



March 27, 2026

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

RE: OSC Audit Report No: 2023-S-7 – 180 Day Response to the Report

Dear Comptroller DiNapoli:

The Office of Children and Family Services (OCFS) offers the following update outlining the steps taken to implement recommendations contained in the Office of the State Comptroller's (OSC) Final Audit Report 2023-S-7. The report entitled *Oversight of Adult Protective Services Staffing and Case Management (New York City Human Resources Administration)* was issued in October 2025. In accordance with the provisions of Executive Law Section 170, this response is being issued within 180 days of OSC's final audit report.

OSC Recommendation 1: Develop a process to monitor vacancies and turnover at APS providers to determine if compensating efforts, such as conducting more frequent Practice Reviews or additional training and technical assistance, are necessary to improve case management.

OCFS has developed and is finalizing a performance report, *APS Caseload and Timeliness Report*, to be sent monthly to local districts of social services (LDSS) for both OCFS and the LDSS to use as a tool to monitor staffing levels and timeliness with performance requirements. The report is expected to begin distribution in May 2026. In addition, New York City Human Resources Administration (HRA) generates a report to monitor caseload sizes and performance for the NYC Adult Protective Services (APS) borough offices and voluntary agencies. This report is currently distributed monthly to the NYC APS borough offices, voluntary agencies, and to OCFS.

The purpose of the monthly performance reports is for each LDSS, the NYC APS offices, HRA, and OCFS to utilize as a tool to monitor staffing levels and to measure performance. The reports will help to determine when discussions are warranted around potential action(s) necessary to improve case management. In such cases, the need for additional training, structure change and/or more staffing will be determined.

OSC Recommendation 2: Develop basic standards or guidance for caseloads that are flexible and adaptable based on the unique needs of each LDSS, including conducting periodic studies to evaluate manageable caseload ratios and determine effective case management practices.

OCFS has developed a new policy entitled *Adult Protective Services (APS) Staffing Guidelines and Case Management*. The policy is in the review process and is anticipated to be implemented in May 2026. The policy includes recommendations for staffing of APS caseworkers to adequately and effectively meet the needs of vulnerable adults and to complete required tasks within the mandated timeframes. The guidance is flexible to consider the numerous variables at the local districts such as types and complexity of cases, geographic areas covered, involvement of other agencies, and a caseworker's skills, training and experience.



The policy will also address a new process for determining if an LDSS has a manageable caseload ratio. OCFS Bureau of Adult Services (BAS) staff will review the monthly compliance reports to evaluate caseload ratios for their assigned LDSS and raise any concerns directly to the LDSS. BAS staff will work directly with the LDSS to alleviate those concerns through the creation of effective case management practices.

OSC Recommendation 3: Improve oversight of LDSS staffing and case management practices including, but not limited to, assessing and noting deficiencies for staffing and case management practices during OCFS Practice Reviews and issuing PIPs as necessary to address deficiencies.

OCFS is implementing the following tools to improve oversight of staffing and case management practices:

- OCFS will distribute *APS Caseload and Timeliness Reports* monthly which will capture the number of APS caseworkers, the number of APS supervisors and the average caseload per caseworker. The report measures the timeliness of case signoff at the intake, assessment, and ongoing stages. This tool will be used to assist in determining if staffing is adequate to meet the needs of APS clients.
- OCFS has added questions about staffing to the APS section of the State Plans that each LDSS must respond to annually. They will be required to describe the roles of each staff member and determine whether their APS staffing is adequate to complete the tasks necessary to protect the eligible vulnerable clients in their district. Any LDSS that does not have adequate staffing must detail a plan for addressing their staffing needs.
- OCFS added information about staffing and case management in the LDSS practice reviews. For any areas that do not meet an 85% regulatory compliance threshold the LDSS must complete a Performance Improvement Plan (PIP). In addition, each LDSS is required to provide OCFS with a PIP for approval by OCFS related to staffing when:
 - a. the LDSS is not meeting the statutory and regulatory compliance threshold;
 - b. The threshold is not being met due to staffing deficiencies, lack of training or staff having other duties; and
 - c. There is no plan for the LDSS to hire more staff or re-evaluate training needs.

OCFS appreciates the opportunity to provide an update regarding our continued efforts in these areas. Please contact Christopher Schall at (518) 402-3985 with any questions or concerns regarding this response.

Sincerely,

Dr. DaMia-Harris Madden, MBA, M.S.
Commissioner

cc: Gail Geohagen-Pratt, Deputy Commissioner
Terrence Pratt, General Counsel
Christopher Schall, Director of Audit and Quality Control