

---

---

**Thomas P. DiNapoli  
COMPTROLLER**



**Audit Objectives** ..... 2

**Audit Results - Summary** ..... 2

**Background** ..... 3

**Audit Findings and  
Recommendations** ..... 4

Timeliness of Investigations ..... 4

OCFS Monitoring ..... 6

*Recommendations* ..... 7

**Audit Scope and Methodology** ..... 7

**Authority** ..... 8

**Reporting Requirements** ..... 8

**Contributors to the Report** ..... 8

**Exhibit A** ..... 9

**Appendix A - Auditee Response** .. 11

**Appendix B - State Comptroller's  
Comments** ..... 13

---

---

**OFFICE OF THE  
NEW YORK STATE COMPTROLLER**

**DIVISION OF STATE  
GOVERNMENT ACCOUNTABILITY**

---

**OFFICE OF CHILDREN AND  
FAMILY SERVICES**

**OVERSIGHT OF CHILD  
PROTECTIVE SERVICES  
OUTSIDE NEW YORK CITY**

**Report 2007-S-129**

---

---

## AUDIT OBJECTIVES

Our objectives were to determine whether local government social services districts (districts) outside New York City are investigating allegations of child abuse and maltreatment within the timeframes required by law, and whether the Office of Children and Family Services (OCFS) is adequately monitoring the districts' compliance with these timeframes.

## AUDIT RESULTS - SUMMARY

In New York State, reports of possible child abuse and maltreatment are investigated by districts under the supervision of OCFS. Under the New York State Social Services Law (Law), district staff has seven days from the receipt of a report to determine whether intervention is required to protect the child against immediate or impending danger of harm, and 60 days to complete and resolve their investigation. If the seven-day and 60-day requirements are not met, needed interventions may be delayed and harm may come to the subject children. In 2007, districts outside of New York City investigated 154,837 such reports and found credible evidence to substantiate the allegations in 50,093 of these cases.

To determine whether districts outside New York City are meeting the seven-day and 60-day requirements, we reviewed the computerized records established to track such compliance. According to these records, in both 2006 and 2007, it appears that more than half of their investigations did not meet the seven-day requirement, and more than half did not meet the 60-day requirement. The noncompliance was extensive in almost all the districts, and records show it to have increased since 1997, when we last audited this program.

To determine whether needed interventions are not being done timely because of delays in district investigations, we selected a sample of 100 allegations, where the child's life and/or health were alleged to be in imminent danger, and which the seven-day requirement was not met, and reviewed the detailed case records. We found that, in all 100 cases, the district staff did in fact intervene within the appropriate timeframes to protect the welfare of the children. However, since district staff either did not complete or document all the steps they are required to take within the seven-day timeframe, they did not fully comply with the law.

OCFS officials acknowledged that, because of the complexities of the cases and staff turnover, actions taken by caseworkers often do not get documented on time. The officials indicated that they are taking steps to upgrade their automated information system and are also exploring mobile technology initiatives that would enable caseworkers to enter progress notes and other information on the system when they are away from the office. We recommend OCFS actively pursue the mobile technology initiative and work with the districts to identify alternate means and best practices for attaining full compliance with the seven-day and 60-day requirements.

In addition, while it appears from our sampled cases that the districts are intervening in a timely and appropriate manner to protect the children who are at risk in the most serious types of child abuse cases, the actions taken by caseworkers are not summarized in a format that would enable OCFS to readily assess that necessary interventions have occurred as opposed to not documented.

Our report contains three recommendations addressing OCFS' monitoring of district compliance. OCFS officials agree with two of our recommendations.

This report, dated June 4, 2009, is available on our website at: <http://www.osc.state.ny.us>. Add or update your mailing list address by contacting us at: (518) 474-3271 or Office of the State Comptroller  
Division of State Government Accountability  
110 State Street, 11<sup>th</sup> Floor  
Albany, NY 12236

## BACKGROUND

According to the New York State Social Services Law (Law), an abused child is a person under 18 years of age whose parent or person otherwise legally responsible (caregiver) inflicts, or allows to be inflicted, a physical injury, or a substantial risk of such injury, by other than accidental means. An abused child is also one whose caregiver commits, or allows to be committed, a sex offense against the child, including incest; permits or encourages the child to engage in prostitution; or allows the child to engage in conduct that constitutes sexual performance.

The Law further states that a maltreated child is a person under 18 years of age whose caregiver fails to exercise a minimum degree of care, resulting in physical, mental or emotional impairment, or imminent danger of such impairment. Caregivers fail to provide minimum care when they do not supply the child with adequate food, clothing, shelter, compulsory education or medical care, even though they are able to do so. Caregivers also fail to provide minimum care when they cause or allow harm, or a substantial risk of harm, to the child as a result of excessive corporal punishment, drug or alcohol abuse that causes the parent to lose self-control, or failure to properly supervise the child. Maltreatment also includes the abandonment of a child.

In New York State, all suspected incidences of child abuse and maltreatment are to be reported to the Office of Children and Family Services (OCFS). The reports, which are

made through the Statewide Central Registry of Child Abuse and Maltreatment, are forwarded to the appropriate local government social services district (district) for investigation. There are 58 such districts in the State (57 counties and New York City), and each district has a Child Protective Services (CPS) Unit to perform the investigations. New York City CPS cases are handled by the NYC Administration for Children Services.

According to the Law, the district CPS staff must begin investigating each report of alleged child abuse and maltreatment within 24 hours of receiving the report. Specifically, district CPS staff must contact someone who is in a position to know something about the alleged abuse such as the affected child, a family member or the source of the report. As part of the contact, the CPS staff must obtain further information about the alleged abuse and must begin evaluating the extent of risk to the children involved.

The CPS staff is also required to complete a preliminary safety assessment within seven days of the receipt of a reported abuse. The purpose of the preliminary assessment is to determine whether intervention is required to prevent serious harm to the child named in the report or any other children living in the same household. In addition, CPS staff must complete a full investigation within 60 days of the receipt of a reported abuse. To complete an investigation of a reported incidence of child abuse or maltreatment, CPS staff must determine whether there appears to be credible evidence of abuse or maltreatment or whether the report is unfounded. If there appears to be credible evidence of abuse or maltreatment, steps are to be taken to protect the welfare of the children involved. Such steps may include foster care placement, placement with other family members or the

provision of support services to the caregiver of the children.

According to the Law, OCFS is to oversee CPS investigative activities. For example, OCFS provides support for CPS activities through its central office in Rensselaer and through its six regional offices located throughout New York State. OCFS also maintains CONNECTIONS, the automated database system that the districts and OCFS use to manage and document CPS investigative activities including the investigator's preliminary safety assessment, progress notes, findings and determinations, and required supervisory approvals. In fact, OCFS does not consider a preliminary safety assessment or an investigation into an alleged abuse to be closed until all required actions associated with the assessment and the investigation have been properly documented on CONNECTIONS. OCFS officials indicated that their oversight of the CPS staff activities is focused on compliance with the seven-day and 60-day requirements and that the judgment and experience of CPS staff is relied on to commence appropriate actions during the first 24 hours after the receipt of an incident report.

For the 2007 calendar year, districts outside of New York City received a total of 154,837 reports of alleged abuse for investigation. For 50,093 of these reports, districts determined that there appeared to be credible evidence in support of the allegations. This resulted in CPS staff classifying the reported incidents as "indicated." The districts determined that 103,804 of the reported allegations were unfounded. For the remaining 940 investigations, districts had yet to make a determination as of August 27, 2008, the end of our field work.

## AUDIT FINDINGS AND RECOMMENDATIONS

---

### *Timeliness of Investigations*

---

To determine whether the district staff was meeting the seven-day and 60-day requirements, we reviewed information from the CONNECTIONS database to determine the dates the preliminary safety assessments were completed and the dates the investigations were closed. We then compared these dates to the dates the CPS reports were received. We performed this comparison for all 57 districts outside New York City for the 2006 and 2007 calendar years.

Based on the criteria that investigative activities are not considered completed until they are properly documented on CONNECTIONS, we found that the districts often did not meet the seven-day and 60-day requirements. In both 2006 and 2007, more than half the preliminary safety assessments (57 and 53 percent, respectively) were not completed within seven days, and more than half the investigations (56 percent in each year) were not completed within 60 days (see Exhibit A). The extent of noncompliance was extensive in almost all of the 57 districts.

Moreover, the rate of noncompliance has increased since 1997, the year covered by our prior audit of OCFS's Child Protective Services Program (Report 98-S-36). In that year, in all 58 local districts (including New York City), it was reported that 40 percent of the preliminary safety assessments were not completed within seven days and 37 percent of the investigations were not completed within 60 days.

We selected for further analysis a sample of 100 reports of alleged abuse where the preliminary safety assessment had not been

recorded as completed within the required seven days. We selected these specific cases because, according to the information on CONNECTIONS, CPS staff had identified one or more of the risk factors that place a child's life or health in imminent danger. When such factors are identified, the child should be promptly removed to foster care or an alternative placement. The objective of our analysis was to determine whether necessary interventions were taken in a timely manner since the seven-day requirement had not been met for completing the preliminary safety assessment for these cases.

We found that, for all 100 instances, the caseworkers had either removed the children from their unsafe environments or taken other appropriate action to protect their welfare without unnecessary delay.

These findings are similar to the findings of our June 2006 audit report (Report 2005-MR-11), issued by the Division of Local Government and School Accountability and pertaining to CPS programs in Broome, Cortland and Sullivan counties. The audit found that 41 percent of the preliminary safety assessments reviewed were not completed within seven days and 34 percent of the CPS investigations reviewed were not completed within 60 days.

As with our current audit, the June 2006 audit of Broome, Cortland and Sullivan counties also concluded that the safety of children was not compromised by the delays in meeting time frame requirements. The audit identified that one of the primary reasons investigators were unable to meet the overall seven-day and the 60-day requirements was a shortage of district caseworkers. The shortage resulted in excessive workloads for individual caseworkers and made it particularly difficult to document completion of routine investigations on time as caseworkers had to

redeploy to priority reports. The audit also found that while caseworkers may have completed required activities associated with preliminary safety assessments and investigations, all necessary actions may not have been documented on CONNECTIONS as required.

We conclude that the shortage of case workers, excessive workloads and need to complete documentation requirements also underlie the non compliance we observed during our current audit. In addition, during our audit we surveyed districts outside of New York City and 26 of 45 responding districts cited high caseloads as a significant contributing factor to not meeting the seven-day and 60-day requirements.

Regarding caseloads, it should be noted that the number of CPS reports received by OCFS increased by 12.5 percent between 2005 and 2007. As a result, in the spring of 2006, the State Legislature directed OCFS to contract with a national child welfare expert to review and recommend manageable workloads for child protective services, foster care and preventive services. OCFS contracted with two experts (Walter R. McDonald and Associates, Inc., and the American Humane Association), and together they issued the New York State Child Welfare Workload Study (Study) in November 2006.

The Study estimated a caseload of 20 investigations per month per investigator in New York City and 27 investigations per month per investigator in ten upstate local districts. The Study stated that in all but one of the districts reviewed there was concern that CPS staff could not meet all of the casework requirements because of their heavy workloads. The Study recommended that the districts achieve a goal of no more than 12 active CPS investigations per caseworker per month.



While, OCFS does not have the authority to require districts to meet caseload standards, OCFS does advocate achieving the caseload goal recommended by the Study. In a letter sent to all district commissioners on January 25, 2008, OCFS stated that, consistent with the recommendations of the Study, its goal is to reduce caseloads so each worker is responsible for no more than 12 open CPS reports per month.

We encourage OCFS and the districts to work toward achieving this goal, especially because in 2007, the State Legislature provided \$9.7 million to the districts to help them hire additional CPS caseworkers and reduce delays in CPS investigations. The funds could also be used to implement innovative strategies for reducing delays in preliminary safety assessments and CPS investigations. A total of 392 additional caseworkers were hired with this funding. At the time of our audit, it was too early to determine whether delays in CPS investigations were being reduced as a result of these additional caseworkers hired.

In response to our findings, OCFS officials acknowledged that, because of the complexities of CPS cases and staff turnover issues, actions taken by caseworkers often do not get documented within the required timeframes. Officials further indicated that they are taking steps to upgrade the CONNECTIONS system and are exploring mobile technology initiatives that would enable caseworkers to enter progress notes and other relevant information on CONNECTIONS when they are away from the office.

We recommend OCFS expedite its efforts to explore the application of mobile technology to improve compliance with the seven-day and 60-day requirements. We also recommend OCFS work with the local districts to identify alternatives and best

practices to improve compliance with the requirements.

---

### *OCFS Monitoring*

---

OCFS is required by Law to monitor and supervise district CPS investigations. OCFS is also required to provide technical assistance in support of CPS investigations and related activities.

OCFS has established a formal process for monitoring district CPS investigations. We reviewed this process to determine whether OCFS was adequately monitoring district compliance with the seven-day and 60-day requirements. We found that OCFS was actively tracking and reviewing district compliance with these requirements.

For example, OCFS produces quarterly reports showing each district's performance in meeting the seven-day and 60-day requirements (the reports show the percentage of investigations that met the requirements in each district), and monthly reports showing the number of caseworkers in each district with more than 15 open CPS investigations. OCFS sends the reports to the regional offices and the districts, and the regional offices meet quarterly with the districts to review their performance and encourage improvement in areas where improvement is needed.

OCFS staff also performs Ongoing CPS Monitoring and Assessment (OMA) reviews. In these reviews, OCFS selects a sample of between 10 and 30 CPS cases from a district, and reviews the case records to determine whether the district has complied with CPS requirements.

We reviewed a judgmental sample of six OMAs (one OMA from six different districts) and found that they addressed all significant CPS requirements. Investigation strengths

and weaknesses were identified, and the districts were required to develop corrective action plans to address the weaknesses.

We visited the Syracuse Regional Office to evaluate the adequacy of Regional Office actions to monitor the district implementation of corrective action plans. We found the Regional Office was actively monitoring district implementation. Documentation showed that the Regional Office periodically met with district staff to determine whether the plans were being implemented and reviewed selected CPS cases to confirm that improvements had been made.

This is a noteworthy improvement from the findings of our prior audit of OCFS's Child Protective Services Program (Report 98-S-36, issued in September 1999), which found that OCFS was not actively monitoring the timeliness or the thoroughness of CPS investigations.

During our review we also determined that OCFS oversight would be improved by modifying CONNECTIONS to distinguish those instances where necessary interventions were not completed timely for priority cases; from those instances where necessary interventions took place timely but the case still is not compliant with time requirements because other necessary steps were either not completed or were documented late.

### **Recommendations**

1. Expedite the efforts to explore the application of mobile technology to improve compliance with the seven-day and 60-day requirements.
2. Work with the districts to identify alternatives and best practices to improve compliance with the seven-day and 60-day requirements.

3. As part of the CONNECTIONS system upgrade, develop a capability for monitoring whether the local districts are intervening in a timely and appropriate manner to protect the children who are at risk in the most serious types of CPS cases.

### **AUDIT SCOPE AND METHODOLOGY**

We audited the OCFS' oversight of district compliance with selected child protective services requirements for the period January 1, 2005 through May 30, 2008. Our audit focused on the 57 districts outside New York City.

To accomplish our objectives, we reviewed the New York State Social Services Law and related New York Codes, Rules and Regulations, and CPS policies and procedures. We interviewed OCFS officials, reviewed relevant OCFS documents, and obtained and reviewed data and case record information from the CONNECTIONS database. We visited OCFS's Syracuse Regional Office, where we interviewed officials and reviewed audit-related records. We also developed and sent a questionnaire to the 57 districts outside New York City, and reviewed the New York State Child Welfare Workload Study that was prepared by Walter R. McDonald and Associates, Inc. and the American Humane Association.

We reviewed a sample of 100 preliminary safety assessments for high-risk CPS cases that were not completed within seven days of the reported allegation. Our sample consisted of 20 cases from each of five judgmentally selected districts (Monroe, Orange, Onondaga, Schenectady, and Westchester). We selected our sample from a total population of 405 preliminary safety assessments for high-risk CPS cases at the five districts, using a random number

generator to select each case. We also reviewed a sample of six OMAs (Ongoing CPS Monitoring and Assessment reviews), judgmentally selecting the sample from two large districts (Suffolk and Monroe), two medium-sized districts (Steuben and Oswego), and two small districts (Cayuga and St. Lawrence).

We conducted our 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.

In addition to being the State Auditor, the Comptroller performs certain other constitutionally and statutorily mandated duties as the chief fiscal officer of New York State. These include operating the State's accounting system; preparing the State's financial statements; and approving State contracts, refunds and other payments. In addition, the Comptroller appoints members to certain boards, commissions, and public authorities, some of whom have minority voting rights. These duties may be considered management functions for purposes of evaluating organizational independence under generally accepted government auditing standards. In our opinion, these functions do not affect our

ability to conduct independent audits of program performance.

### **AUTHORITY**

The audit was performed pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution, and Article II, Section 8 of the State Finance Law.

### **REPORTING REQUIREMENTS**

A draft copy of this report was provided to OCFS officials for their review and comment. Their comments were considered in preparing this final report and are included in their entirety as Appendix A. Comptroller's comments addressing OCFS officials' response are included as Appendix B.

Within 90 days of the final release of this report, the Commissioner of the OCFS shall report to the Governor, State Comptroller, and the leaders of the Legislature and fiscal committees, explaining the actions taken by OCFS to implement the recommendations contained herein, and where not implemented, the reasons therefor.

### **CONTRIBUTORS TO THE REPORT**

Major contributors to this report include William Challice, Frank Patone, Michael Solomon, Ed Durocher, Michael Cantwell, Thierry Demoly, Matt Luther, and Dana Newhouse.



**Investigations of Reported Incidences of Child Abuse and Maltreatment  
Percentage of Investigations not Completed Within the Required 60 Days and  
Percentage of Preliminary Safety Assessments Not Completed Within the Required 7 Days  
Calendar Years 2006 and 2007**

	<b>Investigations</b>		<b>Preliminary Safety Assessments</b>	
<b>Large Districts</b>				
ERIE	27.8%	28.0%	40.1%	40.2%
MONROE	50.2%	53.7%	90.0%	77.9%
NASSAU	46.8%	39.3%	58.2%	53.0%
ONONDAGA	36.3%	41.7%	84.1%	85.4%
SUFFOLK	72.3%	56.4%	80.8%	65.8%
WESTCHESTER	49.1%	36.4%	31.4%	24.0%
<b>Totals</b>	<b>47.1%</b>	<b>42.6%</b>	<b>64.1%</b>	<b>57.7%</b>
<b>Medium-sized Districts</b>				
ALBANY	68.1%	69.7%	74.9%	71.2%
BROOME	66.0%	72.3%	62.8%	63.3%
CHAUTAUQUA	39.3%	35.0%	64.7%	56.2%
CHEMUNG	82.9%	85.6%	74.5%	92.3%
DUTCHESS	65.6%	62.3%	65.7%	49.2%
NIAGARA	46.7%	43.7%	26.9%	22.0%
ONEIDA	79.5%	78.2%	42.7%	50.6%
ORANGE	57.9%	65.9%	27.4%	36.3%
OSWEGO	52.3%	61.5%	53.4%	56.9%
RENSSELAER	54.5%	55.5%	59.4%	59.4%
SARATOGA	26.7%	34.3%	79.6%	54.4%
SCHENECTADY	73.4%	85.6%	71.4%	83.4%
STEUBEN	78.7%	78.5%	51.8%	44.0%
ULSTER	53.7%	53.9%	70.5%	67.7%
CHAUTAUQUA	39.3%	35.0%	64.7%	56.2%
CHEMUNG	82.9%	85.6%	74.5%	92.3%
DUTCHESS	65.6%	62.3%	65.7%	49.2%
NIAGARA	46.7%	43.7%	26.9%	22.0%
ONEIDA	79.5%	78.2%	42.7%	50.6%
ORANGE	57.9%	65.9%	27.4%	36.3%
OSWEGO	52.3%	61.5%	53.4%	56.9%
RENSSELAER	54.5%	55.5%	59.4%	59.4%
<b>Totals</b>	<b>60.4%</b>	<b>63.0%</b>	<b>59.0%</b>	<b>57.6%</b>

<b>Small Districts</b>				
ALLEGANY	76.9%	83.6%	83.7%	82.9%
CATTARAUGUS	53.3%	47.5%	77.9%	68.2%
CAYUGA	61.6%	50.3%	86.0%	74.5%
CHENANGO	40.1%	46.6%	20.9%	11.5%
CLINTON	66.7%	67.9%	74.8%	82.1%
COLUMBIA	72.4%	72.7%	42.1%	28.0%
CORTLAND	59.2%	34.5%	73.0%	65.4%
DELAWARE	70.1%	39.9%	71.8%	29.5%
ESSEX	62.7%	67.4%	65.7%	70.1%
FRANKLIN	63.1%	79.0%	71.2%	73.1%
FULTON	47.4%	54.3%	36.2%	35.4%
GENESEE	81.0%	72.9%	40.8%	16.6%
GREENE	62.3%	45.7%	64.1%	34.1%
HAMILTON	75.0%	95.8%	79.3%	57.1%
HERKIMER	71.6%	75.1%	33.7%	34.6%
JEFFERSON	37.3%	28.1%	34.1%	28.6%
LEWIS	3.2%	0.4%	0.4%	0.5%
LIVINGSTON	81.1%	81.6%	65.2%	69.2%
MADISON	50.1%	56.5%	67.0%	81.8%
MONTGOMERY	34.6%	81.7%	66.0%	90.4%
ONTARIO	53.2%	41.9%	48.7%	38.0%
ORLEANS	57.6%	62.3%	13.6%	9.9%
OTSEGO	43.9%	36.4%	56.7%	43.2%
PUTNAM	52.4%	49.1%	71.7%	63.5%
ROCKLAND	43.7%	36.2%	77.1%	65.6%
SCHOHARIE	58.6%	57.1%	60.4%	58.1%
SCHUYLER	44.5%	55.8%	27.3%	12.7%
SENECA	52.6%	47.6%	52.0%	43.5%
ST. LAWRENCE	59.3%	59.5%	11.7%	14.2%
SULLIVAN	64.6%	80.6%	87.9%	91.1%
TIOGA	55.4%	19.3%	33.2%	18.1%
TOMPKINS	37.5%	38.5%	46.6%	48.6%
WARREN	29.7%	60.8%	59.5%	80.6%
WASHINGTON	84.8%	57.4%	83.5%	76.4%
WAYNE	30.4%	41.3%	40.4%	39.2%
WYOMING	68.8%	61.9%	39.2%	30.0%
YATES	80.4%	61.6%	82.2%	81.3%
<b>Totals</b>	<b>56.4%</b>	<b>55.4%</b>	<b>55.3%</b>	<b>49.9%</b>
<b>Overall Totals</b>	<b>56.4%</b>	<b>55.9%</b>	<b>57.1%</b>	<b>52.6%</b>

## APPENDIX A - AUDITEE RESPONSE



New York State  
Office of  
Children & Family  
Services

April 10, 2009

[www.ocfs.state.ny.us](http://www.ocfs.state.ny.us)

Mr. Frank Patone  
Audit Director  
Office of the State Comptroller  
Division of State Government Accountability  
110 State Street - 11<sup>th</sup> Floor  
Albany, NY 12236

David A. Paterson  
Governor

Gladys Carrión, Esq.  
Commissioner

Dear Mr. Patone:

The Office of Children and Family Services (OCFS) has received the draft audit report (2007-S-129) regarding New York State Office of Children and Family Services: Oversight of Child Protective Services (CPS) Outside of New York City dated February 27, 2009.

Capital View Office Park  
52 Washington Street  
Rensselaer, NY 12144

OCFS appreciates the opportunity to provide clarifications to the language in the report and to respond to the recommendations in the report. That document is enclosed with this letter. Please know that OCFS is committed to improving the delivery of CPS throughout New York State.

Sincerely,

Kevin W. Mahar  
Director  
Office of Audit and Quality Control

Enclosure

cc: T. Tipple  
L. Velez  
W. Travis



An Equal Opportunity Employer

**This is the Office of Children and Family Services (OCFS) response to the draft audit Report 2007-S-129, New York State Office of Children and Family Services: Oversight of Child Protective Services Outside of New York City. This report was issued by the Office of the State Comptroller (OSC) on February 27, 2009.**

**The OCFS response to the three recommendations presented appears below. Please note that OCFS language comments were previously provided to the OSC auditor-in-charge.**

**The OSC recommendations and OCFS are as follows:**

\*  
Comment  
1

#### Recommendations

1. Expedite the efforts to explore the application of mobile technology to improve compliance with the seven-day and sixty-day requirements.

Agency Response – OCFS strongly supports the deployment of mobile technologies throughout the state to improve compliance by providing tools that allow county caseworkers to conduct business in non traditional locations. This has been made possible by an appropriation of \$1 million during each of the last three fiscal years. Investigation activities such as progress notes, assessments, and demographic updates can now be entered into the CONNECTIONS system remotely by over 1100 workers in 46 counties, including New York City. OCFS continues to explore creative financing techniques to advance this important initiative.

2. Work with the districts to identify alternatives and best practices to improve compliance with the seven-day and sixty-day requirements.

Agency Response - OCFS uses management reports to improve compliance. To that end, OCFS provides several management reports that can be used to assist local district administrators in managing compliance with seven-day safety assessments and overdue determinations. The Open Caseload Inquiry report is available on a monthly basis in CONNECTIONS and lists, by worker, cases that are open and the status of the seven-day safety assessments and report determination. Additionally, overdue seven-day safety assessments and overdue report determinations can be accessed weekly through the Data Warehouse. On a quarterly basis, OCFS provides local districts with their performance data related to compliance in meeting the seven-day safety assessment and sixty-day determination requirement.

3. As part of the CONNECTIONS system upgrade, develop a capability for monitoring whether the local districts are intervening in a timely and appropriate manner to protect the children who are at risk in the most serious types of CPS cases.

Agency Response – OCFS contends that the capability to monitor whether the local district is intervening in a timely and appropriate manner to protect children who are alleged to be in immediate or impending danger already exists. OCFS's OMA process provides for a full CONNECTIONS case review to determine whether interventions are appropriately taking place. Local districts have the child protective assessment tool available to them to conduct their own internal assessments of the quality and timeliness of caseworker activities. Ongoing experience demonstrates that when a child(ren) is alleged to be in immediate or impending danger, caseworkers act quickly to protect that child(ren). This was found to be true in all 100 cases reviewed during the audit, when a child was assessed to be in immediate or impending danger (and subsequently placed into foster care or an alternative placement), yet the seven-day safety assessment was not documented in a timely manner.

\*  
Comment  
2

\* See State Comptroller's Comments, page 13

---

## APPENDIX B - STATE COMPTROLLER COMMENTS ON AUDITEE RESPONSE

---

1. OCFS officials note that they had previously given us comments regarding the language (e.g. terms, etc.) we used in our draft report. We have considered those comments and revised this final report as appropriate.
2. In response to Recommendation 3, OCFS officials assert that they already have the monitoring capability we suggest they develop for CONNECTIONS. They reiterate the review process performed by

caseworkers using the current CONNECTIONS system.

As explained on page 7 of our report, the suggested system upgrade pertains to CONNECTIONS being able to distinguish between cases where significant events, such as interventions, have not been documented, or have not been documented timely, versus cases where the significant events have actually not occurred.