



**Office of Children  
and Family Services**

**ANDREW M. CUOMO**  
Governor

**SHEILA J. POOLE**  
Acting Commissioner

**RECEIVED**

EXECUTIVE CORRESPONDENCE

**APR 30 2018**

OFFICE OF THE STATE COMPTROLLER  
**THOMAS P. DiNAPOLI**  
COMPTROLLER

April 25, 2018

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

Dear Comptroller DiNapoli:

In accordance with the provisions of section 170 of the Executive Law, the following are actions the Office of Children and Family Services (OCFS) has taken or will be taking to implement the recommendations contained in the Office of the State Comptroller's (OSC) Final Audit Report (2016-S-39) issued February 13, 2018 concerning Financial Oversight of the Advantage After School Program.

**Recommendation 1:** *Use available information, such as average attendance on quarterly reports, contract expenditure data, and attendance reviewed during Program Manager visits, to identify contracts with an increased risk of exceeding the maximum cost per child and/or serving significantly fewer children than their Maximum Average Daily Attendance (MADA). For contracts with increased risk, implement steps to monitor contract service levels and spending, and take appropriate corrective action, which may include redirecting funds to other sites and providers.*

**Actions Taken to Date:**

OCFS, in its response to the OSC Draft Audit Report, declined to adopt this recommendation because it is inconsistent with the terms of the Advantage After School contracts. The contracts do not establish either the MADA or a maximum cost per child as a payment criterion. However, as also previously noted in the same response, OCFS program managers already monitor programs to identify contractors that are serving significantly fewer children than projected in their initial funding applications. OCFS works with such contractors to implement strategies to try to increase attendance while maintaining program quality. Unfortunately, some schools have low attendance levels during the school day that impact how many children participate in the associated after school programs. For those contractors where significantly low attendance continues, OCFS works with the contractors to adjust their spending and/or move resources between program sites.

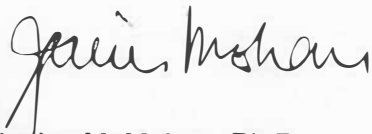
**Recommendation 2:** *Based on the identified risk factors, include a review of selected approved claims in existing Program monitoring efforts.*

**Actions Taken to Date:**

OCFS continues to question the findings underlying this recommendation due to OSC's use of judgmental sampling and the limited number of questionable expenses. Nonetheless, OCFS is implementing a claims review process that requires each Advantage After School Program contractor to submit all backup documentation for one of its quarterly claims. OCFS Division of Child Care Services staff will compare the backup documentation against the contractor claims for completeness, accuracy and consistency with the contract terms. OCFS is initiating the process with six contractors and then will expand it to the remaining contractors.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Jarice M. Molnar". The signature is fluid and cursive, with the first name "Jarice" being more prominent.

Jarice M. Molnar, Ph.D.  
Deputy Commissioner  
Division of Child Care Services

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Honorable Thomas P. DiNapoli  
NYS Comptroller  
110 State Street, 15<sup>th</sup> Floor  
Albany, NY 12236

