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The Commonwealth of Massachusetts

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INDEPENDENT STATE AUDITOR'S REPORT ON CERTAIN ACTIVITIES OF THE MONTACHUSETT OPPORTUNITY COUNCIL, INC. NOVEMBER 1, 2007 TO SEPTEMBER 30, 2009

> OFFICIAL AUDIT REPORT NOVEMBER 9, 2010

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#### INTRODUCTION

The Montachusett Opportunity Council, Inc. (MOC) was established in 1966 under the federal Economic Opportunity Act of 1964, as amended, as a private, non-profit corporation for the primary purpose of promoting the well-being of low-income people in the cities and towns of North Central Massachusetts. Currently, MOC provides services to approximately 24,000 citizens annually in 30 cities and towns in North Central Massachusetts. During the period covered by our audit, MOC employed 282 staff members plus an additional 46 substitute teachers, and maintained its headquarters at 133 Prichard Street in Fitchburg.

The scope of our audit was to examine various activities of MOC relative to its administration of four state-funded programs during the period November 1, 2007 to September 30, 2009. The four programs reviewed were: the Head Start State Supplemental Program, the Child Care Preschool Basic and Supportive Program, the Women, Infant, and Children (WIC) Program, and the WIC on Wheels Program. The objectives of our audit were to 1) determine whether MOC had implemented effective internal controls relative to its administration of these state-funded programs, and 2) assess MOC's business practices and its compliance with applicable laws, rules, and regulations as well as the various fiscal and programmatic requirements of its state contracts.

Our audit testing identified a potential theft of at least \$29,894 in agency funds.

#### AUDIT RESULTS

#### POTENTIAL THEFT OF AT LEAST \$29,894 IN AGENCY FUNDS

We found that MOC had not established adequate internal controls over the revenues it received from families who participated in its child care programs. As a result, during calendar years 2008 and 2009, at least \$29,894 in funds collected in these programs was not deposited in MOC's bank account and had potentially been taken by one or more of MOC's employees who worked in these programs. We brought this matter to the attention of MOC's Executive Director, who took immediate actions to address this matter, including suspending two employees whom she believed may have taken these funds, referring this matter to local law enforcement officials, and implementing more effective internal controls over the receipt of revenues in these programs.

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# INTRODUCTION

## Background

The Montachusett Opportunity Council, Inc. (MOC) was established in 1966 under the federal Economic Opportunity Act of 1964, as amended, as a private, non-profit corporation for the primary purpose of promoting the well-being of low-income people in the cities and towns of North Central Massachusetts. Currently, MOC provides services to approximately 24,000 citizens annually in 30 cities and towns in North Central Massachusetts. During the period covered by our audit, MOC employed 282 staff members plus an additional 46 substitute teachers, and maintained its headquarters at 133 Prichard Street in Fitchburg.

MOC's mission is to empower low-income individuals and families to achieve self-sufficiency and improve the quality of life by creating opportunities, providing advocacy, and coordinating efforts to alleviate poverty. MOC works to fulfill this purpose by providing direct services, collaborating with other public and private entities, and by applying comprehensive strategies to address the complex issues of poverty.

During our audit period, MOC operated 30 programs, the majority of which received state funding. MOC's programs offer a variety of services in the areas of childcare, housing and community services, and nutrition. A description of each of the services offered by MOC during our audit period appears in the Appendix to this report.

During fiscal years 2007 and 2008, MOC received funding from a variety of sources, as indicated in the following table:

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### Summary of Revenue\*

Revenue Source	Fiscal Year 2008	Fiscal Year 2007
Contributions	\$ 985,582	\$ 1,083,757
Grants	1,299,058	1,310,670
Department. of Public Health (DPH)	2,120,991	1,776,749
Department of Social Services (DSS)	143,030	133,781
Department of Early Education and Care (EEC) – Contract	3,841,159	2,666,002
Department of Early Education and Care (EEC) – Voucher	684,460	604,535
Department of Elementary and Secondary Education (DESE)	396,212	1,423,515
Executive Office of Elder Affairs (ELD)	225,104	279,962
Executive Office of Housing Development (OCD)	506,812	520,642
POS Sub Contract	335,724	606,121
Other State Agency POS	18,409	20,679
State Agency Non-POS	-	135,562
Mass. Local Government	266,852	162,990
Non-Mass. Local Government	-	63,444
Direct Federal Grants/Contracts	5,157,737	5,009,159
Private Client Fees	174,387	162,667
Private Client 3rd Party	19,016	13,745
Other Revenue	23,397	18,999
Released Net Assets	894,838	670,320
Totals	<u>\$17,092,768</u>	<u>\$16,663,299</u>

#### Audit Scope, Objectives, and Methodology

The scope of our audit was to examine various activities of MOC relative to its administration of four of its state-funded programs during the period November 1, 2007 to September 30, 2009. The four programs reviewed were: the Head Start State Supplemental Program, the Child Care

<sup>\*</sup> The figures in the table above were extracted from the Uniform Financial Statements and Independent Auditor's reports filed by MOC with the Commonwealth during the fiscal years indicated. The figures in this table are based on the Commonwealth's fiscal year, which runs from July 1<sup>st</sup> through June 30<sup>th</sup> even though MOC's fiscal year runs from November 1<sup>st</sup> to October 31<sup>st</sup>.

Preschool Basic and Supportive Program, the Women, Infant, and Children (WIC) Program, and the WIC on Wheels Program.<sup>1</sup>

We conducted this performance audit in accordance with generally accepted government auditing standards issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence that provides a reasonable basis for our findings and conclusions based on our audit objectives.

Our audit procedures consisted of the following:

- A determination of whether MOC had implemented effective internal controls relative to its administration of these four state-funded programs, including:
  - Processes for planning, organizing, directing, and controlling program operations;
  - Policies and procedures to ensure that resource use is consistent with laws and regulations; and
  - Policies and procedures to ensure that resources are safeguarded and efficiently used.
- An assessment of MOC's business practices and its compliance with applicable laws, rules, and regulations, as well as the various fiscal and programmatic requirements of its state contracts.

In order to achieve our objectives, we first assessed the internal controls established and implemented by MOC over its operations, including the four programs subject to our review. The purpose of this assessment was to obtain an understanding of management's attitude, the control environment, and the flow of transactions through MOC's accounting system. We used this assessment in planning and performing our audit tests. We then held discussions with MOC officials and reviewed organization charts and internal policies and procedures, as well as all applicable laws, rules, and regulations. We also examined MOC's financial statements, cost reports, invoices, and other pertinent financial records to determine whether the expenses it incurred and the income earned during the period covered by our audit in the programs in question were reasonable, allowable, properly authorized and recorded, and in compliance with applicable laws, rules, and regulations.

<sup>&</sup>lt;sup>1</sup> These are the program names as they appear in the Uniform Financial Statements and Independent Auditor's Reports filed by MOC with the Commonwealth.

Our audit was limited to a review of certain activities of MOC's administration of the four statefunded programs mentioned above. We did not conduct any testing of transactions or activities other than those related to the programs in question. Consequently, our audit was not made for the purposes of expressing an opinion on MOC's financial statements. We also did not assess the quality and appropriateness of program services provided by MOC in its programs. Rather, our report was intended to report findings and conclusions on the extent of MOC's compliance with applicable laws, rules, regulations, and contractual agreements, and to identify any operational and administrative processes, methods, and internal controls that could be made more efficient and effective in the areas reviewed.

### AUDIT RESULTS

#### POTENTIAL THEFT OF AT LEAST \$29,894 IN AGENCY FUNDS

During our audit period, Montachusett Opportunity Council, Inc. (MOC) had not established adequate internal controls over the revenues it received from families who participated in its child care programs. As a result, during calendar years 2008 and 2009, at least \$29,894 in funds collected in these programs was not deposited in MOC's bank account and had potentially been taken by one or more of MOC's employees who worked in these programs. We brought this matter to the attention of MOC's Executive Director, who took immediate actions to address this matter, including suspending two employees whom she believed may have taken these funds, referring this matter to local law enforcement officials, and implementing more effective internal controls over the receipt of revenues in these programs.

During the Commonwealth's fiscal years 2008 and 2009, MOC received \$3,997,182 and \$3,938,855, respectively, from the Massachusetts Department of Early Education and Care (EEC) and the Department of Elementary and Secondary Education (DESE) to provide a variety of child care services for children ranging in ages from birth to school-age children up to thirteen years old. For our audit, we reviewed \$1,295,290 in fiscal year 2008 and \$1,371,505 in fiscal year 2009 of these funds that MOC received in the two child care services contracts we audited. MOC primarily administered its child care services at the following five program sites:

- 1. MOC, 133 Prichard Street, Fitchburg
- 2. Mount Wachusett Community College, 444 Green Street, Gardner
- 3. Family Education Center, 100 Lancaster Street, Leominster
- 4. Coleman Street, 68 Coleman Street, Gardner
- 5. Gardner Athol Area Mental Health Association, 208 Coleman Street Extension, Gardner

Families who participate in MOC's childcare programs are assessed a fee by MOC for these childcare services. Each family's fee is established at the time it registers for the program and is typically based on a sliding fee scale depending on the family's income and the level of service it will receive. Families are required to pay their fees each week to staff that are working at the MOC program site where their children receive services. When a parent pays the fee, a MOC

staff member at the program site documents the receipt of this fee using a triplicate prenumbered receipt. One copy of each receipt is maintained in the receipt book, one copy is given to the parent, and a third copy along with the parent's payment goes into an envelope on which the MOC program staff member lists various information about the payment, including the parent's name, child's name, the classroom the child is attending, the amount paid, and the date and form of payment (e.g., cash or check). These envelopes are sealed and placed into a lockbox at each program site. There are two keys to each lockbox. Both keys are maintained by the onsite coordinator of the program except for the Pritchard Street program where the second key is kept by MOC's Support Service Coordinator who works out of MOC's Prichard Street central office location. Once each week, typically on Tuesday, all program sites except MOC's Prichard Street and Lancaster Street locations complete a standard tuition pick-up form that lists each parent's name, type, and amount of payment and identifies the associated receipt number that was issued to the parent at the time payment was made. In the case of MOC's Prichard and Lancaster Street programs, a tuition pick-up form is completed by MOC's Support Services Coordinator or her administrative assistant. The sealed envelopes, along with the tuition pick-up forms, are then picked up from each site by either MOC's Director of Childcare & Head Start or the Director of Administrative Services for the agency's child care and Head Start programs. The Support Services Coordinator's administrative assistant is responsible for entering the fee collection information on the tuition pick-up forms into MOC's computer tracking system. A deposit ticket is then generated from the information entered into the computer tracking system showing the parent's name, receipt number, and total cash and/or checks received. The administrative assistant then prepares a bank deposit slip and brings this slip along with the funds, the deposit ticket, and the tuition pick-up forms to the Support Services Coordinator for The bank deposit slip and the funds are then brought to MOC's central her review. administration finance department for deposit into the bank.

Generally Accepted Accounting Principles (GAAP) require entities such as MOC to establish adequate internal controls over all aspects of its operation, including the collection of revenues. Such controls serve to ensure that agency goals and objectives are met; resources are used in compliance with laws, regulations, and policies; assets are safeguarded against waste, loss and misuse; and financial data is maintained, reported, and fairly disclosed in reports. During our audit, we assessed the internal controls MOC had established over the parent fees it receives in its child care programs and, based on our review, identified several control weaknesses. First, there was an inadequate segregation of duties of some of the staff involved in this activity. Specifically, the Support Service Coordinator's administrative assistant received program revenues, including a significant amount in cash, and was also responsible for recording the information relative to these revenues into MOC's automated tracking system, which generated the deposit ticket. The administrative assistant was also responsible for preparing the bank deposit slip. Although the Support Service Coordinator appeared to reconcile the revenue information inputted by her administrative assistant into the system to the deposit ticket generated by the system, this control was limited in its effectiveness and no other MOC staff member performed any other types of reconciliation, such as comparing receipts to monies inputted into the tracking system to bank deposits to ensure that all revenues that were collected were accounted for and appropriately deposited into MOC's account. Further, the Support Service Coordinator had the ability to handle revenue collections, recording, and processing activities, as well as edit the deposit ticket amounts prior to their being sent to MOC's finance department. It also appeared that the Support Service Coordinator had knowledge of the administrative assistant's password, which would allow the Support Services Coordinator the ability to conduct data entry functions that were normally conducted by her administrative assistant. Finally, although fee assessment and collection information is maintained in MOC's computer tracking system, MOC's accounting department did not maintain an accounts receivable amount for the fees that were assessed in these programs, which would have been useful in facilitating reconciliations between revenue collection and deposit records.

Given these internal control deficiencies, during our audit, we initially attempted to review the documentation relative to all the revenues assessed and collected by MOC in its child care programs during fiscal years 2008 and 2009. However, we noted that many of the receipt books for calendar year 2008 for MOC's Prichard Street program location had been discarded. Consequently, we decided to conduct our testing on all calendar year 2009 records relative to these programs revenues, which, according to MOC's financial records, totaled \$253,160 in assessments (\$73,508 of this amount was collected and deposited by MOC as cash). We compared and reconciled the amounts for program revenues recorded on each program site's tuition pick-up forms, receipt books, and deposit tickets. Based on our review, we found that at least \$19,649 in fees that were assessed by MOC in these programs during calendar year 2009

and collected as cash were not deposited into MOC's account. We found many instances where cash receipts that were issued according to the program's receipt books were either not listed on the tuition pick-up forms or the receipt and amount of cash collected was listed on the tuition pick-up forms but was removed from the total amount to be deposited by someone who recorded a "Tuition Credit" in the computer tracking system. Thus, the receipt of the cash was not listed on the computer-generated deposit ticket and was not deposited in the bank.

During our audit, we brought this matter to the attention of MOC's Executive Director and asked her to conduct her own investigation into this matter. Subsequently, the Executive Director informed us that, based on her investigation, there had been a potential theft of these funds and suspended two individuals whom she believed may have been involved in this matter. The Executive Director also stated that she referred this matter to local law enforcement officials and had taken other immediate measures to improve the internal controls over the collection of these revenues, including: no longer accepting cash in these programs and developing other policies and procedures to better ensure that all revenues collected in these programs were properly recorded and deposited. Finally, the Executive Director told us that although she acknowledged that her agency's records for calendar year 2008 in this area were incomplete, she asked representatives from her private accounting firm, who were on site at the same time we were conducting our audit work, to make an effort to look at the 2008 activity in this area. The Executive Director subsequently reported to us that her private accounting firm believes it found an additional \$10,245 in monies that may have been taken during calendar year 2008 and provided a document in which the private accounting firm states, "the lack of availability of receipt books indicate that it is highly likely that other cash receipts are missing."

### Recommendation

As noted above, when we brought this matter to the attention of MOC's Executive Director, she took immediate actions to address this issue, including improving the internal controls over the collection of revenues in these programs. We believe the actions taken by MOC relative to this matter were necessary and responsive to our concerns. Also, MOC should consider reviewing its revenue receipt and deposit records in its childcare programs for years prior to those reviewed during our audit, to determine if there are any additional unaccounted-for revenues during these prior periods.

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## Auditee's Response

In response to this audit result, MOC's Executive Director provided the following comments:

MOC acknowledges that the internal control environment over the revenue it received from families in the form of parent fees could have been improved. We believed that the controls we had in place such as decentralized collection of payments, providing receipts to clients, recording of payments on tuition forms, direct involvement of division management in the weekly payment pickup, and segregation of duties between the Support Service Coordinator and the Administrative Assistant in terms of record data entry and reconciliation were adequate to minimize the risk of an irregularity. During our investigation, as described below, we realized the extent to which the computer tracking system had been manipulated to hide missing payments.

The processing of client payments into the computer tracking system is a two step process. First, payments are individually recorded into the client record; second, the individual payments are then assigned to a bank deposit. The missing cash payments were actually entered into the computer tracking system as appropriate payments to the individual client accounts on the date the payments were processed in the main Child Care Head Start office. However, a significant number of missing cash payments were assigned (backdated) into a earlier deposit, thus, not appearing on the computergenerated deposit ticket for that day. Our investigation has thus far revealed that the missing cash payments were frequently backdated to deposits up to six months earlier. This method of backdating the cash payment to earlier deposits was also used in 2008.

Further investigation into the computer tracking system led us to discover the "tuition credit" method was not used until December 15, 2009. Missing cash payments that were originally backdated were voided and reentered as tuition credits thus adding more confusion to the audit trail. This method of using tuition credits did not occur prior to December 15 of 2009 and did not occur in 2008.

*MOC is in the process of continuing to investigate earlier years to determine the full extent of the loss and to provide the law enforcement officials with evidence to pursue whoever committed this crime.* 

### Auditor's Reply

Based on the actions the agency's Executive Director took when we brought this matter to her attention during our audit and MOC's response, the agency has taken measures to address our concerns relative to this matter.

# APPENDIX

## Services Provided by MOC

# Child Care & Head Start Services Division

The Division of Child Care and Head Start prepares children and families for appropriate growth, development and school readiness through the provision of comprehensive, family centered services with respect and dignity while fostering individual and family growth.

- 1. Head Start Program is a center-based preschool program, which provides activities to assist children in mental, social, emotional, and physical development. Classrooms are located in the Montachusett area. Parents are offered a sense of belonging along with a variety of training opportunities and self-enrichment programs to promote the development of leadership skills. Head Start services are available to children aged three to five from income eligible families.
- 2. The Child Care Services program component allows parents to seek or continue employment without compromising the health, safety, and development of their children. MOC Child Care offers four programs:
  - a. Preschool Centers Classrooms are set up as learning centers to promote maximum benefits for the children.
  - b. School Age Program Service for children who need before and after school care on days when school is not in session. Provides activities that challenge children's skills and abilities while promoting self-confidence, growth, and development.
  - c. Infant/Toddler Program Center-based child care for children between 12 months and 33 months.
  - d. Family Child Care Safe, nurturing, home based environments for children between six weeks and 12 years old.
- **3.** Coordinated Family and Community Engagement Program MOC is the lead agency for several community grants funded by the Department of Early Education and Care that support families and child care providers. Located in Gardner, Athol and Quabbin School districts the program is designed to build a collaborative system of early childhood programs and comprehensive services for families and child care providers within the communities they serve. Quabbin also provides the Parent Child Home vesting program, an early literacy program serving ages 15 months to four years old.

# Housing and Community Services Division

- **4.** Weatherization Program Provides weatherization services including insulation, weather stripping, and pipe/duct wrap. In addition, the program provides energy audits and client education on energy saving measures.
- **5. Heating Repair and Replacement Program -** Provides for heating system repairs and replacements for homeowners. Also provides referral services to other community agencies focused on fuel efficiency and safety. This program deals with heating emergencies 7 days a week.

- 6. Appliance Monitoring and Replacement Program Provides income eligible Unitil and NGRID customers with appliance monitoring and replacement of inefficient refrigerators, energy saving light bulbs, shower heads, and faucet aerators to reduce electric bills.
- 7. Moderate-Risk De-leading Program This Program enables property owners and their agents to become trained to perform moderate-risk de-leading work themselves.
- 8. Elder Home Repair Services Provides repair and modifications to the homes of elders who are at risk from health or safety hazards.
- **9.** Supportive Housing, Emergency and Homelessness Services MOC offers case management services to homeless families in emergency shelter and to disabled homeless families in permanent supportive housing. Ongoing case management is provided with the goal of families becoming self-sufficient and stable. Services to prevent homelessness are also provided. MOC also convenes the North Central Housing coalition. The purpose of the coalition is to improve communication and education about housing issues, increase affordable housing opportunities, assist in preventing homelessness, and advise policy makers. The above is carried out through the following programs:
  - Continuum of Care/McKinney Supportive Housing Program
  - Transitions at Devens-case management, subcontract with Our Father's House
  - Case Management/Homelessness Services
  - Emergency Food
- **10. Financial Education** Programming in the areas of financial literacy and asset development, assists individuals understand the importance and benefits of developing good financial management and consumer practices to achieve short and long-term personal financial goals. MOC provides financial literacy classes in the region that include budgeting, credit repair, and decision-making. Individual financial counseling is also available.
- **11. Individual Development Accounts (IDA) CommonCents -** CommonCents Individual Development Accounts (IDA) are matched savings accounts that are available to income eligible participants to purchase a home, start or expand a small business or to attend a post secondary educational institution.
- **12. Volunteer Income Tax Assistance (VITA)** Provides free income tax return preparation for taxpayers who have limited or moderate incomes, senior citizens and persons with disabilities.
- **13. H.O.M.E. Counseling -** Provides financial counseling, foreclosure prevention and reverse mortgage counseling to homeowners 60 years of age and older.
- 14. Career Opportunities This is an adult skills program through MOC Learning Center located at 430 Main Street in Fitchburg. This program provides specific skills training in health careers and office careers including comprehensive computer instruction. The course also provides remedial instruction for improving writing, grammar and math skills used in the workplace, as well as pre-employment workshops and job search assistance. A strong support component is present to assist students in successfully completing the program, and in attaining and retaining employment.
- **15. ABE/ESOL** Comprehensive Adult Basic Education (ABE) includes remedial instruction to adults in preparation for obtaining their General Equivalency Diploma or advancing to vocational training. English for Speakers of Other Languages (ESOL) provides instruction and skills in reading, writing and oral communication to prepare adults to further educational and career goals.

- **16. Certified Nursing Assistant Training Program -** This training provides participants with specific knowledge and skills to care for individuals in a variety of health care settings and helps them pass the CNA MA state certification exam and earn a home health aide certificate.
- **17. Summer Youth Works -** This program is a combined effort of the Workforce Investment Board and Local school departments to provide youth ages 14-19 with MCAS remediation and a summer job.

## Nutrition and Wellness Division

- **18. Community Health Education -** Provides a broad array of risk reduction programs offered to target populations in the community. Subjects include HIV/AIDS, teen pregnancy prevention, peer pressure/refusal skills, healthy relationships, and prevention of sexually transmitted infections, parent/child communication, and health promotion. Specific outreach programs geared toward groups of women, men and teens.
- **19. The North Central Comprehensive Care Network (NCCCN)** This is a collaborative program for clients who have a primary health care provider (PCP) at the Community Health Center and receive medical screening for breast, cervical, prostrate, colorectal and cardiovascular disorders (CVD). MOC provides patient navigation and medical case management services for clients who are at risk or have abnormal findings. This program provides risk reduction education for those clients who are at risk for CVD, as well as other lifestyle intervention programs.
- **20. Family Planning Clinic & Health Care Services -** Provides low cost or free gyn exams, pregnancy testing, diagnosis and treatment for sexually transmitted infections, screenings for cervical or testicular cancer, provision of birth control methods, and individualized health education and counseling. Services are available to women, men and teens, regardless of income.
- **21. Teen Pregnancy Prevention -** Offers a 10-week science-based curriculum program in the local schools and community agencies for youth 11 18. This program focuses on decision-making, values clarification, puberty, sexuality, relationships, birth control, and sexually transmitted diseases. Youth peer educators facilitate groups, provide outreach in the schools and work in the Teen Clinic. Parent workshops and roundtable discussions on sexual education are offered.
- **22. Men's Clinic and Services -** Weekly clinics specifically for men are offered every Monday evening. Clinic services include STD screening, diagnostic and treatment services, HIV testing, counseling and referral, sports physicals and individual counseling on behavioral risk reduction.
- **23. WIC (Women, Infant & Children's Program) -** Provides nutrition counseling, education, referrals, and checks for nutritious foods, redeemable at local supermarkets. Services are available for income eligible pregnant and postpartum women, and for children under the age of five. Fathers, mothers, guardians or foster parents may apply for WIC for their children.
- **24. WIC on Wheels -** The WIC on Wheels, MOC's mobile clinic, serves the following communities: Acton, Ayer, Groton, Littleton, Pepperell, Shirley, and Townsend. It provides the same services as WIC but reaches out to each community van.
- **25.** CARE Services Project Provides free services for persons infected with HIV/AIDS, including case management, mental health counseling, support groups, transportation, emergency financial assistance, food resource program, emergency food vouchers, and housing services.

- **26.** Fun 'n Fit Obesity Prevention Program A worksite wellness program focusing on reducing risk factors associated with chronic diseases by supporting sustainable healthy lifestyle behavior changes.
- **27. Childhood Lead Poisoning Prevention and Home Visiting Program** Provides free information, education, seminars and training on lead poisoning prevention. Provides case management to families with children affected by lead poisoning. Works with other agencies to reduce the effects of lead paint and advocate for policy and environmental changes to create a healthy home environment.
- **28.** Congregate Meals Program Provides nutritionally balanced lunches served in strategically located centers. These meal sites offer a place for elders to socialize over lunch and obtain information on other available services. The hot noontime meals, including desserts, meet one-third of the daily-recommended dietary allowances. Frozen meals may also be ordered to take home for evening or weekends.
- **29. Home Delivered Meals Program -** Provides meals to frail elderly who are unable to attend the congregate meal site and require assistance with meal preparation. Hot noontime meals are delivered to an individual's home. Frozen meals are also available for weekday delivery to be used for evenings and weekends.
- **30. Healthy Living Nutrition Services -** Provides group and individual nutrition counseling for elders, and group presentations or individual consultations by a Registered Dietician. This service is available at no cost to meal recipients who are identified through nutritional screening as being "at-risk". For outside groups or individuals interested in nutritional well being, group presentations or individual consultations are available for a fee.