

# AUDIT REPORT



CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER  
BUREAU OF MANAGEMENT AUDIT  
**WILLIAM C. THOMPSON, JR., COMPTROLLER**

## **Audit Report on the Inwood House Foster Care Contract with the Administration for Children's Services**

*MD09-061A*

**June 30, 2009**



THE CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER  
1 CENTRE STREET  
NEW YORK, N.Y. 10007-2341

WILLIAM C. THOMPSON, JR.  
COMPTROLLER

**To the Citizens of the City of New York**

Ladies and Gentlemen:

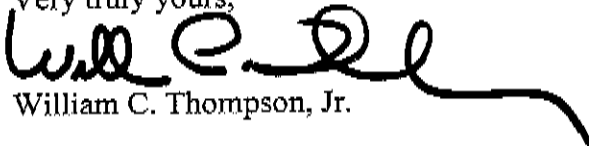
In accordance with the responsibilities of the Comptroller contained in Chapter 5, §93, of the New York City Charter, my office has audited the Inwood House (Inwood) foster care contract with the Administration for Children's Services (ACS).

In March 2000, ACS entered into a contract with Inwood to provide foster care services to pregnant young women between the ages of 12 and 20, including preparation for parenting, as well as to their babies after birth. We audit organizations operating under agreements with the City such as this as a means of ensuring that they comply with their agreements, using City funds effectively and in the best interest of those they serve.

The results of our audit, which are presented in this report, have been discussed with ACS and Inwood officials, and their comments have been considered in preparing this report.

I trust that this report contains information that is of interest to you. If you have any questions concerning this report, please e-mail my audit bureau at [audit@comptroller.nyc.gov](mailto:audit@comptroller.nyc.gov) or telephone my office at 212-669-3747.

Very truly yours,



William C. Thompson, Jr.

WCT/ec

**Report:** MD09-061A  
**Filed:** June 30, 2009

*Table of Contents*

**AUDIT REPORT IN BRIEF ..... 1**  
    Audit Findings and Conclusions..... 1  
    Audit Recommendations..... 2  
    Agency Response..... 2

**INTRODUCTION..... 3**  
    Background..... 3  
    Objective..... 4  
    Scope and Methodology ..... 5  
        Programmatic Aspects ..... 5  
        Background Checks ..... 6  
        Financial Aspects ..... 7  
    Discussion of Audit Results..... 7

**FINDINGS AND RECOMMENDATIONS ..... 8**  
    Concerns about AWOL Young Women ..... 8  
        Thirty-six Percent of Sampled Young Women Were AWOL ..... 9  
        Lack of Services for AWOL Young Women ..... 10  
        Lack of Compliance with AWOL Procedures ..... 11  
        Recommendations ..... 14  
    Discrepancies with Days-of-Care Payments..... 17  
        Recommendations..... 19

*The City of New York  
Office of the Comptroller  
Bureau of Management Audit*

**Audit Report on the Inwood House  
Foster Care Contract with the  
Administration for Children's Services**

MD09-061A

---

**AUDIT REPORT IN BRIEF**

The Administration for Children's Services (ACS) is responsible for protecting children from abuse and neglect and provides preventive, foster care, and adoption services. It contracts with a network of 36 foster care agencies to provide support services to approximately 17,000 foster care children.

In March 2000, ACS entered into a contract with Inwood House (Inwood) to provide foster care services to pregnant young women between the ages of 12 and 20, including preparation for parenting, as well as to their babies after birth. In January 2006, ACS renewed the contract with Inwood for a three-year term for the period March 1, 2006, through February 28, 2009, for a total amount not to exceed \$4,883,974. This audit examined the compliance of Inwood with major provisions of its foster care contract.

Audit Findings and Conclusions

The audit found that Inwood generally complied with the major programmatic provisions of its foster care contract with ACS. For 29 of the 30 cases reviewed, caseworkers had regular contacts with the young women and prepared reports on these contacts. In addition, 14 of the 16 sampled clients who were present at the Maternity Residence on a daily basis and were not AWOL received all of the required services. Furthermore, the four sampled young women in the Mother-Child Foster Care program and the one sampled young women in the Agency-Operated Boarding Home (AOBH) also received all of the required services.

Our review of the foster parents' files indicated that all 13 foster parents received the required background checks and training and that pre-placement inspections of their homes were conducted as required. In addition, the review of the 12 Inwood employee files indicated that the required background checks were completed and that the employees had the credentials and experience necessary for their positions. Lastly, the Maternity Residence and the AOBH provided an adequate living environment.

However, we have concerns about young women who were AWOL from the Maternity Residence and the services they did not receive because of their absences. In addition, there was

no evidence that Inwood filed Missing Person Reports or otherwise reported the young women's AWOL status to the police, as required.

The audit also concluded that Inwood did not always receive the correct payment amount for days-of-care requests made to ACS. We identified both underpayments and overpayments that ACS made to Inwood.

### Audit Recommendations

Based on our findings, we make 10 recommendations, 5 of which are listed below.

ACS and Inwood officials should:

- Examine AWOL incidents and try to find solutions to decrease the AWOL rate and the length of time that clients remain AWOL.
- Ensure that all clients receive the required services, including education, independent-living skills, and in-depth interviews with social workers. In addition, all client contact forms should be reviewed and signed by an Inwood supervisor or manager.
- Ensure that Missing Person Reports are filed for all AWOL young women under the age of 21. For those who are Person in Need of Supervision (PINS) cases, have Family Court warrants, or are below the age of 21, Inwood officials should insist the police file a Missing Person Report. If the police will not file the report, Inwood officials should request that a patrol supervisor come to the scene.
- Arrange a meeting with higher-level police officials at the local precinct to discuss difficulties in filing Missing Person Reports for AWOL young women who have PINS case, have Family Court warrants, or are 17 or 18 years of age.

ACS should:

- Ensure that it generates days-of-care payments using the correct rates and number of days of care.

### Agency Response

We received a written response from ACS that incorporated the responses of both ACS and Inwood. ACS officials generally agreed with the recommendations addressed to them (one recommendation was not addressed). With regard to the recommendations addressed to Inwood, officials generally agreed with all of them but contended that five recommendations were already being addressed during the audit period reviewed.

## INTRODUCTION

### Background

The New York City Administration for Children's Services (ACS) is responsible for protecting children from abuse and neglect and provides preventive, foster care, and adoption services. ACS contracts with a network of 36 foster care agencies to provide support services to approximately 17,000 foster care children.

In March 2000, ACS entered into a contract with Inwood House (Inwood) to provide foster care services. In January 2006, ACS renewed the contract with Inwood for a three-year term for the period March 1, 2006, through February 28, 2009, for a total amount not to exceed \$4,883,974.

The primary mission of Inwood is to provide foster care to pregnant young women between the ages of 12 and 20, including preparation for parenting, as well as to their babies after birth. The pregnant young women referred to Inwood come there from their biological homes or have already been in the foster care system and were receiving services from another foster care agency. For the clients who came from their biological homes, the primary reason for placement is usually a conflict with their parent or guardian over the pregnancy. Young women who are already in foster care are placed with Inwood because of their pregnancy and the inability of the primary foster care agency to care for them.

Inwood has three ACS-funded programs: a Maternity Residence, a Mother-Child Foster Care Program (Foster Care), and an Agency-Operated Boarding Home (AOBH). The Maternity Residence provides 24-hour comprehensive care for pregnant young women in foster care. Inwood provides support, comprehensive prenatal care, professional counseling, educational guidance, job and career development opportunities, and classes in parenting, health and well-being, nutrition, budgeting, and independent living. The temporary Maternity Residence<sup>1</sup> has a maximum capacity of 24. A total of 82 women resided at this facility for some period of time during Fiscal Year 2008. The Maternity Residence has a staff of one Youth Care Worker for every five women in residence.

Once a client gives birth and chooses to remain in the care of Inwood, she and her baby have the option of going to Foster Care where they and their children are placed together in a caring foster home. With the assistance of her foster parents, the young mother learns appropriate family-life skills, continues her education, or establishes a career. During Fiscal Year 2008, there were 13 young women (along with their babies)<sup>2</sup> who were placed with foster parents.

---

<sup>1</sup> At the time of the audit, the Inwood Maternity Residence was undergoing renovations and the young women were being housed in a temporary facility rented by Inwood.

<sup>2</sup> There were 12 babies corresponding to the 13 young mothers who stayed in the Foster Care Program during Fiscal Year 2008. One of the clients in the program did not have a baby, but Inwood received a waiver from ACS that allowed her to stay in a Mother-Child foster home.

After giving birth, the young mothers also have the option of going to the Inwood AOBH, which is a boarding home with a maximum capacity of three mothers and their babies. During their stay in the AOBH, the new mothers are supervised by a house parent and various other Inwood staff, and they continue with their education or the establishment of a career. In addition, young mothers living in the AOBH are provided with independent-living classes. A total of four young women resided in the AOBH for some period of time during Fiscal Year 2008.

If the client is not eligible to remain in the care of Inwood after giving birth, her options can vary. She may be reunited with her family or relatives, or, if she is old enough, she may reside on her own. Some clients may not be eligible for placement within the Inwood Mother-Child Foster Care or the AOBH due to mental health issues, age, etc. These young women are discharged from Inwood, and some may return to their planning agency.<sup>3</sup>

Inwood reports monthly to ACS the number of clients in its care and the days of care that each client received services under Inwood supervision, and ACS pays Inwood based on this information. The payment amount is calculated by multiplying the total days of care reported by Inwood by a per diem rate. Inwood receives an administrative rate for clients in the Maternity Residence and AOBH. For the young women in the Foster Care program, the per diem rate consists of two parts—an administrative rate to compensate Inwood for its services and a pass-through rate that Inwood in turn pays to the foster parents. In addition, Inwood also receives an administrative rate payment for the babies residing with their mothers in the AOBH and an administrative and pass-through rate for the babies residing in the Foster Care program. These payment rates are determined by the New York State Office of Children and Family Services (OCFS) and presented in the schedule of Maximum State Aid Rates (MSAR). Inwood received payments from ACS totaling approximately \$2 million during Fiscal Year 2008, including days-of-care payments, special payments, single issue payments, and exception to policy payments<sup>4</sup>.

In order to more efficiently track the status of children receiving child welfare services statewide, the Office of Children and Family Services developed CONNECTIONS, a computerized system. Both ACS and Inwood use CONNECTIONS to enter and review case information for clients. Inwood uses CONNECTIONS to file Family Assessment and Service Plans and progress notes with ACS.

### Objective

The objective of this audit was to determine whether Inwood House complied with major provisions of its foster care contract with ACS. We focused on whether Inwood:

---

<sup>3</sup> The planning agency is either ACS or the original foster care agency where the teenager resided before being transferred to Inwood.

<sup>4</sup> “Special Payments” are payments made on behalf of foster children for items that are necessary but not covered by regular payments. “Single issue payments” are payments that arise from the resolution of billing discrepancies and are made in between billing cycles. “Exception to policy payments” are payments made for foster children who do not meet some ACS foster care requirement, but an exception is being made.

- Provided all of the required services,
- Ensured that its caseworkers had regular contacts with foster children and prepared reports on these contacts,
- Ensured that the Maternity Residence and AOBH provided an adequate living environment,
- Performed background checks of foster parents,
- Conducted pre-placement inspections of foster homes,
- Provided training to foster parents,
- Performed background checks of its employees,
- Adequately supported its days-of-care payment requests to ACS and prepared them in accordance with the MSAR schedule, and
- Adequately supported special payments made on behalf of foster children.

### Scope and Methodology

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

The scope of this audit was Fiscal Year 2008 (July 1, 2007, to June 30, 2008). To gain an understanding of the services provided by Inwood, we reviewed the Inwood contract and interviewed Inwood officials including the Executive Director, the Chief Financial Officer, and the Senior Director of Program Development and Quality Assurance. In addition we reviewed Inwood's procedures, and reviewed foster child and foster parent case files.

To gain an understanding of ACS foster care service and reimbursement requirements, we interviewed ACS officials, including the Assistant Commissioner of the Agency Program Assistance (APA) unit, a Supervisor within the APA unit, the Assistant Director of Audit and a Child Welfare Supervisor.

### Programmatic Aspects

To determine whether we received a complete and reliable listing of the 2008 population served by Inwood, we obtained printouts from the New York Statewide Service Payment System (SSPS) from ACS of all clients for whom ACS made payments to Inwood during Fiscal Year 2008. We obtained a list from Inwood of those teens that it provided services to in Fiscal Year 2008. We compared the clients on the list received from Inwood with payment information from ACS to verify the completeness and accuracy of the Inwood list and to determine whether Inwood's population was authorized to receive services at Inwood. In addition, we randomly selected a sample of 25 (30%) of the 82 young women who were listed in the care of the Inwood



Maternity Residence for more than two weeks during Fiscal Year 2008 and reviewed the corresponding hard-copy files at Inwood for each client to test the reliability of the provided list.

We reviewed the 25 sampled files to determine whether Inwood was in compliance with the major programmatic provisions of its foster care contract with ACS. We reviewed their case files for provision of the following: educational and vocational services, medical services, clinical and mental health services, and independent-living skills. We also reviewed the files to determine whether caseworkers had regular contacts with foster children and whether they prepared reports on these contacts as required.

We reviewed an additional five randomly selected client files which included 4 (31%) of the 13 young women who resided in the Foster Care program and 1 (25%) of the 4 who resided in the AOBH during Fiscal Year 2008, and also reviewed them for the same provision of services and caseworker contacts mentioned above.

It should be noted that our review was for the purpose of determining whether the required services had been provided. We did not evaluate the quality of (1) the services provided to foster children, (2) the training provided to foster parents, or (3) the determinations of foster parents' qualifications since those assessments were outside the scope of the audit.

We conducted an unannounced visit to the Maternity Residence on September 30, 2008 and to the AOBH on October 1, 2008. Using the APA unit manual as a reference, we created a checklist and used it to determine the adequacy of the living environment for the girls at the Inwood Maternity Residence and the AOBH. In addition, we interviewed a Youth Counselor Supervisor and a Social Worker at the Maternity Residence and the Senior House Parent at the AOBH.

#### Background Checks

To determine whether Inwood met certain contract provisions relating to foster parents, we reviewed the files of all 13 foster parents active during Fiscal Year 2008 to determine whether required background checks were done, pre-placement inspections of foster homes were conducted, and foster parents received the required training. We also determined whether the annual recertifications of foster parents were up to date.

In addition, we randomly selected for review the personnel files of 12 of the 38 employees who worked at Inwood for at least some portion of Fiscal Year 2008. We reviewed the files to ascertain whether the required criminal background checks were performed and whether an inquiry was made for each of the 12 employees to the Statewide Central Register of Child Abuse and Maltreatment for any history of child abuse or maltreatment prior to the employees' employment, as required by the contract. We also reviewed the files to determine whether the employees had the appropriate credentials and experience necessary for their positions.

## Financial Aspects

To determine whether Inwood days-of-care payment requests to ACS were adequately supported, we assessed the accuracy of the number of days of care submitted by Inwood for all 30 clients and five of their babies in our sample. We reviewed progress notes, census reports, and days-of-care information from Inwood records to calculate Inwood's days of care. We then compared the days-of-care information to payment information obtained from SSPS. We checked the calculation of the audit-accepted days of care against the New York State-authorized rates to determine whether Inwood billed ACS for the correct amounts. In addition, we reviewed the total days-of-care payments received by Inwood for all 99 young mothers<sup>5</sup> and corresponding 16 babies<sup>6</sup> who received services at Inwood during Fiscal Year 2008 and compared them to payment information generated from ACS's SSPS system.

We relied on the 2006 determination of the New York State Comptroller that CONNECTIONS was reliable. Its April 6, 2006 audit report *Implementation of CONNECTIONS* (2004-S-70) concluded that controls had been implemented to verify that the system was being used as designed. We reviewed details from CONNECTIONS, such as progress notes and movement information to help determine the days-of-care the clients received from Inwood.

In addition, we reviewed the two special payments made by Inwood on behalf of foster children to determine whether they were adequately supported.

We determined whether the Inwood foster care contract with ACS was registered with the Comptroller's Office, as required by Chapter 13, §328, of the New York City Charter.

The results of the above tests, while not projected to their respective populations, provided a reasonable basis to assess Inwood's compliance with the major provisions of its foster care contract with ACS.

## Discussion of Audit Results

The matters covered in this report were discussed with ACS and Inwood officials during and at the conclusion of this audit. A preliminary draft report was sent to ACS and Inwood officials and discussed at an exit conference held on April 28, 2009. On May 18, 2009, we submitted a draft report to ACS and Inwood officials with a request for comments. On June 2, 2009, we received a written response from ACS officials which incorporated the responses of both ACS and Inwood. The report makes 10 recommendations, 3 of which are addressed to Inwood, 2 of which are addressed to ACS, and 5 of which are addressed to both parties. ACS officials generally agreed with six recommendations addressed to ACS and did not respond to one recommendation. With regard to the recommendations addressed to Inwood, officials agreed with all eight recommendations but contended that five recommendations were already being addressed during the audit period reviewed.

The full text of the ACS response is included as an addendum to this report.

---

<sup>5</sup> During Fiscal Year 2008, 82 teenagers resided in the Maternity Residence, 13 resided in the Foster Care program, and 4 resided in the AOBH, for a total of 99 teenagers.

<sup>6</sup> During Fiscal Year 2008, 12 babies resided in the Foster Care program, and 4 babies resided in the AOBH, for a total of 16 babies.

## FINDINGS AND RECOMMENDATIONS

Our audit revealed that Inwood generally complied with the major programmatic provisions of its foster care contract with ACS. For 29 of the 30 cases reviewed, caseworkers had regular contacts with the young women and prepared reports on these contacts. In addition, 14 of the 16 sampled clients who were present at the Maternity Residence on a daily basis and were not AWOL received all of the required services.<sup>7</sup> Furthermore, the four sampled young women in the Mother-Child Foster Care program and the one sampled young woman in the AOBH, also received all of the required services.

Our review of the foster parents' files indicated that all 13 foster parents received the required background checks and training and that pre-placement inspections of their homes were conducted, as required. In addition, the review of the 12 Inwood employee files indicated that the required background checks were completed and that the employees had the credentials and experience necessary for their positions. Lastly, the Maternity Residence<sup>8</sup> and the AOBH provided an adequate living environment.

However, we have concerns about young women who were AWOL from the Maternity Residence and the services they did not receive because of their absences. In addition, there was no evidence that Inwood filed Missing Person Reports or otherwise reported the young women's AWOL status to the police, as required.

The audit also revealed that Inwood did not always receive the correct payment amount for days-of-care requests made to ACS. We identified both underpayments and overpayments that ACS made to Inwood.

The following sections of this report discuss our findings in more detail.

### Concerns about AWOL Young Women

Our review of the 25 young women who resided in the Maternity Residence revealed that nine (36%) were AWOL for at least some period of time during their stay. This finding is a concern since these are at-risk young people who require close supervision. In addition, as a result of their absence, 5 (55%) of the 9 young women did not receive all of the services required. We found no evidence that Inwood filed a Missing Person Report or otherwise reported the client's absence to the police for the majority of the AWOL instances, as required by ACS. Moreover, there was no evidence that the needs of three AWOL young women were assessed every time they returned to the Inwood Maternity Residence. Two of these three young women were among the five that did not receive all of the required services.

---

<sup>7</sup> The files for one of the two teenagers lacked her reading and math grades and that of the other teenager had 34 client contact forms of which 14 were not signed by a supervisor or manager.

<sup>8</sup> We visited the temporary Maternity Residence being rented by Inwood, since the permanent residence was undergoing renovations.

### Thirty-six Percent of Sampled Young Women Were AWOL

Our review of the sample of 25 young women who resided in the Maternity Residence during Fiscal Year 2008 found that 9 (36%) of the 25 were AWOL from the facility, ranging from a total of 5 to 141 days. Eight of these nine young women were below the age of 18, and seven of them were 15 or 16 years old. Pregnant clients who are AWOL are defined as at-risk and face problems unlike those faced by the average teenager. ACS procedures define these AWOL young people as high-risk because their safety is severely compromised by their pregnancy.

According to ACS procedures, an AWOL client is defined as “any child up to 21 years of age, in the ‘care and custody’ or ‘custody and guardianship’ of the Commissioner of the Administration for Children’s Services and placed in a licensed foster care facility who disappears, runs away, is abducted, or is otherwise absent voluntarily or involuntarily without the consent of the person(s)/facility in whose care he or she has been placed.”

Often, the young women placed in the custody of ACS and Inwood have a family history of abuse, neglect, drug use, or problems with their biological families, and are placed with Inwood for their own safety and well-being. Inwood assigns staff to monitor the entrance to the facility, assigns curfews to the young women, and requires them to sign in and out upon leaving and returning to the facility. However, Inwood officials told us that their facility is not a detention center and that the young women are free to come and go as they please. Nonetheless, these young women are in ACS and Inwood custody and care for their own safety and protection, and ACS and Inwood are responsible for these clients if anything were to happen to them while they are AWOL.

When presented with our concern that 36 percent of our sampled young women had been AWOL at one point during their stay at the Maternity Residence, Inwood officials placed blame on the fact that the Maternity Residence was in a temporary facility for the last two years. They stated that the facility was not large enough to allow visits from the clients’ boyfriends, the main reason for most of the AWOLs. Inwood officials expressed hope that the new facility would alleviate the AWOL problem, since it is a larger facility with more room for visitors. Regardless of the change in residence, pregnant young women with a troubled history require stable supervision and care. These young women were placed in foster care because of abuse, neglect, or other serious problems, and if they are AWOL, there is a significant risk that they may be returning to unsafe environments.

For the safety and well-being of their clients, ACS and Inwood need to examine the AWOL incidences and find solutions to decrease the rate of AWOLs. This analysis should include interviewing the young women and doing additional research in an effort to determine why they feel compelled to leave the facility. It also would include providing closer supervision and creating a hospitable and supportive environment for the young people, as well as programs and recreational activities that will hold their interest. Although we acknowledge that some young women may attempt to run away from the facility regardless of the changes that are made, a significant effort must be made by ACS and Inwood to address AWOLs so as to decrease their frequency.

## Lack of Services for AWOL Young Women

As a result of their absence from the facility, five (55%) of the nine young women who were AWOL did not receive all of the required services during Fiscal Year 2008.<sup>9</sup> The remaining four young women who were AWOL received all of the required services during Fiscal Year 2008.

According to ACS requirements, Inwood is obligated to provide vocational or educational services, independent-living skills, and mental health services to the young women. These services assist them in being able to function better once they leave Inwood. However, Inwood cannot provide all of the required services if the young people are chronically AWOL. Table I, below, shows the lack of services for the AWOL young women.

**Table I**

### Services Not Provided to AWOL Young Women

| Teenager # | Number of Days AWOL During Fiscal Year 2008 | Education Issues* | No Independent - Living Classes or Activities | Absent for Initial In-depth Interview with Social Worker | Client Contact Forms Not Signed by Supervisor or Manager |
|------------|---|-------------------|---|--|--|
| 1          | 32  | A, B, C, D        | X   |  |  |
| 2          | 38  | B, C              |   |  | X  |
| 3          | 77  | B                 |   |  |  |
| 4          | 141   | A, B, C, D        | X   | X  |  |
| 5          | 42  | A, B, C, D        |   |  |  |
|            |   | <b>5</b>          | <b>2</b>                                      | <b>1</b>   | <b>1</b>   |

(A) Young women was not enrolled or did not attend school

(B) There was no communication between Inwood and the school

(C) There was no record of the young women's reading and math scores

(D) For those not enrolled in school, there was no documentation of required vocational training.

As indicated in Table I, five of the nine young women who were AWOL from 32 to 141 days had various issues of education. Three of the five were not enrolled or did not attend school, had no evidence in their file of communication between Inwood and the school, had no record of their reading and math scores and no documentation of any vocational training. The contract between ACS and Inwood requires that Inwood help clients achieve their full educational potential. Therefore, all of the young women should have been provided with all the required educational services, a task difficult to accomplish if the young people are not present to receive the services. Moreover, files for all five young women lacked evidence of

<sup>9</sup> If a young woman is AWOL for more than seven consecutive days she is placed on suspended pay by ACS, and Inwood does not receive payment for these days.

communication between Inwood and the school and reading and math scores—both the responsibility of Inwood officials, regardless of the clients' AWOL status.

In addition to issues of education, one of the five young women who was AWOL for 32 days, did not receive independent-living services. For another young woman, AWOL for 38 days, 26 of 27 client contact forms were not signed by her supervisor, thereby, leading us to question the validity of the client contact forms, which indicate the number of times case workers and social workers make contact with the young woman. In addition to not receiving all her educational requirements, a young woman who was AWOL for 141 days did not receive independent-living services and an in-depth interview with her social worker, which is required to evaluate her mental well-being and to assess the need for more comprehensive psychological evaluations. ACS requires Inwood to provide independent-living services to ensure that young people acquire skills necessary for them to live healthy, productive, and self-sufficient adult lives. The ACS contract also states that Inwood should attempt to ensure that young people leaving foster care are emotionally and physically able to pursue healthy and productive futures.

The ACS contract states that Inwood agrees to take steps to ensure that the services, care, treatment, and support that Inwood clients require are provided. Without the required education or vocational training, independent-living services, mental health services, and regular contact with the social and case workers, AWOL young women are not acquiring the critical and fundamental skills or resources necessary to live productive and self-sufficient lives.

#### Lack of Compliance with AWOL Procedures

We found no evidence that Inwood filed Missing Person Reports with the police or otherwise reported the nine clients' AWOL status to the police. In addition, there was no evidence that the needs of three AWOL young women were assessed each time they returned to the Inwood Maternity Residence.

When we questioned ACS officials about AWOL procedures, they informed us that a Missing Person Report is required to be filed with the police for all AWOL instances. According to ACS procedures, when an agency official is notified of a missing young person (up to the age of 21), the official must immediately notify the local precinct and request that the police file a Missing Person Report. With regard to AWOL teenagers, ACS procedures state, "It is important that Children's Services and its provider agencies concentrate their efforts on locating and engaging these youth, transitioning them from dysfunctional settings to safe ones, and reinforcing permanency with potential resource families."

When we initially questioned Inwood officials about their handling of AWOLs, they informed us that the police will not issue a Missing Person Report if there is a Family Court warrant out for the individual or if the individual is a Person in Need of Supervision (PINS) case. We contacted the Inwood local precinct and confirmed that they do not issue a Missing Person Report if there is a Family Court warrant or if the individual is a PINS case, because in these instances a warrant exists and the individual is already being looked for by the police. However, ACS disagrees with the police regarding PINS and Family Court warrants. According to ACS, a

Missing Persons Report should be filed for all individuals that are AWOL, regardless of their PINS or Family Court warrant status.

Two weeks after we informed Inwood officials about our AWOL concerns, they provided us with copies of 181 internal Inwood House Congregate Care Missing Person Reports (reports)<sup>10</sup> that were completed by Inwood staff, not by the police. These reports were not present in the files of the young women when we initially reviewed the files, but were instead reportedly filed in a binder at the facility. However, it was not until we questioned Inwood officials about the absence of these reports during our review of the case files that they mentioned this binder, approximately two weeks after we initially brought the absent AWOL reports to their attention.

Although we were unable to determine the number of Missing Person Reports that Inwood should have filed, it appears that Inwood presented us with more reports of attempts to file Missing Person Reports than were reasonable. For example, in one instance a young woman’s AWOL period began December 21, 2007, and ended January 2, 2008. Inwood officials provided us with a report that showed an attempt to file a Missing Person Report with the police for *each day* during the period for a total of 13 reports. Table II, below, lists the disposition of the majority of the reports filled out by the Inwood staff.

**Table II**  
Disposition Listed on Reports Filled Out by Inwood Staff

| Young Woman  | Total Days AWOL In FY 08 | Reports Filled Out by Inwood Staff | Reports That Actually State A Missing Person Report Was Filed with Police | Reports Not Issued Due to Family Court Warrants or PINS Case Status | Reports Not Issued Because Young Woman’s Whereabouts Known | Reports Not Issued Because Young Woman Was 17 or 18 Years Old |
|--------------|--------------------------|------------------------------------|---|---|--|---|
| 1            | 32                       | 3                                  | 0   | 2   | 1  | 0   |
| 2            | 5                        | 1                                  | 0   | 0   | 1  | 0   |
| 3            | 25                       | 20                                 | 1   | 8   | 3  | 5   |
| 4            | 64                       | 41                                 | 0   | 17  | 21   | 2   |
| 5            | 38                       | 2                                  | 1   | 0   | 0  | 0   |
| 6            | 77                       | 44                                 | 0   | 37  | 2  | 0   |
| 7            | 141                      | 10                                 | 0   | 9   | 0  | 0   |
| 8            | 42                       | 31                                 | 0   | 0   | 22   | 0   |
| 9            | 42                       | 29                                 | 0   | 22  | 1  | 4   |
| <b>TOTAL</b> | <b>466</b>               | <b>181</b>                         | <b>2</b>  | <b>95</b>   | <b>51</b>  | <b>11</b>   |

As can be seen in Table II, only 2 of the 181 reports filled out by Inwood staff stated that a Missing Person Report was actually filed with the police. However, those reports do not list a Missing Person Report number provided by the police, nor were they signed by a police officer.

<sup>10</sup> These reports were unofficial missing person reports filled out by Inwood staff.

In addition, 157 (87%) of these reports stated that a report could not be filed with the police because the AWOL young women had a warrant, was a PINS case, was 17 or 18 years of age—or because the whereabouts of the young women were known. Further, 59 (33%) of the 181 reports did not list the names of police officers contacted or their badge numbers, which leads us to question whether the police were even contacted in these instances. The remaining 22 reports had different dispositions including the report could not be filed because the young woman was not gone for 24 hours, a Missing Person Report was previously filed, or in some instances the report had no disposition listed.

According to ACS, all clients that go missing from a facility should be referred to the police for the filing of a Missing Person Report. The police are required to take a report for all children under the age of 21. ACS has stated there have been problems with the police taking reports when they get information that the youth is a PINS case or has a warrant. However, according to the Director of the ACS Missing Person Unit, Inwood should insist that a Missing Person Report be taken as PINS status or Family Court warrant are not criminal and merely require the police to produce the young person in Family Court, if found. A Family Court warrant does not instruct the police to look for the youth, but the filing of a Missing Person Report is meant to ensure that someone is looking for the youth. In addition, the Director stated that Inwood should avoid, if possible, the sharing of an AWOL client's PINS or warrant status with the police, because some police officers do not understand that Missing Person Reports should be filed regardless of PINS status or existence of Family Court warrants.

The Director of the ACS Missing Person Unit also stated that if police officers give the agency a difficult time filing a Missing Person Report, the agency should request that a patrol supervisor come to the scene to advise the police officers. In addition, ACS advises facility administrators to set up meetings at their local precinct with higher-level NYPD personnel to discuss their difficulties regarding the filing of Missing Person Reports for young women who are PINS cases or who have Family Court warrants.

After the exit conference, Inwood provided us with a letter dated April 30, 2009, it received from the 19<sup>th</sup> precinct that stated, "This is to serve as verification that . . . Inwood House did come to the 19<sup>th</sup> precinct (NYPD) on October 15, 2008 and spoke to police officers during their Unit Training session. Discussions included policies and guidelines set forth by ACS in which the Inwood House is mandated to follow. Among these procedures is the reporting of AWOLs to the NYPD." However, we were unable to determine whether the problem with the police filing Missing Person Reports for AWOL young women who are PINS cases or have Family Court warrants was specifically discussed at this meeting and whether the meeting resulted in a change in the officers' filing of Missing Person Reports in these instances.

In addition, Inwood officials also stated that if they know the whereabouts of the young women, they do not file a Missing Person Report with the police. A number of the reports filled in by Inwood staff stated that Missing Person Reports were not filed by the police because the whereabouts of the young women were known. However, since the young women were sometimes AWOL for longer than one day, we were unable to determine whether Inwood knew their whereabouts for the duration of their AWOL period, since contact may have only been made periodically. Moreover, we cannot be certain that the young women were truthful about



their whereabouts or that they were in a safe environment. Regardless of the duration of the AWOL, ACS procedures state that if the case planner or assigned caseworker obtains information that may assist in finding the person, that information should be immediately reported to the police. In addition, it states that every effort must be made to return the child to an authorized safe placement.

Furthermore, according to Inwood officials, when a young woman returns from being AWOL, the Inwood staff and social workers should meet with her to assess her needs. This assessment involves attempting to determine why the individual went AWOL and figuring out the solutions to any problems she might have. We found no evidence in the files that the needs of three of the nine young women were assessed by Inwood upon each of their returns to the Maternity Residence.

Family Court warrants and PINS cases result from an inability to control the teenagers or from concern about their potentially dangerous and harmful actions or behavior. The fact that a high-risk young person is AWOL and has a Family Court warrant or is a PINS case signals that it was even more crucial to file Missing Person Reports with the police. When AWOL incidents occur, Inwood needs to immediately file a Missing Person Report or otherwise report the incident to the police, regardless of whether the young woman has a Family Court warrant or is a PINS case, or whether Inwood officials believe they know the person's whereabouts. Inwood officials should insist that the police file a Missing Person Report for all AWOL incidents to ensure that the young women are being looked for by the police, since ultimately Inwood is responsible for the safety and well-being of them. In addition, upon the person's return to Inwood, officials need to ensure that the social worker performs an assessment to address the mental, physical, and emotional needs of the young woman and to work to prevent her absence from reoccurring.

#### Recommendations

ACS and Inwood officials should:

1. Examine AWOL incidents and try to find solutions to decrease the AWOL rate and the length of time that clients remain AWOL.

**ACS Response:** “APA is working with Family Permanency staff to provide technical assistance to this agency on how to work with youth that go AWOL both in terms of prevention and on working to reintegrate them into the program upon their return.”

**Inwood Response:** “Inwood House (IH) currently collects data related to AWOL incidents by participants and has taken proactive steps to lower the incidents as well as shorten the duration of AWOL. IH has met with residents to gain insight related to behaviors and policies related to AWOL and has implemented procedures that include assessing participants' stressors, needs and safety planning upon entry into the program as well as meeting with the Treatment Team upon returning from AWOL to ensure all relevant information that may be related to AWOL behavior is addressed and additional service needs are provided for.”

2. Ensure that all clients receive the required services, including education, independent-living skills, and in-depth interviews with social workers. In addition, all client contact forms should be reviewed and signed by an Inwood supervisor or manager.

**ACS Response:** “ACS engages in a yearly PAMS review that encompasses service provision and planning, education, independent-living skills, and in-depth interviews with social workers.”

**Inwood Response:** “IH provides comprehensive services to residents that include a full psychosocial evaluation by program social worker within 30 days. The Education Specialist on site is in contact with the school of every resident in the Maternity Residence. In addition to tracking attendance and grades the Educational Specialist collects Reading and Math scores for every resident who is attending school. IH offers comprehensive IL [Independent Living] skills on site to all residents.”

**Auditor Comment:** Inwood officials responded to this recommendation as if they have always ensured that all clients receive the required services. However, as stated in this report, we identified five young women for whom there is no evidence that they received all of the required services. Inwood needs to ensure that every client receives all required services, documentation evidencing these services is maintained, and all client contact forms are signed by a supervisor or manager.

3. Ensure that Inwood officials maintain open communication with the young women’s schools and obtain their reading and math scores.

**Inwood Response:** “IH Education Specialist, who is on site on a full-time basis, contacts the schools of every resident on a regular basis. Report cards, IEP, etc. are obtained and kept on file in the resident’s case record at IH. The Educational Specialist obtains attendance records on a weekly basis from all schools.”

**Auditor Comment:** Inwood responded as if it has been maintaining open communication with the young women’s schools and obtaining their reading and math scores all along. However, as stated previously, we identified three young women whose files contained no evidence of communication between Inwood and the school and had no records of reading and math scores.

4. Ensure that Missing Person Reports are filed for all AWOL young women under the age of 21. For those who are PINS cases, have Family Court warrants, or are below the age of 21, Inwood officials should insist that the police file a Missing Person Report. If the police will not file the report, Inwood officials should request that a patrol supervisor come to the scene.

**ACS Response:** “The Missing Children’s Out Reach Unit will work with the Children’s Services NYPD liaison to schedule a meeting with the Inwood House Administration and the appropriate NYPD 19<sup>th</sup> Precinct staff.”

***Inwood Response:*** “IH has been extremely proactive in working to ensure all residents who AWOL from any IH program are reported to the NY police and that a Missing Persons Report is filed (and accepted). . . . IH contacts the NYPD every time a participant is AWOL from any program and insists that a missing person report is filed. This policy is clearly documented on site, Incident Reports are completed and supervisors review the Incident Reports. Missing Person Reports are attached to Incident Reports when IH receives them from NYPD.”

***Auditor Comment:*** Although Inwood officials state that they insist that the police file a Missing Persons Report, we found that only 2 of the 181 reports filled out by Inwood staff note that a Missing Persons Report was filed by the police. (The actual Missing Persons Reports for these two instances were not maintained in Inwood’s files.) Inwood needs to take additional measures to ensure that Missing Persons Reports are filed for all instances that young women are AWOL.

5. Arrange a meeting with higher-level police officials at the local precinct to discuss difficulties in filing Missing Person Reports for AWOL young women who are PINS cases, have Family Court warrants, or are 17 or 18 years of age.

***ACS Response:*** “The Missing Children’s Out Reach Unit will work with the Children’s Services NYPD liaison to schedule a meeting with the Inwood House Administration and the appropriate NYPD 19<sup>th</sup> Precinct staff. The purpose of the meeting is to: Inform NYPD about Family Courts PINS status; Discuss Family Court Warrants; Discuss Suzanne’s Law requirements; Share the Children’s Services Provider Agency responsibility requirements about reporting children who run away from Foster Care; Discuss how to build a better relationship to support each other mandates for reporting.”

***Inwood Response:*** “IH staff . . . requested to meet with Precinct Captain and officers from the 19<sup>th</sup> Precinct. They attended Roll Call on October 15<sup>th</sup>, 2008 and explained the importance of accepting all Missing Person Reports including providing the heightened needs & risks of the population of youth & young adults who reside at IH, ACS Regulations and Mandates and a copy of full explanation of ‘Suzanne’s Law.’”

Inwood officials should:

6. Immediately report to the police information about the whereabouts of AWOL young women upon obtaining this information.

***Inwood Response:*** “IH contacts the NYPD when they learn the whereabouts of any resident who was previously reported ‘Missing.’ This practice is documented in IH AWOL Policy.”

***Auditor Comment:*** We did not see evidence that Inwood officials contacted the police when they learned the whereabouts of AWOL young women. Inwood should ensure that these contacts are documented as evidence that its staff performs this function.

7. Ensure that social workers perform assessments of AWOL young woman upon their return to Inwood to address their mental, physical, and emotional needs.

***Inwood Response:*** “All participants meet with the Treatment Team upon their return from AWOL.”

***Auditor Comment:*** As previously stated, we found no evidence that the needs of three young women were assessed by Inwood upon each return to the residence after being AWOL. Inwood officials need to ensure that these assessments are performed and that documentation evidencing the assessments is maintained.

### Discrepancies with Days-of-Care Payments

Inwood did not always accurately request days-of-care payments from ACS, and ACS did not always make days-of-care payments to Inwood accurately. We identified several instances in which Inwood was not paid for the correct number of days of services they provided to clients.

Each month, Inwood reports to ACS the number of foster children and the days of care the clients received in the Maternity Residence, Mother-Child Foster Care program, or the AOBH. ACS compares the information received from Inwood with its own information and if both sets of records match, makes the payments. The payment amount is calculated by multiplying the total days of care reported by Inwood by a per diem rate.

We reviewed the total days of care reported by Inwood for all 99 young women and the corresponding 16 babies who resided within Inwood facilities during Fiscal Year 2008. According to our review, Inwood received a total of \$10,546.23 in overpayments for five clients and was underpaid a total of \$7,378.87 for three clients, resulting in a net overpayment of \$3,167.36. Table III, below, lists the discrepancies in the days-of-care payments.

**Table III**  
**Discrepancies in Days-of-Care Payments**

| Teenager # | # of Days Discrepancy | Type of Facility    | Amount of Overpayment from ACS | Amount of Underpayment from ACS | Explanation  |
|------------|-----------------------|---------------------|--------------------------------|---------------------------------|--|
| 1          | 29                    | Foster Care         | \$4,590.99                     |                                 | Payment was made for 31 days at the Maternity residence rate, but client resided 2 days in Maternity Residence and 29 days in Foster Care. |
| 2          | 1                     | Maternity Residence | \$213.34                       |                                 | Payment was made for 7 days, but client resided at Inwood for 6 days.  |
| 3          | 30                    | Foster Care         | \$1,475.10                     |                                 | Payment was made for 30 days at Foster Care rate for a baby, but the mother does not appear on any Inwood records.                         |
| 4          | 13                    | Maternity Residence | \$2,773.42                     |                                 | ACS paid Inwood two times for the same 13-day period.  |
| 5          | 25                    | AOBH                |                                | \$6,036.00                      | Client mother and baby resided in AOBH for 25 days during February 2008. Inwood did not receive payment for the baby.                      |
| 6          | 1                     | Foster Care         |                                | \$55.03                         | Client resided in Foster Care home for 25 days. ACS paid for 24 days.  |
| 7          | 7                     | Maternity Residence | \$1,493.38                     |                                 | Payment was made for a total of 183 days, but client resided in Maternity Residence 190 days.  |
| 8          | 6                     | Maternity Residence |                                | \$1,287.84                      | Payment was made for 30 days, but client resided in Maternity Residence for 24 days.   |
|            |                       |                     | <b>\$10,546.23</b>             | <b>\$7,378.87</b>               |  |

After we brought these discrepancies to the attention of Inwood officials, they agreed with the number of days and the dollar amounts of the discrepancies. ACS also acknowledged the discrepancies for clients #1, #3, #4, #5, and #6. Although the dollar amount of the net overpayment is not substantial, the fact that the discrepancies still existed indicate that billing errors do occur and that they are not rectified in a timely manner.

Both Inwood and ACS need to carefully review the days-of-care requests and corresponding payments regularly to ensure that they are accurate. In 2007, ACS hired an independent Certified Public Accounting firm to conduct audits of the Inwood Foster Care and Independent Living program for Fiscal Years 2000, 2001, 2002, and 2003. The audits determined that Inwood owed ACS \$107,194 as a result of the net underpayments and overpayments received over the four fiscal years. As a result, Inwood has been repaying ACS \$10,000 a month. Inwood officials stated that in the past, payments were made by ACS in advance based on the census for the two prior months rather than following the current practice whereby payments are made based on the actual census for the month being billed. Therefore, Inwood was required to make these repayments to ACS.

Although ACS no longer makes payments to Inwood in advance, discrepancies in days-of-care payments are still occurring. ACS should consider conducting more timely audits of the payments made to Inwood for subsequent years to identify any additional overpayments or underpayments to Inwood.

Recommendations

Inwood should:

8. Ensure that it requests accurate days-of-care payments and should review ACS payments to ensure that payments were calculated at the correct rate and number of days of care.

***Inwood Response:*** “IH will review any overpayment or underpayment on a monthly basis and will work with ACS to correct the errors expediently.”

ACS should:

9. Ensure that it generates days-of-care payments using the correct rates and number of days of care.

***ACS Response:*** “Financial Services Budget division notifies Payments of approved rates to pay along with effective dates which are entered into BICS/SSPS (Statewide Payment System).”

10. Conduct additional and timely audits of the Inwood Foster Care contract to determine whether additional overpayments or underpayments were made to Inwood.

***ACS Response:*** “Currently a Draft Audit for Inwood House for Fiscal Year 2006 was submitted. The field work has been completed on the Fiscal Year 2007 audit and the Draft is anticipated shortly. Thereafter, plans will be made to complete the Fiscal Years 2008 and 2009.”



NEW YORK CITY CHILDREN'S SERVICES  
150 William Street, 10th Floor  
New York, NY 10038

JOHN B. MATTINGLY Ph.D., M.S.W.  
*Commissioner*

SUSAN NUCCIO  
*Deputy Commissioner  
Financial Services*

June 02, 2009

Mr. John Graham  
Deputy Comptroller  
Policy, Audits, Accountancy & Contracts  
The City of New York Office of the Comptroller  
Executive Offices  
1 Centre Street, Room 500  
New York, New York 10007-2341

Re: NYC Comptroller's Draft Report MD09-061A Audit on  
Inwood House Foster Care Contract with the  
Administration for Children's Services

Dear Mr. Graham:

Thank you for sharing with us the Draft Report for the above captioned audit.

Attached is our response to your recommendations and appropriate Audit Implementation Plans (AIP's). Please note that ACS was happy to find that Inwood House generally complied with the major provisions of its Foster Care contract with ACS. In many instances, recommended controls were already in place by the time the audit was completed. ACS looks forward to continue working with your office to improve the delivery of services to the children of the City of New York.

If you have any questions, please do not hesitate to contact me at (212) 676-8855.

Thank you,

A handwritten signature in black ink, appearing to read "Tom Welsh".

Tom Welsh  
Assistant Commissioner  
Audit Services

**ADMINISTRATION FOR CHILDREN'S SERVICES AUDIT IMPLEMENTATION PLAN  
 NEW YORK CITY COMPTROLLER'S AUDIT REPORT ON INWOOD HOUSE FOSTER CARE CONTRACT  
 WITH THE ADMINISTRATION FOR CHILDREN'S SERVICES  
 AUDIT NUMBER: MD09-061A**

**RECOMMENDATION # 1** Inwood should examine AWOL incidents and try to find solutions to decrease the AWOL rate and the length of time that clients remain AWOL.

**RESPONSIBLE MANAGERS' NAME:** LINDA BRYANT, EXECUTIVE DIRECTOR INWOOD HOUSE

| CORRECTIVE ACTIONS TO BE TAKEN   | RESPONSIBLE PERSON  | DATES           |          | DOCUMENTATION   | COMMENTS |
|--|---|-----------------|----------|---|----------|
|  |   | START           | END      |   |          |
| Inwood House (IH) currently collects data related to AWOL incidents by participants and has taken proactive steps to lower the incidents as well as shorten the duration of AWOL. IH has met with residents to gain insight related to behaviors and policies related to AWOL and has implemented procedures that include assessing participants' stressors, needs and safety planning upon entry into the program as well as meeting with the Treatment Team upon returning from AWOL to ensure all relevant information that may be related to AWOL behavior is addressed and additional service needs are provided for. | Dr. K. Boyce,<br>Sr. Dir. Of<br>Program Dev. &<br>QA<br>M. Adams, AED<br>for Programs<br>C. Batista, Dir.<br>Maternity<br>Residence | January<br>2009 | On-going | All AWOL incidents are documented on IH Incident Reports that are sent to QA Dept. and kept on file at Residence. |          |



**ADMINISTRATION FOR CHILDREN'S SERVICES AUDIT IMPLEMENTATION PLAN  
 NEW YORK CITY COMPTROLLER'S AUDIT REPORT ON INWOOD HOUSE FOSTER CARE CONTRACT  
 WITH THE ADMINISTRATION FOR CHILDREN'S SERVICES  
 AUDIT NUMBER: MD09-061A**

RECOMMENDATION # 1 ACS should examine AWOL incidents and try to find solutions to decrease the AWOL rate and the length of time that clients remain AWOL.

RESPONSIBLE MANAGERS' NAME: JESS DANNHAUSER, ASSISTANT COMMISSIONER ACS QUALITY ASSURANCE

| CORRECTIVE ACTIONS TO BE TAKEN   | RESPONSIBLE PERSON  | DATES<br>START      END                          | DOCUMENTATION   | COMMENTS |
|--|---|--|---|----------|
| <p>APA staff monitors outcomes measures on a quarterly basis which track the number of AWOL occurrences.</p> <p>APA is working with Family Permanency staff to provide technical assistance to this agency on how to work with youth that go AWOL both in terms of prevention and on working to reintegrate them into the program upon their return.</p> <p>The yearly PAMS reviews cover agency's practice around youth who go AWOL and APA staff will continue to monitor this area to assess improvements in the agency's practice.</p> | <p>Frank Callagy,<br/>Deputy Director<br/>ACS QA</p> <p>Michael Calabrese,<br/>ACS QA</p> | <p>On-going</p> <p>On-going</p> <p>July 2009</p> | <p>Quarterly Complementary measures reports.</p> <p>PAMS results.</p> |          |

ADMINISTRATION FOR CHILDREN'S SERVICES AUDIT IMPLEMENTATION PLAN  
NEW YORK CITY COMPTROLLER'S AUDIT REPORT ON INWOOD HOUSE FOSTER CARE CONTRACT  
WITH THE ADMINISTRATION FOR CHILDREN'S SERVICES  
AUDIT NUMBER: MD09-061A

RECOMMENDATION # 2 Inwood should ensure that all clients receive services, including education, independent-living skills, and in-depth interviews with social workers. In addition, all client contact forms should be reviewed and signed by an inwood supervisor or manager.

RESPONSIBLE MANAGERS' NAME: LINDA BRYANT, EXECUTIVE DIRECTOR INWOOD HOUSE

| CORRECTIVE ACTIONS TO BE TAKEN   | RESPONSIBLE PERSON  | DATES START | DATES END | DOCUMENTATION   | COMMENTS  |
|--|---|-------------|-----------|---|---|
| IH provides comprehensive services to residents that include a full psychosocial evaluation by program social worker within 30 days.   | Program Social Worker   | On-going    | On-going  | Psychosocial is filed in Case Record (of each resident).  | Youth who AWOL prior to Social Worker obtaining full and adequate information related to their history, family & current functioning may only have a truncated report on file. If the youth returns, the Social Worker will complete the psychosocial if placement duration allows. |
| The Education Specialist on site is in contact with the school of every resident in the Maternity Residence. In addition to tracking attendance and grades the Educational Specialist collects Reading and Math scores for every resident who is attending school.   | Educational Specialist, J. Boyd   | On-going    | On-going  | Documentation of school contacts are reflected in Connections. Hard copies of report cards, IEP's, etc. are kept in the case record of the resident on site.      | Sessions are offered at various times to accommodate the schedules of residents. Some groups are offered twice weekly so that all residents can attend.   |
| IH offers comprehensive IL Skills on site to all residents, that include (but are not limited to) Child Birth Education classes, Health (including maternal and infant) classes, job readiness and career option workshops, recreation, nutrition and cooking, housekeeping (including laundry & cleaning), housing, college and vocational training planning, Family Planning, Domestic Violence, Anger Management, Relationship Workshop, Creative Writing, etc. | Various staff members including paid consultants & volunteers & program staff | On-going    | On-going  | All sessions are documented on "Group Activity Forms" and signed by the facilitator and approved by a Supervisor. Attendees sign the form as proof of attendance. | Some groups are mandatory & some are voluntary.   |

**ADMINISTRATION FOR CHILDREN'S SERVICES AUDIT IMPLEMENTATION PLAN  
 NEW YORK CITY COMPTROLLER'S AUDIT REPORT ON INWOOD HOUSE FOSTER CARE CONTRACT  
 WITH THE ADMINISTRATION FOR CHILDREN'S SERVICES  
 AUDIT NUMBER: MD09-061A**

RECOMMENDATION # 2 ACS should ensure that all clients receive services, including education, independent-living skills, and in-depth interviews with social workers. In addition, all client contact forms should be reviewed and signed by an Inwood supervisor or manager.

RESPONSIBLE MANAGERS' NAME: JESS DANNHAUSER, ASSISTANT COMMISSIONER ACS QUALITY ASSURANCE

| CORRECTIVE ACTIONS TO BE TAKEN  | RESPONSIBLE PERSON   | DATES<br>START      END               | DOCUMENTATION | COMMENTS |
|---|--|---------------------------------------|---------------|----------|
| ACS engages in a yearly PAMS review that encompasses service provision and planning, education, independent-living skills, and in-depth interviews with social workers. | Frank Callagy,<br>Deputy Director<br>ACS QA<br><br>Michael<br>Calabrese,<br>ACS QA | July 2009<br><br><br>Annual<br>review | PAMS results. |          |

**ADMINISTRATION FOR CHILDREN'S SERVICES AUDIT IMPLEMENTATION PLAN  
 NEW YORK CITY COMPTROLLER'S AUDIT REPORT ON INWOOD HOUSE FOSTER CARE CONTRACT  
 WITH THE ADMINISTRATION FOR CHILDREN'S SERVICES  
 AUDIT NUMBER: MD09-061A**

RECOMMENDATION # 3 Inwood should ensure that Inwood officials maintain open communication with the young women's schools and obtain their reading and math scores.

RESPONSIBLE MANAGERS' NAME: LINDA BRYANT, EXECUTIVE DIRECTOR INWOOD HOUSE

| CORRECTIVE ACTIONS TO BE TAKEN   | RESPONSIBLE PERSON                 | DATES    |          | DOCUMENTATION  | COMMENTS |
|--|------------------------------------|----------|----------|--|----------|
|  |                                    | START    | END      |  |          |
| IH Education Specialist, who is on site on a full-time basis, contacts the schools of every resident on a regular basis. Report cards, IEP, etc. are obtained and kept on file in the resident's case record at IH.<br>The Educational Specialist obtains attendance records on a weekly basis from all schools. | J. Boyd,<br>Educational Specialist | On-going | On-going | Education contacts are noted in Connections. Hard copies of documents (report cards, IEP's, etc.) are kept on in the resident's case record on file at IH. |          |

**ADMINISTRATION FOR CHILDREN'S SERVICES AUDIT IMPLEMENTATION PLAN  
NEW YORK CITY COMPTROLLER'S AUDIT REPORT ON INWOOD HOUSE FOSTER CARE CONTRACT  
WITH THE ADMINISTRATION FOR CHILDREN'S SERVICES  
AUDIT NUMBER: MD09-061A**

**RECOMMENDATION #4** Inwood should ensure that Missing Person Reports are filed for all AWOL young women under the age of 21. For those who are PINS cases, have Family Court Warrants, or are below the age of 21, Inwood officials should insist that the police file a Missing Person Report. If the police do not file a report, Inwood officials should request that a patrol supervisor come to the scene.

**RESPONSIBLE MANAGERS' NAME:** LINDA BRYANT, EXECUTIVE DIRECTOR INWOOD HOUSE

| <b>CORRECTIVE ACTIONS TO BE TAKEN</b>   | <b>RESPONSIBLE PERSON</b>  | <b>DATES START END</b>       | <b>DOCUMENTATION</b>  | <b>COMMENTS</b>   |
|---|--|------------------------------|---|---|
| <p>IH has been extremely proactive in working to ensure all residents who AWOL from any IH program are reported to the NY police and that a Missing Persons Report is filed (and accepted). As described in the Audit Exit Conference, Program Director, Cathy Batista and Program Coordinator, Nancy Andino met with the local precinct during roll call and described ACS regulations and mandates related to runaway (AWOL) and missing youth and provided a copy of Suzanne's Law. IH contacts the NYPD every time a participant is AWOL from any program and insists that a missing person report is filed. This policy is clearly documented on site, Incident Reports are completed and supervisors review the Incident Reports.</p> | <p>Staff on duty when the child/young adult AWOL's from the program. Supervisor reviews the Incident Report related to the AWOL.</p> | <p>On-going<br/>On-going</p> | <p>AWOL incidents are reported on IH Incident Reports that are kept on file in the Incident Report Binder in the program site as well as sent to QA and AED for Programs.</p> | <p>Missing Person Reports are attached to Incident Reports when IH receives them from NYPD.</p> |

**ADMINISTRATION FOR CHILDREN'S SERVICES AUDIT IMPLEMENTATION PLAN  
 NEW YORK CITY COMPTROLLER'S AUDIT REPORT ON INWOOD HOUSE FOSTER CARE CONTRACT  
 WITH THE ADMINISTRATION FOR CHILDREN'S SERVICES  
 AUDIT NUMBER: MD09-061A**

**RECOMMENDATION # 4** ACS should ensure that Missing Person Reports are filed for all AWOL young women under the age of 21. For those who are PINS cases, have Family Court Warrants, or are below the age of 21, Inwood officials should insist that the police file a Missing Person Report. If the police do not file a report, Inwood officials should request that a patrol supervisor come to the scene.

**RESPONSIBLE MANAGERS' NAME:** LORRAINE STEPHENS, DEPUTY COMMISSIONER, ACS FAMILY PERMANENCY SERVICES

| CORRECTIVE ACTIONS TO BE TAKEN   | RESPONSIBLE PERSON                  | DATES<br>START      END           | DOCUMENTATION                                  | COMMENTS  |
|--|-------------------------------------|-----------------------------------|--|---|
| <p>The Missing Children's Out Reach Unit will work with the Children's Services NYPD liaison to schedule a meeting with the Inwood House Administration and the appropriate NYPD 19<sup>th</sup> Precinct staff.</p> <p>The purpose of the meeting is to:</p> <ul style="list-style-type: none"> <li>• Inform NYPD about Family Courts PINS status.</li> <li>• Discuss Family Court Warrants.</li> <li>• Discuss Suzanne's Law requirements.</li> <li>• Share the Children's Services Provider Agency responsibility requirements about reporting children who run away from Foster Care.</li> <li>• Discuss how to build a better communication relationship to support each other mandates for reporting.</li> </ul> | <p>Dominique Jones,<br/>ACS FPS</p> | <p>July 2009      August 2009</p> | <p>Attendance and minutes from the meeting</p> | <p>There is a Federal ruling (Suzanne's Law) that states that Law Enforcement must take the report of any missing youth up to the age of 21.<br/>                     There is no difference between PINS or non-PINS youth in Foster Care.<br/>                     A Family Court Warrant is just notification to the court and only instructs Law Enforcement to produce the youth in court if called upon, and is not a criminal warrant whereas no one is looking for the youth.</p> |

ADMINISTRATION FOR CHILDREN'S SERVICES AUDIT IMPLEMENTATION PLAN  
NEW YORK CITY COMPTROLLER'S AUDIT REPORT ON INWOOD HOUSE FOSTER CARE CONTRACT  
WITH THE ADMINISTRATION FOR CHILDREN'S SERVICES  
AUDIT NUMBER: MD09-061A

RECOMMENDATION # 5 Inwood should arrange a meeting with higher-level police officials at the local precinct to discuss difficulties in filing missing person reports for AWOL young women who are PINS cases, have Family Court Warrants, or are 17 or 18 years of age.

RESPONSIBLE MANAGERS' NAME: LINDA BRYANT, EXECUTIVE DIRECTOR INWOOD HOUSE

| CORRECTIVE ACTIONS TO BE TAKEN   | RESPONSIBLE PERSON   | DATES START END                         | DOCUMENTATION  | COMMENTS |
|--|--|---|--|----------|
| <p>See Section Above<br/>IH staff, Program Director, C. Batista &amp; Program Coordinator, N. Andino requested to meet with the Precinct Captain and officers from the 19<sup>th</sup> Precinct. They attended Roll Call on October 15th, 2008 and explained the importance of accepting all Missing Person Reports including providing the heightened needs &amp; risks of the population of youth &amp; young adults who reside at IH, ACS Regulations and Mandates and a copy of full explanation of "Suzanne's Law".</p> | <p>C. Batista,<br/>Program Director,<br/>Maternity Residence;<br/>M. Adams, AED for Programs;<br/>N. Andino,<br/>Program Coordinator</p> | <p>October 15, 2008</p> <p>On-going</p> | <p>Documentation of the October 15<sup>th</sup>, 2008 meeting was provided (letter from Precinct Captain to Comptrollers Office)</p> |          |

**ADMINISTRATION FOR CHILDREN'S SERVICES AUDIT IMPLEMENTATION PLAN  
NEW YORK CITY COMPTROLLER'S AUDIT REPORT ON INWOOD HOUSE FOSTER CARE CONTRACT  
WITH THE ADMINISTRATION FOR CHILDREN'S SERVICES  
AUDIT NUMBER: MD09-061A**

**RECOMMENDATION # 5** ACS should arrange a meeting with higher-level police officials at the local precinct to discuss difficulties in filing missing person reports for AWOL young women who are PINS cases, have Family Court Warrants, or are 17 or 18 years of age.

**RESPONSIBLE MANAGERS' NAME:** LORRAINE STEPHENS, DEPUTY COMMISSIONER, ACS FAMILY PERMANANCY SERVICES

| CORRECTIVE ACTIONS TO BE TAKEN   | RESPONSIBLE PERSON                  | DATES            |                    | DOCUMENTATION                                  | COMMENTS  |
|--|-------------------------------------|------------------|--------------------|--|---|
|  |                                     | START            | END                |  |   |
| <p>The Missing Children's Out Reach Unit will work with the Children's Services NYPD liaison to schedule a meeting with the Inwood House Administration and the appropriate NYPD 19<sup>th</sup> Precinct staff.</p> <p>The purpose of the meeting is to:</p> <ul style="list-style-type: none"> <li>• Inform NYPD about Family Courts PINS status.</li> <li>• Discuss Family Court Warrants.</li> <li>• Discuss Suzanne's Law requirements.</li> <li>• Share the Children's Services Provider Agency responsibility requirements about reporting children who run away from Foster Care.</li> <li>• Discuss how to build a better communication relationship to support each other mandates for reporting.</li> </ul> | <p>Dominique Jones,<br/>ACS FPS</p> | <p>July 2009</p> | <p>August 2009</p> | <p>Attendance and minutes from the meeting</p> | <p>There is a Federal ruling (Suzanne's Law) that states that Law Enforcement must take the report of any missing youth up to the age of 21.</p> <p>There is no difference between PINS or non-PINS youth in Foster Care.</p> <p>A Family Court Warrant is just notification to the court and only instructs Law Enforcement to produce the youth in court if called upon, and is not a criminal warrant whereas no one is looking for the youth.</p> |



**ADMINISTRATION FOR CHILDREN'S SERVICES AUDIT IMPLEMENTATION PLAN  
 NEW YORK CITY COMPTROLLER'S AUDIT REPORT ON INWOOD HOUSE FOSTER CARE CONTRACT  
 WITH THE ADMINISTRATION FOR CHILDREN'S SERVICES  
 AUDIT NUMBER: MD09-061A**

RECOMMENDATION # 6 Inwood officials should report to the police information about the whereabouts of AWOL young women upon obtaining this information.

RESPONSIBLE MANAGERS' NAME: LINDA BRYANT, EXECUTIVE DIRECTOR INWOOD HOUSE

| CORRECTIVE ACTIONS TO BE TAKEN   | RESPONSIBLE PERSON                                      | DATES<br>START      END  | DOCUMENTATION  | COMMENTS |
|--|---|--------------------------|--|----------|
| IH contacts the NYPD when they learn the whereabouts of any resident who was previously reported "Missing". This practice is documented in IH AWOL Policy. | Staff on duty when the resident returns to the program. | On-going<br><br>On-going | Return from AWOL and notification of contacting the NYPD that the resident has returned from AWOL is noted in Connections. |          |

**ADMINISTRATION FOR CHILDREN'S SERVICES AUDIT IMPLEMENTATION PLAN  
 NEW YORK CITY COMPTROLLER'S AUDIT REPORT ON INWOOD HOUSE FOSTER CARE CONTRACT  
 WITH THE ADMINISTRATION FOR CHILDREN'S SERVICES  
 AUDIT NUMBER: MD09-061A**

**RECOMMENDATION # 7** Inwood officials should ensure that social worker perform assessments of AWOL young women upon their return to Inwood to address their mental, physical, and emotional needs.

**RESPONSIBLE MANAGERS' NAME:** LINDA BRYANT, EXECUTIVE DIRECTOR INWOOD HOUSE

| CORRECTIVE ACTIONS TO BE TAKEN   | RESPONSIBLE PERSON                 | DATES    |          | DOCUMENTATION  | COMMENTS  |
|--|------------------------------------|----------|----------|--|---|
|  |                                    | START    | END      |  |   |
| All participants meet with the Treatment Team upon their return from AWOL. The Treatment Team consists of Program Director (LMSW), Program Coordinator (LCSW), Social Worker assigned to resident, Primary Youth Development Counselor, and other relevant staff such as Program RN, Ed Specialist, Youth Development Staff with whom the resident has a strong relationship, etc. | Social Worker assigned to resident | On-going | On-going | Meetings are documented in Connections. Policy that outlines this procedure is documented in the AWOL Log. | Treatment Team Meetings aim to assess the needs and risk of participants upon their return to the program and ensure IH is fully meeting their needs. |

**ADMINISTRATION FOR CHILDREN'S SERVICES AUDIT IMPLEMENTATION PLAN  
NEW YORK CITY COMPTROLLER'S AUDIT REPORT ON INWOOD HOUSE FOSTER CARE CONTRACT  
WITH THE ADMINISTRATION FOR CHILDREN'S SERVICES  
AUDIT NUMBER: MD09-061A**

**RECOMMENDATION # 8** Inwood should ensure that it requests accurate days-of-care payments and should review ACS payments to ensure that payments were calculated at the correct rate and number of days of care.

**RESPONSIBLE MANAGERS' NAME:** LINDA BRYANT, EXECUTIVE DIRECTOR INWOOD HOUSE

| CORRECTIVE ACTIONS TO BE TAKEN  | RESPONSIBLE PERSON         | DATES      |          | DOCUMENTATION  | COMMENTS   |
|---|----------------------------|------------|----------|--|--|
|   |                            | START      | END      |  |  |
| IH will review any overpayment or underpayment on a monthly basis and will work with ACS to correct the errors expediently. | Controller/Billing Analyst | April 2009 | On-going | -SSPS Reports<br>-Daily Attendance<br>-Payment Detail<br>Reports | IH does not have case management responsibilities for our Maternity Resident clients. In order to get paid, admission and discharge data must be entered into CCRS. IH does not have access to CCRS, often resulting in a lag between billing and attendance data. |

**ADMINISTRATION FOR CHILDREN'S SERVICES AUDIT IMPLEMENTATION PLAN  
 NEW YORK CITY COMPTROLLER'S AUDIT REPORT ON INWOOD HOUSE FOSTER CARE CONTRACT  
 WITH THE ADMINISTRATION FOR CHILDREN'S SERVICES  
 AUDIT NUMBER: MD09-061A**

RECOMMENDATION # 9 ACS should ensure that it generates days-of-care payments using the correct rates and number of days of care.

RESPONSIBLE MANAGERS' NAME: RON KUCH, EXECUTIVE DIRECTOR, ACS PAYMENT SERVICES

| CORRECTIVE ACTIONS TO BE TAKEN  | RESPONSIBLE PERSON                       | DATES    |          | DOCUMENTATION  | COMMENTS   |
|---|--|----------|----------|--|--|
|   |  | START    | END      |  |  |
| Financial Services Budget division notifies Payments of approved rates to pay along with effective dates which are entered into BICS/SSPS (Statewide Payment System). | Ida Anderson,<br>ACS<br>Payment Services | On-going | On-going | 1. Approved rates from Budget.<br>2. Monthly SSPS care day submission with rate from agency. | When authorized, new rates will be entered in BICS and paid. |

ADMINISTRATION FOR CHILDREN'S SERVICES AUDIT IMPLEMENTATION PLAN  
NEW YORK CITY COMPTROLLER'S AUDIT REPORT ON INWOOD HOUSE FOSTER CARE CONTRACT  
WITH THE ADMINISTRATION FOR CHILDREN'S SERVICES  
AUDIT NUMBER: MD09-061A

RECOMMENDATION # 10 ACS should conduct additional and timely audits of the Inwood foster care contract to determine whether additional overpayments or underpayments were made to Inwood.

RESPONSIBLE MANAGERS' NAME: TOM WELSH, ASSISTANT COMMISSIONER, ACS AUDIT SERVICES

| CORRECTIVE ACTIONS TO BE TAKEN  | RESPONSIBLE PERSON                  | DATES    |          | DOCUMENTATION | COMMENTS |
|---|-------------------------------------|----------|----------|---------------|----------|
|   |                                     | START    | END      |               |          |
| Currently a Draft Audit for Inwood House for Fiscal year 2006 was submitted. The field work has been completed on the Fiscal Year 2007 audit and the Draft is anticipated shortly. Thereafter, plans will be made to complete the Fiscal Years 2008 and 2009. | Tom Welsh,<br>ACS<br>Audit Services | On-going | On-going | Audit Reports |          |