



Commonwealth of Massachusetts
Office of the State Auditor
Suzanne M. Bump

Making government work better

Official Audit Report – Issued June 18, 2014

Lutheran Community Services, Inc.
For the period July 1, 2011 through June 30, 2012





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Office of the State Auditor
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Making government work better

June 18, 2014

Jeffrey P. Kinney, Chair, Board of Directors
Lutheran Community Services, Inc.
14 East Worcester Street, Suite 300
Worcester, MA 01604

Dear Mr. Kinney:

I am pleased to provide this performance audit of Lutheran Community Services, Inc. This report details the audit objectives, scope, methodology, findings, and recommendations for the audit period, July 1, 2011 through June 30, 2012. My audit staff discussed the contents of this report with management of the agency, and their comments are reflected in this report.

I would also like to express my appreciation to the Lutheran Community Services, Inc. management and staff for the cooperation and assistance provided to my staff during the audit.

Sincerely,

A handwritten signature in blue ink, appearing to read 'SMBump'.

Suzanne M. Bump
Auditor of the Commonwealth

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EXECUTIVE SUMMARY

Lutheran Community Services, Inc. (LCS), located in Worcester, was incorporated on June 21, 2001 under the provisions of Chapter 180 of the Massachusetts General Laws as a not-for-profit organization. LCS provides various human and social services, including refugee services and adoption services.

LCS is one of a group of companies affiliated with an organization called Lutheran Social Services of New England, Inc. (LSS). LSS was incorporated in 1972 under the provisions of Chapter 180 of the General Laws as a not-for-profit organization. LSS provides various central administrative services (i.e., executive management, board development, public relations, church relations, human-resource management, worker's compensation and unemployment claim management, group purchasing, debt management, internal auditing, and benefit management) to its affiliated organizations.

In accordance with Chapter 11, Section 12, of the General Laws, the Office of the State Auditor (OSA) has conducted a performance audit of certain activities of LCS for the period July 1, 2011 through June 30, 2012. The objectives of our audit were to (1) determine whether certain LCS expenses charged to Massachusetts contracts were reasonable, allowable, and allocable to these contracts in accordance with regulations promulgated by the state's Operational Services Division (OSD); (2) determine whether LCS achieved all of the performance-goal standards stipulated in its contract with the Massachusetts Office for Refugees and Immigrants (MORI); and (3) analyze selected transactions conducted between LCS and a related party, LSS, to determine whether they were reasonable, allowable, and allocable to LCS's state contracts.

Summary of Findings

- LCS could not support \$5,701 of \$253,883 in total payroll costs for 12 of the 16 employees working under its MORI contracts. Specifically, the employee rates of pay were not supported by current pay rate authorizations in LCS's Human Resources department's employee files. As a result, the \$5,701 difference between the rate paid and the authorizations on file was nonreimbursable, represents an overcharge to these contracts, and should be recovered by OSD.
- The former chief executive officer (CEO) incurred \$5,279 of travel expenses (hotels, airfare, and food) during the fiscal year ended June 30, 2012 that LCS allocated to its programs, including its state-funded programs, and that we determined to be unallowable charges to the Commonwealth. Therefore, LCS overcharged its state contracts by as much as \$5,279 for these expenses, and OSD should recover all state funds that were used to pay for these unallowable charges.

- Case files pertaining to the MORI contracts did not always support the reports outlining the achievement of performance goals LCS was required to file with MORI. As a result, LCS cannot support the reported performance results, and state oversight agencies may be relying on incorrect information.

Recommendations

- OSD should recover the \$5,701 we identified as unsupported costs against its MORI contracts. In the future, LCS should ensure that any pay increases provided to employees are properly authorized and documented in each employee's file.
- OSD should determine how much of the \$5,279 of unallowable travel costs that LCS billed against its state contracts during the audit period should be recovered and recoup these funds. Additionally, LCS should strengthen its internal controls to ensure that its existing policies for the documentation of expenses are followed and that all travel expenses charged to state contracts are appropriately documented.
- LCS should continue its planned procurement of a more modern case file management system. In the meantime, LCS should document the information required by its MORI contracts, conducting additional case-worker training on case file management if necessary.

Post-Audit Action

After our audit period, LCS hired a new CEO, who instituted a new procedure requiring the approval of the Human Resources department and the appropriate vice president of Operations before changes in an employee's rate of pay could be implemented. In addition, LCS officials told OSA that they are taking measures to ensure that all pay rate increases are properly documented. The new CEO also told us that she reviewed existing policies and procedures regarding travel expenses to determine whether they were sufficient and took the appropriate steps to ensure that they were being adhered to.

OVERVIEW OF AUDITED AGENCY

Background

Lutheran Community Services, Inc. (LCS), located in Worcester, was incorporated on June 21, 2001 as a not-for-profit organization. LCS provides various human and social services in Massachusetts, Maine, and New Hampshire. A complete list of the services provided by LCS during our audit period appears in Appendix A.

LCS is one of a group of companies affiliated with an organization called Lutheran Social Services of New England, Inc. (LSS). LSS was incorporated in 1972 under the provisions of Chapter 180 of the Massachusetts General Laws as a not-for-profit organization. LSS provides various central administrative services (i.e., executive management, board development, public relations, church relations, human-resource management, worker's compensation and unemployment claim management, group purchasing, debt management, internal auditing, and benefit management) to its affiliated organizations and allocates the associated expenses to those organizations. A list of the companies to which LSS provides administrative support is provided in Appendix B. At the beginning of each fiscal year, LSS develops a budget for those expenses, which, during the fiscal year ended June 30, 2012, totaled approximately \$6.6 million. LCS was allocated approximately \$3.9 million of these central administrative expenses.

LCS is the largest of the LSS-affiliated companies in terms of revenue, and it has a staff of 158 employees. Below is a summary of LCS's revenue for the fiscal year ended June 30, 2012.

LCS Summary of Revenue¹

Fiscal Year Ended June 30, 2012

Revenue Source	Revenue
Department of Children and Families	\$ 6,502,568
Department of Developmental Services	1,493,097
Massachusetts Office for Refugees and Immigrants	1,115,864
Purchase-of-Service Subcontracts	488,013
Massachusetts Non-Purchase-of-Service	318,957
Other Massachusetts Agencies	38,322
Massachusetts Client Stipends	133,729

¹ This information was taken from the Uniform Financial Statement and Independent Auditor's Report that LCS filed with the Commonwealth.

Revenue Source	Revenue
Client Resources and Private Client Fees	136,539
Grants and In-Kind Contributions	76,350
Direct Federal Grants	1,392,334
Released Net Assets	331,780
Commercial Activities	74,282
Other Revenue	34,066
Out-of-State Programs	24,072,518
Total Revenue	<u>\$36,208,419</u>

AUDIT OBJECTIVES, SCOPE, AND METHODOLOGY

In accordance with Chapter 11, Section 12, of the Massachusetts General Laws, the Office of the State Auditor has conducted a performance audit of certain activities of Lutheran Community Services, Inc. (LCS) for the period July 1, 2011 through June 30, 2012. The objectives of our audit were to (1) determine whether certain LCS expenses charged to Massachusetts contracts were reasonable, allowable, and allocable to these contracts in accordance with regulations promulgated by the state's Operational Services Division (OSD); (2) determine whether LCS achieved all of the performance-goal standards stipulated in its contracts with the Massachusetts Office for Refugees and Immigrants (MORI); and (3) analyze selected transactions conducted between LCS and a related party, Lutheran Social Services of New England, Inc. (LSS), to determine whether they were reasonable, allowable, and allocable to LCS's state contracts.

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.

We determined that the following internal controls were relevant to our audit objectives:

- controls over payroll expenses
- controls over executive travel expenditures
- controls over MORI contract performance goals
- controls over contract billings

We assessed these relevant controls and identified deficiencies related to the first three items as discussed in the Detailed Audit Results and Findings section of this report.

To accomplish our audit objectives, we performed the following procedures:

- Gained an understanding of LCS and its affiliated organizations, including the composition of its and LSS's boards of directors, and identified the key officers and senior-level employees. We also interviewed various other members of LCS's staff and employees from other outside organizations, such as LCS's audit firm and OSD, that we considered pertinent to our objectives.

- Identified and reviewed applicable laws, rules, and regulations pertinent to our audit objectives, including 808 Code of Massachusetts Regulations, promulgated by OSD; the Commonwealth Terms and Conditions for Human and Social Services; Federal Office of Management and Budget Circular A-122, “Cost Principles for Non-Profit Organizations”; and LCS’s own internal policies and procedures.
- Reviewed meeting minutes of the LCS board of directors.
- Obtained, reviewed, and analyzed annual Uniform Financial Statement and Independent Auditor’s Report filings.²
- Obtained accounting record data, in hardcopy and electronic form, for review and analysis.
- Determined the reliability of data from LCS’s electronic accounting records by selecting source documents and tracing them to the system. Because many transactions are based on allocations of expenses, we also reviewed the allocation process as well as certain allocation tables to determine the reasonableness of the expenses charged. We determined that the data from the system were sufficiently reliable for the purposes of our audit.
- Selected certain transactions, primarily by using a non-representative judgmental sample selection, for further examination to determine whether they were adequately supported, reasonable, allowable, and allocable to state contracts. We used judgmental samples because that was a better way to take into account the relative materiality of various costs and to assess the relative risks that some of these costs might be noncompliant with existing regulations.
- Selected judgmental samples specifically related to our audit findings, which allowed us to account for material transactions, without projecting the sample results to the population. Information on the pertinent population and sample sizes is as follows:
 - For payroll charges to the MORI Worcester and West Springfield job-service contracts, LCS charged \$253,883 for the year examined. We selected a \$56,195 representative judgmental sample of salary billings.
 - For the former chief executive officer’s (CEO’s) travel expenses, we extracted travel expenses totaling \$25,337 from LSS’s centralized administrative costs. We then judgmentally selected larger or unusual transaction amounts, totaling \$7,279, for further review.
 - For performance-goal reporting of the Worcester MORI contract, LCS reported serving 412 clients. We selected a representative judgmental sample of 27 case files to determine whether source document case files recorded the details of certain performance goals identified in the contract.

² Each year, agencies such as LCS that operate social programs and contract with various Commonwealth departments must prepare financial statements called Uniform Financial Statements and Independent Auditor’s Reports and file them electronically with OSD.

For other areas examined during the audit that did not result in audit findings, the following are the population and sample sizes that we judgmentally selected and did not project to the population:

- For common costs incurred by LSS before being allocated to LCS,
 - Management payroll of \$3,410,648, of which we sampled \$373,415;
 - Consultant costs of \$51,576, of which we sampled \$21,161;
 - Rental expenses of \$213,813, of which we sampled \$38,401;
 - Fees of \$47,856, of which we sampled \$18,375.
- For the Therapeutic Foster Care program,
 - Foster care payments of \$670,286, of which we sampled \$21,700;
 - Payroll costs of \$364,219, of which we sampled \$124,348;
 - Direct administrative expenses of \$295,728, of which we sampled \$16,102;
 - Clothing allowances of \$38,594, of which we sampled \$4,792.
- For direct administrative charges to the MORI Worcester and West Springfield job-service contracts, LCS charged \$160,618, of which we sampled \$122,571.
- For payments from the Worcester Refugee Cash Assistance program, the population was 136 clients, of which we sampled 12.
- For performance-goal reporting of the Worcester MORI contract provision of serving at least 212 new clients, the population was 225 clients served and we sampled 36 case files.

We determined that this level of sampling was sufficient to conclude that our audit of these areas resulted in no reportable findings.

At the conclusion of our audit, we provided a copy of our draft report to LCS's board chair as well as the CEO for review and comments. We considered those comments when drafting our final report.

DETAILED AUDIT RESULTS AND FINDINGS WITH AUDITEE'S RESPONSE

1. Lack of supporting documents resulted in \$5,701 of payroll overcharges to Lutheran Community Services, Inc.'s contracts with the Massachusetts Office for Refugees and Immigrants.

During fiscal year 2012, Lutheran Community Services, Inc. (LCS) entered into contracts with the Massachusetts Office for Refugees and Immigrants (MORI) to provide various refugee resettlement services, including providing refugee employment services to help refugees become self-sufficient. We judgmentally selected three months of salary charges for its two Comprehensive Refugee Employment Services Worcester contracts and found that LCS could not support \$5,701 of \$253,883 in total payroll costs for 12 of the 16 employees working under these contracts, contrary to Operational Services Division (OSD) regulations. Specifically, the employee rates of pay were not supported by current pay rate authorizations in LCS's Human Resources department's employee files. As a result, the \$5,701 difference between the rate paid and the authorizations on file was nonreimbursable, represents an overcharge to these contracts, and should be recovered by OSD.

After our audit, LCS officials told us that when the new chief executive officer (CEO) took office, she instituted a new procedure requiring the approval of Human Resources and the appropriate vice president of Operations before changes in an employee's rate of pay could be implemented. Additionally, LCS officials told us that they would take measures to ensure that payroll change forms are promptly filed and documented in each employee's file.

Authoritative Guidance

According to OSD regulation 808 Code of Massachusetts Regulations (CMR) 1.05(26), undocumented costs are nonreimbursable program costs, as follows:

Undocumented Expenses. Costs which are not adequately documented in the light of the American Institute of Certified Public Accountants statements on auditing standards for evidential matters.

Additionally, internal procedures at LCS require that a program manager authorize salary costs and forward the related information to the Human Resources department for input into the payroll system.

Reasons for Lack of Documentation

According to LCS officials, there had been turnover in LCS's Human Resources; although the pay increases were likely approved and implemented, the turnover caused paperwork to accumulate without being filed, and some records may have been lost. Although its procedures provided for pay rate increases to be authorized at the program level by a program manager or director, LCS had no process that required an executive-level administrative staff member, such as a Human Resources director, to review and approve pay rate changes to ensure that they were reasonable and adequately documented in an employee's file before payment.

Recommendations

OSD should recover the \$5,701 we identified as unsupported costs against its MORI contracts. In the future, LCS should ensure that any pay increases provided to employees are properly authorized and documented in each employee's file.

Auditee's Response

The LCS board chair responded as follows:

All pay rate adjustments require the approval of both a member of the Human Resource team as well as an Operational Vice President (or member of Executive Management) before it is entered into the Human Resource System. Each rate adjustment shall be documented on an Employee Change Form and every attempt will be made to retain the documentation in the employee file as evidence that the approval process occurred.

2. LCS's CEO incurred undocumented and non-program-related travel expenses.

The former CEO incurred \$5,279 of travel expenses (hotels, airfare, and food) during the fiscal year ended June 30, 2012 that LCS allocated to its programs, including its state-funded programs, and that we determined to be unallowable charges to the Commonwealth. These expenses were either undocumented or not program related. For example, the credit card statement showed that the former CEO incurred \$1,020 on February 13, 2012 for airline tickets, but LCS had insufficient documentation to support the expense, and it also could not provide any documentation to show the purpose of the trip or how it was related to LCS's state programs. Therefore, LCS overcharged its state contracts by as much as \$5,279 for these expenses, and OSD should recover all state funds that were used to pay for these unallowable charges.

LCS's new CEO told us that she had reviewed existing policies and procedures regarding travel expenses to determine whether they were sufficient and had taken the appropriate steps to ensure that they were being followed and monitored.

Authoritative Guidance

According to OSD regulation 808 CMR 1.05(26), undocumented costs are nonreimbursable. In addition, 808 CMR 1.05(12) states that non-program-related expenses are nonreimbursable.

Reasons for Undocumented and Non-Program-Related Travel

Although LCS had policies in place requiring that sufficient documentation be provided to support payments and to ensure that expenses are for program-related purposes, LCS's internal controls were not sufficient to ensure that these policies and procedures were being followed.

Recommendations

OSD should determine how much of the \$5,279 of unallowable travel costs that LCS billed against its state contracts during the audit period should be recovered and recoup these funds. Additionally, LCS should strengthen its internal controls to ensure that its existing policies for the documentation of expenses are followed and that all travel expenses charged to state contracts are appropriately documented.

Auditee's Response

The LCS board chair responded as follows:

LCS has reviewed its travel policy and procedures and is in the midst of a formal revision with its Governance Committee. Immediately upon review of this policy by the new CEO, new procedures regarding travel were instituted by the Organization requiring all travel be pre-approved based upon purpose and estimated expense by an immediate supervisor. Further, all expenses incurred during travel are reported to and reviewed by an immediate supervisor (via expense report or [credit card] transaction) for appropriateness and validation of supporting documentation.

. . . The \$5,279 of unsupported CEO travel expense was incurred directly by Lutheran Social Services of New England. Due to the nature of the Central Office Charge Allocation, it is estimated that approximately \$1,000 of these expenses would have been allocated to the State of Massachusetts programs administered by LCS. Additionally, because of the tiered allocation methodology utilized within the State of Massachusetts by LCS, only a fraction of such items would have made its way to any single cost reimbursement based contract.

3. Reporting of program performance required by state MORI contracts was not adequately documented.

Our examination of underlying source document case files found that the case files pertaining to the MORI contracts did not always support the reports outlining the achievement of performance goals LCS was required to file with MORI. As a result, LCS cannot support the reported performance results, and state oversight agencies may be relying on incorrect information.

Provisions in the MORI contracts established various performance goals LCS was to strive to meet with respect to outcomes for the MORI program. We judgmentally selected 27 case files to examine and found problems with the following performance goals:

- Seven of the 27 files did not document the clients' dates of employment.
- Nineteen of the 27 files did not document that the clients held the job for 90 days.
- There was no information in any of the 27 case files to indicate whether health insurance was provided.
- Most clients' employment did not meet the goal of at least a \$10.10 per hour wage.

Authoritative Guidance

These multiyear contracts provide 30 specific program performance goals to be achieved and identified 8 goals as most applicable to the fiscal year 2012 contracts. Of those 8 goals, we selected the following 5 to determine whether attainment of the reported progress was supported by documentation: LCS is to provide services to 329 new clients, plus existing clients; 76% of clients are to obtain jobs within the contract year; client jobs are to pay \$10.10 per hour; 78% of clients are to retain their jobs for at least 90 days; and 86% of clients are to be placed in full-time jobs with health benefits within six months.

The contracts also require LCS to prepare, and submit to MORI, a stipulated program progress report three times a year as well as an overall annual report. These reports contain statistical information as well as a narrative further explaining the statistical information. Additionally, LCS policies and procedures state that reported information must be supported by case file information.

Reasons for Not Adequately Documenting Performance

When we discussed these matters with LCS personnel, they noted that they are aware that the agency's manual client case management records system is not sufficient to meet its needs in this area and that they have been in the process of finding a new computerized system that best fits LCS's needs. Additionally, contrary to LCS's established policies and procedures, case workers did not always fully document the supporting information in the case files. LCS officials noted that case workers may know of certain information that was used in developing the thrice-yearly and annual reports, but that information was not communicated or documented in case files. In addition, LCS officials noted that case workers would generally know whether a client's employer provides health insurance, but stated that that information is not in the case files. Lastly, management agreed that the wage rate paid was not always fully documented in case files, but they did note in their reporting to MORI that attaining the goal wage rate of \$10.10 per hour was generally unrealistic considering the state of the economy and client skill sets.

Recommendations

LCS should continue its planned procurement of a more modern case file management system. In the meantime, LCS should document the information required by its MORI contracts, conducting additional case-worker training on case file management if necessary.

Auditee's Response

The LCS board chair responded as follows:

Management agrees with the State's recommendation that it should consider the procurement of a more modernized case management system. Unfortunately, the capital outlay required for such a purchase is substantial and currently not supported as a purchase under any of its current State contracts. Lutheran Community Services, Inc. is working to improve the documentation process it has in place to ensure all reported results can be substantiated with appropriate evidence. The Organization overall is currently in the initial stages of developing a Client Management System internally that may ultimately improve file content compliance as well when it is implemented during Fiscal Year 2016.

OTHER MATTERS

Documentation was not adequate to support recipient eligibility records for Department of Transitional Assistance benefits.

In order to be eligible to receive Transitional Aid to Families with Dependent Children (TAFDC) benefits from the state's Department of Transitional Assistance (DTA), benefit recipients, unless deemed to be exempt, must work for pay or take part in an Employment Services Program (ESP) activity for 20 – 30 hours a week. DTA provides benefits totaling approximately \$1.8 million annually for Lutheran Community Services, Inc. (LCS) clients under this program.

While conducting our audit work, we noticed that LCS employees sign a form titled DTA ESP Participation and Attendance Record attesting to the number of hours of ESP activity for some of the agency's clients, who submit them to DTA so that they can maintain their eligibility for TAFDC benefits. However, LCS case files do not always contain information to support all the hours claimed by the recipients and attested to by LCS staff. For example, although this issue was not in the scope of our audit, our review of LCS employee records in relation to our planned audit work indicated that a client may be required to perform 30 hours per week of a mix of education, job searching, and community service, but LCS files only substantiate the performance of a portion of those hours.

We discussed this matter with LCS officials, who told us that LCS is not under contract and is not compensated by DTA to sign these forms. We acknowledge this to be true; however, DTA relies on the accuracy of the information in these forms to ensure that its clients continue to meet DTA eligibility requirements. Consequently, we believe that if LCS staff continues to perform this service, the agency should consider taking measures to ensure that the DTA-related activities performed by these individuals are adequately documented and that the forms are accurately completed before LCS personnel attest to these activities.

We attempted to contact DTA officials for additional information and documents regarding this matter, but did not receive a response.

APPENDIX A

SERVICES PROVIDED BY LUTHERAN COMMUNITY SERVICES, INC.³

CHILD AND FAMILY SERVICES

Intensive Foster Care Program

Lutheran Social Services provides highly personalized supports for foster families who can parent a child in need. Our program provides the highest level of support and services to foster families, including 24/7 emergency on call support as well as generous financial reimbursement, training, networking and respite opportunities. In accordance with our mission to serve and care for people in need, we work with foster children and families of all backgrounds and beliefs.

The ultimate goal of LSS foster care is to help children to reach their potential as members of society by learning positive skills to help them increase their self-esteem, recognize their own innate value as persons, restore their trust in other people, and help them to build and maintain lasting relationships with their foster families and beyond.

Parenting Teen Living and Ruth House Teen Living

Lutheran Social Services of New England directs two programs for single teenage mothers and their children. Both offer transitional living in a supportive environment for low income and often homeless mothers who, with the help of staff, gain the skills necessary to manage life successfully when they leave.

TEEN PARENTS find support, training, advocacy and transitional housing within two LSS Teen Parent programs. The Florence House in Worcester, Massachusetts, and the Ruth House in Brockton, Massachusetts, provide housing in safe, therapeutic residential environments that build upon individual strengths in order to help young families move toward self-sufficiency.

Serving a total of 18 families, these programs assist teenage mothers and their children by providing housing, case management and training in a structured setting that fosters the development of life skills and healthy family relationships.

These programs offer recreational activities that help to build family bonds and encourage healthy social relationships. Children receive early intervention healthcare and specialized services.

Young Parents Support Program

The Young Parents Support Program serves families who live in the community as well as in the Florence House or Ruth House. Advocates help them to enter school and work programs, access child care, and assure that they receive the necessary healthcare, counseling and resources to provide for their children. Mothers, many of whom live at the Ruth House or Florence House with their children, and fathers participate in parenting and life skills training.

³ The text of this appendix is quoted from materials provided by LCS.

Unaccompanied Refugee Minors Program

The Unaccompanied Refugee Minors program (URM) of Lutheran Social Services (LSS) is the only program in the New England states that assists refugee and migrating youth exclusively. The program is responsible for refugee, asylee and trafficked young people under age 18 who are in the U.S. with no parent or guardian. The program places the minors in foster care with specially trained families and provides culturally and linguistically appropriate support. Since 1983, this program of Lutheran Social Services has placed more than 400 unaccompanied minors with foster families in Massachusetts. Currently, over 90 youth are in our care.

The URM program serves these young people with financial support and comprehensive services designed to assist with their resettlement and adjustment to their new culture, provide for them while they pursue educational goals, and prepare them for eventual independence. Services are tailored to the needs of refugee youth, blending their cultural identity with their new American environment. The refugee young people receive the same child welfare benefits and services as other foster children in the state of Massachusetts. . . .

Adoption

Lutheran Social Services (LSS) is a full service, licensed nonprofit adoption agency serving children and families in Connecticut, Massachusetts and Rhode Island since 1872.

Our agency's comprehensive adoption program offers international, domestic infant and waiting child adoptions as well as pregnancy counseling and post adoption counseling, educational services and other support. LSS is recognized for reputable, professional, responsive adoption services. Whether we coordinate your adoption from start to finish, or work together with another agency of your choice, we commit fully to be your primary adoption resource for a lifetime.

When you choose LSS as your adoption agency, we will accompany you every step of the way on this life-changing journey. LSS has been the ethical, trusted choice for adoption services in New England for over a century.

DISABILITY SERVICES

Forsberg Independent Living Program

The Forsberg Program is a unique model that enables and empowers persons with developmental disabilities to live on their own terms in the Worcester community. Funded by the Mass. Department of Developmental Services, this program assists participants with their finances, helps them improve their skills for the activities of daily living and encourages self-reliance in decision making. Case workers visit their program individuals, monitor their progress, and serve as a constant resource and support in all life situations. Participants enjoy the dignity of being fully integrated and valued members of society. The program is named for David Forsberg, founder of the program and a well-known figure in public life in Massachusetts.

Lutheran Creative Living

Lutheran Creative Living, Andover, Mass., which was dedicated in November 2006, resulted from a unique partnership among HUD, the Mass. Department of Developmental Services, Lutheran Social Services and Creative Living, a community based respite program for adults with developmental disabilities. This new residence for eight adults with developmental disabilities is comprised of eight private apartments, a large common room and two sitting rooms. It is staffed

by professional care staff who help residents to work on life skills that will enable them to live with dignity in their apartments while participating in the life of their residential community. Residents are also involved in a wide range of activities within their community.

SERVICES FOR OLDER ADULTS

Emanuel Village

Emanuel Village is a HUD subsidized, low income, senior housing facility nestled in the heart of the Quinsigamond Village area of Worcester, Massachusetts. Emanuel Village offers independent living in comfortable studio and one bedroom apartments for low income elders and mobility impaired adults.

Emanuel House Residence

Emanuel House Residence in Brockton, Massachusetts, is an assisted living community that offers safe and affordable private senior apartments in an attractive setting in Boston's South Shore.

Our wide range of personalized support services, including escort service for medical appointments and daily shopping, enables our residents to live as independently as possible.

NEW AMERICAN SERVICES

LSS Refugee and Immigrant Services

LSS Refugee Services continue the Lutheran tradition of caring for the strangers among us. We are part of a national network of voluntary organizations working in partnership with the U.S. Department of State and the United Nations High Commissioner for Refugees (UNHCR) to resettle refugees. Our professional staff and volunteers provide refugees with the basic services to enable them to achieve economic self-sufficiency in their new homeland.

Refugee Resettlement

Refugee resettlement generally refers to the first 90 days of service refugees receive after arrival.

LSS staff meets each individual or family at the airport and takes them to their new home. The resettlement program locates and furnishes an appropriate apartment, and pays rent for the first 30 days. Food is available on arrival, sometimes bought and prepared by volunteers. Staff provides a basic safety orientation immediately after the arrival. . . .

Throughout the resettlement period, staff and LSS volunteers assist all families to complete medical appointments as needed, orient them to shopping and the use of public education in the US and to other available community resources. In-depth orientation to American society and culture is also provided.

Employment Services

The Federal Government has very strict guidelines for the employment of refugees. LSS participates in a federal matching grant program that discourages reliance on public assistance and encourages early employment for refugees. There is the expectation that all new arrivals participating in this program will have employment as soon as possible.

In NH and MA the job developer assists each employable refugee by providing an orientation to employment in the US, identifying potential jobs, accompanying them to job interviews and arranging transportation for interviews or job training. In addition, in MA this service is available for both refugees and immigrants.

It is the goal of the job developer to place refugees and immigrants in jobs, when possible above minimum wage and with benefits.

Vocational Services

LSS programs in MA receive funding from the MA Office of Refugee and Immigrants to offer a variety of vocational training opportunities:

1. *Comprehensive Refugee Employment Services (CRES) assists refugees with the fast track employment options, and offers Employability, Computer Proficiency, [English for Speakers of Other Languages] and Adult Literacy training classes.*
2. *Targeted Assistance Grant (TAG) offers skill specific training for careers as a:*
 - *home health aide*
 - *carpenter*
 - *plumber*
 - *translator*
 - *truck driving*
3. *Achieving Self Sufficiency In Short Time (ASSIST) offers skill specific employment training to single-parent, disabled, and older refugees and offers trainings for careers:*
 - *Direct care professional*
 - *Driving*
 - *Food preparation and handling*
 - *Hospitality*
4. *Job Search/Job Readiness program (JS/JR), funded by the MA Department of Transitional Assistance offers fast-track employment services to non-English speaking persons (immigrant/refugee/others) receiving public assistance.*
5. *The Immigrant and Refugee Agriculture Initiative (IMMAG) offers vocational services that train for employment with nurseries, farms and landscapers. They also offer beginning farmers assistance for refugees that want to start their own farms.*

English for Speakers of Other Languages (ESOL)

All new arrivals are referred to the appropriate ESOL class in their resettlement area. Classes in both states are funded by Department of Education and are open to both Refugees and Immigrants.

The ESOL curriculum is a competency-based model and focuses on helping students reach early self-sufficiency by incorporating community and societal orientation with an emphasis on job-related ESOL instruction. Classes are also designed to assist students in learning cross-cultural perspectives in parenting and family life.

Immigration Legal Assistance

The Immigration Legal Assistance Program at Lutheran Social Services provides free and low-cost legal services to immigrants in New England. The program offers legal advice and representation to complete immigration applications and petitions.

Survivors of Human Trafficking

LSS provides confidential legal services and other types of support to survivors of human trafficking, including:

- *Pro bono legal advice and representation, including assistance to noncitizen survivors of human trafficking applying for a T Visa.*
- *Comprehensive case management services;*
- *Employment services;*
- *English as a Second Language classes and educational programs;*
- *Referrals to community-based organizations.*

New Lands Farm

New Lands Farm is a refugee farmer collective. Refugees are persons fleeing persecution in their homeland and seeking protection in a new country. Despite previous hardships, most refugees are resilient and highly motivated to begin a new life and succeed in their new homeland. Representing a diversity of culture and experiences, our farmers come from all over the world. Currently, the top countries of origin are Iraq, Burma and Bhutan, but over the past few years LSS has welcomed refugees from Burundi, Central African Republic, Chad, D.R. Congo, the former Soviet Union, Liberia, Somalia and Vietnam. Of these populations, a large number have experience working in an agricultural setting either as farmhands, farm owners, subsistence farmers or gardeners.

APPENDIX B**PRIMARY CORPORATIONS AFFILIATED WITH
LUTHERAN SOCIAL SERVICES OF NEW ENGLAND,
INC.**

Lutheran Community Services, Inc.

Emanuel Development Corporation, also known as Emanuel Village

Lutheran Housing Corporation—Brockton, also known as Emanuel House Residence

Good News Garage—LSS

Luther Ridge at Middletown, including Lutheran Assisted Living at Middletown, Lutheran Housing Corporation at Middletown, and Lutheran Service Association

Lutheran Community Services—Creative Living, also known as Lutheran Creative Living

Lutheran Home of Southbury

Fair Havens

Lutheran Community Care

Lutheran Social Services of New England Foundation