



Office of Children and Family Services

ANDREW M. CUOMO
Governor

SHEILA J. POOLE
Commissioner

January 26, 2021

Attn: Thomas DiNapoli, State Comptroller
Office of the State Comptroller
110 State Street
Albany, NY 12236

Re: Audit 2019-S-47 180-day update

Dear Mr. DiNapoli:

On behalf of the New York State Office of Children and Family Services (OCFS) and pursuant to Executive Law § 170, I write to provide you with the 180-day update of our progress to date concerning OCFS's responses to OSC's three recommendations detailed in Audit Report 2019-S-47 entitled "Oversight of Runaway and Homeless Youth Program." OSC's stated audit objective was "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 final audit, issued May 2020, covered the period January 1, 2018 through February 21, 2020, and contained three key findings and recommendations.

OCFS Response to Key Findings: OCFS generally agreed with OSC's key findings, specifically, the finding that OCFS RHY programs visited met the health and safety standards required by regulation and OSC's stated goal of strengthening the Child and Family Services Plan (CFSP) process. Since early 2018, OCFS has continually taken significant steps to strengthen the CFSP process with the goal of making service plans a more effective tool for counties. In addition, OCFS agreed that timely inspections and correcting deficiencies were important goals for the RHY program.

OCFS also identified numerous actions taken prior to the inception of the audit to strengthen the RHY program since 2018. 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 became part of our routine oversight practice. Finally, since 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.

1. **OSC 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 180-day Response: We agree with this recommendation. OCFS is in the process of completely restructuring the RHY regulations which, once adopted, will impact the content and process of oversight. The issuance of the regulations have been delayed because OCFS was caused to refocus energies to supporting programs in their responses to the COVID-19 pandemic i.e. providing PPE, monitoring

outbreaks and intake closures, and other health and safety issues. However, subsequent to the audit report being released, OCFS resumed its work on the RHY regulations and has made significant strides through work with internal experts and external stakeholders. Once final regulations are promulgated, OCFS will create a corresponding program manual to standardize monitoring practice for OCFS staff as recommended by OSC.

In addition, OCFS institutionalized its quarterly quality assurance reviews of reports, letters, and Performance Improvement Plans (PIPS) in January of 2020 and that process has continued. In the spring of 2021 programmatic monitoring and oversight work will transition from Child Welfare and Community Services (CWCS) to Youth Development and Partnerships for Success (YDAPS). Fire safety oversight will remain with CWCS. As OCFS prepares for this shift, monitoring and tracking tools are being revised to include additional detail and YDAPS monitoring staff are being trained in monitoring standards. These efforts will result in a team that is prepared to conduct oversight tasks consistently and adequately.

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

OCFS 180-day Response: We agree with this recommendation. As of the date of this letter, OCFS has determined through its oversight activities that most identified issues have been appropriately resolved. Despite progress being slowed by the COVID-19 pandemic, OCFS continues to monitor the few outstanding issues that remain including: finalizing construction of the second means of egress, variance for playroom on the second story of a program, and working with the local municipality to obtain documentation verifying required physical plant inspections were completed. OCFS has taken every measure to ensure the safety of all OCFS staff and RHY shelter staff and residents while simultaneously implementing the recommendation in a timely fashion.

3. **OSC 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 180-day Response: We agree with this recommendation. OCFS is continually and actively working toward strengthening the Child and Family Services Plan (CFSP) process with the goal of making service plans a more effective tool for counties to meet changing needs. Per OSC’s recommendation OCFS re-phrased a question pertaining to the response available to runaway and homeless youth for the upcoming 2021 plan cycle. Also, OCFS institutionalized its quarterly quality assurance reviews of reports, letters and PIPS in January of 2020 and that process has continued.

If you have any questions with respect to this response, please contact Bonnie Hahn at Bonnie.Hahn@ocfs.ny.gov.

Sincerely,



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

CC: Sheila J. Poole, OCFS Commissioner
Suzanne Miles, Deputy Counsel
Brendan Schaefer, Director of Internal Audit