

# **Office of Children and Family Services**

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## **Oversight of Runaway and Homeless Youth**

**Report 2019-S-47 | August 2020**

**OFFICE OF THE NEW YORK STATE COMPTROLLER  
Thomas P. DiNapoli, State Comptroller**

**Division of State Government Accountability**



# Audit Highlights

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## Objective

To determine if the Office of Children and Family Services (OCFS) is adequately overseeing runaway and homeless youth and facilities to ensure they meet State standards and regulations. The audit covered the period January 1, 2018 through February 21, 2020.

## About the Program

Homelessness can make youth vulnerable to violence, crime, and sexual exploitation. OCFS oversees a system of supports designed to meet the needs of runaway and homeless youth (RHY), including residential assistance through OCFS-certified crisis services programs; transitional independent living support programs; and non-residential services that address needs such as food, clothing, emergency housing, behavioral/medical health, and educational/vocational support. Counties that operate certified RHY programs can opt in to receive RHY funding from OCFS. Every county – regardless of whether it receives OCFS funding – is required to complete and submit a Child and Family Services Plan (Services Plan) outlining the provision of services and the allocation of resources. OCFS is responsible for reviewing and approving all county Services Plans, and approval of the RHY portion of these plans is equivalent to OCFS endorsement. OCFS staff reviews of these plans should determine if they support positive local programming within the county, and plans that do not warrant approval should be returned for revision.

OCFS is also required to perform program and fire safety inspections annually for all certified RHY programs and facilities. OCFS staff issue inspection reports and performance improvement plans (Improvement Plans) addressing any deficiencies identified.

## Key Findings

- OCFS has generally established controls to ensure it is conducting program and fire safety inspections for certified RHY programs and facilities. However, we found OCFS did not always conduct inspections within established time frames. We found 57 of 186 program inspections (31 percent) and 23 of 184 fire safety inspections (13 percent) were late.
- While the overall conditions of the RHY programs generally meet program and fire safety requirements, we identified 32 deficiencies across many of the 20 programs we visited. These included missing smoke detectors, dirty bathroom vents, a loaded power strip plugged into another loaded power strip, missing outlet covers, and water-damaged ceilings with possible mold.
- We reviewed 15 Services Plans for counties that do not receive RHY funding and found they were not always sufficiently detailed to determine whether they support positive local programming within the county. Eleven counties (73 percent) failed to identify any residential resources specifically available to RHY; nine (60 percent) identified available residential services, but not specifically for RHY. Additionally, one county's plan stated it has no programs specifically for RHY and provided no details regarding any services available.

## Key Recommendations

- Develop written standards for conducting inspections as well as recording and reconciling

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deficiencies found during inspections on the written report and Improvement Plans.

- Work with RHY programs to ensure the deficiencies identified during our site visits are corrected.
- Revise the Services Plan internal guidance to include additional information detailing what is expected/sufficient information to provide assurance that counties are supporting positive local programming.



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**Office of the New York State Comptroller  
Division of State Government Accountability**

August 6, 2020

Ms. Sheila J. Poole  
Commissioner  
Office of Children and Family Services  
52 Washington Street  
Rensselaer, NY 12144

Dear Ms. Poole:

The Office of the State Comptroller is committed to helping State agencies, public authorities, and local government agencies manage their resources efficiently and effectively. By so doing, it provides accountability for the tax dollars spent to support government operations. The Comptroller oversees the fiscal affairs of State agencies, public authorities, and local government agencies, as well as their compliance with relevant statutes and their observance of good business practices. This fiscal oversight is accomplished, in part, through our audits, which identify opportunities for improving operations. Audits can also identify strategies for reducing costs and strengthening controls that are intended to safeguard assets.

Following is a report of our audit entitled *Oversight of Runaway and Homeless Youth*. This audit was performed pursuant to the State Comptroller's authority under Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law.

This audit's results and recommendations are resources for you to use in effectively managing your operations and in meeting the expectations of taxpayers. If you have any questions about this report, please feel free to contact us.

Respectfully submitted,

*Division of State Government Accountability*

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# Glossary of Terms

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Term	Description	Identifier
Improvement Plan	Performance improvement plan	<i>Key Term</i>
OCFS	Office of Children and Family Services	<i>Auditee</i>
RHY	Runaway and homeless youth	<i>Key Term</i>
Services Plan	Child and Family Services Plan	<i>Key Term</i>

# Background

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Runaway and homeless youth (RHY) can be fleeing neglect, abuse, or conflict in their homes. These youths are generally still physically and emotionally developing and may not have completed their education, may lack general life skills, and have little or no work experience. Homelessness can make youth vulnerable to violence, crime, and sexual exploitation. According to the U.S. Department of Housing and Urban Development, on any given night in January 2018, New York State reported nearly 3,000 homeless, unaccompanied youths.

The Office of Children and Family Services' (OCFS) mission is to promote the safety, permanency, and well-being of children, families, and communities. OCFS oversees a system of supports designed to meet the needs of RHY, including: residential assistance through OCFS-certified crisis services programs; transitional independent living support programs; and non-residential services that address needs such as food, clothing, hygiene, emergency housing, behavioral/medical health, case management, and educational/vocational support.

In 2019, there were approximately 128 OCFS-certified RHY programs (31 crisis shelters, 39 group residences, 50 supported residences, and 8 interim family programs) with a total capacity for 1,251 RHY.

OCFS must certify all State-funded RHY residential programs, except those serving fewer than 20 youth over age 18. Certifications do not expire, and all services – based on the youths' goals and what they are willing to do to meet those goals – are voluntary. As a result, while OCFS collects data from RHY programs, it does not track program outcomes.

Counties that operate certified RHY programs can opt in to receive RHY funding from OCFS. Half of the counties in the State (31) opt to receive funding; the other half do not and do not operate certified programs in their county specifically for RHY (see Exhibit). Every county, regardless of whether it receives OCFS funding, is required to complete and submit a Child and Family Services Plan (Services Plan). The Services Plan is a local, five-year plan (with annual updates) for the provision of services and the allocation of resources, including RHY. The RHY section of the Services Plan requires each county to answer specific questions regarding RHY and the services available. Services Plans for funded counties should detail how the county will allocate RHY funding and identify certified programs and the services these programs will provide. According to OCFS guidance, unfunded counties should provide OCFS with demographic details on the county's RHY population, resources available to support the needs of RHY, and details on how these resources are coordinated. Counties must answer all questions on the Services Plan.

OCFS is responsible for reviewing and approving all county Services Plans. Guidance provided to OCFS staff states that their approval of the RHY section of the Services Plan is equivalent to OCFS endorsement. When reviewing county Services Plans, OCFS staff should understand what is provided in the plans and determine if they support positive local programming within the county. Services Plans that do not warrant approval should be returned for revision, and counties have 60 days from the date of the notification of disapproval to submit a revised plan.

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State regulations detail specific facility infrastructure and fire safety requirements that all certified RHY programs must meet. Generally, the buildings and grounds of each residential facility must be kept in a sanitary and safe condition to facilitate the comfort and physical and mental well-being of youth. Each program is also required to maintain a policy and procedure manual, which OCFS must review and approve prior to program certification.

OCFS is required to perform program and fire safety inspections annually (within 364 days of the prior inspection) for all certified RHY programs and facilities. Program inspections generally include: walkthroughs; stakeholder interviews; and a review of organizational structure, program staffing/supervision, youth case records, and employee/volunteer/consultant records. Fire safety inspections check for compliance with State fire safety and facility infrastructure regulations.

After each inspection, OCFS staff meet with program officials to ensure they are aware of any issues identified. According to OCFS' policy, within 30 days of the completed program inspection, OCFS is to send a findings letter and report detailing any deficiencies identified, general observations, and recommendations. Further, OCFS staff issue a performance improvement plan (Improvement Plan) addressing each deficiency. Program staff are expected to complete the Improvement Plan, correct deficiencies, and provide OCFS with a corrective action plan (including supporting documentation, if applicable).

OCFS generally conducts fire safety inspections separately. As with program inspections, OCFS provides program staff with a findings letter and an Improvement Plan. OCFS tracks all program and fire safety inspections on an electronic spreadsheet.

# Audit Findings and Recommendations

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OCFS has generally established controls to ensure it is conducting program and fire safety inspections for certified RHY programs and facilities. All RHY programs received required annual program and fire safety inspections in 2018 and 2019. However, we found OCFS did not always conduct inspections within established time frames, and supporting documentation was not always complete or provided timely by or to program staff after the conclusion of an inspection. For the two-year period, 57 of 186 program inspections (31 percent) were late and 23 of 184 fire safety inspections (13 percent) were late. For both program and fire safety inspections, OCFS improved their timeliness from 2018 to 2019.

While we found the overall conditions of the RHY programs generally met program and fire safety requirements, we identified 32 deficiencies across many of the 20 programs we visited. These included missing smoke detectors, dirty bathroom vents, a loaded power strip plugged into another loaded power strip, missing outlet covers, and water-damaged ceilings with possible mold.

For counties that do not opt in to receive RHY funding and do not operate certified RHY programs, we found that the Services Plans were not always sufficiently detailed to determine whether they support positive local programming within the county. We found inconsistencies in the level of detail provided by counties and, in some cases, it was not clear what services, if any, the county provides to address the needs of RHY.

## Inspections

### Program and Fire Safety Inspections

OCFS generally has established controls to ensure it is conducting program and fire safety inspections for certified RHY programs and facilities. However, we found OCFS did not always conduct inspections within established time frames, and supporting documentation was not always complete or provided timely by or to program staff after the conclusion of an inspection. Additionally, the tracking spreadsheet OCFS uses to monitor inspections did not always match the inspection documentation, which reduces its usefulness as a tool to monitor inspection requirements and overall program and fire safety compliance.

OCFS establishes time frames to ensure programs and facilities consistently meet programmatic and fire safety standards. Timely provision of findings letters and inspection documents is important in making program officials aware of any deficiencies so they can be remedied as soon as practicable. Program staff should also complete Improvement Plans within the required time frames, as deadlines are aligned with the severity of the deficiency.

All certified RHY programs and facilities received required OCFS annual program and fire safety inspections between January 1, 2018 and August 30, 2019. However, we found that the inspections were not always performed within a year of the previous inspection. For the two-year period, 57 of 186 program inspections (31 percent) were late and 23 of 184 fire safety inspections (13 percent) were late. For

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both program and fire safety inspections, OCFS improved their timeliness from 2018 to 2019: 42 of 103 program inspections in 2018 and 15 of 83 program inspections in 2019 were late and 19 of 105 fire safety inspections in 2018 and 4 of 79 fire safety inspections in 2019 were late. Forty-seven of the inspections were less than 30 days late, 20 were between 31 and 90 days late, and 13 were more than 90 days late.

We reviewed 100 program and 100 fire safety inspections to determine whether all inspection documentation was completed (including findings letters, inspection reports, and Improvement Plans) to support each inspection, whether deficiencies were addressed in Improvement Plans, and whether tracking spreadsheets captured complete and accurate information for each inspection. We found:

- 57 documents supporting inspection results were not provided to program staff, and 6 others could not be provided by OCFS;
- 32 findings letters were not issued within 30 days of the completion of the inspection;
- 30 Improvement Plans were not received by the due date (between 2 and 136 days late); and
- 112 of 687 items we reviewed included documentation that did not match information in the inspection tracking spreadsheet. Generally, inaccuracies were found in date fields indicating when documentation was received by or sent to program staff.

## Visits to RHY Programs

We visited 20 OCFS-certified RHY programs within 14 counties to determine: whether the programs meet fire safety requirements; whether the policy and procedure manuals include selected required elements; and, where possible, whether deficiencies cited on the programs' most recent fire safety inspection were corrected in accordance with their Improvement Plans. While we found the overall conditions of the RHY programs generally met program and fire safety requirements, we identified 32 deficiencies across the programs we visited. These included missing smoke detectors, dirty bathroom vents, a loaded power strip plugged (or "daisy-chained") into another loaded power strip (see Figure 1), missing outlet covers, and water-damaged ceilings with possible mold (see Figures 2 and 3).



**Figure 1:** Loaded power strip plugged (or “daisy-chained”) into another loaded power strip.



**Figure 2:** Water damage/possible mold.



**Figure 3:**  
Water damage.

Most of the deficiencies (46 of 50) that were previously identified on the most recent Improvement Plans have been corrected.

OCFS stated it has developed and is in the process of updating guidelines for monitoring compliance with time frames and documentation. However, OCFS has not developed procedures specifying how certain aspects of inspections should be completed, such as the number of records that should be reviewed on site or how to select a sample for review. Additionally, there are no procedures or tools for ensuring that deficiencies found during the inspection are included in the report and addressed in the Improvement Plan.

Given the vulnerability of RHY, it is essential they feel safe and secure at support programs and facilities. An integral part of maintaining that safety and security is ensuring programs and facilities meet regulatory requirements, address deficiencies timely, and record and maintain this information consistently.

Both before and during our audit, OCFS officials stated they had started implementing additional controls to improve RHY program oversight, such as:

- Using automated reports to track when programs were inspected and documented to determine if inspections were completed timely; and

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- Providing monthly updates, reminders, and guidance to staff, including upcoming inspection due dates for programs.

## Child and Family Services Plans for Unfunded Counties

We reviewed 15 Services Plans from 2019 from counties that do not opt in to receive RHY funding, and found that the plans were not always sufficiently detailed to determine whether they support positive local programming within the county. We found inconsistencies in the level of detail provided and, in some cases, it was not clear what services, if any, the counties provide to address the needs of RHY.

For example, five counties reported they provided transportation to RHY that needed it; however, seven counties (47 percent) did not address transportation services at all. The remaining counties provided conflicting information or noted a lack of available transportation. Further, three of the seven counties whose Services Plan did not address transportation needs also stated they would refer youths to outside counties for services, but provided no information on how they would get RHY to those counties. As a result, it is unclear if OCFS staff could determine if the Services Plans were adequate to support whether transportation services are available to RHY in these counties. OCFS officials stated that counties are not required to provide transportation services to RHY. However, although transportation services may not be listed as a specific requirement, a Services Plan that states RHY will be referred to another county for services is missing key information if it does not address how the RHY will get to the other county.

Eleven counties (73 percent) failed to identify any residential resources specifically available to RHY; nine (60 percent) identified available residential services, but not specifically for RHY. Additionally, one county's plan stated it has no programs specifically for RHY and provided no details regarding any services available. This county's plan primarily discussed the implementation of a new program that creates a more effective and efficient response to youth who have experienced or who are vulnerable to commercial sexual exploitation or trafficking. While the county answered all the required plan questions and stated there were ten RHY in the county in 2018, it was unable to identify any needs of these youth. As a result, it is unclear what services, if any, are available for RHY in this county currently or were available in prior years.

While OCFS guidance requires counties to complete all questions on the Services Plan, there is limited guidance for the counties or OCFS staff reviewing the plan regarding what is considered sufficient information for each question.

OCFS officials stated there is no statutory requirement for counties to request funding for RHY programs. Additionally, State regulations do not point to a specific OCFS oversight role for unfunded counties. Therefore, oversight is limited to approving the Services Plan, being available to answer questions, and providing technical assistance and training.

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As approval of the Services Plan may be the only point of contact OCFS officials have with unfunded counties, it is critical OCFS be satisfied that these plans adequately address all required information, including identifying and addressing gaps in meeting the needs of RHY. This will better enable OCFS officials to provide assistance, training, and technical help to these counties to best address RHY needs. Overall, OCFS officials agreed they could update the Services Plan review guidance to better meet the ever-evolving needs of the RHY community. Officials stated they have been working toward strengthening the Services Plan process since early 2018 to make it a more effective tool for counties.

## Recommendations

1. Develop written standards for conducting inspections as well as recording and reconciling deficiencies found during inspections on the written report and Improvement Plan.
2. Work with RHY programs to ensure the deficiencies identified during our site visits are corrected.
3. Revise the Services Plan internal guidance to include additional information detailing what is expected/sufficient information to provide assurance that counties are supporting positive local programming. This guidance should include, but not be limited to, procedures for returning inadequate Services Plans and providing assistance to counties to improve their Services Plans.

# Audit Scope, Objective, and Methodology

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The objective of our audit was to determine if OCFS is adequately overseeing RHY and facilities to ensure they meet State standards and regulations. The audit covered the period January 1, 2018 through February 21, 2020.

To accomplish our objective and assess internal controls related to our objective, we interviewed OCFS and regional office and county officials and reviewed relevant laws, regulations, policies, and procedures. We also became familiar with and assessed OCFS' internal controls as they relate to the fulfillment of its responsibilities for the RHY program and facility inspections. We reviewed OCFS' program and fire safety inspection tracking spreadsheets covering the period January 1, 2018 through August 30, 2019 to determine whether all programs received both annual inspections and whether these inspections were timely (within 364 days of the previous inspection). OCFS completed 104 fire safety inspections and 110 program inspections in 2018 and 79 fire safety inspections and 87 program inspections in 2019. We randomly selected 50 of each inspection type for each of the two years for a total of 200 inspections of 380 that were completed. We reviewed these completed inspections to determine whether all inspection documentation was provided, findings letters and Improvement Plans were issued and completed timely, deficiencies were addressed by Improvement Plans, and the tracking spreadsheet matched the information on the inspection documentation provided.

We reviewed a judgmental sample of 15 of 31 Services Plans from 2019 from counties that do not receive RHY funding to assess what services the county reports to address the needs of RHY and to identify any inconsistencies. We selected counties that are geographically dispersed and included at least one county from each region (except for the New York City region, as all counties in this region receive RHY funding).

We conducted site visits to a judgmental sample of 20 of 123 OCFS-certified RHY programs in 14 funded counties statewide to determine whether the program met selected facility infrastructure and fire safety requirements; whether the program policy and procedure manual includes selected required elements; and, where possible, whether deficiencies cited on the program's most recent fire safety inspection were corrected in accordance with the Improvement Plan. We selected programs that are geographically dispersed (including five of six regions); included a mix of funded counties (where possible, at least two counties in each region), program types (crisis shelter, group residence, supported residence), and programs required and not required to complete an Improvement Plan; and, where possible, included each program provider only once in our review sample. None of the samples selected for our audit testing were projected or intended to be projected across the populations as a whole.

As part of its audit procedures, the audit team used Geographic Information Systems (GIS) software for geographic analysis. As part of the geographic analysis, we developed visualizations (see Exhibit) to improve understanding of our report. To improve ease of use, some minor locational changes were made in these visualizations. The changes do not materially affect the accuracy or interpretation of the underlying data or visualization.

# Statutory Requirements

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## 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.

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

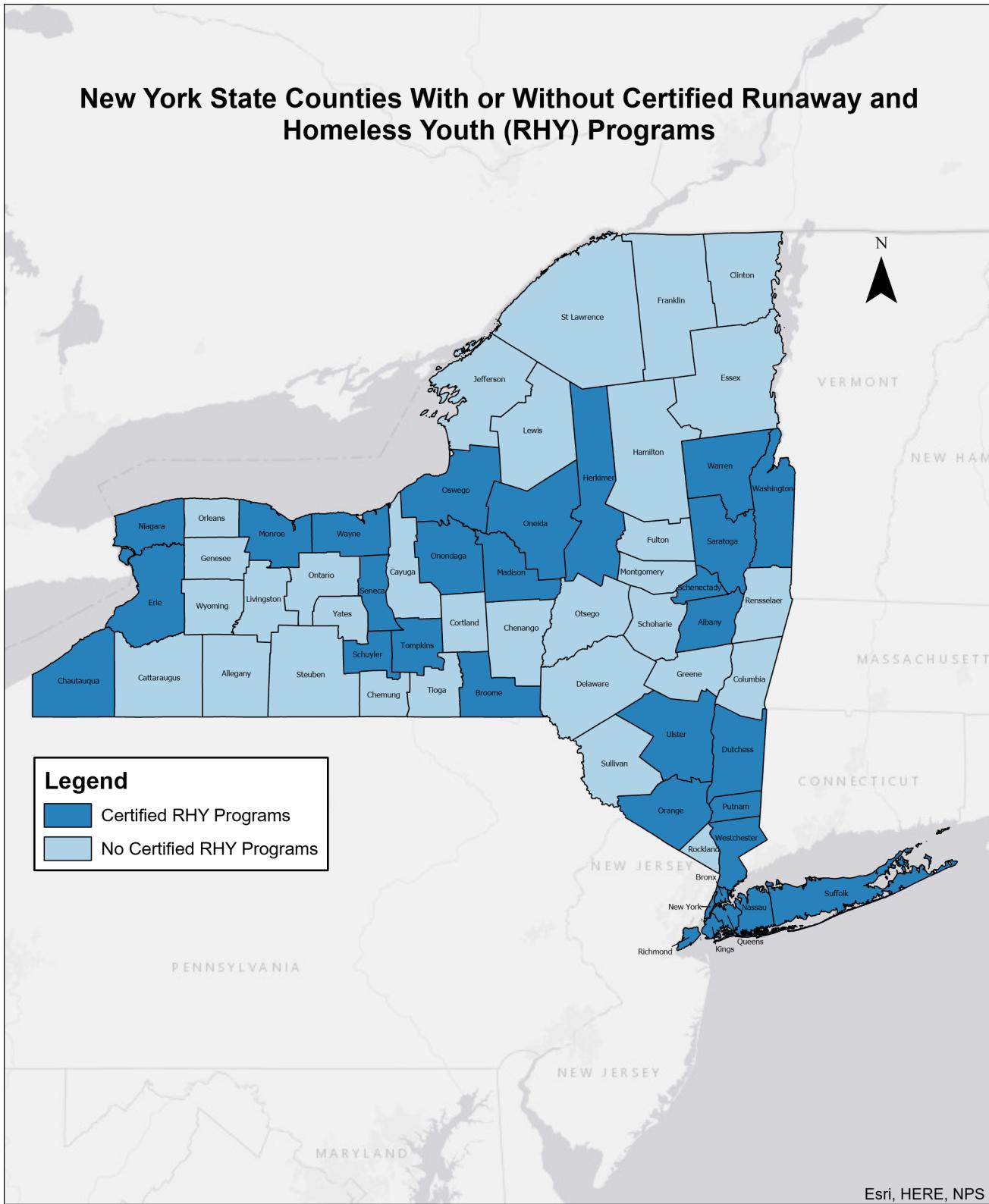
In addition to being the State Auditor, the Comptroller performs certain other constitutionally and statutorily mandated duties as the chief fiscal officer of New York State. These include operating the State's accounting system; preparing the State's financial statements; and approving State contracts, 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.

## Reporting Requirements

We provided a draft copy of this report to OCFS officials for their review and written comment. Their comments were considered in preparing this final report and are attached in their entirety at the end of it. OCFS officials agreed with the report's recommendations and indicated the actions they will take to implement them.

Within 180 days after final release of this report, as required by Section 170 of the Executive Law, the Commissioner of OCFS shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees, advising what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons why.

# Exhibit



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# Agency Comments

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## Office of Children and Family Services

ANDREW M. CUOMO  
Governor

SHEILA J. POOLE  
Commissioner

June 18, 2020

Attn: Heather Pratt, CFE  
Office of the State Comptroller  
110 State Street, 11<sup>th</sup> Floor  
Albany, NY 12236

Re: Audit 2019-S-47 Draft Report

Dear Ms. Pratt:

The New York State Office of Children and Family Services (OCFS) has prepared this letter in response to the Office of the State Comptroller's (OSC) Draft Report for Audit 2019-S-47.

### **Response to Audit 2019-S-47 Draft Report**

OSC's audit objective as stated is "to determine if the Office of Children and Family Services (OCFS) is adequately overseeing runaway and homeless youth and facilities to ensure they meet State standards and regulations." The audit covered the period January 1, 2018 through February 21, 2020. The audit draft report was issued in May 2020 and contained three key findings.

- 1. OSC Key Finding:** "OCFS has generally established controls to ensure it is conducting program and fire safety inspections for certified RHY programs and facilities. However, we found OCFS did not always conduct inspections within the established time frames. We found 57 of 186 program inspections (31 percent) were late, and 23 of 184 fire safety inspections (13 percent) were late."

**OCFS Response to Key Finding:** OCFS acknowledges that while all required inspections during the audit period were completed, not all were completed on time. However, those inspections predate OCFS's significant changes in the inspection process. Prior to the inception of the audit, OCFS strengthened the systems by which inspections were tracked and monitored and continues to work to improve them. In June 2018, the OCFS Division of Child Welfare and Community Services (CWCS) Home Office staff created a reporting mechanism by which senior staff could monitor the timeliness and completion of inspections and documentation. In addition, in February 2019, the OCFS Division of Youth Development and Partnerships for Success (YDAPS) staff began targeted monthly updates to each regional office responsible for the oversight of RHY programs which included reminders of upcoming inspections, new guidance, and follow up on overdue items. Also, in 2019, YDAPS began a quality assurance pilot program on a sample of monitoring documents that were completed, and feedback was subsequently provided to the staff who have monitoring and oversight responsibilities. In January 2020, this pilot program was formally instituted and quality assurance staff continue to review documentation on a quarterly basis. These reviews are to provide feedback to monitoring staff and supervisors on the completeness, accuracy, and overall quality of inspection documentation. Finally, in 2018, Home Office staff convenes semi-annual learning collaboratives with all regional staff (CWCS and YDAPS) working on RHY across the state to reinforce consistent inspection practices and provide technical assistance.

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**OSC Key Recommendation:** “Develop written standards for conducting inspections as well as recording and reconciling deficiencies found during inspections on the written report and Improvement Plans.”

**OCFS Response to Key Recommendation:** OCFS agrees with the recommendation and intends to produce an internal program manual to further standardize our monitoring and oversight practice statewide. As OSC is aware, OCFS is in the midst of rewriting the RHY regulations as of the date of this letter. As a result, the creation of a corresponding program manual will follow the promulgation of these new regulations.

2. **OSC Key Finding:** “While the overall conditions of the RHY programs generally meet program and fire safety requirements, we identified 32 deficiencies across many of the 20 programs we visited. These included missing smoke detectors, dirty bathroom vents, a loaded power strip plugged into another loaded power strip, missing outlet covers, and water-damaged ceilings with possible mold.”

**OCFS Response to Key Finding:** OCFS agrees that the RHY programs visited met the health and safety standards required by regulation. In instances where OSC auditors identified minor issues, many were corrected while the auditors were still on-site or immediately thereafter. As of the date of this letter, Home Office staff remain in communication with Regional Offices on the status of each remaining concern to make sure they are fully resolved. Improvements in oversight through the ongoing use of the continuous quality improvement (CQI) strategies described above will continue.

It is imperative to note that on page 10 of the draft report, OSC implies that they believe OCFS lacks certain inspection elements that could lead young people in these settings to feel endangered or that the facility lacked security. OCFS disagrees with this assessment. OCFS prioritizes internal controls that support the health and safety of its programs, and we maintain that our oversight of these programs protects the health and safety of youth, as evidenced by the speed with which findings are addressed. All of these strategies play an important role in maintaining the health and safety of all youth residents. OCFS further commends the extraordinary work of our partner agencies in creating and fostering home-like environments that provide safe and secure settings for youth during a distressing time in their lives.

**OSC Key Recommendation:** “Work with RHY programs to ensure the deficiencies identified during our site visits are corrected.”

**OCFS Response to Key Recommendation:** OCFS agrees with the recommendation. Many of the issues identified on site have already been corrected, and OCFS staff remain in communication with programs on the status of each remaining concern to make sure they are fully resolved.

3. **OSC Key Finding:** “We reviewed the Services Plans for counties that do not receive RHY funding and found that they were not always sufficiently detailed enough to determine whether they support positive local programming within the county. Eleven counties failed to identify any residential resources specifically available to RHY, and nine (60 percent) identified available residential services, but not specifically for RHY. Additionally, one county’s plan stated it has no programs specifically for RHY and provided no details regarding any services available.”

**OCFS Response to Key Finding:** OCFS has been actively working toward strengthening the Child and Family Services Plan (CFSP) process since early 2018, with the goal of making service plans a more effective tool for counties. Pursuant to Section 420 of NYS Executive Law, each municipal Youth Bureau must submit to OCFS a comprehensive services plan. The plan provides a description of the current runaway and homeless population including their age, place of origin, family status, service needs and eventual disposition. In addition, the plan describes the public and private resources available to serve runaway and homeless youth within the county. Finally, a description of new services to be provided and current services to be expanded is also included in the plan.

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The law does not require municipalities to provide resources, including residential services; it requires them to describe what resources they have and plan to provide. OCFS asks for additional information regarding the local planning process beyond the legislative requirements so that when a young person in need is identified, services are made available. OCFS remains committed to constant improvement and is open to reviewing the CFSP to determine whether changes to the plan or associated guidance documents are warranted.

**OSC Key Recommendation:** “Revise the Services Plan internal guidance to include additional information detailing what is expected/sufficient information to provide assurance that counties are supporting positive local programming.”

**OCFS Response to Key Recommendation:** OCFS agrees with the recommendation and will review the existing guidance. The recommended additions will be incorporated in time to be used during the 2021 plan cycle.

If you have any questions with respect to this response, please contact Bonnie Hahn at [Bonnie.Hahn@ocfs.ny.gov](mailto:Bonnie.Hahn@ocfs.ny.gov).

Sincerely,



Nina Aledort, PhD.  
Deputy Commissioner  
Youth Development and Partnerships for Success

CC: Sheila J. Poole, Commissioner  
Amanda Eveleth  
Brandon Schaefer  
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