



**Office of Children
and Family Services**

KATHY HOCHUL
Governor

SHEILA J. POOLE
Commissioner

April 13, 2022

RECEIVED
EXECUTIVE CORRESPONDENCE

APR 18 2022

Hon. Thomas P. DiNapoli
New York State Comptroller
110 State Street, 15th Floor
Albany, NY 12236

OFFICE OF THE STATE COMPTROLLER
THOMAS P. DINAPOLI
COMPTROLLER

Dear Comptroller DiNapoli:

In accordance with the provisions of Section 170 of the Executive Law, the Office of Children and Family Services (OCFS) offers the following update regarding steps the agency has taken to implement those recommendations contained in the Office of the State Comptroller's (OSC) Final Audit Report (2020-S-2), issued in November 2021.

OSC Recommendation 1: Revise existing policies and procedures to include written guidance on the frequency of Reviews as well as practices for following up on and documenting that those deficiencies have been corrected.

As indicated in our response to the draft audit report, OCFS has implemented a number of changes to address this recommendation, including the development of:

- A practice review schedule and tracking system that includes data fields for monitoring the status and completion dates of program improvement plans (PIPs).
- Internal practice review protocols, with timeframes for completing each step, which include timeframes for OCFS follow-up with the Local Departments of Social Services (LDSS)/Adult Protective Service (APS) agency. The practice review protocols also establish a formal communication process for OCFS PIP approval, extension, and completion of the LDSS/APS agency PIP.
- Standardized review tool and report template
- PIP development and review protocol with standardized letters and template where LDSSs record their improvement strategies.

OCFS will continue to conduct a formal APS practice review for each LDSS or contracted provider every four years. By the end of 2022, every LDSS/contracted APS agency will have at least one review completed for the four-year review cycle.

OCS Recommendation 2: Work with APS providers to improve case file documentation, including ensuring case notes are sufficiently detailed and entered timely to ensure that required visits are made to adequately assess the needs of the clients.

Prior to the audit, OCFS developed a case review process which assessed, among other things, the timely completion of client visits and progress note entry as well as the quality of progress note content. Using the updated practice review tool, OCFS completes an analysis of compliance with all regulatory timeframes, as well as assesses the degree to which the case documentation supports decision making, actions taken, service provision and risk mitigation. The practice review process includes a debriefing meeting with the LDSS/APS agency to share preliminary findings,

program strengths and concerns, and is an opportunity to gather additional information if needed. If a deficiency is noted, OCFS requires the development of a PIP with targeted strategies to address the areas of deficiency.

As part of the training contract with Silberman School of Social Work at Hunter College, OCFS updated its APS training curriculum, *Case Practice, Note Writing and Documentation*, to include more in-depth coverage of APS documentation requirements, including timeframes and content. The revised training was made available to LDSSs beginning December 7, 2021 and will be offered as a regular training opportunity.

OSC Recommendation 3: Develop processes to improve the reliability and consistency of ASAP data and communicate consistent expectations on when and how to enter information into the system, including but not limited to referral dates.

OCFS hired a business analyst on September 16, 2021, and a program developer on November 18, 2021, to assess and address any application and reporting vulnerabilities identified within the Adult Services Automation Project (ASAP.Net). Reporting analysis includes verification of data reliability for existing reports, as well as the development of data dictionaries for existing reports and any new reports to be developed. Consistent with OSC's findings, the analysis performed included proposed application enhancements regarding the ability for APS supervisors to insert comments and feedback into caseworker's progress notes and to generate reports for tracking timely completion of casework activities.

As part of a continuous quality improvement process, OCFS performs an analysis of the totality of the practice review findings. The analysis is used to influence training curricula for both systems and case work practice. OCFS has incorporated the findings into curricula improvements for ASAP.Net trainings.

OCFS remains committed to providing support to LDSS APS through oversight, monitoring and technical assistance activities as demonstrated throughout the audit.

If you have any questions regarding this response, please contact Brenden Schaefer, Director of Internal Audit at 518-402-3985.

Sincerely,



Lisa Gharthey Ogundimu, Esq.
Deputy Commissioner
Child Welfare and Community Services