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Adult Protective Services and Public Guardian

Issue Statement

Do the Adult Protective Services and Public Guardian operate effectively to protect the aged and dependent adults who are unable to manage their own financial affairs and/or physical care or may be vulnerable to abuse?

Summary

San Mateo County is required by legislation enacted in 1999 to provide services to prevent elder and dependent adult abuse and serve the needs of those who require assistance in the conduct of their daily lives. The Grand Jury received a complaint concerning Adult Protective Services and the Public Guardian program. The findings, conclusions and recommendations of this report derive from the resulting investigation.

The Adult Protective Services (APS) and the Public Guardian program are part of Aging and Adult Services (AAS), a division of the Health Department. APS investigates cases of abuse and neglect and may refer cases to the Public Guardian for conservatorship if needed. The Public Guardian program is available to the frail elderly and physically and mentally disabled residents who are unable to provide for their personal needs of health, food, clothing, or shelter, and/or are unable to manage financial resources or resist fraud or undue influence. The deputy public guardians coordinate the care, including the arrangement of placement and treatment, and manage the income and assets of the conservatees, under the jurisdiction of the Superior Court.

The Grand Jury interviewed members of the administration and staff of Aging and Adult Services and Superior Court staff, and studied pertinent laws, rules, and regulations. The Jury examined the process from a first call regarding a person perceived to be in trouble through the management of assets and personal care.

From its findings, the Grand Jury concludes that although APS and the Public Guardian program are adequately protecting the aged and dependent adults in our community, there are areas where improvement is needed. Proposed conservatees were not always personally notified of conservatorship hearings or of their rights. There can be gaps in

service after a temporary conservatorship has been placed on an estate. Administration policy was not always carried out by staff, and there was little oversight of caregivers. Finally, the management of conservatees' investment assets bears examination as to claimed returns and fee structure.

The Grand Jury recommends a number of changes to assure that the vulnerable elderly or incapacitated persons subject to conservatorship be well advised and promptly cared for in their own homes when possible, and that their person and property be managed following current Public Guardian policies. New policies should be put in place for oversight of deputy public guardians and caregivers. The Jury also recommends a review of provisions for contracting with caregiver organizations, financial managers, property managers and brokers, and auditing of the conservatees' financial accounts to confirm claimed rates of return and evaluate the fee payment process.



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Background

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There are three types of Conservatorship: Probate; Dementia Conservatorship (a category of Probate Conservatorship); and Lanterman Petris Short (LPS) for persons unable to provide for themselves because of a mental disorder. For each of these, the Public Guardian, acting under the authority and direction of the Superior Court, may be appointed for the person, for the estate, or for both. The deputy public guardians coordinate the care, including the arrangement of placement and treatment, and manage the income and assets of the conservatees under the jurisdiction of the Superior Court.

The Public Guardian and the Adult Protective Services programs are managed by a Health Services Manager who reports directly to the AAS Director. As of May 2, 2005, the APS and Public Guardian total caseload, is 769 conservatees (probate caseload is 425 and LPS is 342 with two guardianship cases). Three units within the Public Guardian program carry the conservatorship caseload, and a fiscal office specialist and a

transportation officer work with all of the units. An organizational chart is found in Appendix A.

The Public Guardian program also has an Estate Management unit and a Trust Accounting unit. The Estate Management unit protects the real and personal property assets of the conservatees. Typical duties include investing, selling, storing, transporting personal property, and preparing tax returns. Assets may include houses, unimproved lots, stocks, bonds, jewelry and other personal property.

A Financial Services Manager who reports to the AAS Deputy Director oversees the Trust Accounting unit and manages the Budget and Accounting unit. This unit receives and posts income, processes authorized payments and court accountings, inputs and updates inventory items, and maintains records of all transactions. Also supporting the Public Guardian program is an Information Technology Analyst who is responsible for database and systems management

The Grand Jury interviewed members of the administration and staff of Aging and Adult Services and Superior Court staff, and studied pertinent laws, rules, and regulations. The Jury examined the process from a first call regarding a person perceived to be in trouble through the management of assets and personal care.

Findings

The Grand Jury found that the Public Guardian is not identified on the organizational chart of the Health Department's Aging and Adult Services, nor was it listed in the County and City Telephone Directory. There is no sign on a wall or door indicating one has reached the Public Guardian office. However, AAS has centralized the system for citizens to report suspected elder abuse, request assistance and information, and to provide emergency response to elderly, disabled or dependent adults, or those concerned about them. "TIES", maintained by AAS as a 24-hour phone line, is staffed by social workers and public health nurses. AAS is working to increase public awareness of this number.

Each county in the state is different in its structure for providing the services of the Public Guardian. Those differences hinder counties from networking or collaborating effectively across county lines.

Managing Care. The primary function of Adult Protective Services is to ensure the safety of the person at risk and, if necessary, develop an appropriate care plan. Some services can be administered whether or not a conservatorship is warranted. When a call for assistance is received, an investigator from Adult Protective Services goes out within forty-eight hours to assess the needs of the person about whom the call is made. If the person is unable to manage his or her own affairs or attend to personal care, an investigator from the Superior Court staff evaluates the situation to confirm the need for a conservatorship. A petition for either Temporary or full Conservatorship may be filed with the court by the Public Guardian, with the approval of the court investigator. The

Public Guardian then seeks a court order granting authority to manage the care, housing, medical, transportation and/or financial needs of the proposed conservatee.

Although the public guardian searches for relatives, neighbors, or friends to assist, Grand Jury interviews revealed that this effort could be improved.

The administrative policies of Aging and Adult Services expressed in the interviews generally were found to be excellent. However, the Grand Jury found that the policies need to be written, and oversight is needed to assure that those policies are implemented consistently by workers dealing with their vulnerable clients.

Current practice is to mail notice of the filing of the Petitions for Temporary Conservatorship and/or full Conservatorship. However, without personal service that the petition has been filed, there may be no proof that the conservatee was advised of his or her rights. These include the rights to attend the hearing, obtain an attorney, challenge the proposed conservator, and name a desired conservator.

Conservatees, under local rules, must be visited at least once every three months. The Grand Jury learned that in instances where the conservatee is living independently, a minimum of once a month visits could better protect the health and safety of the individual.

Currently, a few days to a month can elapse between taking over a proposed conservatee's assets and providing assistance. This practice creates a dangerous situation where bills have not been paid and supplies and services, including medications, are not available for up to 11-12 days, according to interviewees, or a month, according to the complainant.

AAS and the Public Guardian staff acknowledge that there is no oversight of in-home service caregivers. Caregivers may or may not be in the home for their assigned hours. The caregivers providing in-home service for AAS are not certified and training appears to be minimal. Agencies contracting with the AAS and Public Guardian for caregiver service claim they oversee the caregivers to assure that services are always provided, but there is little or no documentation of individual service provided supplied to the agency.

The Grand Jury learned that a shortage of transportation staff resulted in deputy public guardian staff spending too much time on transporting clients to appointments for services such as personal or medical care or court appearances.

Managing Finances.

In San Mateo County, the County Counsel charges 1.5% of a conservatee's estate value annually to represent the Public Guardian. The Public Guardian charges 1.5% of a conservatee's estate value annually to manage the conservatee's person and/or estate. The Financial Manager charges 1% annually of the total value of a conservatee's investment account. This is paid monthly. There are additional fees paid to the Estate Manager for storage of personal property, and to real estate brokers for sales of property, to cleaning personnel, and for other miscellaneous expenses. The Grand Jury found that in some circumstances the total fees chargeable to a conservatee with the ability to pay might exceed what a private conservator would be paid for similar services.

The Grand Jury examined the current financial management company's accounts to analyze the claimed average annualized return of 7.9%-11% and the payment process of the 1% annual management fee. The Grand Jury was unable to interview the Financial Manager as he was unavailable and found that the information offered by AAS did not provide a complete and satisfactory explanation of how the average annualized return was calculated. Other interviewees stated that the Financial Manager's annual fee was 1% of the total value of the conservatee's investment portfolio, including cash and money market accounts, and that it was calculated by, and paid to, himself, monthly. It was unclear to the Grand Jury whether the Financial manager received more than 1% of the individual investment portfolio value by benefiting from commissions paid to the broker with whom he was affiliated and whether it was appropriate for the Financial manager to receive the full contract fee percentage on cash and money market accounts.

The Grand Jury could find no written policies regarding requests for proposals or awarding contracts for in-home caregiver organizations, financial managers, real estate brokers, and attorneys.

Conclusions

The Grand Jury concluded that the APS and Public Guardian programs are adequately protecting the aged and dependent adults in our community but there are areas where improvement is needed.

The Public Guardian's office is not readily identifiable by the public, as the name and address are not found in the city and county directory, or at the office location.

More contact with other California county Public Guardian offices could serve to facilitate communication, collaboration, and networking that would offer a higher level of service to conservatees, particularly since some clients may be placed out of the county.

There is a need for increased effectiveness in locating families of conservatees and insuring that relatives are adequately informed and have the opportunity to assist.

Care should be given to assure that the proposed conservatees understand, to the best of their ability, their rights when facing a conservatorship in ample time to exercise them.

Conservatees living independently would benefit from a visit from the Public Guardian's office once a month at a minimum.

Written policy manuals for deputy public guardians are needed to provide directions for maintaining conservatees in their homes, dealing with family members, friends, and neighbors, detecting abuse, and providing prompt, needed assistance. There should be oversight of deputy public guardians to assure consistent and proper administration of agency policy.

There is no oversight by the Public Guardian staff of in-home service caregivers. Those caregivers who work for the AAS in-home services need not be credentialed and training is minimal. Oversight is essential in all cases.

There should be no time lapse between freezing of bank accounts and the provision of assistance. The proposed conservatee should be left with some cash and whatever personal property can be safely left, in order that he or she feels comfortable, secure, and oriented to familiar surroundings. Caregiver help should be supplied immediately if needed. If medical prescriptions are ordered and sent to the Public Guardian, that office should deliver the medicine to the proposed conservatee promptly, rather than a week later as claimed by the complainant.

The investment accounts of conservatees, held by the Financial Manager, need to be audited annually to determine the appropriateness of investments, to define the period covered by “average annualized rate of return,” and monitor the methodology used for fee and rate of return calculations. Consideration should be given as to whether cash and money market holdings should be included in the total estate value for purposes of the full fee calculation. The auditor should determine whether compensation exceeds the contract fee of 1% per year of the investment portfolio value, e.g. includes commissions or partial commissions or some other benefit as a result of the affiliation between the Financial Manager and the broker.

Recommendations

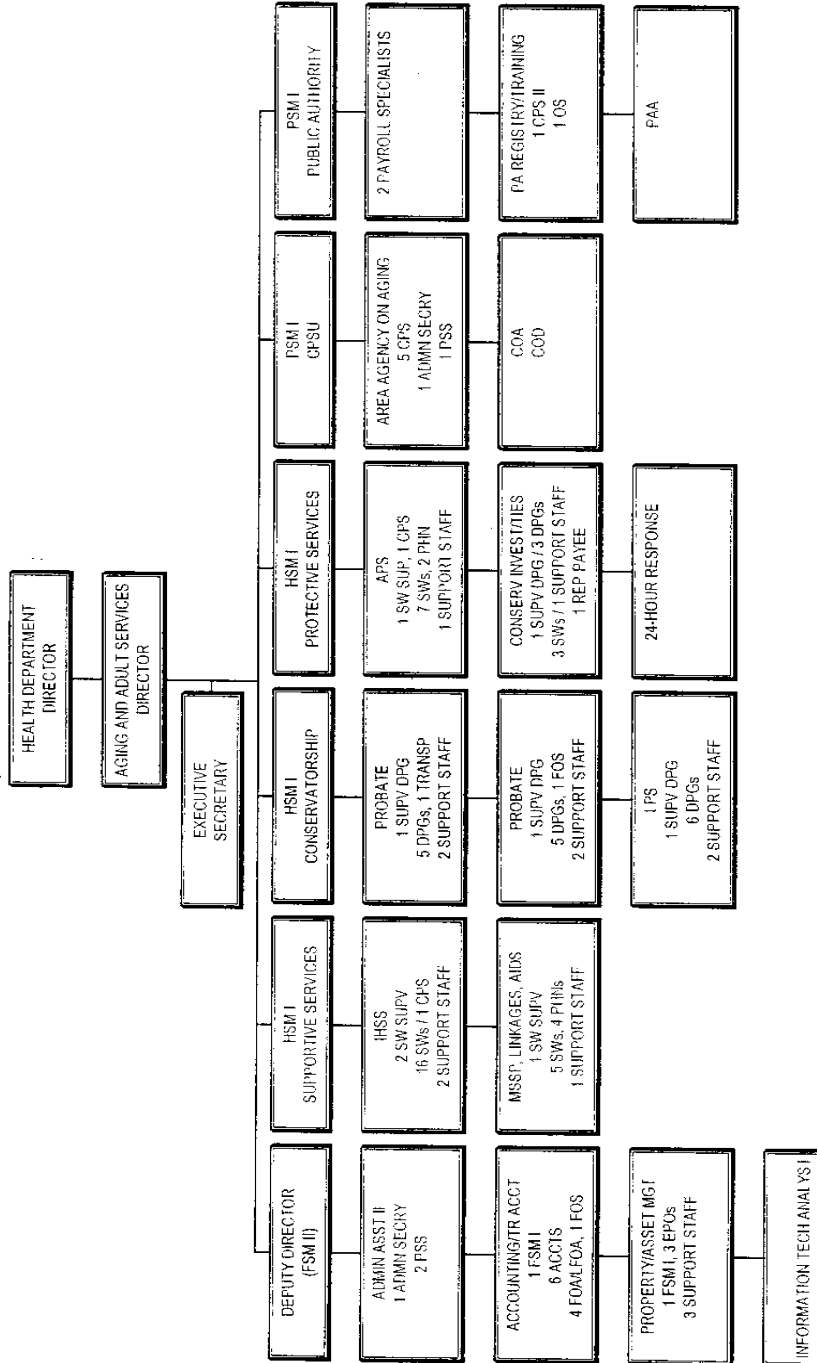
1. The Grand Jury recommends that the Board of Supervisors direct the Director of Health Services to:
 - 1.1 identify the office of Public Guardian in its building and in directories to improve citizen awareness and access.
 - 1.2 give proposed conservatees an explanation in person and in writing of their rights at the time of filing a petition to curtail or remove their personal and/or property rights.
 - 1.3 issue specific written policies instructing the deputy Public Guardians about AAS priorities, including maintaining the conservatees in their own home if possible, locating and consulting with all family, friends, and neighbors (against whom there is no evidence of abusive actions), and providing all needed assistance without delay.
 - 1.4 install a plan for regular agency oversight and consultation with the deputy Public Guardians.
 - 1.5 eliminate any lag time between the time that all bank accounts are frozen and the time when provision is made for the proposed conservatee’s bills to be paid and supplies and services made available.
 - 1.6 document the oversight and upgrade the training of in-home service caregivers.
 - 1.7 establish written policies for requests for proposals or contracts for in-home caregiver organizations, financial managers, real estate brokers, et al.
 - 1.8 visit conservatees living independently once a month at a minimum.

- 1.9 perform an annual audit of investment accounts of conservatees held by the Financial Manager to assure they are appropriately invested to meet the account goals and to clearly show the annual rate of return and commissions on transactions.
 - 1.10 establish additional procedures that set rigorous “best practices” standards for calculation of fees and consider requiring that any billing method used not include cash or money market accounts as part of the total investment account, and determine whether there is additional compensation, such as commissions or partial commissions paid the Financial Manager as a result of his affiliation with the broker.
2. The Grand Jury recommends that the Board of Supervisors fund Adult and Aging Services for additional transportation services for conservatees’ appointments for personal or medical care, or court appearances.

Appendix A

San Mateo County Health Department Aging and Health Services

SAN MATEO COUNTY HEALTH DEPARTMENT
AGING AND ADULT SERVICES





COUNTY OF SAN MATEO
Inter-Departmental Correspondence

County Manager's Office

DATE: September 12, 2005
BOARD MEETING DATE: September 20, 2005
SPECIAL NOTICE: None
VOTE REQUIRED: None

TO: Honorable Board of Supervisors
FROM: John L. Maltbie, County Manager
SUBJECT: 2004-05 Grand Jury Response

Recommendation

Accept this report containing the County's responses to the following 2004-05 Grand Jury reports on Youth Gangs in San Mateo County, San Mateo County Indigent Health Care, and Adult Protective Services and Public Guardian.

Vision Alignment:

Commitment: Responsive, effective and collaborative government.

Goal 20: Government decisions are based on careful consideration of future impact, rather than temporary relief or immediate gain.

This activity contributes to the goal by ensuring that all Grand Jury findings and recommendations are thoroughly reviewed by the appropriate County departments and that, when appropriate, process improvements are made to improve the quality and efficiency of services provided to the public and other agencies.

Discussion

The County is mandated to respond to the Grand Jury within 90 days from the date that reports are filed with the County Clerk and Elected Officials are mandated to respond within 60 days. It is also the County's policy to provide periodic updates to the Board and the Grand Jury on the progress of past Grand Jury recommendations requiring ongoing or further action. To that end, attached is the County's responses to the Grand Jury's reports on Youth Gangs in San Mateo County issued on June 23, 2005, and San Mateo County Indigent Health Care and Adult Protective Services and Public Guardian issued June 29, 2005.

Adult Protective Services and Public Guardian

Findings:

Since many of the findings are already standard practice within Aging and Adult Services (AAS), staff concurs with the majority of them with the exception of the one related to caregiver oversight and one related to transportation, which are explained within the recommendation responses.

Recommendations:

1.0 The Board of Supervisors should direct the Director of Health Services to:

1.1 Identify the office of Public Guardian in its building and in directories to improve citizen awareness and access.

Response: Agree. Staff agrees that separate listings for the Public Guardian could improve public access to the program. A sign will be posted to identify the office of the Public Guardian and other services provided by AAS. The Public Guardian program is currently listed in the government section of the SBC telephone directory under AAS. Staff will request that the Public Guardian be listed separately in the next publication of San Mateo County's "County and City Telephone Directory."

1.2. Give proposed conservatees an explanation in person and in writing of their rights at the time of filing a petition to curtail or remove their personal and/or property rights.

Response: Agree. Personal noticing of proposed conservatees and relatives is required by law. In addition to continuing the practice of verbally informing the proposed conservatee of his/her rights, a new one-page informational notice is being developed. This notice will inform proposed conservatees of their right to oppose the Conservatorship, to have an attorney appointed to represent them if they cannot afford to hire an attorney, to have a court trial, or to have a jury trial. This information is always reiterated by the Court Investigator, who personally visits each proposed conservatee.

1.3. Issue specific written policies instructing the Deputy Public Guardians about Aging and Adult Services priorities, including maintaining the conservatees in their own home if possible, locating and consulting with all family, friends, and neighbors (against whom there is no evidence of abusive actions), and providing all needed assistance without delay.

Response: Agree. AAS and the Public Guardian are publicly and explicitly committed to keeping people in their own homes as long as they are safe and can afford to remain there. AAS works according to its goal as stated in

the Division's informational brochure and on the AAS website: "Our goal is to ensure the delivery of client-centered, compassionate, and fiscally responsible services that foster self-determination, meet professional standards and ethics, and reflect the County's statement of beliefs. We will accomplish this by offering services that provide a combination of protection, support, prevention and advocacy." This principle of fostering self-determination and supporting the wishes of people to remain in their homes as long as possible is emphasized at staff meetings, unit meetings, case conferences, and individual supervision meetings. AAS will continue to emphasize this guiding principle, both in writing and verbally.

The Probate Code and the Welfare and Institutions Code, which are the bodies of law that govern the actions of the Public Guardian, contain specific noticing requirements for all legal actions. The law requires the written noticing of all relatives within the second degree of relationship when legal actions are taken. There are specific confidentiality and privacy restrictions that prevent information being shared with non-relatives. In addition, the Health Insurance Portability and Accountability Act (HIPAA) requirements prevent the disclosure of private health information. The Public Guardian strives to gather all relevant information to support comprehensive and compassionate decision-making. The office maintains names, addresses, and phone numbers of all relatives and significant others, and contact is made whenever it is necessary. The Public Guardian, as addressed in its budget statements, considers, acknowledges and values family members as partners in the Conservatorship program.

AAS, including Adult Protective Services (APS) and the Public Guardian program, will continue to provide assistance required by its vulnerable clients without delay. An AAS leadership sub-committee will be convened to recommend improvements to current policies and procedures. Written procedures will be distributed to staff by March 2006.

1.4. Install a plan for regular agency oversight and consultation with the Deputy Public Guardians.

Response: Agree. There are existing systems for providing regular and close agency oversight of and consultation with the Deputy Public Guardians. In AAS there are four units of Deputy Public Guardians; one unit comprised of three conservatorship investigators and three units comprised of 16 Deputy Public Guardians who are assigned the continuing conservatorships. Each unit is supervised by a knowledgeable and experienced supervisor who meets with the workers both individually and as a unit. Supervisors are available for immediate consultation as needed. In addition, the supervisors meet individually on a weekly basis with the program manager to review problems and resolve issues. There are frequent interdisciplinary case conferences and weekly meetings with supervisors, managers and County Counsel to review and consult regarding cases. There is a case review system to provide quality assurance and improvement oversight, and there are checks and balances within the

accounting functions that provide fiscal support to the Public Guardian. In addition, all Conservatorship cases are reviewed by the Superior Court, and Probate cases receive review by the Probate Court Investigator.

There is an annual audit performed by the County's Auditor/Controller's office on all cases receiving public benefits, and periodically the County Controller audits all of the work of the Public Guardian. AAS will continue to provide oversight and consultation for the Deputy Public Guardians following the above protocols.

1.5. Eliminate any lag time between the time that all bank accounts are frozen and the time when provision is made for the proposed conservatee's bills to be paid and supplies and services made available.

Response: Agree. The APS program provides intervention activities directed toward safeguarding the well being of elders and dependent adults suffering from or at risk of abuse or neglect, including self-neglect. APS and the Public Guardian are committed to providing timely response to individuals' needs. Not all bank accounts are frozen; however, there are times when it is necessary for APS to freeze an individual's assets using Probate Code 2901, which allows for the freezing of bank accounts to prevent losses belonging to proposed conservatees and to prevent abusive dissipation. Usually one account remains available for the use of the proposed conservatee. Provision is made for payment of bills for essential services and supplies such as food and medications. APS has emergency funding available to ensure the individual's safety during the conservatorship process. Funding is available for such services as attendant care, food, clothing, temporary shelter, medications, and other emergency expenses. The APS Supervisor and Deputy Public Guardian supervisor for investigations monitor these policies and procedures. These policies will continue to be followed.

1.6. Document the oversight and upgrade the training of in-home service caregivers.

Response: Disagree. There are two scenarios in which clients of AAS, including conservatees and individuals open to APS, receive in-home services by caregivers. The first is through home health agencies on contract with AAS. In this scenario, caregivers are supervised by the agencies that employ them. These agencies invoice AAS for services provided, and any questions of discrepancies are resolved prior to payment. For services provided through contracts, AAS staff is responsible for deciding the level of services needed by the client. The staff monitors the provision of those services and makes changes as necessary. It is the responsibility of the contracted agencies to provide training to their caregiver staff. In the future, AAS will require agencies to provide detailed information regarding training provided to their staff as a part of the Request For Proposals (RFP) and contractor selection process.

The second scenario is through the In-Home Supportive Services (IHSS) program, where Medi-Cal eligible clients or conservatees are assisted in finding a caregiver through the IHSS Public Authority registry of caregivers or identifying a family member or friend to provide the in-home services. In this scenario, it is the client (or Public Guardian, if the client is a conservatee) who handles the hiring/firing of caregivers and is responsible for the oversight of that caregiver. The Deputy Public Guardians, in coordination with the IHSS case manager, determine the appropriate in-home care services to be provided to the conservatees and the number of hours of care necessary.

The Public Authority currently provides six trainings per year for in-home caregivers supplied through the IHSS program. In addition, the Public Authority provides caregivers with information on additional training available through other agencies and schools, including referrals to Peninsula Works to identify other training opportunities. Each caregiver has available up to \$150 per year to be used for training purposes as part of the IHSS provider union contract. The State of California does not require certification of IHSS caregivers, although the provider pool in San Mateo County does include some certified nursing assistants.

1.7. Establish written policies for requests for proposals or contracts for in-home caregiver organizations, financial managers, real estate brokers, et al.

Response: Agree. AAS follows the County of San Mateo's written guidelines for RFPs and the Administrative Memorandum B-1 issued by the County Manager for issuing contracts. RFPs were issued on January 21, 2004 for in-home caregiver agencies, and on December 22, 2003 for contract caregiver services for the IHSS program. An RFP was issued on March 4, 2005 for real estate services for the Public Guardian, and five contracts were awarded. RFPs were issued on March 1, 2004 for financial management services and on August 9, 2004 for tax preparation services. AAS uses County Counsel for attorney services. These policies will continue to be followed.

1.8. Visit conservatees living independently once a month at a minimum.

Response: Agree. The Public Guardian has a written policy and procedure, last updated and revised in June of 2004, which requires monthly visits to all conservatees who are living independently. Adherence to this procedure is monitored by the Deputy Public Guardian Supervisors who review every visit report for individual conservatees. Additionally, the supervisors monitor monthly reports of all visits made and due to be made. This procedure will continue to be followed.

- 1.9. Perform an annual audit of investment accounts of conservatees held by the Financial Manager to assure they are appropriately invested to meet the account goals and to clearly show the annual rate of return and commissions on transactions.**

Response: Agree. Annual audits are regularly performed at several different levels. A court accounting of each individual conservatee with investments is prepared and presented yearly for review and approval by the Court. The Court Investigator reviews each accounting and submits a report of findings to the Court. The Probate Judge reviews each report and accounting.

Additionally, the Estate Manager meets with the Financial Advisor to review and re-balance each conservatee's portfolio no less than once yearly. Securities America audits the Financial Advisor's files and procedures on an annual basis. In addition, the Financial Advisor is subject to announced and unannounced audits by the Securities and Exchange Commission (SEC) and the Department of Corporations. Staff will meet with a representative of the County's Auditor/ Controller to discuss other possible audit options to ensure that conservatees' investments are appropriate and meet account goals. The annual rate of return is clearly identified on every quarterly and year-end report received from the Financial Advisor for each conservatee. There are no commissions paid by the Public Guardian or by the conservatees on any transactions, as the Financial Advisor contracted by the Public Guardian is an independent broker.

- 1.10. Establish additional procedures that set rigorous "best practices" standards for calculation of fees and consider requiring that any billing method used not include cash or money market accounts as part of the total investment account, and determine whether there is additional compensation, such as commissions or partial commissions paid the Financial Manager as a result of his affiliation with the broker.**

Response: Agree. The process for calculation of fees currently in use by the Financial Advisor is the "best practice" standard as regulated by the SEC. Fees are calculated by Securities America (not the Financial Advisor) and are based on the monthly average, not daily or year-end averages which would result in a higher fee. This process includes charging a fee on funds in the money market account. However, that account is maintained at the lowest level possible. The money market account is purposefully set up for several reasons: funds are set aside in the money market account when it is known at the time of investment that a lump sum payment will be due shortly (such as a capital gains tax on the sale of a residence) and for the monthly management fee. An estimate for one year of fees is set aside every annual review to avoid periodic sales during the year and any associated fees. The Financial Advisor contracted by the Public Guardian is an independent broker; as such he receives no commissions as a result of

any affiliation with a brokerage company.

Staff will request that the Auditor/Controller's office review the Division's practices and procedures related to fee calculation, billing methods, and related areas and will request that office to make recommendations regarding best practices and standards to be followed.

2. **The Grand Jury recommends that the Board of Supervisors fund Aging and Adult Services for additional transportation services for conservatees' appointments for personal or medical care, or court appearances.**

Response: Disagree. AAS has one Transportation Officer who provides transportation for Public Guardian clients to Court, medical appointments, and for shopping. When Deputy Public Guardians transport conservatees to medical appointments, this time spent allows for conferring with medical treatment care providers and for individual visiting time with the conservatees. This is valuable and necessary time spent developing relationships and assuring that necessary services are appropriately provided.

AAS will review current staff resources and allocations of funding for this function. Staff will convene a committee comprised of the Paratransit Council, Mental Health Services, and other community providers to address the overall transportation gaps and client needs, and will report back to the Board in January during the FY 2005-06 mid-year budget review.