bureau uses the acronym ADRC for the Aging and Disability Resource Centers.

## The Bureau Responded to the 2014 Recommendation by Consolidating 10 ADR Centers into 4, Freeing \$510,000 Annually for Other Services

Following the recommendations made in the 2014 report, the Bureau closed 6 of the 10 ADR Centers. Table 1 shows that the line-item appropriation for the 10 centers in 2010 was \$1 million. This amount was reduced to \$935,000 for a few years. Following the 2014 PERD report, the Bureau consolidated the 10 ADR Centers into 4 and the line-item appropriation was lowered appropriately to \$425,000. PERD determines that the number of ADR Centers can be consolidated to one Bureau-operated ADR center and the line-item appropriation can be reduced substantially below its current amount.

**Table 1**  
**Appropriations, Actual Expenditure for ADR Centers, and the Number of ADR Centers**  
**FY 2010 through FY 2021**

Fiscal Year	Line-Item Appropriation	Actual Expenditures	Number of ADR Centers
2010	\$1,000,000	\$996,822	10
2011	\$935,000	\$921,368	10
2012	\$935,000	\$930,000	10
2013	\$935,000	\$906,000	10
2014	\$864,875	\$731,539	7
2015	\$425,000	\$292,608	4
2016	\$425,000	\$354,010	4
2017	\$425,000	\$293,806	4
2018	\$425,000	\$298,144	4
2019	\$425,000	\$427,165	4
2020	\$425,000	\$355,830	4
2021	\$425,000	\$388,374	4

Source: Bureau of Senior Services, *Our Advanced Solution with Integrated Systems (OASIS) Report WV-FIN-FARS-030 and Financial Information Management System.*

*PERD determines that the number of ADR Centers can be consolidated to one Bureau-operated ADR center and the line-item appropriation can be reduced substantially below its current amount.*

## **Consolidating the ADR Centers Would Provide an Annual Cost Savings Between \$225,000 to \$305,000 Without Reducing Services If Federal Grants Funds Are Not Affected**

Depending on how the Bureau responds to the recommendation that the information, referral, and counseling services be provided from one Bureau-operated ADR center, the Legislature could reduce the line-item appropriation for ADR Centers by as much as \$305,000. In the event the Bureau decides it could absorb the cost of providing some of the information, referral, and counseling services with its existing staff and resources, the Legislature could appropriate a lesser amount of monies to fund the services. However, the Bureau may feel it needs to hire three to five counselors to respond to telephone calls and maintain the website with the information related to long-term care supports and services that assist seniors and those with disabilities. In this instance, the cost for each full-time counselor is estimated to be approximately \$40,000 for salary, benefits, and possibly one-time costs for furniture and equipment. Therefore, the current appropriation of \$425,000 state lottery funds could be reduced to \$120,000 or as much as \$200,000, for an annual savings of between \$225,000 to \$305,000. These savings can be transferred to other purposes the Legislature considers beneficial to West Virginia citizens, as stipulated by the State Lottery Act, such as the Lottery Education Fund, the School Construction Fund, the Lottery Senior Citizens' Fund, the Division of Natural Resources, or the Development Office (W. Va. Code §29-22-18). **However, the Bureau and the federal Department of Health and Human Services ACL officials met with PERD staff and indicated that further consolidation may result in the loss of federal grant funds. PERD recognizes that the loss of federal grant funds could offset any state funding savings. Thus, PERD recommends that the Bureau discuss with ACL officials whether consolidating the four ADR Centers would still meet the purposes of the grants while saving the State funds that can be used for other senior services.**

## **The Federal Administration for Community Living States It May Reassess the Amount of Three Federal Grants Awarded on the Premise that West Virginia Has Four Regional ADR Centers**

On Monday, August 23, 2021, PERD met with the Bureau to discuss the draft of the current report. At this time PERD learned that the Bureau had shared the draft with the United States Department of Health and Human Services' ACL. In response to the draft, the ACL Regions II & III regional administrator wrote in an email to the Bureau commissioner:

*Reducing the number of ADRC locations, as contemplated by the audit, may materially adversely affect West Virginia's existing ADRC grants from ACL. These grants*

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*These savings can be transferred to other purposes the Legislature considers beneficial to West Virginia citizens, as stipulated by the State Lottery Act.*

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*Thus, PERD recommends that the Bureau discuss with ACL officials whether consolidating the four ADR Centers would still meet the purposes of the grants while saving the State funds that can be used for other senior services.*

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*were all awarded on the premise of having local community presence and having four ADRCs in their application to ACL. A change in the number or scale of ADRCs would significantly impact goals and outcomes of the grant(s) and may require revisiting funding allocations.*

The ACL regional administrator further wrote:

*If this proposed elimination of ADRC locations moves forward, ACL assumes that you will notify the WV Olmstead Council (with representation of people with disabilities (and family members), advocates, providers, and state agency representatives) and the WV Department of Health and Human Resources Office of the Inspector General regarding the reduced capacity to provide nursing home transition as a result of this change.*

Following the August exit conference, PERD had a virtual meeting on September 23, 2021, with the Bureau commissioner, the Bureau's chief financial officer, the ACL Regions II & III regional administrator, and the ACL's director of the ADR Center/No Wrong Door Program. PERD's intention was to increase its understanding of the ACL email and to clarify any possible misunderstanding the federal agency may have had with the recommendation to consolidate the ADR Centers. The following concerns were raised in the meeting about further consolidating ADR Centers.

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*West Virginia's State Plan on Aging mentions the number of ADR Centers only once.*

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1. The commissioner stated that the Bureau would have to amend West Virginia's State Plan on Aging.
2. Individuals contacting the Bureau-operated ADR Center for information and referrals would have longer wait time, and that persons answering the telephone would refer callers to someone else, which would defeat the No Wrong Door policy.
3. West Virginia would be unable to fulfill grant outcomes and it would be reducing its capacity to provide nursing home transition.

PERD's response to these concerns are as follows:

1. Federal law requires State Agencies on Aging, such as the Bureau, to develop a state plan for aging programs for two, three, or four-year periods. West Virginia has elected to have a three-year period and its current plan became effective October 1, 2021, to cover the time period of October 1, 2022 through September 30, 2025. This plan mentions the number of ADR Centers only once. According to the Program Instructions to State Agencies on Aging, states may amend a current plan as needed to keep a plan current and/or to incorporate significant changes desired by the



State. The Bureau emails revised State Plans and amendments to the ACL for review and approval. Furthermore, as the Bureau has incorporated the State Plan on Aging as an interpretive rule, the Bureau would need to follow the proper steps for public notice of a change to a rule. Therefore, amending the State Plan is common and would be without significant consequence.

2. Currently, one to three persons staff each of the four ADR Centers. As such, it is reasonable to conclude that there are times now that people receive a busy signal or otherwise find themselves leaving a message for a call back. The ACL's comments suggest that it is interpreting PERD's recommendation would result in the State running a switchboard, and that callers would be directed elsewhere for information because the person answering calls would lack knowledge on long-term care support and services. PERD's recommendation is not to run a switchboard, but for the Bureau to operate one ADR Center that functions and is appropriately staffed to do what the current ADR Centers are doing.
3. The ACL stated that one ADR Center would not be able to fulfill grant outcomes. The grants awarded in May 2020 and April 2021 have the following intended outcome:

With a single point of entry, individuals have streamlined access to information, screenings, and follow-up, in addition to a reduction of repeat referrals and faster receipt of needed services.

This outcome consists of an online searchable database of information that is accessible by staff of the four ADR Centers and the four AAAs. Given that three of the four ADR Centers are co-located in AAA offices, it seems illogical to conclude grant outcomes would not be fulfilled when the database would still be accessible from five locations: the four AAAs and the recommended Bureau-operated ADR Center. The ACL further indicated that West Virginia's capacity to provide nursing home transitions would be reduced under the recommended consolidation of ADR Centers. PERD finds it difficult to understand the reason ACL made this assertion at the meeting. The only logical explanation is a misunderstanding of PERD's recommendation. **The recommendation is not that one ADR Center act as a switchboard, but that there be one ADR Center appropriately staffed to do what is currently done with four Centers.**

The grant awarded in July 2021 has the following envisioned grant outcome:

- Enhance outreach, provide Medicare application assistance, and educate on preventative benefits.

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*PERD's recommendation is not to run a switchboard, but for the Bureau to operate one ADR Center that functions and is appropriately staffed to do what the current ADR Centers are doing.*

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*Given that three of the four ADR Centers are co-located in AAA offices, it seems illogical to conclude grant outcomes would not be fulfilled when the database would still be accessible from five locations: the four AAAs and the recommended Bureau-operated ADR Center.*

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As with the other grants, the ability to fulfill this grant outcome is not dictated by the number of ADR Centers. The number of locations does not dictate quality of service and the Bureau should maximize as much as possible all government funding.

The ACL indicated it may reconsider the amount of three existing ADR Center grants summarized in Table 2. The legislative auditor cannot predict how the ACL will ultimately regard West Virginia operating one ADR Center rather than four. The concerns pointed out by the Bureau and ACL in resistance to the recommendation are either a misunderstanding or have insufficient justification. **The legislative auditor is concerned that the State may spend as much as \$305,000 more than is necessary to provide the same level of services. Therefore, the legislative auditor recommends the Bureau have a discussion with ACL officials to determine if the Bureau could address ACL's concerns and reduce state expenditures without diminishing the federal grant award.**

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*The number of locations does not dictate quality of service and the Bureau should maximize as much as possible all government funding.*

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**Table 2**  
**Bureau of Senior Services**  
**Select ACL Federal Grants Summary**

Award Date	Project Title	Award Amount	Subrecipient
7/1/2021	FY 2020 MIPPA: Priority 3 for ADRCs	\$36,204	AAA: Appalachian, Upper Potomac, Metro
4/22/2021	WV No Wrong Door System COVID-19 Vaccine Access Supplemental Funding	\$236,836	AAA: Metro
5/12/2020	WV ADRC/No Wrong Door Critical Relief Funds for COVID-19 Pandemic Response	\$455,454	AAA: Metro
	<b>Total</b>	<b>\$728,494</b>	

*Source: Notice of Awards from the Department of Health and Human Services Administration for Community Living. MIPPA is Medicare Improvement for Patients and Providers Act.*

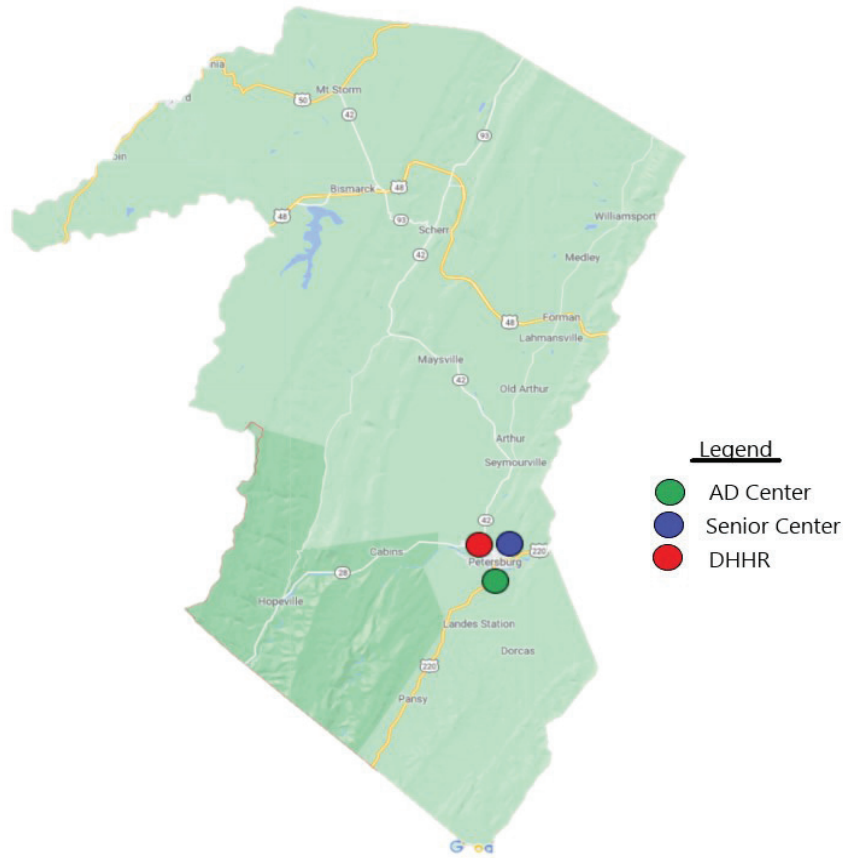
## **The ADR Centers Are Within Close Proximity to Other Facilities That Provide the Same Information**

The following four West Virginia county maps illustrate the proximity the four ADR Centers are to other service providers in their respective communities.<sup>2</sup>

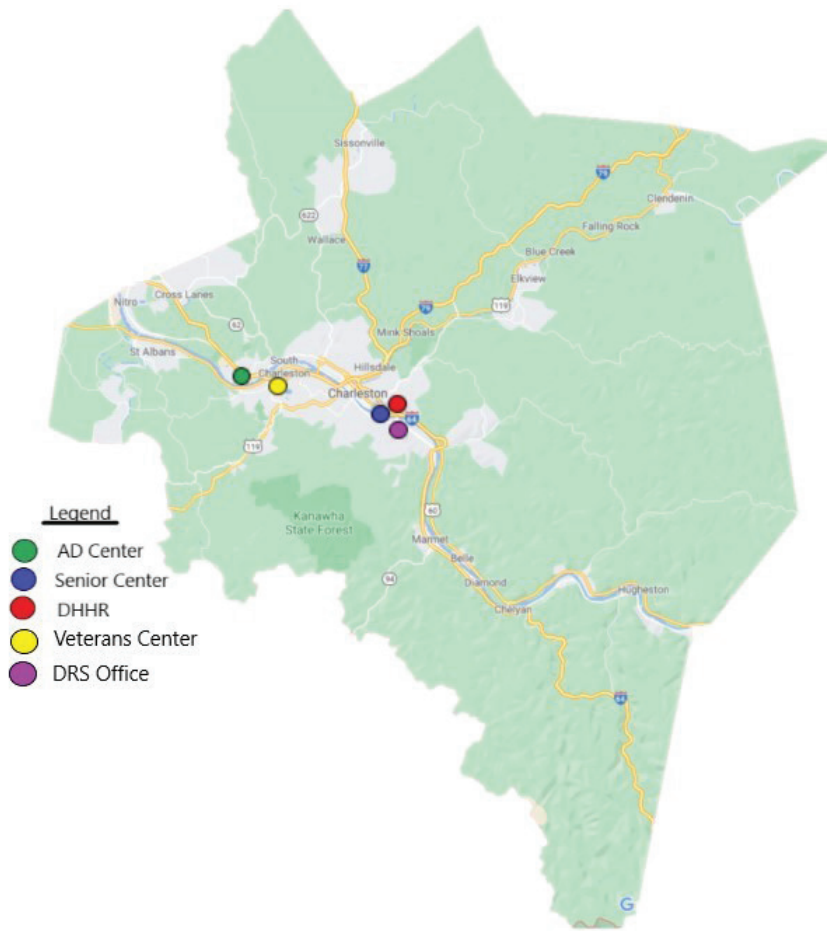
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<sup>2</sup> Maps are not to scale and locations may be closer than they appear. Grant County does not have a Division of Rehabilitation Office or Veterans Center. The nearest offices are in Hardy County. Marion County does not have a Veterans Center. The nearest office is in Harrison County.

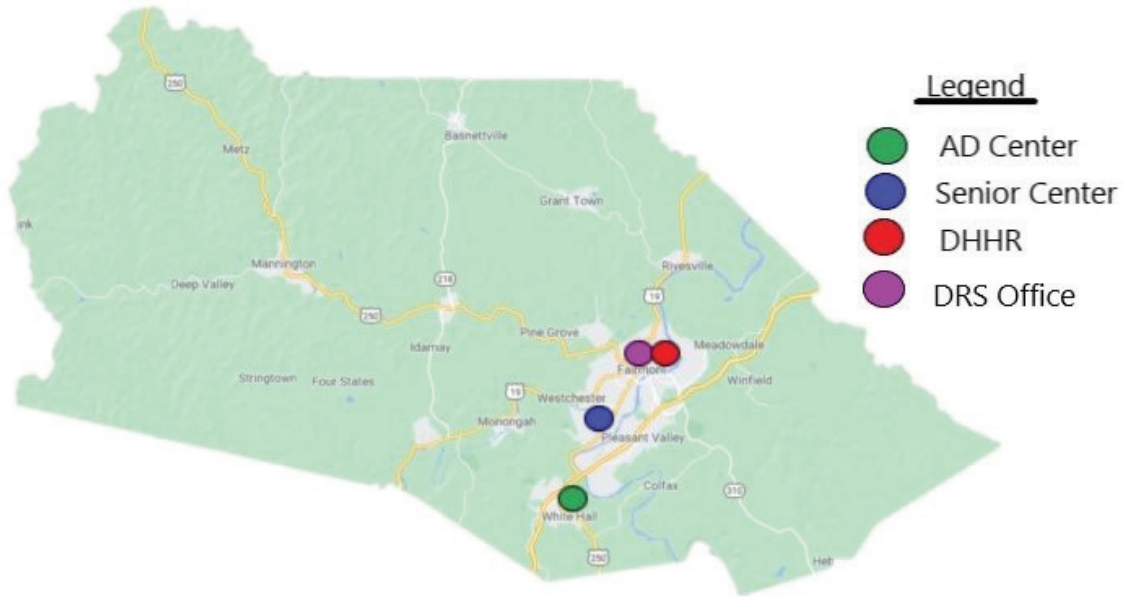
## Map 1 - Grant County



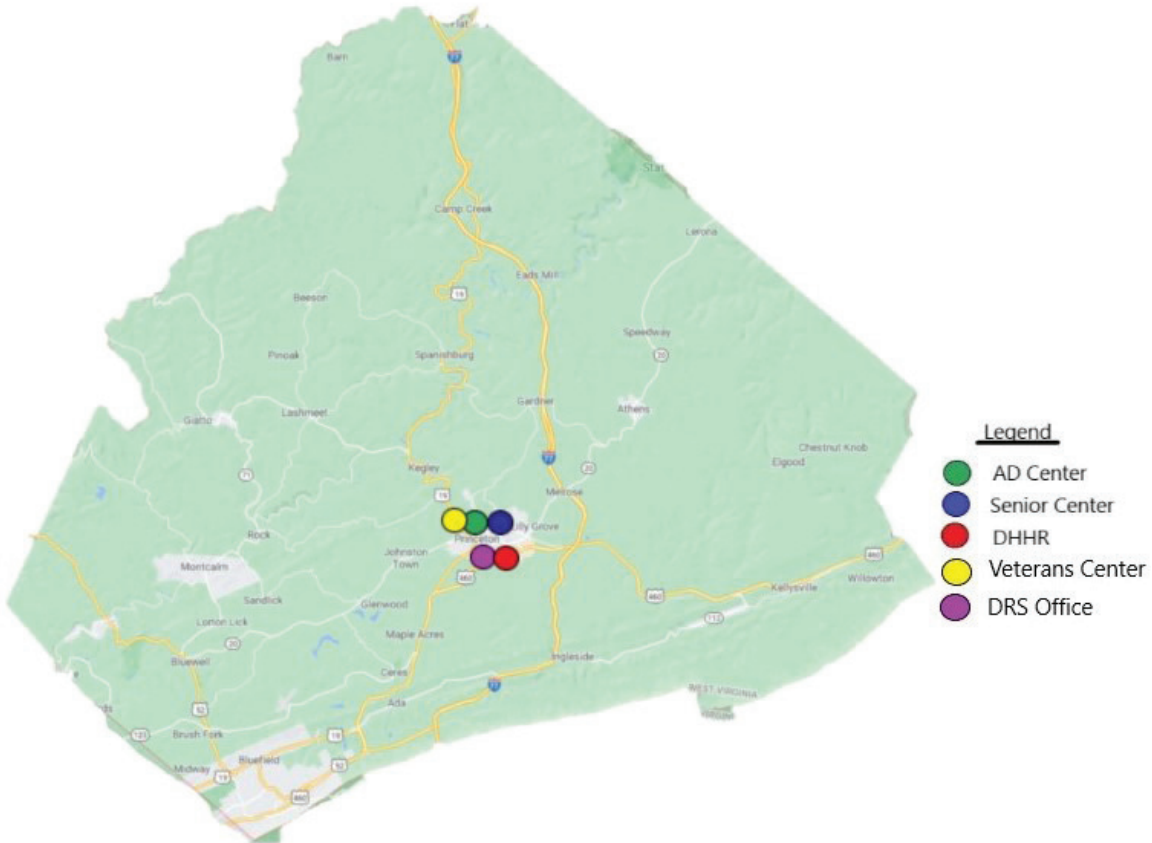
## Map 2 - Kanawha County



Map 3 - Marion County

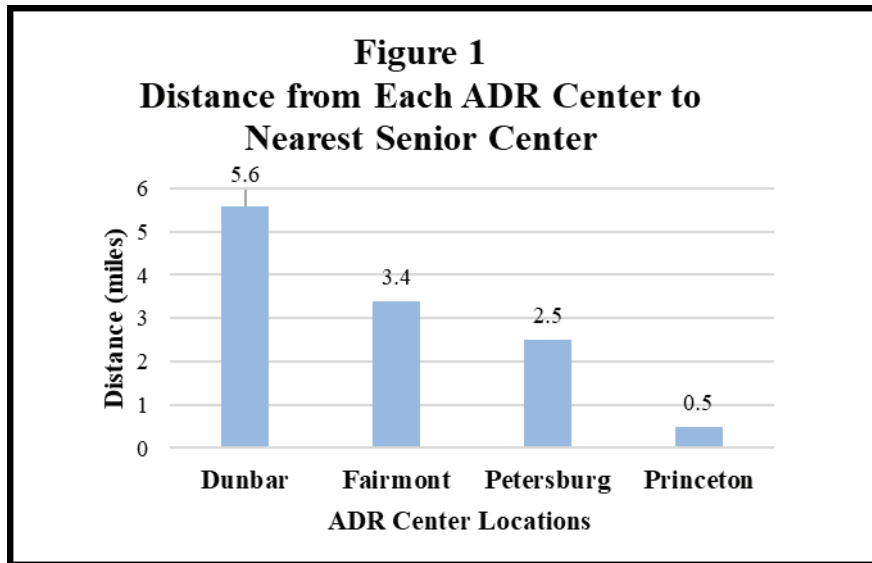


Map 4 - Mercer County



## Senior Centers

**The average distance of the senior center to each ADR Center is 3 miles.** Figure 1 illustrates the distance from the ADR Center site to the nearest senior center. Each of the ADR Centers are less than six miles of the local senior center.



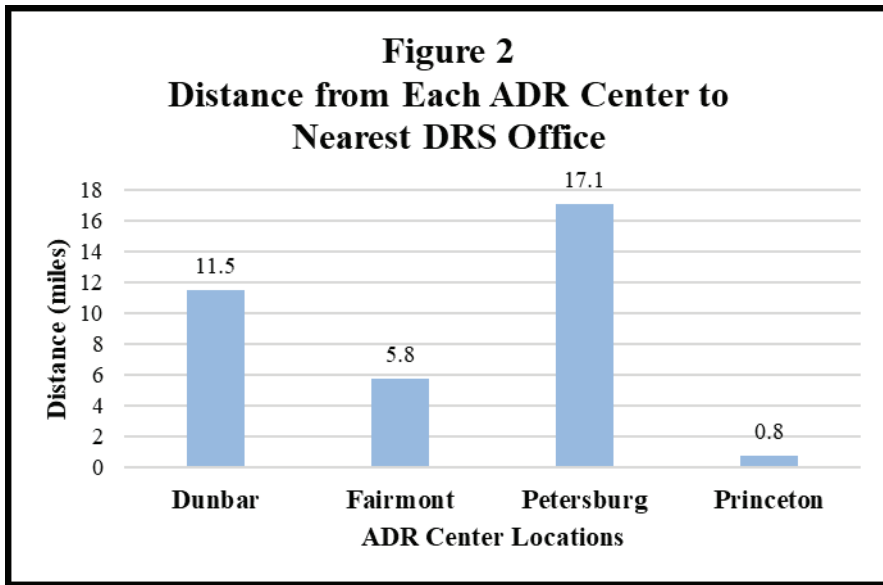

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*DRS offices have counselors on-site to help individuals with disabilities in obtaining or keeping employment, as well as providing other services pertaining to transportation assistance, support for the deaf-blind, and therapeutic services, among other things.*

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## The Division of Rehabilitation Services

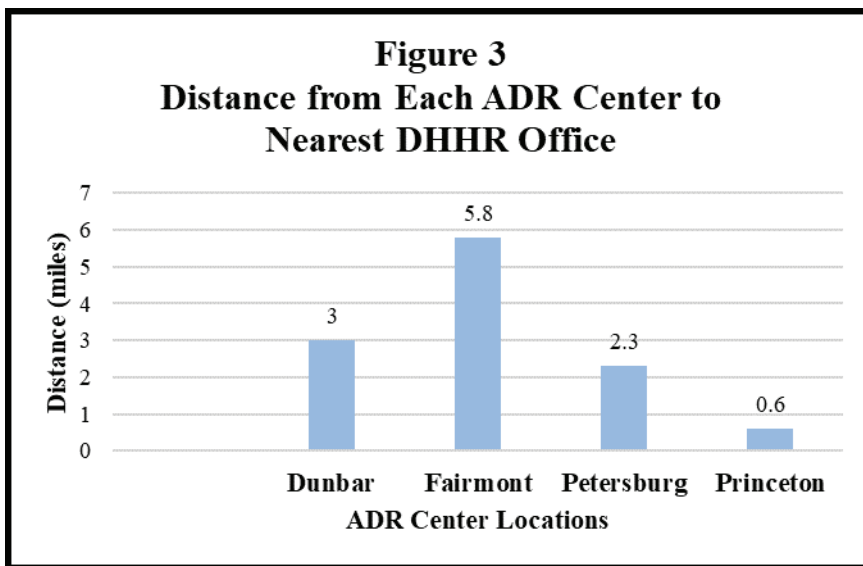
The mission of the West Virginia Division of Rehabilitation Services (DRS) is to enable and empower individuals with disabilities to work and to live independently. DRS offices have counselors on-site to help individuals with disabilities in obtaining or keeping employment, as well as providing other services pertaining to transportation assistance, support for the deaf-blind, and therapeutic services, among other things. Any information for disabled individuals offered at the ADR Centers is readily available at the local DRS offices as well. Figure 2 illustrates the distance from each ADR Center location to the nearest DRS office. **The average distance of the closest DRS office to each ADR Center is 8.8 miles.**



**The Department of Health and Human Resources**

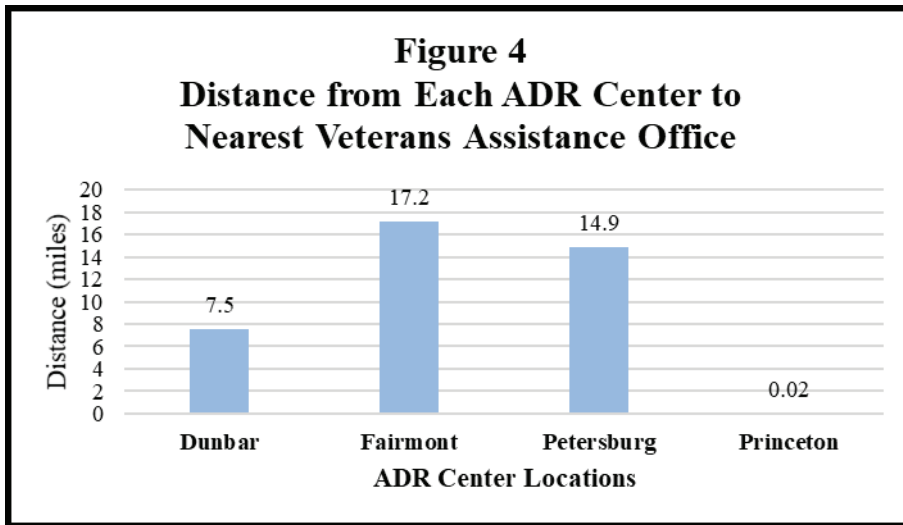
The DHHR employs staff in its local offices who can give information or make referrals from information sources provided by the ADR Centers. Figure 3 illustrates the distance of the closest DHHR office to each of the 4 ADR Centers. Three of the four ADR Centers are within three miles of the closest DHHR office. **The average distance of the closest DHHR office to each ADR Center is 2.9 miles.**

*The DHHR employs staff in its local offices who can give information or make referrals from information sources provided by the ADR Centers.*



## The Department of Veterans Assistance

The Department of Veterans Assistance aids, assists, counsels, and advises veterans with claim assistance for pensions, health, disability, compensation, and other benefits with the United States Department of Veterans Affairs. Figure 4 illustrates the distance of the closest Veterans office to each of the four ADR Centers. **The average distance of the closest Veterans office to each ADR Center is 9.9 miles.**




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*The Department of Veterans Assistance aids, assists, counsels, and advises veterans with claim assistance for pensions, health, disability, compensation, and other benefits with the United States Department of Veterans Affairs.*

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## **The Four ADR Centers Primarily Provide Services Via the Telephone Which Could Be Provided By One ADR Center**

Each of the four regional ADR Centers is a walk-in location open to the public. However, according to the ADR Centers' contact data, contact with the locations occurs primarily through telephone calls and emails rather than physical walk-ins. As shown in Table 3, there were 10,829 total contacts in Fiscal Year 2019, of which the ADR Centers classified only 1,207 of these contacts as walk-in visits. This calculates to 11.1 percent of the total contacts. Fairmont had the highest percentage of walk-in visits at 47.7 percent, while Dunbar had 2 percent. According to the data provided to PERD, ADR Centers received 6,874 telephone calls, about 64 percent of all contacts. The ADR Center in Dunbar also fields the statewide toll-free telephone line, had the highest percentage of telephone calls at 73.6 percent. Fairmont had the least at 39.1 percent. Other methods of contact were Home Visits/ Field Visits, which made up 0.8 percent and E-mail/Mail, which made up 24.5 percent of the total contacts. Based on the contact data, ADR Centers are primarily operating as call centers, and therefore do not necessitate walk-in locations to provide services.

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*There were 10,829 total contacts in Fiscal Year 2019, of which the ADR Centers classified only 1,207 of these contacts as walk-in visits. This calculates to 11.1 percent of the total contacts.*

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**Table 3  
ADR Center Contact Methods  
FY 2019**

Contact Category	Dunbar		Fairmont		Petersburg		Princeton		Totals
	#	%	#	%	#	%	#	%	#
<b>Telephone Calls</b>	2,885	73.6	716	39.1	1,351	67.7	1,922	62.3	6,874
<b>Email/Mail</b>	902	23.0	237	13.0	475	23.8	1,043	33.8	2,657
<b>Walk-Ins</b>	79	2.0	872	47.7	145	7.3	111	3.6	1,207
<b>Home/Field Visits</b>	54	1.4	4	0.22	24	1.2	9	0.29	91
<b>Total Contacts</b>	<b>3,920</b>	<b>100.0</b>	<b>1,829</b>	<b>100.0</b>	<b>1,995</b>	<b>100.0</b>	<b>3,085</b>	<b>100.0</b>	<b>10,829</b>

*Source: Bureau of Senior Services contact numbers which include duplicated and unduplicated contacts. Unaudited by PERD.*

## Conclusion

As it did in 2014, the Bureau reports that walk-in clients are a relatively small percentage of total contacts in comparison to telephone calls and emails. Furthermore, the total number of contacts reported in FY 2019 is 69 percent lower than the total of 34,958 contacts the Bureau reported in FY 2012. The four regional ADR Centers provide long-term support and service information, referrals, and counseling through the telephone and the State does not need walk-in locations to serve the public. During FY 2019, an average of 11.1 percent of contacts made at the regional ADR Centers were through walk-ins, with the number of walk-in clients decreasing over the years. With the self-reported decline in demand, it is a further sign that one Bureau-operated ADR Center would suffice. Although the ACL and the Bureau raised some objections to further consolidating the four ADR Centers, these objections seem unjustified and some misunderstanding about the recommendation is apparent. Thus, the legislative auditor finds that the current operating structure of the ADR Centers is not cost-efficient, and that the Bureau can close the regional ADR Centers and maintain capacity at one ADR Center serving the entire state itself.

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*The total number of contacts reported in FY 2019 is 69 percent lower than the total of 34,958 contacts the Bureau reported in FY 2012.*

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## Recommendations

1. *The Bureau of Senior Services should further consolidate the regional ADR Centers from four to one, and administer the counseling, referral, and information services in-house if consolidating these would not result in an offsetting loss of federal grant funds.*
2. *The Legislature should consider reducing the line-item appropriation for the ADR Centers appropriately as the ADR Centers are consolidated if consolidating the ADR Centers would not result in an offsetting loss of federal grant funds.*

## ISSUE 2

### **A Seven-year Accumulation of Nearly \$354,000 of Unexpended Appropriations for ADR Centers Remains Idle Because the Bureau Has No Spending Authority to Use It, and the Accountability of State Funds Granted to ADR Centers Is Inadequate**

#### **Issue Summary**

From FY 2015 through 2021, the Legislature appropriated a total of \$2,975,000 in lottery monies specifically to the Senior Citizens Fund in line-item appropriations to run the four ADR Centers. Of this total, an accumulated amount of \$353,956 is unexpended and remains idle in the Senior Citizen Lottery Fund because the Bureau has no authority to spend it. Unspent line-item appropriations remain with a particular lottery fund and can only be spent by the Bureau if a supplemental or additional appropriation in the amount of the unspent balance is made by the Legislature. According to the Department of Revenue's State Budget Office, no appropriations have been made for these unexpended balances. Pursuant to the State Lottery Act, this unspent balance can be used elsewhere, such as: 1) the Lottery Education Fund, 2) the School Construction Fund, 3) the Division of Natural Resources, or 4) the Development Office. Additionally, when the Bureau distributes the appropriated monies as grants, it does not enforce some terms of the grant agreements. In particular, the Bureau has been awarding excess administrative costs to grantees. Moreover, ADR Centers receive more than \$50,000 in state grants each year and submit substitute financial reports to account for how the grants were spent. However, while substitute reports are allowed by law (W. Va. Code §12-4-14(b)(1)), the legislative auditor is concerned that the documentation does not provide adequate accountability of how state grants were spent. The legislative auditor recommends the Legislature consider amending W. Va. Code §12-4-14 to provide clear accountability of the use of state grants.

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*Unspent line-item appropriations remain with a particular lottery fund and can only be spent by the Bureau if a supplemental or additional appropriation in the amount of the unspent balance is made by the Legislature.*

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*When the Bureau distributes the appropriated monies as grants, it has been awarding excess administrative costs to grantees.*

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#### **Unexpended Appropriated Funds for ADR Centers Remain in the Senior Citizen Lottery Fund**

The Legislature appropriates to the Bureau, via a line-item in the Lottery Senior Citizen Fund, monies to run the ADR Centers. The Bureau then awards most of these monies in the form of grants to three of the State's four AAAs. As a result of the federal Older Americans Act, the federal Administration on Aging, awarded a three-year grant to West Virginia to set up two ADR Centers in 2003. The Legislature funds ADR Center operations through a line-item appropriation in the Bureau's Lottery Senior Citizen Fund. From FY 2008 through FY 2010, the Legislature appropriated the Bureau \$1 million annually to run 10

ADR Centers throughout the state. The Legislature reduced this amount to \$935,000 per year for FY 2011 through 2013, and further reduced it to \$864,875 for FY 2014. Following PERD's 2014 audit, the Bureau began to consolidate the ADR Centers to seven and then to four by 2015. From FY 2015, the line-item appropriation for the ADR Centers became \$425,000 annually through FY 2021 (see Table 4). **However, Table 4 shows that in every year except FY 2019 the appropriated amount exceeded what was needed to operate the ADR Centers. The unexpended amount totals \$353,956 from FY 2015 through FY 2021.** These unexpended appropriations remain in the fund, but the Bureau has no spending authority for them, therefore, the monies are serving no purpose.

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*These unexpended appropriations remain in the fund, but the Bureau has no spending authority for them, therefore, the monies are serving no purpose.*

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**Table 4  
ADR Center Appropriations and Expenditures  
FY 2015 through FY 2021**

FY	Appropriations	Expenditures	Remaining Funds
2015	\$425,000	\$296,334	\$128,666
2016	\$425,000	\$371,108	\$53,892
2017	\$425,000	\$380,599	\$44,401
2018	\$425,000	\$343,936	\$81,064
2019	\$425,000	\$427,165	-\$2,165
2020	\$425,000	\$380,887	\$44,113
2021	\$425,000	\$421,015	\$3,985
<b>Total</b>	<b>\$2,975,000</b>	<b>\$2,621,044</b>	<b>\$353,956</b>

*Source: PERD calculations using OASIS Reports WV-FIN-FARS-030 and WV-FIN-GL-146.*

The Bureau calculates its expenditures, and thus its remaining funds, on a budget fiscal year basis as opposed to calculating expenditures on a fiscal year. As such, using that calculation for the same time period, the remaining funds would be \$358,176. The difference between the Bureau's calculated remaining funds and what is shown above in Table 4 is attributable to \$4,220 that was not deducted from the Bureau's fund until July 2021 (FY 2022).

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*An act of the Legislature is needed to expire the monies by a supplementary appropriation. This would allow the unspent funds to be re-purposed as the Legislature sees fit.*

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The Bureau confirmed that it does not spend the entire appropriation to fund the Centers but asserts that the funds expired back to the State. The Bureau provided no documentation to support this claim, and PERD found no evidence to support it. According to the Department of Revenue's State Budget Office, unspent monies of a line-item lottery appropriation remain in a particular lottery fund but cannot be spent. In order for those unexpended monies to be used, an act of the Legislature is needed to expire the monies by a supplementary appropriation. This would allow the unspent funds to be re-purposed as

the Legislature sees fit. The Budget Office states that no amount in the Senior Citizen Lottery Fund was expired by supplementary appropriation from FY 2015 through FY 2021.

Pursuant to the State Lottery Act, W. Va. Code §29-22-18, lottery revenues are paid in the following order: 1) prizes, 2) fund operation and administrative expenses, and 3) bond retirement. The State Lottery Act goes on to state that the Legislature is to annually appropriate any remaining monies in the proportion it considers beneficial to West Virginia citizens to the following funds: 1) Lottery Education Fund, 2) School Construction Fund, 3) Lottery Senior Citizens’ Fund, 4) the Division of Natural Resources, and 5) the Development Office. **Given the excess funds to ADR Centers that could be re-purposed, as listed above, the Legislature should consider reducing the amount appropriated to operate them.**

*Given the excess funds to ADR Centers that could be re-purposed, the Legislature should consider reducing the amount appropriated to operate them.*

### Documentation Is Insufficient to Substantiate that Grant Recipients Used Funds as Intended

Table 5 displays the FY 2015 through FY 2021 grant award amounts for the ADR Centers. Additionally, grants the Bureau awarded to two other entities from the line-item appropriation are also shown in the table. The Upshur County Senior Citizens Opportunity Center located in Buckhannon received ADR Center funds in FY 2017 and FY 2018 to use towards the cost of the Bureau’s client case management database. In FY 2020 and FY 2021 Mission West Virginia, Inc. was awarded a grant from the ADR Center funds for its relatives as parents program.

FY	Appalachian AAA (Princeton)	Upper Potomac AAA (Petersburg)	Metro AAA (Dunbar)	Upshur County Senior Citizens Opportunity Center	Mission West Virginia, Inc.	Sum
2015	\$54,153	\$117,614	\$120,840	-	-	<b>\$292,608</b>
2016	\$68,613	\$119,503	\$165,894	-	-	<b>\$354,010</b>
2017	\$61,734	\$78,552	\$153,520	\$76,000	-	<b>\$369,806</b>
2018	\$42,467	\$36,171	\$219,506	\$45,792	-	<b>\$343,936</b>
2019	\$87,530	\$88,432	\$251,203	-	-	<b>\$427,165</b>
2020	\$51,359	\$55,217	\$249,254	-	\$25,057	<b>\$380,887</b>
2021	\$63,598	\$57,924	\$266,851	-	\$32,641	<b>\$421,015</b>

*Source: PERD calculations using OASIS Report WV-FIN-GL-146. Rounding may result in some totals not summing.*

As Table 5 shows that in most cases, ADR Centers receive over \$50,000 in state grant awards. West Virginia Code §12-4-14(b)(1) and (3) require grantees receiving \$50,000 or more in a fiscal year to file a report provided by an independent certified public accountant confirming that grantees spent state grants as intended. Legislative rule CSR §148-18-4 permits a grantee that receives federal and state grants to substitute the audit required by the federal government for the report required under W. Va. Code §12-4-14(b)(1). The AAAs submitted financial reports in FY 2015 through FY 2018. To date Upper Potomac (Region VIII) and Metro AAA have submitted the FY 2019 financial report. However, pursuant to W. Va. Code §12-4-14(b)(3) grantees have up to two fiscal years following disbursement of state grant funds to file the required reports. The financial reports filed by the Appalachian Area on Aging includes a statement of functional expenses and a schedule of expenditures. While the schedule for the function expenses does report multiple line-item expenditures, the total amount of expenditures does not match the total of expenditures reported on the schedule of expenditures. The Region VIII Planning & Development Council provides a schedule of revenues and expenditures with the total grant amount and a breakdown of the categories of expenses and the amounts spent for each category. The audit submitted by the Metro Area Agency on Aging has a schedule for the function expenses that reports multiple line-item expenditures, however, the total amount of expenditures does not match the total of expenditures reported on the schedule of revenues and expenditures.

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*Legislative rule CSR §148-18-4 permits a grantee that receives federal and state grants to substitute the audit required by the federal government for the report required under W. Va. Code §12-4-14(b)(1).*

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From a technical standpoint, the financial audits required by the federal government may meet the letter of the law as audits that may be substituted for the report required under W. Va. Code §12-4-14(b)(1). However, the substitute reports do not have statements that the state funds were spent as intended, and in many cases the substitute reports do not provide an itemized schedule of state grant expenditures, only aggregate totals. It is the legislative auditor's opinion that the substitute reports that are being submitted do not provide adequate accountability of state grant awards. The legislative auditor recommends the Legislature consider amending W. Va. Code §12-4-14 to provide clear accountability when grantees substitute an audit for the required report.

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*The substitute reports do not have statements that the state funds were spent as intended, and in many cases the substitute reports do not provide an itemized schedule of state grant expenditures, only aggregate totals.*

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## **The Bureau Routinely Awards Grants Whose Administrative Costs Exceed the 10 Percent Cap**

The Bureau's grant agreements with AAA to fund the ADR Centers stipulate that the AAAs submit a budget plan for the grant money. PERD found that the budget plans AAAs submitted listed expenses under categories that did not differentiate themselves from other more specific categories. For instance, there is the category of 'direct costs' where personnel, rent, utilities, telephone, and other expenses are listed.<sup>3</sup> There

<sup>3</sup> *The ADR Center appropriations fund nine full-time equivalent positions.*

is also the category of ‘indirect costs’, also described as ‘administrative’ ‘or administrative cost pool.’ Furthermore, there is a category named ‘other.’ PERD inquired of the Bureau as to the definitions of indirect or administrative and other. The Bureau responded that it was “Not aware of any documentation from the Bureau that defines the terms you ask about.” When asked if it had a current policies and procedures manual on grants, the Bureau’s Director of Finance, responded:

*What we have if anything is very dated and have started the process of updating a finance manual.*

The Bureau did not require grantee budgets to itemize, and it accepted budgets wherein the grantee did not itemize the indirect/administrative costs in 17 of the 21 grants. Furthermore, it paid the grantees’ invoices which, while the grantee had generally itemized for direct costs, the grantee had not itemized all indirect/administrative costs in 127 of 150 the invoices. The grantees itemized the remaining 23 invoices in a limited fashion. Without sufficient documentation there is a risk that grantees are using the monies for purposes other than running the ADR Center functions.

The grant agreement terms also stipulate that grant administrative costs are to be capped at 10 percent of the grant award. However, PERD found that the AAAs requested, and the Bureau awarded, more than 10 percent in administrative costs 13 out of the 21 ADR Center grants awarded from FY 2015 through FY 2019. As shown in Table 6, in total from FY 2015 through FY 2019 budgeted administrative costs exceeded the cap by \$46,857. The Bureau continued to provide monies to grantees despite a lack of compliance with the terms of the grant agreements.

*The Bureau did not require grantees to itemize all indirect/administrative costs in 127 of 150 the invoices. The grantees itemized the remaining 23 invoices in a limited fashion.*

*PERD found that the AAAs requested, and the Bureau awarded, more than 10 percent in administrative costs 13 out of the 21 ADR Center grants awarded from FY 2015 through FY 2019.*

**Table 6  
ADR Center Grants with Budgeted Administrative Costs  
Exceeding Ten Percent  
FY 2015 through FY 2019**

	2015	2016	2017	2018	2019	Sum
<b>Number of Grants</b>	4	5	6	3	3	21
<b>Number of Grants w/ Administrative Costs Exceeding Ten Percent</b>	4	2	5	1	1	13
<b>Excess Cap Total</b>	<b>\$6,916</b>	<b>\$9,215</b>	<b>\$18,587</b>	<b>\$2,926</b>	<b>\$9,213</b>	<b>\$46,857</b>

*Source: PERD calculations using AAA budget plans submitted to Bureau.*

## Conclusion

For several years the amount the Bureau has requested to operate ADR Centers is more than it needs. The unexpended amount remains in the Senior Citizen Lottery fund and cannot be spent. These unspent funds have accumulated to nearly \$355,000. The Legislature should consider re-purposing these monies through supplementary appropriations. Furthermore, the Bureau awards grantees administrative costs that exceed grant agreements and it accepts documentation (budget plans and invoices) that does not contain sufficient information to allow for an understanding of how funds were used to operate the ADR Centers. This continued funding without holding grantees accountable shows a lack of financial accountability by the Bureau when awarding and administering funds. Pursuant to the State Lottery Act these monies could also have been appropriated elsewhere. Moreover, reports required by law to account for the use of state grants do not provide adequate documentation and should be revisited by the Legislature.

## Recommendations

3. *The Legislature should consider further reducing the line-item appropriation to operate the ADR Centers.*
4. *If the ADR Centers are not closed, the Bureau of Senior Services should enforce the terms of awarded grant agreements and develop a plan for funding that more directly benefits senior citizens.*
5. *The Legislature should consider expiring the unexpended line-item appropriations for the ADR Centers through supplementary appropriation in order to re-purpose them.*
6. *The Legislature should consider amending W. Va. Code §12-4-14 to provide clear accountability when an audit is substituted for the required report.*



## ISSUE 3

### **Eight County Senior Citizen Centers Generally Meet Federal Accessibility Guidelines for Most Requirements**

#### **Issue Summary**

In addition to the ADR Network, the Bureau serves West Virginia senior citizens (60 years of age or older) through the non-profit county-based service organizations that run senior centers in all 55 counties. PERD conducted field visits to 8 of the 55 senior centers across the state to determine general handicap accessibility in relationship to select Americans with Disabilities Act (ADA) requirements. The senior centers visited were in Kanawha, Raleigh, Gilmer, Lewis, Marion, Taylor, Monroe, and Logan counties. PERD's review showed that handicap parking, entrances, hallways, offices, and elevators generally met ADA standards at all senior centers. Most senior centers met the general requirements for bathrooms and interior doors and spaces. However, most of the senior centers did not meet the requirements for signs or service counters. However, all senior centers did meet requirements for dining seating and access, either independently or through the provision of accommodations.

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*PERD's review showed that handicap parking, entrances, hallways, offices, and elevators generally met ADA standards at all senior centers.*

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### **Senior Centers Offer Services to Seniors in All West Virginia Counties**

Senior centers receive federal and state funding from the Legislature through appropriations made to the Bureau. Requirements for receiving this funding include the senior center's compliance with ADA standards as noted in the Title III Federal Grant Terms and Conditions that each center signs. The terms and conditions state, "The Service Provider also assures that it will comply with the requirements of the Americans with Disabilities Act." The senior centers offer a variety of services, including nutrition, personal care, health screenings, exercise programs, and information and referral. Transportation for seniors to the senior centers and other locations such as grocery stores, doctors, and pharmacies are also provided.

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*Public entities, such as state government programs, must run their programs and services so that they are accessible and usable to individuals with disabilities*

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### **Seven Selected Centers Do Not Meet a Few Accessibility Measures**

PERD began a review of eight senior centers in February 2020. Seven of the eight senior centers did not meet the Americans with Disabilities Act (ADA) Accessibility Guidelines. Public entities, such as state government programs, must run their programs and services so that

they are accessible and usable to individuals with disabilities. While the regulations do not require states to engage in construction or alteration projects, a state can become compliant through the reassignment of services to accessible buildings.

The ADA Checklist measures accessibility in terms of four measures, listed as priorities:

- I-Accessible Approach and Entry
- II-Access to Goods and Services
- III-Usability of Restrooms
- IV-Additional Access.

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*A state can become compliant through the reassignment of services to accessible buildings.*

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PERD conducted on-site visits at eight centers to measure the facilities against the ADA Accessibility Standards contained in the ADA Checklist which is shown in Table 7.

<b>Table 7 Americans with Disabilities Checklist</b>	
<b>Priorities</b>	<b>Accessibility Measures</b>
I- Accessible Approach and Entry	<ul style="list-style-type: none"> <li>• Route of Travel</li> <li>• Ramps</li> <li>• Parking/Drop-Off Areas</li> <li>• Entrance</li> </ul>
II-Access to Goods and Services	<ul style="list-style-type: none"> <li>• Maneuvering Space</li> <li>• Doors</li> <li>• Rooms and Spaces</li> <li>• Signage</li> <li>• Seats, Tables, and Counters</li> <li>• Ramps, Elevators, and Lifts</li> </ul>
III-Usability of Restrooms	<ul style="list-style-type: none"> <li>• Access</li> <li>• Doorways and Passages</li> <li>• Stalls</li> <li>• Lavatories</li> </ul>
IV-Additional Access	<ul style="list-style-type: none"> <li>• Drinking Fountains</li> <li>• Telephones</li> </ul>
<p><i>Source: The Americans with Disabilities Act Checklist for Readily Achievable Barrier Removal published by the Adaptive Environments Center Inc.</i></p>	

PERD used the ADA checklist to review the accessibility of the Kanawha, Raleigh, Gilmer, Lewis, Marion, Taylor, Monroe, and Logan senior centers. This review does not certify the centers as ADA compliant.

The audit team used professional judgement and the ADA checklist as a guide to determine that the buildings are generally handicap accessible in relation to select ADA requirements.

Our review finds that in all eight centers handicap parking, entrances, hallways, offices, and elevators met the general accessibility standards of the ADA checklist. All eight centers also provide seniors with access to dining, either independently or through the provision of reasonable accommodations. Issues found in these areas were determined to have minimal impact on the overall accessibility to the services provided at the centers. However, there were some accessibility issues found in other areas of the centers.

The Kanawha Valley Senior Services Center is in a former school building.<sup>4</sup> While the entrance and nutrition services are accessible, other services including respite care are only physically accessible if a person can climb stairs or had the strength to transfer themselves from a wheelchair to a chair lift. The person would then need a caregiver with the ability to carry the wheelchair up approximately 10 steps. The person would then have to transfer themselves back into the wheelchair at the top of the steps. The process would be reversed upon leaving the building. The center's interior doors and spaces are adequately sized, and there are interior directory signs. However, there were concerns with some door handles throughout the center as well as various issues among the bathrooms, including grab bar lengths and placement, non-insulated pipes under sinks, and toilet paper and hand towel dispenser placement that did not meet the general ADA requirements.

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*All eight centers also provide seniors with access to dining, either independently or through the provision of reasonable accommodations.*

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The Raleigh County Commission on Aging Center did not present any significant issues with general ADA accessibility. The center is an updated facility with automatic doors at the building's main entry, adequate interior doors and spaces, and interior directory signs. All other areas that PERD observed met the general ADA requirements.

The Gilmer County Senior Center is a one-story facility built in 2001. The center met many of the general ADA requirements, including automatic doors at the building's main entry, adequate interior doors and spaces, and most bathroom items. The issues presented at the center included non-insulated pipes in bathrooms, inadequate mirror and hand dryer placement, lack of rear grab bar in toilet rooms, and a lack of interior directory signs.

The Lewis County Senior Center presented minimal issues with general ADA accessibility as it has adequate interior doors and spaces to supply services. However, it has some issues in the bathrooms, where

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<sup>4</sup> Kanawha Valley Senior Services Center relocated to a different facility in 2021.

grab bar placement in toilet rooms and a lack of rear wall grab bars are inadequate. The center also lacked interior directory signs.

The Marion County Senior Center is in a former two-story church with interior spaces that accommodate services and had other features that met general accessibility, such as door handles. PERD found issues with the center's elevator, which did not have the proper measurements for general accessibility. However, the center has an outdoor ramp for access to the second floor with the ground floor accessible from the sidewalk. The center has various issues with the bathrooms, including mirror and hand dryer placement, faucet handles, toilet height, and grab bar measurements. In addition, some interior doorways have smaller widths than necessary for general accessibility.

The Taylor County Senior Center is in a two-story building built in 2000. The center has recently made updates to improve general ADA accessibility, such as new faucet handles and some door handles, and has made plans for future updates. The center has automatic doors and adequate interior spaces and doorways. The center met most general bathroom accessibility items, but issues in the bathrooms include insufficient floor space underneath sinks, grab bar length and placement and mirror heights. Additionally, the water fountain did not meet the measurements for general accessibility.

The Monroe County Senior Center is in a former school building that is over 100 years old. The center's interior spaces met the requirements for general accessibility. However, PERD found issues with the center's bathrooms including non-insulated pipes under sinks, and inadequate toilet heights and grab bar placements. The center lacked interior directory signs and did not have interior door widths and door handles that met general accessibility requirements.

The Logan County Senior Center is in a former school building that is over 80 years old. All senior services are provided on the first floor. The center met most general bathroom accessibility items, but issues in the bathrooms include insufficient floor space underneath sinks, grab bar length, and toilet flush control placement. All other areas that PERD observed met the general ADA requirements.

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*The legislative auditor recommends that the Bureau of Senior Services should review the accessibility of the senior centers and provide guidance and assistance as necessary and feasible to ensure that the centers continue to maintain handicap accessibility.*

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## Conclusion

While most centers faced issues with certain areas of the checklist, PERD's review found that the centers were able to meet the ADA standards for generally providing handicap accessibility either independently or through the provision of accommodations. However, the legislative auditor recommends that the Bureau of Senior Services should review the accessibility of the senior centers and provide guidance and assistance

as necessary and feasible to ensure that the centers continue to maintain handicap accessibility.

## **Recommendation**

7. *The Bureau of Senior Services should review the accessibility of the county senior citizen centers and provide guidance and assistance as necessary and feasible.*



## ISSUE 4

### The Bureau of Senior Services’ Website Needs Modest Improvements Overall to Enhance User-Friendliness and Transparency

#### Issue Summary

In order to actively engage with a state agency online, citizens must first be able to access and comprehend the information on government websites. Every website should include some elements, such as a search tool and contact information including physical and email address, telephone number and the names of administrative officials. Other elements such as social media links, graphics, and audio/video features may not be necessary or practical for some state agencies. Table 8 shows the Bureau integrates 60 percent of the checklist items in its website. This measure indicates that overall, the Bureau has a good website with modest improvements in user-friendliness needed but with a need for more transparency.

*Table 8 shows the Bureau integrates 60 percent of the checklist items in its website.*

<b>Table 8</b> <b>Bureau of Senior Services</b> <b>Website Evaluation Score</b>			
Substantial Improvement Needed	More Improvement Needed	Modest Improvement Needed	Little or No Improvement Needed
0-25%	26-50%	51-75%	76-100%
		<b>Bureau 60%</b>	
<i>Source: PERD’s review of the Bureau of Senior Services website as of July 25<sup>th</sup>, 26<sup>th</sup>, and 29<sup>th</sup>, 2019.</i>			

### The Bureau’s Website Scores High in User-Friendliness, But Scores Relatively Low in Transparency

It has become common and expected that governments convey to the public what it is doing through website technology. Therefore, government websites should be designed to be user-friendly. A user-friendly website is understandable and easy to navigate from page to page. Government websites should also provide transparency of an agency’s operation to promote accountability and trust. A number of organizations have developed assessment criteria to evaluate federal and state government websites for transparency and user-friendliness. The Office of the Legislative Auditor conducted a literature review on assessments of governmental websites and developed an assessment

checklist to evaluate West Virginia's state agency websites (see Appendix D). The assessment checklist lists several website elements including a search tool, public records, budget data, mission statement, an organizational chart, Freedom of Information request information, agency history, and website update status. An agency can score a total of 50 points on the checklist, 18 in user-friendliness and 32 in transparency. As illustrated in Table 9, the Bureau's website scored a total of 30 points. This total comprises 14 points, or 78 percent, for user-friendliness and 16 points, or 50 percent, of the possible points for transparency. This means the website is user-friendly but it could be more transparent. **The Bureau should consider making website improvements, particularly in the area of transparency, to provide a better online experience for the public.**

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*The website is user-friendly but it could be more transparent.*

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**Table 9**  
**Bureau of Senior Services**  
**Website Evaluation Score**

Category	Possible Points	Agency Points	Percentage
User-Friendly	18	14	78%
Transparency	32	16	50%
<b>Total</b>	<b>50</b>	<b>30</b>	<b>60%</b>

*Source: PERD's review of the Bureau of Senior Services website as of July 25<sup>th</sup>, 26<sup>th</sup>, and 29<sup>th</sup>, 2019.*

## **The Bureau's Website Needs Modest Improvement to Enhance User-Friendliness**

The Bureau's website is easy to navigate and includes many of the core website elements, such as a Frequently-Asked-Questions section, and a search box on every page. Users can access the homepage by clicking the home button on the navigation bar on any page of the website. The website also features a Site Map that allows users to browse an index of the entire site and contains links to the Bureau's social media on the homepage. The website also features functionality tools that allow users to change the text size and offers a mobile version of the website. Users can also provide feedback to the Bureau by utilizing the website's feedback option. However, for user-friendliness, it is recommended that the website's content be written on a 6<sup>th</sup>-7<sup>th</sup> grade reading level. According to the Flesch-Kincaid Test for measuring readability, on average, the readability of the Bureau's content ranges from a 9<sup>th</sup>-11<sup>th</sup> grade reading level.

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*For user-friendliness, it is recommended that the website's content be written on a 6<sup>th</sup>-7<sup>th</sup> grade reading level. According to the Flesch-Kincaid Test for measuring readability, on average, the readability of the Bureau's content ranges from a 9<sup>th</sup>-11<sup>th</sup> grade reading level.*

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## User-Friendly Considerations

Some key attributes that the Bureau might consider incorporating into its website to further enhance user-friendliness are:

- **Foreign Language Accessibility** – A link to translate all webpages into languages other than English.
- **Online Survey/Poll** – A short survey that pops up and requests users to evaluate the website.
- **RSS Feeds** – RSS stands for “Really Simple Syndication” and allows subscribers to receive regularly updated work (i.e., blog posts, news stories, audio/video, etc.) in a standardized format.
- **Readability** – Ensure that all information can be understood by the general public.

## **The Bureau’s Website Needs More Improvements to Enhance Transparency**

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*The Bureau has made significant improvements to the transparency of the website since the previous review.*

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A website that is transparent will have elements such as email contact information, the geographical location of the agency, the agency’s phone number, budget information, and performance measures. A transparent website also allows interaction between the agency and citizens concerning a host of issues. The Bureau has made significant improvements to the transparency of the website since the previous review. The Bureau’s website has 50 percent of the core transparency elements that are necessary, such as a general address and telephone number, and a map that shows the agency’s location. The website also features contact information for administrative officials and an administrator biography. A privacy policy and some budget data for the Bureau can also be found on the website. The website includes a section on special events, as well as agency history, access to some of the Bureau’s public records and e-publications, and a narrative describing the agency organization.

## Transparency Considerations

Some key attributes the Bureau might consider incorporating in its website to improve transparency are:

- **Email** – A general website contact.
- **Complaint Form** – A specific page that contains a form to file a complaint, preferably an online form.
- **Online FOIA Submission Form** – A form that can be completed and submitted through the website.

- **Mission Statement** – A mission statement located on the website’s homepage.
- **Graphic Capabilities** – Allows users to access relevant graphics such as maps, diagrams, etc.
- **Performance Measures** – A page linked to the homepage explaining the agency’s performance measures and outcomes.
- **Website Updates** – A website update status, ideally for every page.
- **Job Postings/Link to Personnel Division Website** – A section on the homepage for open job postings and a link to the Division of Personnel’s application page.

## Conclusion

The legislative auditor finds that the Bureau’s website needs only modest improvements to provide a better online experience for the public. The website scores well in user-friendliness but could improve its transparency. The website is easy to navigate and contains pertinent public information; however, the Bureau should consider incorporating the core elements suggested in the report to improve user-friendliness and transparency.

## Recommendation

8. *The Bureau should consider incorporating the core website elements identified by the legislative auditor to enhance the transparency of the website.*

# Appendix A Transmittal Letter

## WEST VIRGINIA LEGISLATURE *Performance Evaluation and Research Division*

Building 1, Room W-314  
1900 Kanawha Boulevard, East  
Charleston, West Virginia 25305-0610  
(304) 347-4890  
(304) 347-4939 FAX



John Sylvia  
Director

August 13, 2021

Robert E. Roswall, Commissioner  
Bureau of Senior Services  
1900 Kanawha Boulevard, East  
Charleston, WV 25305

Dear Commissioner Roswall:

This is to transmit a draft copy of the agency review of the Bureau of Senior Services. This report is tentatively scheduled to be presented during the September 12-14, 2021 interim meetings of the Joint Committee on Government Operations, and the Joint Committee on Government Organization. We will inform you of the exact time and location once the information becomes available. It is expected that a representative from your agency be present at the meeting to orally respond to the report and answer any questions committee members may have during or after the meeting.

We need to schedule an exit conference to discuss any concerns you may have with the report. We would like to have the meeting between Friday, August 20, 2021 and Tuesday, August 24, 2021. Please notify us to schedule an exact time. In addition, we need your written response by noon on Friday, August 27, 2021 in order for it to be included in the final report. If your agency intends to distribute additional material to committee members at the meeting, please contact the House Government Organization staff at 304-340-3192 by Thursday, September 9, 2021 to make arrangements.

We request that your personnel not disclose the report to anyone unaffiliated with your agency. However, the Legislative Auditor advises that you inform any non-state government entity of the content of this report if that entity is unfavorably described, and request that it not disclose the content of the report to anyone unaffiliated with its organization. Thank you for your cooperation.

Sincerely,

  
John Sylvia

Enclosure

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*Joint Committee on Government and Finance*

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## Appendix B

# Objectives, Scope and Methodology

The Performance Evaluation and Research Division (PERD) within the Office of the Legislative Auditor conducted this review on the Bureau of Senior Services (Bureau) as required and authorized by the West Virginia Performance Review Act, Chapter 4, Article 10, of the West Virginia Code, as amended. The purpose of the Bureau, as established in West Virginia Code §16-5P-et al., is to serve as the primary agency within state government to promote services to enhance the health, safety, and welfare of West Virginia's senior population.

### Objectives

An objective of this review was to determine how the Bureau responded to the recommendations made in Issue 1 of the January 2014 PERD report. An additional objective was to assess general compliance with the Americans with Disabilities Act checklist of 8 of 55 county senior centers in February and March of 2020. Finally, the evaluation includes a review of the Bureau's website for user-friendliness and transparency.

### Scope

The evaluation included a review of the amount of line-item appropriations to fund four aged and disabled resource centers (ADR Centers), the amount and percent of that appropriation spent and/or disbursed including the names of grant recipients, dollar amounts, and percentage awarded as grants, including itemization, for fiscal years 2015 through 2019. The evaluation also included a review of the reported statistics of each ADR Center's client contact methods (telephone, walk-in visits, etc.) for fiscal years 2015 through 2021, along with the availability of the services available through the ADR Centers through other methods including telephone, internet, and other government entities with a physical presence in West Virginia communities. Additionally, the review included assessing the general compliance of 8 of 55 county senior centers with the Americans with Disabilities Act in February and March of 2020. This assessment included measuring and documenting public areas in the building including but not limited to the entrances, handicapped restrooms, hallways, dining rooms, drinking fountains, fire alarms, and elevators or lifts as were applicable. Furthermore, this evaluation included a review of key features of the Bureau's website.

### Methodology

PERD gathered and analyzed several sources of information and conducted audit procedures to assess the sufficiency and appropriateness of the information used as audit evidence. PERD staff visited the Bureau's Charleston office located in the Town Center Mall and met with the Commissioner and the Bureau's Chief Financial Officer. We also visited the ADR Center on Ohio Avenue in Dunbar which is housed within the Metro Area Agency on Aging (AAA) and where the State Aged and Disabled Resource Network (ADR Network) program director has her office and met with Metro AAA Director and an ADR Center staff member. We obtained a copy of the State Plan on Aging to understand the requirements states must fulfill for the federal mandate for ADR Centers. We obtained information about the services provided by the ADR Centers, senior centers, Department of Health and Human Resource (DHHR), Division of Rehabilitation Service (DRS) and Department of Veterans Assistance (DVA) veterans from published documents including websites and annual reports to decide which of those services are duplicate or unique. We calculated the distance in miles from the ADR Center locations to the nearest senior centers, DHHR offices, DRS offices, and DVA field offices using Google Maps.

Testimonial evidence was gathered and confirmed through written statements and in some cases by corroborating evidence. PERD collected and analyzed the Bureau and ADR Network's annual reports; budget information; grant policy and procedure manuals, legislative and procedural rules; and its procedures for recording contact with seniors and disabled individuals. Financial data presented in the report came from the Financial Information and Management System (FIMS) and the West Virginia Our Advanced Solution with Integrated Systems (OASIS). FIMS was the State of West Virginia's financial payment system through fiscal year 2014. OASIS is the State of West Virginia's Enterprise Resource Planning (ERP) system. It is business management software that allows West Virginia to use a system of integrated applications to manage business functions. The grant program records were assessed against its grant procedures and W. Va. Code §12-4-14, to determine if the Bureau complies with its own procedures and W. Va. Code in awarding grants and paying grantees.

To assess the eight senior center's general compliance with the American with Disabilities Act (ADA), PERD utilized the ADA checklist to determine the standards for the review of the senior center facilities. We visited eight senior centers and interviewed senior center staff at each. The state's 55 counties are divided into four regions. Each county has a senior center. A statistical number of senior centers was selected. Two senior centers in each of the four regions were selected (Region 1: Marion and Gilmer; Region 2: Logan and Kanawha; Region 3: Taylor and Lewis; and Region 4: Raleigh and Monroe). The same number of senior centers in each region, one rural and one town location, were selected.

In order to evaluate state agency websites, the Legislative Auditor conducted a literature review of government website studies, reviewed top-ranked government websites, and reviewed the work of groups that rate government websites in order to establish a master list of essential website elements. The Brookings Institute's "2008 State and Federal E-Government in the United States" and the Rutgers University's 2008 "U.S. States E-Governance Survey (2008): An Assessment of State Websites" helped identify the top ranked states in regards to e-government. The Legislative Auditor identified three states (Indiana, Maine and Massachusetts) that were ranked in the top 10 in both studies and reviewed all 3 states' main portals for trends and common elements in transparency and open government. The Legislative Auditor also reviewed a 2010 report from the West Virginia Center on Budget and Policy that was useful in identifying a group of core elements from the master list that should be considered for state websites to increase their transparency and e-governance. It is understood that not every item listed in the master list is to be found in a department or agency website because some of the technology may not be practical or useful for some state agencies. Therefore, the Legislative Auditor compared the Bureau's website to the established criteria for user-friendliness and transparency so that the Bureau of Senior Services can determine if it is progressing in step with the e-government movement and if improvements to its website should be made.

The Office of the Legislative Auditor reviews the statewide single audit and the Division of Highways financial audit annually with regards to any issues related to the State's financial system known as the West Virginia Our Advanced Solution with Integrated Systems (OASIS). The Legislative Auditor's staff, on a quarterly basis, requests and reviews any external or internal audit of OASIS. In addition, through its numerous audits, the Office of the Legislative Auditor continuously tests the financial information contained in OASIS. Based on these actions, along with the audit tests conducted on the audited agency, it is our professional judgement that the information in OASIS is reasonably accurate for auditing purposes under the 2018 Government Auditing Standards (Yellowbook). However, in no manner should this statement be construed as a statement that 100 percent of the information in OASIS is accurate.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.



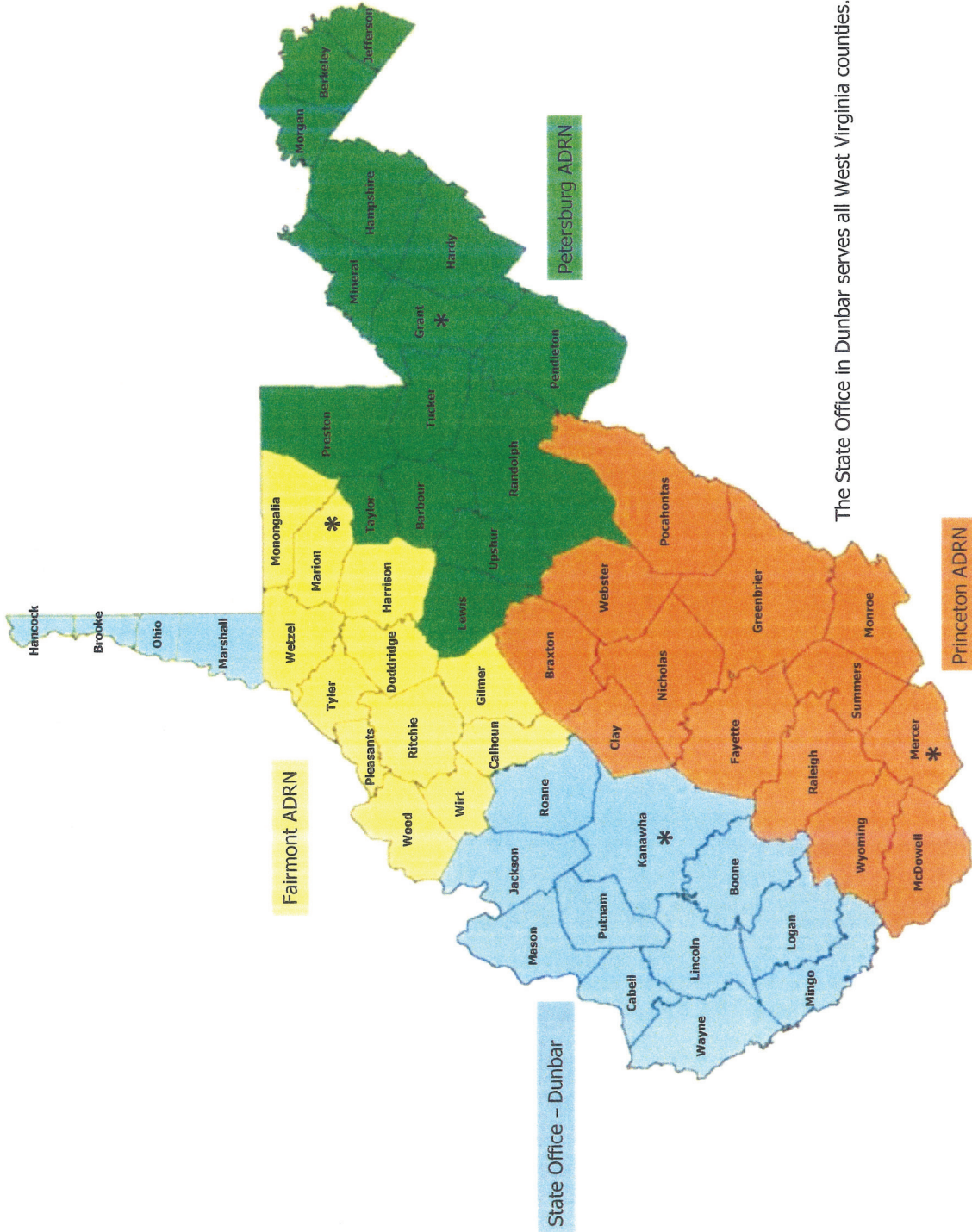




# Appendix C

## Aging & Disability Resource Network Offices

### AGING & DISABILITY RESOURCE NETWORK OFFICES



The State Office in Dunbar serves all West Virginia counties.



## Appendix D

### Website Criteria Checklist and Points System

<b>Website Criteria Checklist and Points System</b>			
<b>User-Friendly</b>	<b>Description</b>	<b>Total Points Possible</b>	<b>Total Agency Points</b>
<b>Criteria</b>	The ease of navigation from page to page along with the usefulness of the website.	<b>18</b>	<b>14</b>
		<b>Individual Points Possible</b>	<b>Individual Agency Points</b>
Search Tool	The website should contain a search box (1), preferably on every page (1).	2 points	2 points
Help Link	There should be a link that allows users to access a FAQ section (1) and agency contact information (1) on a single page. The link's text does not have to contain the word help, but it should contain language that clearly indicates that the user can find assistance by clicking the link (i.e. "How do I...", "Questions?" or "Need assistance?")	2 points	2 points
Foreign language accessibility	A link to translate all webpages into languages other than English.	1 point	0 points
Content Readability	The website should be written on a 6 <sup>th</sup> -7 <sup>th</sup> grade reading level. The Flesch-Kincaid Test is widely used by Federal and State agencies to measure readability.	No points, see narrative	
Site Functionality	The website should use sans serif fonts (1), the website should include buttons to adjust the font size (1), and resizing of text should not distort site graphics or text (1).	3 points	3 points
Site Map	A list of pages contained in a website that can be accessed by web crawlers and users. The Site Map acts as an index of the entire website and a link to the department's entire site should be located on the bottom of every page.	1 point	1 point
Mobile Functionality	The agency's website is available in a mobile version (1) and/or the agency has created mobile applications (apps) (1).	2 points	1 point

<b>Website Criteria Checklist and Points System</b>			
Navigation	Every page should be linked to the agency's homepage (1) and should have a navigation bar at the top of every page (1).	2 points	2 points
FAQ Section	A page that lists the agency's most frequent asked questions and responses.	1 point	1 point
Feedback Options	A page where users can voluntarily submit feedback about the website or particular section of the website.	1 point	1 point
Online survey/poll	A short survey that pops up and requests users to evaluate the website.	1 point	0 points
Social Media Links	The website should contain buttons that allow users to post an agency's content to social media pages such as Facebook and Twitter.	1 point	1 point
RSS Feeds	RSS stands for "Really Simple Syndication" and allows subscribers to receive regularly updated work (i.e. blog posts, news stories, audio/video, etc.) in a standardized format.	1 point	0 points
<b>Transparency</b>	<b>Description</b>	<b>Total Points Possible</b>	<b>Total Agency Points</b>
<b>Criteria</b>	A website which promotes accountability and provides information for citizens about what the agency is doing. It encourages public participation while also utilizing tools and methods to collaborate across all levels of government.	<b>32</b>	<b>16</b>
		<b>Individual Points Possible</b>	<b>Individual Agency Points</b>
Email	General website contact.	1 point	0 points
Physical Address	General address of stage agency.	1 point	1 point
Telephone Number	Correct telephone number of state agency.	1 point	1 point
Location of Agency Headquarters	The agency's contact page should include an embedded map that shows the agency's location.	1 point	1 point

<b>Website Criteria Checklist and Points System</b>			
Administrative officials	Names (1) and contact information (1) of administrative officials.	2 points	2 points
Administrator(s) biography	A biography explaining the administrator(s) professional qualifications and experience.	1 point	1 point
Privacy policy	A clear explanation of the agency/state's online privacy policy.	1 point	1 point
Complaint form	A specific page that contains a form to file a complaint (1), preferably an online form (1).	2 points	0 points
Budget	Budget data is available (1) at the checkbook level (1), ideally in a searchable database (1).	3 points	2 points
FOIA information	Information on how to submit a FOIA request (1), ideally with an online submission form (1).	2 points	1 point
Calendar of events	Information on events, meetings, etc. (1) ideally imbedded using a calendar program (1).	2 points	1 point
Mission statement	The agency's mission statement should be located on the homepage.	1 point	0 points
Agency history	The agency's website should include a page explaining how the agency was created, what it has done, and how, if applicable, has its mission changed over time.	1 point	1 point
Public Records	The website should contain all applicable public records relating to the agency's function. If the website contains more than one of the following criteria the agency will receive two points: <ul style="list-style-type: none"> <li>• Statutes</li> <li>• Rules and/or regulations</li> <li>• Contracts</li> <li>• Permits/licensees</li> <li>• Audits</li> <li>• Violations/disciplinary actions</li> <li>• Meeting Minutes</li> <li>• Grants</li> </ul>	2 points	1 point

### Website Criteria Checklist and Points System

e-Publications	Agency publications should be online (1) and downloadable (1).	2 points	2 points
Agency Organizational Chart	A narrative describing the agency organization (1), preferably in a pictorial representation such as a hierarchy/ organizational chart (1).	2 points	1 point
Graphic capabilities	Allows users to access relevant graphics such as maps, diagrams, etc.	1 point	0 point
Audio/video features	Allows users to access and download relevant audio and video content.	1 point	0 points
Performance measures/ outcomes	A page linked to the homepage explaining the agencies performance measures and outcomes.	1 point	0 points
Website updates	The website should have a website update status on screen (1) and ideally for every page (1).	2 points	0 points
Job Postings/links to Personnel Division website	The agency should have a section on homepage for open job postings (1) and a link to the application page Personnel Division (1).	2 points	0 points

# Appendix E

## Agency Response



**STATE OF WEST VIRGINIA**  
**BUREAU OF SENIOR SERVICES**  
1900 Kanawha Boulevard, East  
Charleston, West Virginia 25305-0160  
Telephone (304) 558-3317  
FAX (304) 558-5609  
[www.wvseniorservices.gov](http://www.wvseniorservices.gov)

Robert E. Roswall  
Commissioner

November 5, 2021

Jill Mooney  
Legislative Auditor Office

Dear Ms. Mooney,

The WV Bureau of Senior Services (Bureau) submits the following comments and corrections to the Legislative Auditor's Report for FY2015 through 2019:

The Aging and Disability Resource Center (ADRC) reduction as related to the Bureau data system. The \$400,000+ grant was, as stated by the Administration for Community Living (ACL), a competitive grant. West Virginia's contribution of \$400,000 State dollars for the operation of the ADRC in WV made WV's application attractive in awarding the grant.

Without the State investment a different decision was possible.

The Notice of Grant Award to Upshur County was misread (Page 17). The grant was for both the Bureau's Data System (ADRC) and also for online case management development unrelated to the ADRC programs or funds.

**Issue I: Continue Process of Consolidating Regional ADRC's to one Statewide ADRC.**

The Bureau does not agree that one (1) State ADRC can handle the volume of calls into a single agency. Also, the continued development of the No Wrong Door agency partnership is built to coordinate a single-entry point for long term care services and support without a consumer having to make multiple calls to multiple agencies or multiple times to agencies. The system will tie the agencies together and remove the silos of single agency referrals and information. As the No Wrong Door is built out, a universal intake will be developed.

Ms. Mooney  
November 5, 2021  
Page Two

The data system development funded by ACL is currently in a survey development phase. This is the point where the developer surveys the current data system, needs of the system, and evaluates the partners' data abilities. Once developed, this will result in a system installation and operation among our strategic partners of the No Wrong Door System. These strategic partners are the Bureau for Medical Services, the Bureau of Behavioral Health, the WV Developmental Disabilities Council, the Bureau of Senior Services and the Aging and Disabilities Resource Center's representative.

The Bureau will again reach out to our regional Administration on Community Living administrator to discuss the potential claw back of the competitive data development grant.

The Bureau will continue to monitor ADRC operations, the progress of the No Wrong Door data system development and continue to provide conflict free referral services that are person centered and cost effective.

## **Issue 2**

Changes in ADRC operations, number of ADRC and their location over 7 years resulted in reductions in operating costs (leaving grant balances).

1. The \$60,000 budgeted in FY2015 and FY2016 were for the development and installation of the web resource center. The development was delayed resulting in two (2) years of those funds being unspent.
2. The closing of the ADRC at the Town Center Mall resulted in saving funds that were not necessary for the operations of the transfer of its consolidation to the Metro ADRC.

The Bureau does not have the authority to spend unexpended funds. Expending those funds is a function of the WV Legislature and the Executive Branch. The Bureau and the Metro AAA will review the ADRC allocations and track budget progress and revise budgets to match needs of program operations.

## **Issue 3**

### Senior Center Accessibility

Provider Agencies are to prioritize and to review and use projected excess funds to address ADA compliance. Many of the WV Senior facilities are in older buildings that were older school buildings. The Bureau will have the Area Agencies on Aging to review ADA compliance at their annual Provider Agency Monitoring reviews.

## **Issue 4**

### Bureau's Website

The Bureau posts links to surveys that solicit input from seniors on program and financial operational changes or issues.



Ms. Mooney  
November 5, 2021  
Page Three

Sixth and seventh grade readability are not possible for some medical related programs operated by the Bureau of Senior Services and its contract responsibilities.

Medical terms, Federal Program Guidance and programmatic policies do not always translate to sixth or seventh grade level.

The WV Bureau of Senior Services webpage has a “contact us” link that sends emails to the webpage. Operation and information request are forwarded to the appropriate staff to address. The Bureau’s website contains the following:

1. A link to the WV State Plan on Aging
2. A link to the Bureau’s Annual Report
3. A link to the WV Auditor’s page on the Bureau’s expenditures
4. Date of the update is noted at the bottom of the page
5. A link to the WV Department of Personnel
6. Performance measures are listed within the State Plan
7. Graphic capability is currently available, but usage needs to be increased.
8. Mission Statement is on the Home Page.

Sincerely,



Robert E. Roswall  
Commissioner





WEST VIRGINIA LEGISLATIVE AUDITOR

**PERFORMANCE EVALUATION & RESEARCH DIVISION**

Building 1, Room W-314, State Capitol Complex, Charleston, West Virginia 25305

telephone: 1-304-347-4890 | [www.legis.state.wv.us/Joint/PERD/perd.cfm](http://www.legis.state.wv.us/Joint/PERD/perd.cfm) | fax: 1-304-347-4939