

SUBMITTAL TO THE BOARD OF SUPERVISORS  
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA



ITEM: 2.4  
(ID # 28653)

MEETING DATE:  
Tuesday, September 09, 2025

FROM : AUDITOR CONTROLLER

SUBJECT: AUDITOR-CONTROLLER: Internal Audit Report 2025-016: Riverside County Department of Public Social Services, In-Home Supportive Services, Public Authority Audit [District: All], [\$0]

RECOMMENDED MOTION: That the Board of Supervisors:

1. Receive and file Internal Audit Report 2025-016: Riverside County Department of Public Social Services, In-Home Supportive Services, Public Authority Audit.

ACTION: Consent

  
Ben J. Benoit, COUNTY AUDITOR-CONTROLLER 8/13/2025

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MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Spiegel, seconded by Supervisor Gutierrez and duly carried, IT WAS ORDERED that the above matter is received and filed as recommended.

Ayes: Medina, Spiegel, Perez and Gutierrez  
Nays: None  
Absent: Washington  
Date: September 9, 2025  
xc: Auditor

Kimberly A. Rector  
Clerk of the Board  
By:   
Deputy

**SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,  
STATE OF CALIFORNIA**

| <b>FINANCIAL DATA</b>       | <b>Current Fiscal Year:</b> | <b>Next Fiscal Year:</b> | <b>Total Cost:</b>        | <b>Ongoing Cost</b> |
|-----------------------------|-----------------------------|--------------------------|---------------------------|---------------------|
| <b>COST</b>                 | \$ 0.0                      | \$ 0.0                   | \$ 0.0                    | \$ 0.0              |
| <b>NET COUNTY COST</b>      | \$ 0.0                      | \$ 0.0                   | \$ 0.0                    | \$ 0.0              |
| <b>SOURCE OF FUNDS: N/A</b> |                             |                          | <b>Budget Adjustment:</b> | No                  |
|                             |                             |                          | <b>For Fiscal Year:</b>   | n/a                 |

**C.E.O. RECOMMENDATION:** Approve

**BACKGROUND:**

**Summary**

In accordance with Board of Supervisors Resolution 83-338, we audited the Riverside County Department of Public Social Services, In-Home Supportive Services Public Authority. This audit is conducted to provide management and the Board of Supervisors with an independent assessment of internal controls over record retention, background checks, caregiver eligibility, training and development

Based on the results of our audit, internal controls over background checks, caregiver eligibility, and training and development are functioning as designed to help the In-Home Supportive Services Public Authority achieve its business process objectives. However, we identified improvement opportunities for internal controls over record retention. Specifically, the retention of caregiver documentation and closed case files did not consistently align with the Departmental Records Retention Schedule, which impacts the ability to demonstrate compliance and maintain complete program records.

**Impact on Residents and Businesses**

Provide an assessment of internal controls over the audited areas.

**Additional Fiscal Information**

Not applicable

**ATTACHMENT:**

A: Riverside County Auditor-Controller's Office - Internal Audit Report 2025-016: Riverside County Department of Public Social Services, In-Home Supportive Services, Public Authority Audit.



Office of Ben J. Benoit  
Riverside County Auditor-Controller

### Number of Findings & Recommendations

#### High Risk

**0** Findings  
• # Recommendations

#### Medium Risk

**0** Findings  
• # Recommendations

#### Low Risk

**1** Findings  
• 1 Recommendations

\* Please refer to Appendix A for a classification of the priority levels.

# Internal Audit Report

2025-016

Riverside County Department of Public Social Services,  
In-Home Supportive Services, Public Authority Audit

September 9, 2025



COUNTY OF RIVERSIDE  
OFFICE OF THE AUDITOR-CONTROLLER

BEN J. BENOIT, AUDITOR-CONTROLLER  
TANYA S. HARRIS, DPA, CPA,  
ASSISTANT AUDITOR-CONTROLLER



September 9, 2025

Charity Douglas  
Director of Department of Public Social Services  
Riverside County DPSS, In-Home Supportive Services  
4060 County Circle Drive  
Riverside, CA 92503

**Subject: Internal Audit Report 2025-016: Riverside County Department of Public Social Services, In-Home Supportive Services, Public Authority Audit**

Dear Ms. Douglas:

In accordance with Board of Supervisors Resolution 83-338, we audited the Riverside County Department of Public Social Services, In-Home Supportive Services Public Authority to provide management and the Board of Supervisors with an independent assessment of internal controls over record retention, background checks, caregiver eligibility, training and development.

We conducted our audit in accordance with the International Standards for the Professional Practice of Internal Auditing. These standards require that we plan and perform the audit to obtain sufficient, reliable, relevant and useful information to provide reasonable assurance that our objective as described above is achieved. An internal audit includes the systematic analysis of information to evaluate and improve the effectiveness of internal controls. We believe this audit provides a reasonable basis for our conclusion.

Internal controls are processes designed to provide management reasonable assurance of achieving efficiency of operations, compliance with laws and regulations, and reliability of financial and non-financial information. Management is responsible for establishing and maintaining adequate internal controls. Our responsibility is to evaluate the internal controls.

Our conclusion and details of our audit are documented in the body of this audit report.



**Internal Audit Report 2025-018: Riverside County Transportation and Land Management Agency, Building and Safety Audit**

As requested, in accordance with paragraph III.C of the Board of Supervisors Resolution 83-338, management responded to each reported condition and recommendation contained in our report. Management's responses are included in the report. We will follow-up to verify that management implemented the corrective actions.

We thank you and your staff for the help and cooperation. The assistance provided contributed significantly to the successful completion of this audit.

Ben J. Benoit  
Riverside County Auditor-Controller

By: René Casillas, CPA, CRMA  
Deputy Auditor-Controller

cc: Board of Supervisors  
Jeff A. Van Wagenen, Jr., County Executive Officer  
Juan Perez, Chief Operating Officer  
Charissa Leach, Assistant Chief Executive Officer  
Grand Jury



**Internal Audit Report 2025-016: Riverside County Department of Public Social Services, In-Home Supportive Services, Public Authority Audit**

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## Internal Audit Report 2025-016: Riverside County Department of Public Social Services, In-Home Supportive Services, Public Authority Audit

### Executive Summary

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#### Overview

Riverside County Ordinance 918 establishes the Department of Public Social Services In-Home Supportive Services Public Authority to act as an employer of record for Riverside County's In-Home Supportive Services. As the employer of record, In-Home Supportive Services Public Authority is responsible for recruiting, training, maintaining, and mobilizing a registry of in-home care providers to assist the elderly and people with disabilities remain safely in their homes. Riverside County Department of Public Social Services is responsible for administering Riverside County's In-Home Supportive Services and provides oversight to In-Home Supportive Services Public Authority.

In-Home Supportive Services Public Authority has an adopted budget of \$9.27 million and 70 authorized positions to execute its responsibilities. *County of Riverside, Fiscal Year 2024-25 Adopted Budget Volume 1, 157-158.*

#### Audit Objective

Our objective is to provide management and the Board of Supervisors with an independent assessment about the adequacy and effectiveness of internal controls over record retention, background checks, caregiver eligibility, training and development. Internal controls are processes designed to provide management reasonable assurance of achieving efficiency of operations, compliance with laws and regulations, and reliability of financial and non-financial information. Reasonable assurance recognizes internal controls have inherent limitations, including cost, mistakes, and intentional efforts to bypass internal controls.

#### AUDIT HIGHLIGHTS

- Caregiver case file documentation and retention practices need improvement.
- Annual reconciliation and tracking of untraceable files should be formalized.



## **Internal Audit Report 2025-016: Riverside County Department of Public Social Services, In-Home Supportive Services, Public Authority Audit**

### **Audit Scope and Methodology**

We conducted the audit from January 8, 2025, through May 30, 2025, for operations from July 1, 2022, through April 30, 2025. Using a risk-based approach, our scope included the following:

- Record Retention
- Background Checks
- Caregiver Eligibility
- Training and Development

### **Audit Conclusion**

Based on the results of our audit, internal controls over background checks, caregiver eligibility, and training and development are functioning as designed to help In-Home Supportive Services Public Authority achieve its business process objectives. However, we identified improvement opportunities for internal controls over record retention. Specifically, the retention of caregiver documentation and closed case files did not consistently align with the Departmental Records Retention Schedule, which impacts the ability to demonstrate compliance and maintain complete program records.



## Internal Audit Report 2025-016: Riverside County Department of Public Social Services, In-Home Supportive Services, Public Authority Audit

### Record Retention

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#### Background

Department of Public Social Services (Public Social Services) centrally maintains caregiver records for the In-Home Supportive Services program, while In-Home Supportive Services Public Authority retains employer responsibilities. This centralized custodianship helps ensure secure storage and consistent access to caregiver eligibility, payroll, and compliance records for operational, legal, and audit purposes.

Public Social Services oversees the annual Document Record Retention Schedule process, which identifies the types of records maintained, their required retention periods, and the legal or regulatory authorities that govern them. This process ensures that all records are retained or destroyed in compliance with state mandates and internal county policies.

Effective records retention supports the County's mission by safeguarding sensitive information, promoting accountability, and enabling timely responses to audits, investigations, or legal inquiries. Public Social Services follows both the Countywide General Records Retention Schedule and the Departmental Records Retention Schedule, granting authorized personnel controlled access to physical and scanned documents, including those maintained for In-Home Supportive Services Public Authority.

Authorized personnel have controlled access to request physical records or retrieve scanned documents, particularly when responding to subpoenas, claims investigations, or document destruction inquiries. Public Social Services follows both the Countywide General Records Retention Schedule and the Departmental Records Retention Schedule, which define specific requirements for the storage, retention, and disposal of In-Home Supportive Services related documents, including those maintained on behalf of the Public Authority.

#### Objective

To verify the existence and adequacy of internal controls over record retention.

#### Audit Methodology

To accomplish these objectives, we:

- Conducted interviews and performed walk-throughs with key personnel responsible over record retention processes.



## Internal Audit Report 2025-016: Riverside County Department of Public Social Services, In-Home Supportive Services, Public Authority Audit

- Obtained an understanding of relevant record retention policies and procedures, including:
  - Departmental Records Retention Schedule (Form 793) for retention sources, type, and period of retention.
- Obtained a copy of In-Home Supportive Services Public Authority’s organizational chart that was effective during the audit period.
- Obtained a listing detailing registry caregivers that were active and inactive during the audit period.
- Reviewed a selected sample of caregiver closed cases files to verify whether adequate documentation was retained per the record retention
- Verified that a selected sample of registry caregivers had documentation retained per retention requirements.
- Conducted a site visit to verify whether physical security was enforced through restricted badge access, security cameras, audit logs, and information backup.
- Observed the storage and retrieval of records to assess whether processes support inventory accuracy.
- Reviewed daily inventory quality assurance process to verify whether inventory completeness is regularly monitored.
- Obtained access logs and verified whether physical file retrieval requests were tracked and properly documented.

### Finding 1: Caregiver Documentation

Priority Level: 3<sup>1</sup>

In-Home Supportive Services Public Authority is required to maintain caregiver case files in accordance with the County of Riverside Board of Supervisors-approved Departmental Records Retention Schedule (DRRS – Form 793). Registry Provider Case Files (DPSS0750) must be retained for ten years from the date of termination, as required by Welfare and Institutions Code §§ 12301.24 and 12305.87(b) and (d)(4), and as further supported by All County Letters (ACLs) 10-35, 10-51, 11-12, and 15-26. Ineligible and Disqualified Provider Case Files (DPSS0800) must be retained for two years after case closure, as outlined in Government Code § 26202 and ACL 10-51. These case files include documentation such as provider applications, identification records

<sup>1</sup> Please see Appendix A (page 16) for a description of the finding priority level classifications.



## Internal Audit Report 2025-016: Riverside County Department of Public Social Services, In-Home Supportive Services, Public Authority Audit

(e.g., driver's license, Social Security number), background check results, and drug and alcohol screening records.

Based on our review of 75 active and 30 closed registry caregiver case files, we identified the opportunities for improvement in documentation and file retention practices:

- 35 out of 75 (47%) registry caregiver files did not contain the BCIA 8016, *Request for Live Scan* form. Of these, two files were also missing completed applications or SOC 426 forms.
- 17 out of 30 (57%) sampled closed caregiver files could not be located, despite being within the applicable records retention period.

The majority of the missing files pertained to cases closed prior to 2022. In-Home Supportive Services Management indicated that formal written policies or desk procedures were not in place prior to 2023. Additionally, the department transitioned from physical to digital recordkeeping in 2022, which helped reduce inconsistencies in historical file retention. Department personnel noted that In-Home Supportive Services is unable to trace files because the barcodes assigned by the County's records management system were not retained. Also, In-Home Supportive Services was not involved directly in the annual reconciliation of the Document Record Retention Schedule. Maintaining records in accordance with the Departmental Records Retention Schedule supports the department's ability to demonstrate compliance with state and federal program requirements and promote program accountability and transparency.

### Recommendation 1.1

Ensure annual reconciliation of caregiver case files against the Departmental Records Retention Schedule to verify retention timeframes and completeness is performed timely with active coordination with In-Home Supportive Services management.

### Management's Response

"**Concur.** DPSS will prepare an annual reconciliation of the caregiver case files in compliance with Departmental Records Retention schedule."

**Actual/Estimated Date of Corrective Action:** December 31, 2026



## **Internal Audit Report 2025-016: Riverside County Department of Public Social Services, In-Home Supportive Services, Public Authority Audit**

### **Recommendation 1.2**

Create and maintain a log of untraceable or missing caregiver case files, including caregiver name, case status (active/closed), last known retention action, and reason file is untraceable and require supervisory review and sign-off of the log on at least an annual basis.

### **Management's Response**

**"Concur.** DPSS will create a log to capture any missing files noted in the reconciliation above."

**Actual/Estimated Date of Corrective Action:** June 30, 2026



## Internal Audit Report 2025-016: Riverside County Department of Public Social Services, In-Home Supportive Services, Public Authority Audit

### Background Checks

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#### Background

Riverside County Board of Supervisors Policy C-33 mandates background checks for volunteers, interns, and contractors before appointment or selection for risk-sensitive roles. Managed by the Human Resources department, these checks vary depending on the specific assignment, internship, or contract. Risk-sensitive positions involve direct care, supervision, or unsupervised access to vulnerable populations, including patients, children, the elderly, and individuals with disabilities.

California penal code § 11105.3 permits governmental and private organizations to conduct criminal background checks to assess the suitability of individuals applying for licenses, employment, or volunteer positions involving children, the elderly, or individuals with disabilities. Authorized entities, such as law enforcement agencies, schools, nonprofits, and in-home supportive care agencies, use fingerprint-based background checks as a safeguard. The Riverside County Public Authority functions as an Applicant Agency in this process.

These background checks, required before employment, licensure, or certification, are crucial for maintaining workplace integrity and security, especially for positions of trust serving California's most vulnerable populations. Neglecting to conduct them could compromise safety, create legal liabilities, and expose at-risk individuals to harm.

#### Objective

To verify the existence and adequacy of internal controls over background checks.

#### Audit Methodology

To accomplish these objectives, we:

- Conducted interviews and performed walk-throughs with key personnel responsible for background checks.
- Obtained an understanding of relevant background check policies and procedures, including:
  - Public Authority Manual, *Department of Justice & Custodian of Records (DOJ-COR)*.
  - Form BCIA 8016, *Request for Live Scan Service*.
  - State of California Form 426, *In-Home Supportive Services (IHSS) Program Recipient Designation of Provider*.



## Internal Audit Report 2025-016: Riverside County Department of Public Social Services, In-Home Supportive Services, Public Authority Audit

- Verified that a selected sample of registry caregivers had supporting documentation of completed background checks.
- Verified whether the selected sample of registry caregivers were not listed under Megans Law database.
- Obtained a listing of employees with access to the Department of Justice portal.
- Verified whether employees performing background checks had received appropriate training.

### Finding: None Noted

Based on the results of our audit, we determined that internal controls over background checks provide reasonable assurance that its objective related to this area will be achieved. Reasonable assurance recognizes internal controls have inherent limitations, including cost, mistakes, and intentional efforts to bypass internal controls.



## Internal Audit Report 2025-016: Riverside County Department of Public Social Services, In-Home Supportive Services, Public Authority Audit

### Caregiver Eligibility

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#### Background

In-Home Supportive Services Public Authority plays a vital role in connecting qualified caregivers with eligible recipients, including seniors and individuals with disabilities. As an intermediary between caregivers and In-Home Supportive Services recipients, In-Home Supportive Services Public Authority is responsible for recruiting, screening, and maintaining a registry of eligible caregivers. Although In-Home Supportive Services recipients retain the right to select and hire their own caregivers, In-Home Supportive Services Public Authority facilitates this process by ensuring that all potential caregivers meet state and county requirements, including background checks and other eligibility criteria. This process helps safeguard the health and safety of recipients while supporting compliance with federal, state, and local regulations.

#### Objective

To verify the existence and adequacy of internal controls over caregiver eligibility.

#### Audit Methodology

To accomplish these objectives, we:

- Conducted interviews and performed walk-throughs with key personnel responsible for the eligibility of caregivers.
- Obtained an understanding of relevant background check policies and procedures, including:
  - Public Authority Manual, *Department of Justice & Custodian of Records (DOJ-COR)*.
  - Public Authority Manual, *Training & Recruitment*.
  - State of California, *All-County Letter No. 16-53 & 19-14*.
- Verified that a selected sample of registry caregivers had required documentation to support eligibility, including applications, background checks, and enrollment forms.
- Verified that the selected sampled registry caregivers completed Pacific Toxicology testing and received cleared results.
- Verified that the caregiver enrollment process was tracked and updated to reflect progress toward eligibility.



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### Finding: None Noted

Based on the results of our audit, we determined that internal controls over caregiver eligibility provide reasonable assurance that its objective related to this area will be achieved. Reasonable assurance recognizes internal controls have inherent limitations, including cost, mistakes, and intentional efforts to bypass internal controls.



## Internal Audit Report 2025-016: Riverside County Department of Public Social Services, In-Home Supportive Services, Public Authority Audit

### Training and Development

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#### Background

A clearly defined training and development program is important for maintaining a qualified and compliant In-Home Supportive Services workforce. Providing caregivers with appropriate training supports service quality, program compliance, and risk reduction. Training also helps ensure caregivers have the skills and information necessary to meet the needs of In-Home Supportive Services recipients.

In-Home Supportive Services Public Authority in Riverside County is responsible for offering training and development to In-Home Supportive Services providers. The program is intended to equip caregivers with the knowledge and resources required to provide in-home care services in accordance with state and federal In-Home Supportive Services regulations.

#### Objective

To verify the existence and adequacy of internal controls over training and development.

#### Audit Methodology

To accomplish these objectives, we:

- Conducted interviews and performed walk-throughs with key personnel responsible for training and development.
- Obtained an understanding of relevant training and development policies and procedures, including:
  - Public Authority Manual, *Training & Recruitment*.
  - In-Home Supportive Services Provider Training Requirements.
  - 2020 In-Home Supportive Services Provider Orientation Video Script.
  - 2023 *IHSS & Public Authority Caregiver Handbook*.
- Assessed whether In-Home Supportive Services caregiver training aligns with applicable state and federal regulations.
- Verified that a selected sample of registry caregivers completed the required orientation videos.
- Verified whether training records were properly documented and retained.



## Internal Audit Report 2025-016: Riverside County Department of Public Social Services, In-Home Supportive Services, Public Authority Audit

- Verified whether a process is in place to inform caregivers about optional training.

**Finding: None Noted**

Based on the results of our audit, we determined that internal controls over training and development provide reasonable assurance that its objective related to this area will be achieved. Reasonable assurance recognizes internal controls have inherent limitations, including cost, mistakes, and intentional efforts to bypass internal controls.



**Internal Audit Report 2025-016: Riverside County Department of Public Social Services, In-Home Supportive Services, Public Authority Audit**

**Appendix A: Finding Priority Level Classification**

| Priority Level 1  | Priority Level 2   | Priority Level 3   |
|---|--|--|
| <p>These are audit findings that represent the most critical issues that require immediate attention and pose a significant risk to the department’s objectives, compliance, security, financial health, or reputation. They may indicate serious control failures, non-compliance with laws or regulations, significant financial errors, or vulnerabilities with severe potential impact. Immediate corrective measures are necessary to mitigate the risks associated with these findings.</p> | <p>These are audit findings that are important and require timely resolution, but their impact is not as severe as Priority Level 1. They may highlight moderate control weaknesses, areas of non-compliance with internal policies and procedures, or financial discrepancies that are significant but are not critical. While they might not pose an immediate threat, they should be addressed promptly to prevent further escalation or potential negative consequences.</p> | <p>These are audit findings that are less critical and generally have a lower impact on the department’s objectives, compliance, or operations. They may include minor control deficiencies, procedural deviations with minimal impact, or non-critical administrative errors. While they may not require immediate attention, they should still be acknowledged and addressed within a reasonable timeframe to ensure ongoing improvement and prevent potential accumulation of minor issues.</p> |
| <p><b><u>Expected Implementation Date of Recommendation*</u></b><br/>One to three months</p>  | <p><b><u>Expected Implementation Date of Recommendation *</u></b><br/>Three to six months</p>  | <p><b><u>Expected Implementation Date of Recommendation *</u></b><br/>Six to twelve months</p>   |

\* Expected completion to implement recommendation date begins after issuance of final audit report.