



Office of Children and Family Services

ANDREW M. CUOMO
Governor

SHEILA J. POOLE
Acting Commissioner

July 23, 2018

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

Dear Comptroller DiNapoli:

In accordance with the provisions of Section 170 of the Executive Law, the following are actions that 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 (2017-S-16) issued on April 24, 2018.

Recommendation 1: Develop a centralized method for tracking and maintaining all DV program information.

Recommendation 2: Develop procedures to ensure consistency in reporting across all regions.

Recommendation 3: Develop procedures for monitoring the Regional Offices' oversight of residential domestic violence programs and each of their respective residences.

Actions Taken to Date:

As OCFS indicated in its response to the draft audit, OCFS had already implemented these recommendations prior to the commencement of OSC's audit.

In 2014, OCFS developed a DV Licensing Manual that included protocols and tools for regional offices to use in conducting monitoring site visits, which is regularly updated in response to comments from the regional office staff and central office reviews. In 2016, OCFS developed a SharePoint site to centralize inspection/visit reports for programs being certified/recertified. The use of the site was later modified to include a DV site tracking sheet, tools, protocols and monitoring documents. The changes were completed by January 2017. At that time, protocols were expanded to require the regional offices to upload annual inspection/visit reports for programs that were not being certified or recertified at the time of the inspections/visits. The SharePoint site is reviewed monthly by Regional and Home Office staff to assess compliance with conducting monitoring visits and fire safety inspections. Calls and meetings between Home and Regional Offices are held monthly to review any outstanding monitoring visits. Plans of action are developed as necessary.

Furthermore, in December 2017, OCFS revised several sections of the Domestic Violence Licensing Manual to improve clarity and enhance consistency of reporting procedures across all regions.

Recommendation 4: Formally assess the adequacy of the internal control environment at OCFS, and take necessary steps to ensure the control environment is adequate, including cooperation with authorized State oversight inquiries.

Actions Taken to Date:

OCFS previously asserted our disagreement with OSC's recommendation that OCFS enhance its "cooperation with authorized State oversight inquiries." Consistent with federal and state confidentiality laws, OCFS did not provide the audit team assigned to this engagement with unfettered access to the agency's personnel and

information systems. During the planning stages of this audit, OSC's Division of State Government Accountability was made fully aware of federal and state confidentiality laws relating to OCFS's domestic violence programs, as well as the agency's commitment to adhere to these requirements, which are necessary to protect one of the state's most vulnerable populations. Instead of adhering to these laws, the OSC chose instead to recommend violation of them.

OCFS has demonstrated a strong track record of complying with internal control verifications, and although we have considered this recommendation, we believe that current controls are robust. Consistent with federal and state confidentiality laws, OCFS continues to cooperate with authorized State oversight inquiries.

Sincerely,

A handwritten signature in black ink, reading "Laura M. Velez". The signature is fluid and cursive, with the first name "Laura" being the most prominent part.

Laura M. Velez
Deputy Commissioner
Child Welfare and Community Services