



Child Protective Services

2013-MS-5



Thomas P. DiNapoli

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State of New York Office of the State Comptroller

Division of Local Government and School Accountability

October 2014

Dear County Officials:

A top priority of the Office of the State Comptroller is to help local government officials manage government resources efficiently and effectively and, by so doing, provide accountability for tax dollars spent to support government operations. The Comptroller oversees the fiscal affairs of local governments statewide, as well as compliance with relevant statutes and observance of good business practices. This fiscal oversight is accomplished, in part, through our audits, which identify opportunities for improving operations and county governance. Audits also can identify strategies to reduce costs and to strengthen controls intended to safeguard local government assets.

Following is a report of our audit titled Child Protective Services. This audit was conducted pursuant to Article V, Section 1 of the State Constitution and the State Comptroller's authority as set forth in Article 3 of the New York State General Municipal Law.

This audit's results and recommendations are resources for local government officials to use in effectively managing operations and in meeting the expectations of their constituents. If you have questions about this report, please feel free to contact the local regional office for your county, as listed at the end of this report.

Respectfully submitted,

*Office of the State Comptroller
Division of Local Government
and School Accountability*



State of New York Office of the State Comptroller

EXECUTIVE SUMMARY

In New York State, counties administer the State's child welfare service programs, including the Child Protective Services (CPS) Program. Each county has its own CPS unit and must adhere to the State's CPS Program Manual (Manual), which incorporates current laws and regulations as well as relevant guidelines and procedures. Each county CPS unit is required to investigate child abuse and neglect reports, to protect children from further abuse or neglect and to provide rehabilitative services to children, parents and other involved family members.

Federal reviews of the State's child welfare programs conducted in 2001 and 2008 found the State did not comply with federal child welfare requirements. These reviews found the State's recurrence rate of child abuse and neglect was high, indicating a weakness or ineffectiveness in the State's CPS Program. In fact, the State's recurrence rate has been much higher than the national standard for several years and is on the rise in many counties. As a result, each county CPS unit was required to develop and implement a Program Improvement Plan (PIP)¹ to help reduce the recurrence rates.

The Family Assessment Response (FAR) approach, an alternative method to the typical CPS investigation process, was enacted in 2007 and made permanent in 2011. The FAR approach was, in part, intended to better protect children and assist families with their child-rearing needs. FAR uses a non-investigatory decision-making and engagement approach to working with families. FAR focuses on assessing families' needs and providing support and does not require a child abuse or neglect determination.

Scope and Objective

The objective of our audit was to determine if actions taken by the county CPS units were sufficient to reduce child abuse and neglect recurrence rates for the period January 1, 2011 through December 31, 2012. We expanded our scope forward to examine a report issued to Rockland County in June 2013 on its implementation of the FAR approach. Our audit addressed the following related question:

- Have county CPS units established measurable recurrence rate reduction goals, implementation plans and progress tracking mechanisms, and are the recurrence rates declining as a result?

¹ A written strategy for improving safety outcomes

Audit Results

Each county CPS unit we audited (Dutchess, Livingston, Niagara, Oneida, Rockland, Saratoga, Ulster and Washington counties) had developed a PIP, which included an implementation plan and progress tracking mechanism. All but one county (Oneida) had also developed measurable recurrence rate reduction goals to lower their recurrence rates. However, these efforts did not always lower the child abuse and neglect recurrence rates. While Dutchess and Washington counties had lower recurrence rates, the other six counties we examined saw an increase in their child abuse and neglect recurrence rates after the PIP implementation period. Although many factors can influence a county's child abuse and neglect recurrence rate, our analysis indicates that a fairly strong statistical correlation exists between a county's recurrence rate and the average number of cases a caseworker manages – higher caseloads correlate to higher recurrence rates.

In addition, we found three counties (Niagara, Rockland and Saratoga) did not fully implement their PIPs, and one county (Dutchess) experienced significant delays in implementing its PIP. Further, we found that all of the counties we examined failed to use historical recurrence case data to evaluate actions and outcomes and identify trends that might be influential in formulating future actions. Improved actions could help reduce a county's child abuse and neglect recurrences.

Comments of Local Officials

The results of our audit and recommendations have been discussed with local officials and their comments, which appear in Appendix B, have been considered in preparing this report.

Introduction

Background

The New York State Office of Children and Family Services (OCFS) oversees the State's child welfare service programs that are administered by counties, including the Child Protective Services (CPS) Program. Each county has its own CPS unit and must adhere to the OCFS CPS Program Manual (Manual), which incorporates current laws and regulations as well as relevant guidelines and procedures. Each CPS unit is required to investigate child abuse and neglect reports, to protect children from further abuse or neglect and to provide rehabilitative services to children, parents and other involved family members.

For reporting purposes, child abuse or neglect is considered to have a recurrence when a previous investigation determined a child was abused or neglected and, within six months of the first report of abuse, another report is made and it is determined that credible evidence exists to conclude the child was abused or neglected again. According to OCFS records, as of September 2012, the State's abuse and neglect recurrence rate was 12.4 percent. The national standard was 5.4 percent.²

Federal reviews of OCFS's child welfare programs conducted in 2001 and 2008 found that OCFS did not comply with federal child welfare requirements. The reviews found the State's recurrence rate of child abuse and neglect was high, indicating a weakness or ineffectiveness in the CPS program. In fact, the recurrence rate has been much higher than the national standard for several years and is on the rise in many counties. As a result, each county CPS unit was required to develop and implement a Program Improvement Plan (PIP)³ to help reduce recurrence rates.

OCFS operates a State Central Register, also known as the Hotline, which receives most of the telephone calls alleging child abuse or neglect within the State. The Hotline relays information from the calls to the county CPS units for investigation. It also monitors the county CPS unit response time and identifies if there are prior child abuse or neglect reports associated with the report subject. The Hotline receives calls 24 hours a day, seven days a week, from two sources: people who are required by law to report suspected cases of

² The U.S. Department of Health and Human Services' Children's Bureau sets a national standard for recurrence of neglect which is measured using data from the National Child Abuse and Neglect Data System.

³ A written strategy for improving safety outcomes

child abuse and neglect and non-mandated reporters, including the public. Onondaga and Monroe County do not use the Hotline, but instead maintain their own independent hotlines. These counties are required to report all hotline calls they receive that allege child abuse or neglect to the Hotline.

Once the Hotline notifies a county CPS unit of an alleged abuse, the CPS unit must decide whether to conduct an investigation or, when available and appropriate, complete a Family Assessment Response (FAR) which assesses the family environment and family needs. In either case, investigation or FAR, the child's safety is assessed. A CPS investigation must be conducted within specified periods and should determine if credible evidence exists to conclude that abuse or neglect occurred (indicated) or did not occur (unfounded). OCFS must approve a FAR approach before a county CPS unit may use it as an alternative to conducting an investigation. A county CPS unit may use the FAR approach instead of conducting an investigation in certain circumstances (e.g., reports of inadequate guardianship, excessive corporal punishment or educational neglect). The FAR approach is designed to provide protection to children by engaging families in an assessment of child safety and family needs, helping to find solutions to family problems and identifying information and formal support mechanisms to meet the family's needs and increase the parent's/guardian's ability to care for their children.

When a county CPS unit concludes that abuse or neglect has occurred, the CPS worker should provide or arrange for services for the children, parents and other involved family members. Services provided typically include case management and supervision, individual and family counseling, respite care, parenting education, housing assistance, substance abuse treatment, childcare and home visits. Staff may also provide or arrange for any appropriate rehabilitative services, including foster care and mandated preventive service. County CPS units also provide preventive services, such as in-home assessments, counseling and case management services to high-risk families.⁴ A family may refuse services;⁵ however, when services are refused, the county CPS unit may initiate a Family Court proceeding to ensure the child's best interests are met. County CPS workers must monitor the services provided when the county CPS unit is not the primary services provider.

⁴ The Risk Assessment Profile categorizes risk as low, moderate, high and very high. Risk categories are determined by 15 preliminary risk factors and eight elevated risk factors. If any elevated risk factors exist, the final risk rating is very high. If no elevated risk factors are present, the final risk rating is the same as the preliminary risk rating from the 15 preliminary risk factors.

⁵ A county CPS unit has no legal authority to compel an individual or family to receive services.

We audited eight counties across the State. Figure 1 provides relevant information about recurrence rates for each county and the State as a whole.

Figure 1: Recurrence Rates By County, March 2007 – September 2012

County	Mar '07	Sep '07	Mar '08	Sep '08	Mar '09	Sep '09	Mar '10	Sep '10	Mar '11	Sep '11	Mar '12	Sep '12	Averages
Dutchess	13.5	12.2	15.5	13.1	13.0	17.0	16.4	17.1	17.8	11.7	18.0	15.4	15.1
Livingston	25.7	15.9	19.3	13.0	26.3	14.4	9.4	13.9	9.9	12.9	19.0	18.2	16.5
Niagara	13.3	20.7	15.9	17.7	12.7	11.7	11.4	17.8	18.3	13.1	12.0	14.1	14.9
Oneida	19.7	21.3	21.8	21.0	21.0	16.8	15.5	18.0	10.8	17.3	14.6	19.5	18.1
Rockland	4.8	14.2	6.6	10.6	11.1	6.2	8.8	10.3	5.5	4.4	8.2	10.0	8.4
Saratoga	9.7	17.3	14.9	17.2	14.6	18.8	24.7	14.7	17.2	21.4	20.5	21.5	17.7
Ulster	13.1	14.9	11.4	17.3	12.8	12.1	7.3	17.8	11.7	14.5	12.7	14.7	13.4
Washington	21.5	23.7	20.3	25.3	22.9	21.1	13.9	16.0	19.6	16.7	14.3	11.6	18.9
Statewide	11.4	12.3	11.1	12.1	11.7	12.2	11.9	12.3	11.4	12.2	11.3	12.4	11.9

Objective

The objective of our audit was to determine if actions taken by the county CPS units were sufficient to reduce child abuse and neglect recurrence rates. Our audit addressed the following related question:

- Have county CPS units established measurable recurrence rate reduction goals, implementation plans and progress tracking mechanisms, and are the recurrence rates declining as a result?

Scope and Methodology

For the period January 1, 2011 through December 31, 2012, we interviewed county CPS unit officials and staff, reviewed the county CPS units’ policies and procedures, identified the Manual’s case management requirements and reviewed samples of indicated cases and recurrence cases to ensure compliance with State and county CPS requirements. We also reviewed each county’s PIP and PIP progress reports and analyzed each county’s abuse and neglect recurrence rates. We expanded our scope forward to examine a report issued to Rockland County in June 2013 on its implementation of the FAR approach.

We conducted our audit in accordance with generally accepted government auditing standards (GAGAS). More information on such standards and the methodology used in performing this audit is included in Appendix C of this report.

Comments of Local Officials

The results of our audit and recommendations have been discussed with local officials and their comments, which appear in Appendix B, have been considered in preparing this report.

Recurrence Rate Reduction

Each county CPS unit we audited (Dutchess, Livingston, Niagara, Oneida, Rockland, Saratoga, Ulster and Washington counties) had developed a PIP, which included an implementation plan and progress tracking mechanism, and all but one county (Oneida) had developed measurable recurrence rate reduction goals to lower their recurrence rates. However, these efforts did not appear to always lower the child abuse and neglect recurrence rates. While Dutchess and Washington counties had lower recurrence rates, the other six counties we examined experienced an increase in their child abuse and neglect recurrence rates after the PIP implementation period.

While many factors can influence a county's child abuse and neglect recurrence rate, our analysis also indicates that a fairly strong statistical correlation exists between a county's recurrence rate and the average number of cases a caseworker manages – higher caseloads correlate to higher recurrence rates. In addition, we found three counties (Niagara, Rockland and Saratoga) did not fully implement their PIPs and one county (Dutchess) experienced significant delays in implementing its PIP. Further, we found that all of the counties we examined failed to use historical recurrence case data to evaluate actions and outcomes and identify trends that might be influential in formulating future actions and outcomes. Improved actions could help reduce a county's child abuse and neglect recurrences.

Program Improvement Plans

A county's recurrence rate is one measurement used to assess a CPS unit's effectiveness. To help address the State's high recurrence rates, OCFS required each county to implement a PIP that focused on its specific needs. The PIPs were implemented from 2010 through 2011, and quarterly progress reports were submitted to OCFS during this time. We found that, while the PIPs generally included a measurable child abuse and neglect recurrence reduction goal, implementation plan and progress tracking mechanisms, recurrence rates for most counties did not decline. Figure 2 details the pre- and post-PIP recurrence rates for the eight counties we audited and the State as a whole.

**Figure 2: Pre- and Post-PIP Implementation
Child Abuse and Neglect Recurrence Rates**

County	September 2009	September 2012	Increase/ (Decrease)
Dutchess	17.0	15.4	(1.6)
Livingston	14.4	18.2	3.8
Niagara	11.7	14.1	2.4
Oneida	16.8	19.5	2.7
Rockland	6.2	10.0	3.8
Saratoga	18.8	21.5	2.7
Ulster	12.1	14.7	2.6
Washington	21.1	11.6	(9.5)
Statewide	12.2	12.4	.2

Several factors contributed to the limited success in reducing a county’s abuse and neglect recurrence rate. For example:

- Three counties (Niagara, Rockland and Saratoga) did not fully implement their PIP. According to county officials, the necessary training courses and material were not readily available; therefore, they could not train their work force and roll out certain portions of their PIP initiatives. Rockland County rolled out its training program in January 2014.
- Oneida County did not establish a reduction goal and Ulster County did not track its progress in lowering child abuse and neglect recurrence rates.
- Officials in six counties (Livingston, Niagara, Oneida, Rockland, Ulster and Washington) stated that they believe they could have achieved greater success in lowering their child abuse and neglect recurrence rates if they were given more latitude in developing their PIP. County officials said they were required to select a PIP focus from predetermined initiatives that OCFS formulated, which did not always align with their needs.
- One year into their PIP implementation plans, Dutchess County officials were informed by OCFS that they needed to develop a new PIP initiative. OCFS officials determined that the approved PIP focused on an existing CPS unit strength. Therefore, Dutchess County was delayed in implementing its PIP. As a result, sufficient time has not elapsed to determine the impact the PIP may have on Dutchess County’s child abuse and neglect recurrence rates.

Overall, six of the eight counties we examined saw an increase in their child abuse and neglect recurrence rates after the PIP implementation period. Two counties (Dutchess and Washington) did have lower recurrence rates in September 2012 when compared to the pre-PIP implementation recurrence rates from September 2009; however, their rates were still significantly higher than the national standard of 5.4 percent.

While many factors can influence a county's child abuse and neglect recurrence rate, we specifically examined whether a caseworker's caseload size had an impact. Our analysis suggests that a strong correlation exists between a county's recurrence rate and the average number of cases a caseworker manages such that the higher the caseworker's caseload, the higher the county's recurrence rate. For the eight counties included in our audit, we compared each county's average caseload size to its average recurrence rate and found the correlation coefficient⁶ of .7140, which suggests there is a fairly strong linear relationship between caseload and recurrence. For example, the average open caseload for Rockland County's caseworkers was 6.48 cases and Rockland County's average recurrence rate was 8.39 percent.⁷ In contrast, Livingston County's average open caseload was higher, at 14.19 percent, and Livingston County's average recurrence rate was also higher, at 16.49 percent. Appendix A contains additional information on the correlation between caseload and recurrence rates.

The continued high recurrence rates in the State and the individual counties indicate limited improvements in the safety, permanency and well-being of children and families that receive child welfare services. Although PIPs were implemented across the State, they have not lowered the State's recurrence rate as it increased from 12.2 percent in September 2009 to 12.4 percent as of September 2012.

Tracking and Analyzing Child Abuse and Neglect Recurrences

According to the National Resource Center on Child Maltreatment (Center),⁸ any state attempting to improve or maintain its recurrence rate should engage in research and evaluation to identify and evaluate potential program improvements. Every state maintains a wealth of information on families within the child welfare system, and analyzing this information allows for a better understanding of why state or county CPS units are experiencing specific outcomes, both positive and negative. The Center asserts that combining the use of

⁶ A statistical measure of the strength and direction of the linear relationship between two variables

⁷ See Figure 4 in Appendix A

⁸ Operated by the Child Welfare Institute and Action for Child Protection, a service of the U.S. Department of Health and Human Services' Children's Bureau

historical data and programmatic knowledge can help maximize the impact of CPS interventions.

We found that none of the counties we examined use available historical and programmatic knowledge to determine if program improvements are needed or if certain initiatives or actions result in positive outcomes. Of the eight counties we audited, one county (Saratoga) began to track recurrences of abuse and neglect in May 2012; however, it did not yet analyze tracked cases. In addition, none of the counties we audited require CPS unit caseworkers to conduct a reexamination of recurrence cases.

To gain an understanding of what actions the county takes during a recurrence case, we randomly selected 10 recurrence cases from each county for the period January 1, 2011 through December 31, 2012.⁹ We examined the case file to determine if the caseworker complied with the Manual requirements; completed the investigation properly; developed Risk Assessment Profiles appropriately, including the provision of services where necessary; designed Family Assessment and Service Plans; and met the face-to-face communication requirement. We found that the county CPS caseworkers complied with the Manual and managed the cases according to the county's policies and procedures.

We also interviewed the county CPS caseworker who managed each case and/or the case supervisor who oversaw the case to learn why they believe the recurrence occurred and what they might have done differently to prevent the recurrence. The county CPS caseworkers and supervisors often stated that the caregiver or other individual residing in the home had a history of domestic violence, drug abuse or mental health conditions or there was general abuse associated with the family. However, in all 80 cases we examined, the county CPS caseworkers and supervisors could not identify any other actions they may have taken to prevent a recurrence.

Understanding and analyzing a county's historical data could also help reduce its child abuse and neglect recurrence rate. For example, tracking and analyzing child abuse and recurrence data based on the type of abuse or neglect, defining the abuser (including such characteristics as the relationship with the victim, age, gender, mental health status, previous abuse or neglect findings or substance abuse issues), family culture, demographics and family history with the CPS unit are all valuable for understanding the family environment

⁹ Recurrence cases totaled 1,092 cases during the period.

and abuse and neglect triggers. Correlating such known information with previous services offered or received could lead to a better understanding of the abuse or neglect. Such actions may allow for more proactive and preventative measures that could lead to lower recurrence rates.

Family Assessment Response

In 2007, legislation was enacted in the State allowing for the use of a FAR as an alternative response to the traditional CPS investigation process. Intended as a way to better protect children and assist families with their child-rearing needs, the FAR uses a non-investigatory decision-making and engagement approach to working with families. The FAR focuses on assessing a family's needs and providing support, using family meetings as a key component of support, and, unlike a CPS investigation, does not require a child abuse or neglect determination. FAR allows for a response to a report of neglect that takes into account each family's unique needs and strengths.

Each county's FAR approach is unique and requires OCFS approval prior to its implementation. A county CPS unit using the FAR approach is required to comply with federal and State child welfare service requirements. In all cases, a caseworker must assess the child's safety. Services provided in the FAR approach are generally short-term and directly provided by the county CPS unit or provided through referral to agencies or others in the community.

The type of abuse or neglect calls which a county CPS unit can respond to with a FAR can vary by county, but typically include inadequate guardianship, lack of supervision and educational neglect. The FAR cannot be used with certain abuse or neglect allegations such as allegations of sexual abuse, serious physical abuse, severe or repeated abuse, abandonment or failure to thrive.

State law mandates FAR approaches include the following:

- Notice to the family of the county CPS unit's intent to use the FAR approach rather than a traditional CPS investigation.
- An examination, with the family, of the family's strengths, concerns and needs.
- Planning and provision of services, including case management where appropriate, that are responsive to the needs of the family and supportive of family stabilization.
- A joint evaluation and assessment of the family's progress including ongoing, periodic assessments of risk to the child.

Currently 28 counties, the St. Regis Tribe and New York City have been approved to implement FAR approaches. Five of the eight counties we reviewed implemented a FAR approach. Figure 3 shows relevant FAR statistics for the counties we examined who implemented FAR.

Figure 3: FAR Implementation and Response Data

County	Implementation Date	Abuse/Neglect Allegations Responded To
Ulster	April 2013	0 ^a
Niagara	January 2012	211
Livingston	April 2010	489
Rockland	May 2011	890
Washington	January 2010	889

^a The FAR approach was implemented just prior to our audit visit and relevant information was not yet available.

OCFS reported several positive outcomes associated with the FAR approach in a January 2011 report on FAR implementation at six pilot counties, none of which are included in our audit. The report indicates the counties achieved improved satisfaction, increased linkages to needed services, a reduced need for traditional public child welfare services and fewer petitions filed in Family Court. The report also stated that families who received a FAR were more likely to obtain services, especially those that meet basic family needs such as food, housing, utilities and other necessities. However, the report indicates no significant differences between those who received FAR services and those who received a traditional CPS investigation in the likelihood of a subsequent report or recurrence event.

To provide assurance that the FAR approach, as an alternative to the traditional CPS investigation, is effective, a best practice would be to have a mechanism in place to determine its effectiveness. At the time of our audit, the counties we examined that implemented the FAR approach had not conducted evaluations and had not developed a method to determine if a program outcome – to better protect children – is being achieved. However, since we completed our audit work, Rockland County and Niagara County had their FAR approaches evaluated in consultation with an external consultant.

Recommendations

1. County CPS officials should:

- Work with OCFS to develop additional strategies to achieve long-term recurrence rate reductions.
- Examine each recurrence and determine, based on the actions taken and outcomes, what actions might have prevented

the recurrence. Using the information gathered during this process, county CPS officials should adjust future actions accordingly.

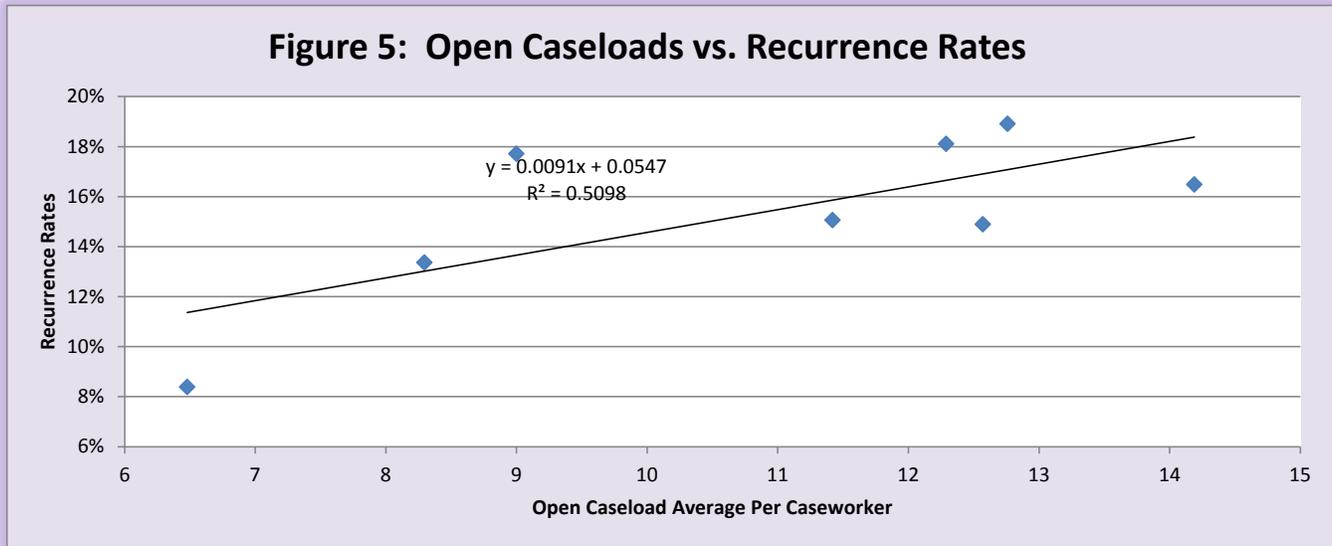
- Track and analyze recurrence data to identify historical trends, actions and data correlations to help predict future outcomes and reduce recurrences of child abuse and neglect.
 - Develop a method to evaluate the FAR approach to determine if it is achieving its goal to protect children better or if program modifications are necessary to achieve this result.
2. County policymakers and officials should consider the benefits of lower caseworker caseloads as they structure CPS operations and provide funding for staffing.

APPENDIX A

CASELOAD AND RECURRENCE RATE CORRELATION

For the eight counties included in our audit, we compared each county’s average caseload size to its average recurrence rate and found the correlation coefficient¹⁰ of .7140, which suggests there is a fairly strong linear relationship between caseload and recurrence. The coefficient of determination¹¹ is .5098, which indicates 50.98 percent of the variation in recurrence rates can be explained by the counties’ average caseloads.

Figure 4: Correlation of Average Open Caseloads ^a to Average Recurrence Rate (2007-2012)		
County	Average Open Caseload (2011 - 2012)	Average Recurrence Rate (2007-2012)
Dutchess	11.42	15.06%
Livingston	14.19	16.49%
Niagara	12.57	14.89%
Oneida	12.29	18.11%
Rockland	6.48	8.39%
Saratoga	9.00	17.71%
Ulster	8.295	13.36%
Washington	12.76	18.91%
Correlation Coefficient		.7140
Coefficient of Determination		.5098
^a Per caseworker		



¹⁰ A statistical measure of the strength and direction of the linear relationship between two variables

¹¹ Indicates how well data points fit a statistical model. Specifically, in bivariate analysis, the coefficient indicates the proportion of the variance in one variable that is explained by the other.

APPENDIX B

RESPONSE FROM LOCAL OFFICIALS

We provided a draft copy of this global report to the eight county CPS units we audited and requested a response. We received responses from five units.

The following comments are excerpted from those responses.

Overall Comments

Saratoga County officials said: “Currently, Saratoga County CPS tracks recurrence, and since we began tracking recurrence in May 2012, the recurrence rate for Saratoga County has dropped to 8%. Since the audit, our senior casework staff have begun pulling the old file and reviewing it to see what the case was indicated for and what was done on the case. This practice will continue.”

Livingston County officials said: “The State’s recurrence rate is impacted by dynamics that do not influence the recurrence rate nationwide. Comparing one state to another without the allowance for these variables provides an unreliable representation.”

Rockland County officials said, “. . . the audit is, in our view, flawed as it attempts to examine the recurrence rate in a vacuum without a looking at underlying facts. Statistics alone simply do not provide an accurate picture.”

Ulster County officials said, “. . . it is to be noted that the nationwide recurrence rate does not account for individual differences among states in regards to conduct defined as child abuse and neglect, standards utilized to determine indications of child abuse and neglect and statutory scope of individuals and professionals identified as mandated reports. Without careful consideration of the significant differences that result from these factors it is not reliable to draw comparisons between national averages and New York averages on recurrence.” Officials also said, “We will continue to monitor CPS average caseload size to determine if there is truly a correlation between caseload and recurrence rates, and continue to make efforts to maintain manageable caseload size.”

Washington County officials said, “The State’s recurrence rate is impacted by dynamics that do not influence the recurrence rate nationwide. Comparing one state to another without the allowance for these variables provides an unreliable representation from the start.”

OSC Response

OCFS uses the national standard for comparative purposes and included the national standard in the comparative safety data packet reports it shares publicly on its Internet site. OCFS does not adjust the rate to allow for the variables referenced. This report reflects each county’s recurrence rate, the State’s overall recurrence rate and the national standard. The report provides charts and tables for users to compare county performance over an extended period of time as well as to other counties.

APPENDIX C

AUDIT METHODOLOGY AND STANDARDS

We interviewed county CPS unit staff for general background information and to determine CPS unit activities for child abuse and neglect, recurrences, training, report intake and management oversight. We reviewed the Manual and any county policies and procedures regarding child abuse and neglect. We reviewed the counties' PIPs and quarterly reports to ensure compliance with the PIP. We also reviewed certain controls over computerized data that OCFS uses to calculate a county's child abuse and neglect recurrence rate and traced records to and from the system to determine if the records appeared reasonably accurate and complete.

For four counties (Dutchess, Niagara, Rockland and Saratoga), we used a random sampling method to select cases to determine if the counties followed the requirements set forth in the Manual. We randomly selected and reviewed 10 cases to confirm a Risk Assessment Profile was developed and that the caseworker completed a thorough safety assessment and investigation of child abuse and neglect in a timely manner. We randomly selected and reviewed 10 different cases to determine if the caseworker developed a Family Assessment Services Plan and to confirm that caseworkers maintained face-to-face contacts with the family. We also randomly selected and reviewed 10 different recurrence cases to ensure that the Manual and local policies were followed.

For the four other counties (Livingston, Oneida, Ulster and Washington) we used a random sampling method to select cases to determine if the counties followed the requirements set forth in the Manual. We randomly selected and reviewed 10 recurrence cases. We reviewed the recurrence cases to ensure that a Risk Assessment Profile was developed, the caseworker completed a thorough safety assessment and investigation of child abuse and neglect in a timely manner, the caseworker developed a Family Assessment Services Plan, the caseworker maintained face-to-face contacts with the family and the Manual and local policies were followed.

We conducted this performance audit in accordance with GAGAS. 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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

APPENDIX D

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