



## BOARD REPORT

REPORT No.: 2024-05  
MEETING DATE: FEBRUARY 15, 2024  
SUBJECT: INTERNAL REVIEW POLICY

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### RECOMMENDATION

THAT with respect to Report No. 2024-05 (Integrated Social Services Division) we, The District of Thunder Bay Social Services Administration Board, approve the revised Internal Review Policy as attached;

AND THAT Policy CLS-02:113 Fee Subsidy Internal Review of Decision (Child Care and Early Years), Policy HO-02:13 Review Officers, and Policy HO-02:14 Review of Decisions - Housing be rescinded and replaced with the Internal Review Policy.

AND THAT the Chief Administrative Officer be authorized to amend the Internal Review Policy with respect to housekeeping items, as may be required from time to time.

### REPORT SUMMARY

To provide The District of Thunder Bay Social Services Administration Board (TBDSSAB or the Board) with a revised Internal Review Policy for approval.

### BACKGROUND

In 2021 the Manager, Social Assistance Programs initiated a study of the Internal Review & Case Presenting Officer (IR & CPO) position and its role inside TBDSSAB which included dependencies and collaborations inside the organization. It was identified that this position's documentation and instruction in case of service should be updated. The role has been in its current form since approximately 1998. Prior to this, appeals were heard by a panel of individuals.

The internal review process is legislated for Ontario Works and the review process for Housing Programs has followed this same process for internal reviews since 2012. There is also requirement for internal review from the Ministry of Education related to Child Care and Early Years programs, and Child Care Fee Subsidy reviews were added to the IR & CPO duties in 2021.

## COMMENTS

Following this review, a revised Internal Review Policy was drafted to address review matters in all three TBDSSAB program areas: Social Assistance, Housing, and Child Care and Early Years. As a result, it is recommended that the existing internal review policies and procedures for Child Care and Early Years and for Housing and Homelessness Prevention Programs be rescinded and replaced with the new Internal Review Policy.

## STRATEGIC PLAN IMPACT

There are no direct correlations with the current Strategic Plan with this report.

## FINANCIAL IMPLICATIONS

There are no immediate financial implications for TBDSSAB with the approval of the Internal Review Policy, however the policy will guide ongoing review and decisions in the program areas in the future.



## CONCLUSION

It is concluded that the draft Internal Review Policy be approved by the Board as presented.

## REFERENCE MATERIALS

Attachment #1      [POL ISS-01:162 Internal Review - Draft](#)

Attachment #2      [PCR ISS-01-03 Internal Review - Draft](#)

PREPARED BY:	Jennifer Libe, Manager, Social Assistance Programs
SIGNATURE	
APPROVED BY	Ken Ranta, Director, Integrated Social Services Division
SIGNATURE	
SUBMITTED BY:	William (Bill) Bradica, Chief Administrative Officer

<b>POLICY</b>	CATEGORY/SECTION <b><del>CLIENT SERVICES – CHILD CARE &amp; EARLY YEARS</del> <u>Integrated Social Services - General</u></b>
	SUBJECT <b><del>FEE SUBSIDY</del> – INTERNAL REVIEW OF DECISION</b>

**AUTHORITY**

*Child Care and Early Years Act 2014, Ontario Works Act 1997, Housing Services Act 2011.*

**INTENT OF POLICY**

To set out the mechanism for internal review of decisions pertaining to Fee Subsidy eligibility decisions in all programs administered by the District of Thunder Bay Social Services Administration Board (TBDSSAB), social community and affordable.

**DEFINITIONS**

<u>Eligibility Decision</u>	<u>Decision made by an individual related to another individual's application or participation in the child care, social assistance, and/or housing programs. This is inclusive of application and all benefits.</u>
<u>Fee Subsidy</u>	<u>payment for child care costs made directly to a provider on behalf of the parent/caregiver for services, based on income needs</u>
<u>Parent/Caregiver/Appellant</u>	<u>Pperson appealing a decision who may be but is not limited to, an applicant, trustee, social assistance recipient, tenant, waitlist applicant, and/or parent/caregiver who is -legally responsible for a child for whom child care is required or their representative. Demonstration of consent of representative must be provided for consideration.</u>
<u>Program</u>	<u>any All programs administered by the TBDSSAB, Social Community and Affordable</u>

**POLICY**

It is the Policy of TBDSSAB The Appellant Parent/caregivers have to have has an established process where an Appellant has the opportunity to have a decision reviewed that has negatively impacted their application, ongoing assistance or program participation fee subsidy application or eligibility.

IMPLEMENTATION / BOARD APPROVAL DATE:

**May 25, 2017**

REVISION DATE(S): March 2023 January 2024

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CATEGORY/SECTION	SUBJECT
<del>Children and Early Years Services – Fee Subsidy</del> <u>Integrated Social Services - General</u>	<del>RESIDENCY REQUIREMENTS</del> <u>INTERNAL REVIEW</u>

**STANDARDS OF APPLICATION**

1. This policy is applied in compliance with noted legislation.
2. Where there are no specific requirements for consideration including but not limited to timing, the procedure will follow the more restrictive requirement.
  1. ~~The Parent/Caregiver will have the opportunity to discuss the decision with the Child Care Worker (CCW) and provide additional information to better inform the decision under dispute.~~  
~~The Parent/Caregiver will have the opportunity request a review of the decision of the CCW and the Manager will respond in writing.~~Re: Housing Programs decisions appeal O / Programs Property Management Programs
  2. Housing – Re: Application for Housing / forwarded to the Internal Review and Case Presenting Officer.
  3. ~~The Manager's decision shall be final.~~

**RELATED PROCEDURES**

- PRC ISS--01:0033-113 – Internal Review Procedure
- PRC ISS--04--11:-01 – Internal Audit
- ~~PCR CC Internal Review~~

~~X Committee Review Date: YYYYMonDA~~  
~~IMPLEMENTATION / BOARD APPROVAL DATE:~~

**Month date, YYYY**May 25, 2017

REVISION DATE(S): March 2022January 2024

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**THE DISTRICT OF THUNDER BAY  
SOCIAL SERVICES ADMINISTRATION BOARD**

<b>PROCEDURE</b>	<b>PROCEDURE NAME</b>	Internal Review
	<b>PROCEDURE NUMBER</b>	ISS-0 <del>13</del> : <del>003</del> 113
	<b>PROCEDURE SECTION</b>	Integrated Social Services— <del>Child Care and Early Years (Fee Subsidy) - General</del>
	<b>POLICY REFERENCE</b>	<del>CLS-02:113; ISS-03:113</del> ISS-01-XX
	<b>REVISION DATE</b>	<del>May 6, 2020</del> March 2023January 2024
	<b>SUPERSEDES</b>	CLS-02:113
	<b>IMPLEMENTATION DATE</b>	May 2017

**PROCEDURE STATEMENT:**

The intent of this procedure is to outline the internal review of a decision related to [the programs of The District of Thunder Bay Social Services Administration Board \(TBDSSAB\)](#). ~~fee subsidy payment. Please review definitions in the above noted policy.~~

**PROCEDURE:**

1. [The Appellant or a representation \(with Appellant consent\) will notify TBDSSAB in writing of a request to appeal a decision regarding their eligibility for the program and or program decision.](#)
2. [Requests for appeal will be directed as follows:](#)
  - a. [Child Care – forwarded to the Internal Review and Case Presenting Officer \(IRO & CPO\).](#)
  - b. [Housing – Re: Housing Programs decisions. Forward to ~~Manager, Housing Programs.~~ Manager, Intake and Eligibility or Manager, Housing Operations and Homelessness Programs who will requests review by Housing Programs Officer. Where decision is noted correct, the appeal is provided to IRO & CPO to advise appellant. Where the decision is incorrect, the reviewing manager ~~Manager, Housing Operations~~ provides direction to the ~~Property Management Clerk~~ appropriate program manager \(who executes remediation\) and IRO & CPO \(who notifies the appellant of review and corrective action\). The same process is followed for not for profit housing providers.](#)
  - c. [Housing – Re: Application for Housing / forwarded to the IRO & CPO.](#)
  - d. [Social Assistance – forwarded to the IR & CPO.](#)
3. [The Appellant or a representative \(with Appellant consent\) responds to a decision within thirty \(30\) days of a decision.](#)
4. [The appeal is received by TBDSSAB.](#)

- a. [An extension beyond thirty \(30\) may be granted in substantiated circumstances beyond the control of the appellant.](#)
    - i. [If no extension is granted, correspondence is sent \(from the source system and if unavailable, using the template from the shared drive\) ~~is used.~~](#)
  5. [An appeal is advanced for internal review in the following manner:](#)
    - a. [Social Assistance – to the IRO & CPO.](#)
    - b. [Housing – to the appropriate program manager ~~Manager, Housing Operations who may engage the Housing Programs Officer~~ and provides decision to the IRO & CPO- for communication to appellant.](#)
    - c. [Child care – to the IRO & CPO.](#)
  6. [Where possible, the appeal is managed in the program’s system of record. This includes but is not limited to Rent Café \(Housing Applicant\), Yardi \(Tenant\), Social Assistance Management System \(SAMS\) \(Ontario Works\) and Ontario Child Care Management System \(OCCMS\). At a minimum, all correspondence is stored on the appropriate record in the source system.](#)
    - a. [With the exception of SAMS, the responsible Program staff person adds the final documentation to the source system.](#)
  7. [All other appeal types follow document retention guidelines for the relevant program.](#)
    - a. [If no guidelines exist, appeal requests are scanned and saved to the shared drive for work completion.](#)
  8. [The Appellant has an opportunity to provide additional information.](#)
  9. [An Internal Review is conducted, documented in the appropriate source system and/or shared drive per above and may include:](#)
    - a. [Review of case files in various systems \(SAMS, Rent Café, Voyageur, OCCMS, Rent Cafe\).](#)
    - b. [Discussion with staff \(including but not limited to Caseworker\(s\), Child Care Worker, Manager, Housing Operations, ~~Manager, Intake and Eligibility, Manager, Housing and Homelessness Programs, Housing Programs Officer, Team Clerk\).~~](#)
  10. [An internal review for appeal of Special Priority Policy \(SPP\) Status in Housing Programs is owed to the appellant within ten \(10\) days.](#)
  11. [If the decision by the staff person is upheld, communication is sent to the Appellant.](#)
  12. [If the decision is varied \(changed from the original appeal\), the Appellant is notified and corrective action \(if any\) is completed by the appropriate staff person. ~~Please note t~~The entity performing corrective action may also be an external party in the case of not for profit housing rent change appeals.](#)
  13. [If the decision is overturned, the Appellant is notified.](#)
  14. [Internal Review decisions related to some Ontario Works decisions can be appealed to the Social Benefits Tribunal \(SBT\). This is noted as an option to appellants in notification correspondence.](#)
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15. ~~If an appeal goes to SBT, the IRO & CPO works with the Manager, Social Assistance Programs to craft develop documentation, and represents the Administrator at the hearing.~~
16. ~~Internal reviews are conducted within the context of the appropriate legislation.~~
  1. ~~Internal reviews are tracked, monitored and results are available for review.~~
  2. ~~Consultation and reporting to the Administrator (CAO)?~~
  2. ~~Reporting to the Board (and public)? The Parent/Caregiver will have the opportunity to discuss the decision for eligibility or overpayment, with the Child Care Worker (CCW) and provide additional information to better inform the decision under dispute.~~
  3. ~~If the decision is deemed to be correct by the CCW, the Parent/Caregiver will have the opportunity to request a review from the Manager of Child Care and Early Years Programs.~~
  4. ~~The Manager shall review the decision taking into account all available information and respond to the parent/caregiver of the final decision in writing.~~
  5. ~~The decision of the Manager shall be final.~~

#### **AUTHORITY AND RESPONSIBILITY:**

~~Manager, Intake and Eligibility Social Assistance Programs; Manager, Housing Operations; Manager, Intake & Eligibility and Manager, Housing and Homelessness Programs are responsible as outlined above and for implementation and monitoring of this procedure.~~

~~Director, Integrated Social Services is responsible for overall oversight, operations, and compliance with this procedure in consultation with the Chief Administrative Officer when required.~~

~~Director, Integrated Social Services~~

#### **EMPLOYEE TRAINING**

This procedure will be reviewed with all affected staff.