



## Office of Children and Family Services

**KATHY HOCHUL**  
Governor

**SHEILA J. POOLE**  
Commissioner

June 7, 2022

Heather Pratt, Certified Fraud Examiner  
Office of the State Comptroller  
110 State Street  
Albany, NY 12236

Re: Oversight of Runaway and Homeless Youth (Follow-Up) 2021-F-24

Dear Ms. Pratt:

On behalf of the New York State Office of Children and Family Services (OCFS) I write to provide a response to the Oversight of Runaway and Homeless Youth (RHY) Report 2021-F24. The report examined OCFS's responses to the Office of the State Comptroller (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. Your office thereafter conducted a follow-up audit to determine the extent to which OCFS implemented each of the recommendations. Our comments on your follow-up determinations are below.

**OSC Recommendation 1:** *Develop written standards for conducting inspections as well as recording and reconciling deficiencies found during inspections on the written report and Improvement Plan.*

**OSC Determination:** Partially Implemented

**OCFS Response:** OCFS agrees that progress was made in this area. During the audit and the period that followed, OCFS reviewed standardized inspection tools and forms which enabled us to make necessary updates to support clarity and consistency. Additionally, OCFS developed an RHY Program Manual for use by field staff responsible for monitoring and oversight. This is a living document that is updated regularly, based on feedback from our team and as new trends and circumstances emerge.

Simultaneously, despite delays caused by the COVID-19 pandemic, OCFS continued to make progress on a new regulatory package to strengthen and clarify the requirements of RHY programs and providers. Once these new regulations are promulgated this summer, the revised forms and draft Program Manual will be updated to reflect new expectations.

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

**OSC Determination:** Fully Implemented

**OCFS Response:** OCFS places the highest priority on supporting the health and safety of youth in RHY programs. We appreciate the opportunity to identify and rectify additional concerns raised by OSC through the

audit process. In partnership with our office, RHY providers with identified deficiencies worked diligently to address each concern and all have been resolved in a manner that ensures a safe and healthy environment.

**OSC Recommendation 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.*

**OSC Determination:** Not Implemented

**OCFS Response:** OCFS does not agree with OSC's finding that Recommendation 3 was not implemented. During the audit process, there were numerous conversations between OSC and OCFS that focused on the Child and Family Services Plan (CFSP). Based on these conversations, OCFS updated a question in the plan central to OSC's concerns. OCFS recognizes that the internal guidance to accompany this revised question was not updated at that time, but these updates will be included in the 2022 guidance documents.

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 for Youth Development and Partnerships for Success

CC: Sheila J. Poole, OCFS Commissioner  
Suzanne E. Miles-Gustave, Executive Deputy Commissioner  
Willow Baer, General Counsel  
Brendan Schaefer, Director of Internal Audit  
Brandon Ogden, OSC Audit Supervisor