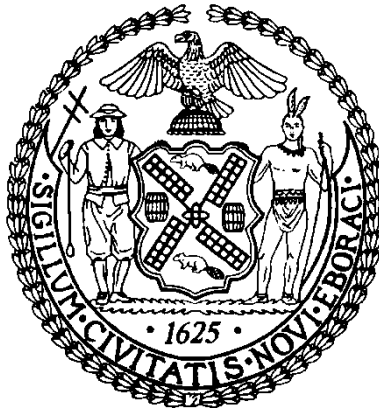


**CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
John C. Liu
COMPTROLLER**

**MANAGEMENT AUDIT
H. Tina Kim
Deputy Comptroller for Audit**



**Audit Report on the Investigation of Child
Abuse and Maltreatment Allegations
Received by the Administration for
Children's Services**

MG10-059A

January 5, 2011



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

John C. Liu
COMPTROLLER

January 5, 2011

To the Residents of the City of New York:

My office has audited the controls of the Administration for Children's Services (ACS) to determine if ACS ensured that investigations of child abuse and maltreatment reports were conducted in accordance with established guidelines and regulations. We audit City entities such as this as a means of increasing accountability and ensuring that City programs operate in the best interest of the public.

The audit found that ACS generally ensured that investigations of child abuse and maltreatment reports were conducted in accordance with established guidelines and regulations. Two weaknesses were identified, however. Case workers were not always making timely entries of the various investigative activities performed into CONNECTIONS (CNNX), a child welfare computer system. The delayed recording of the activities increases the risk that case workers may enter inaccurate or incomplete information and interferes with the supervisors' ability to adequately oversee the investigations and offer meaningful directives in a timely manner. In addition, ACS case managers (CPMs) were inconsistent in the performance of random managerial reviews, increasing the risk that some investigations may not be handled in accordance with established guidelines and that such occurrences may go undetected.

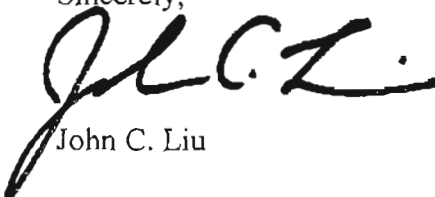
The audit recommends that ACS should ensure that case workers document entries into CNNX on a timely basis, continue to provide case workers with periods of time dedicated to entering in CNNX their investigative activities, and ensure that Deputy Directors follow up with CPMs to make certain that all random reviews are performed and completed in a timely manner.

This audit focused solely on the investigative process performed by the Division of Child Protection. The audit did not test any aspects of preventive or foster care services provided by ACS or its contracted agencies subsequent to those investigations.

The results of the audit have been discussed with ACS officials, and their comments have been considered in preparing this report. Their complete written response is attached to this report.

If you have any questions concerning this report, please e-mail my audit bureau at audit@comptroller.nyc.gov.

Sincerely,



John C. Liu

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

**Audit Report on the Investigation of Child Abuse and
Maltreatment Allegations Received by the
Administration for Children's Services**

MG10-059A

AUDIT REPORT IN BRIEF

The Administration for Children's Services (ACS) was created in 1996 to ensure the safety and well-being of New York City children and to strengthen families. The ACS Division of Child Protection (DCP) is responsible for protecting all children who are abused or neglected and for ensuring that the appropriate services are provided to them and their families. The Child Protective Services Borough Offices (borough offices) within DCP are in charge of investigating an average of 55,000 reports of alleged child abuse each year. A Child Protective Services investigation must be initiated within 24 hours of the receipt of a report.

The reports of alleged child abuse are entered in CONNECTIONS (CNNX), a child welfare computer system developed and maintained by New York State. CNNX allows for the documentation of information about families and children, including the investigation of alleged child abuse. The objective of this audit was to determine whether ACS ensures that investigations of child abuse and maltreatment reports are conducted in accordance with established guidelines and regulations. This audit focused solely on the investigative process performed by DCP and did not test any aspects of preventive or foster care services provided by ACS or its contracted agencies subsequent to those investigations.

Audit Findings and Conclusions

ACS generally ensured that investigations of child abuse and maltreatment reports were conducted in accordance with established guidelines and regulations. We found for our sampled investigations of child abuse reports that case workers made face-to-face contact with the children involved in the allegations of child abuse within the required time frames and that they completed the Safety Assessments, the Risk Assessment Profile (RAP), and the Investigation Conclusion Narratives on a timely basis. Unit supervisors conducted the required pre-investigation conferences with the case workers and performed the necessary case reviews. In addition, the investigations of the sampled reports were properly approved.

However, our review of the progress notes of the sampled investigations showed that case workers were not always making timely entries in CNNX of the various investigative activities performed. The delayed recording of these events increases the risk that case workers may enter

inaccurate or incomplete information. It also interferes with the supervisors' ability to adequately oversee the investigations and offer meaningful directives in a timely manner. In addition, we found that ACS Child Protective Managers (CPMs) were inconsistent in the performance of random managerial reviews. These managerial reviews are of particular importance, since CPMs are not required to give final approvals for the closing of investigations (except for cases coded 1 and 13) and may not otherwise be familiar with how they are handled. Accordingly, failure to perform all of the required reviews increases the risk that some investigations may not be handled in accordance with established guidelines, and that such occurrences may go undetected.

Audit Recommendations

To address these issues, we recommend that ACS should:

1. Ensure that case workers document entries into CNNX on a timely basis.
2. Continue to provide case workers with periods of time dedicated to entering into CNNX their investigative activities.
3. Ensure that Deputy Directors follow up with CPMs to make certain that all random reviews are performed and completed in a timely manner.

ACS officials agreed with the audit's three recommendations.

INTRODUCTION

Background

ACS was created in 1996 to ensure the safety and well-being of New York City children and to strengthen families. DCP is responsible for protecting all children who are abused or neglected and for ensuring that the appropriate services are provided to them and their families. The borough offices within DCP are in charge of investigating an average of 55,000 reports of alleged child abuse each year. A Child Protective Services investigation must be initiated within 24 hours of the receipt of a report.

The New York State Office of Children and Family Services (OCFS) is the state agency responsible for overseeing ACS and for operating the Statewide Central Register of Child Abuse and Maltreatment (SCR). Every allegation of suspected child abuse is referred to the SCR hotline,¹ which operates 24 hours a day, seven days a week. The reports of alleged child abuse are entered in CNNX, a child welfare computer system developed and maintained by New York State. CNNX allows for the documentation of information about families and children, including the investigation of alleged child abuse. DCP's work is supported by CNNX and by the Automated Case Reference System (ACRSplus), DCP's system of record and the central repository of all ACS cases. ACRSplus receives a direct data feed from CNNX every 20 minutes as well as a nightly case update.

Once an allegation of child abuse has been reported, the SCR marks the intake report as either non-high priority or high priority. High priority cases are assigned codes, ranging from 1 through 13. The codes indicate the type of allegation, the age of the children involved, and the number of prior investigations involving the family². (An intake report may be assigned more than one high priority code.) All high priority cases require that DCP make face-to-face contact with the children involved within 24 hours of receipt of the report to establish initial contact with the family and begin an assessment of the children's safety. Non-high priority cases require DCP to make face-to-face contact within 48 hours of the receipt of the report.

All intake reports are forwarded to the respective ACS borough office via CNNX. ACS has 18 borough offices throughout the City³, and each borough office is responsible for investigating the allegations of child abuse for the families residing in its area.

The staff of the Applications Unit is responsible for retrieving intake reports from CNNX, reviewing the reports' basic information, performing a clearance process, and assigning the case to the investigative units in the Operations Unit. The clearance process consists of gathering background information regarding the alleged subject, the alleged victim(s), and any household members. A search is performed for each person listed in the intake report using four different computer systems: (1) CNNX; (2) ACRSplus; (3) the Human Resource Administration's Welfare Management System (WMS); and (4) the Department of Education's

¹ Calls placed to the 311 Citizen Service Center (311) are connected to the SCR hotline.

² For example, allegations involving a fatality are classified as code 1 and allegations involving families with four or more reports are classified as code 13.

³ There are six borough offices in Brooklyn, five in Manhattan, three in Queens and the Bronx, respectively, and one in Staten Island.

Automate The Schools (ATS). In addition, cases with certain high priority codes, such as those for sexual abuse or fatality, must also be assigned by the Applications Unit to the borough office's Instant Response Team (IRT). IRT is responsible for coordinating investigative efforts between ACS and New York City law enforcement agencies.

Once the intake report is assigned to the Operations Unit, the unit supervisor is required to review the report and then assign it to a case worker. Assignments are made based on rotations, the complexity of a case, and the nature of the allegation. Unit supervisors are also required to review as soon as possible any prior intake reports and investigations pertaining to the family. Based on the background information obtained in the clearance process, the review of prior investigations, and the actual intake report, a pre-investigation conference is scheduled between the supervisor and the case worker to develop a preliminary investigation plan and allow the supervisor to provide initial guidance and directives to the case worker.

Throughout the investigation, the investigative team is responsible for a continuous and thorough assessment of the safety and level of risk of every child in the household and documenting this information in CNNX accurately and in a timely manner. An investigative team consists of a CPM, a Child Protective Specialist Supervisor (CPSS II or unit supervisor), and a Child Protective Specialist (CPS or case worker). For cases that are in the open investigation stage, CPMs are responsible for conducting random reviews of three per week.⁴

By days 7 and 55 of the investigation, a case worker is required to submit a Safety Assessment report to the supervisor for approval. The Safety Assessment identifies certain safety factors that may exist and whether the child is faced with present or impending danger. The case worker is also required to submit a Safety Modification plan if at any point during the investigation the case worker becomes aware of changes in the family's circumstances that may affect the child's safety. In addition, the case worker must complete a RAP between day 40 of the investigation and the closing date of the investigation.⁵ The RAP is designed to help case workers and supervisors make informed decisions regarding whether to open a case for services that would reduce the future likelihood that the child will be abused or maltreated. Supervisors are required to perform in-depth case reviews by days 5, 25, and 50 of the investigation.

Each allegation captured in the report must be fully investigated. DCP gathers the facts by reviewing the family's history (if any) with ACS; contacting the source of the allegation; conducting home visits; and interviewing the alleged subject, the alleged victim, parents/caregivers, other household members, and collateral contacts (e.g., school staff, health care providers).

The state mandates that ACS investigations of alleged child abuse be concluded—including the determination of each allegation—within 60 days of receipt of the report. Table 1, which follows, lists the critical case investigation monitoring milestones.

⁴ The three cases are randomly selected by ACRSplus.

⁵ If an investigation does not last for 40 days, the RAP must be completed prior to closing the investigation.

Table 1
Critical Case Investigation Monitoring Milestones

Requirement	Responsible Individual	Due Date
High Priority Case Face to Face Meeting	Caseworker	Within 24 Hours of Receipt of Report
Non-High Priority Case Face to Face Meeting	Caseworker	Within 48 Hours of Receipt of Report
Safety Assessment Report to Supervisor	Caseworker	By Day 7 and by Day 55 of the Investigation
Safety Modification Plan	Caseworker	Any time during the investigation if a noted change affects the child's safety
Risk Assessment Profile (RAP)	Caseworker	After Day 40 but before the close of the investigation (Day 60)
In Depth Case Reviews	Unit Supervisor	By Day 5, 25, and 50 of the Investigation
Weekly Random Reviews	CPM	Responsible for conducting three weekly reviews of cases that are in the open investigation stage
Investigation Conclusion Narrative	Caseworker	By Day 60. State mandates that investigation of alleged child abuse be concluded within 60 days of receipt of the report

CPMs must approve investigations for allegations involving a fatality (code 1) or those involving families with four or more prior reports (code 13). Unit supervisors approve all other high priority and non-high priority investigations. If the investigation reveals that “some credible evidence” of child abuse exists, the overall report determination is considered “indicated.” If no credible evidence exists, the report determination is considered to be “unfounded.”

Not every investigation resulting in a determination of “indicated” requires the removal of a child from the home. Only those children who cannot remain safely at home are placed in foster care. However, many families receive preventive services that help children remain safely in the home while their parents or caregivers obtain the help that they need.

Objective

Our objective was to determine whether ACS ensures that investigations of child abuse and maltreatment reports are conducted in accordance with established guidelines and regulations.

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 responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

The time period reviewed in this audit was Fiscal Year 2009 (July 1, 2008, through June 30, 2009). The audit focused solely on the investigative process performed by DCP in determining whether child abuse and maltreatment allegations can be substantiated. The audit did not test any aspects of preventive or foster care services that would be provided by ACS or its contracted agencies subsequent to those investigations.

To accomplish our objective and to obtain an understanding of the ACS investigative process, we held various meetings with the Deputy Commissioner of DCP, the Deputy General Counsel, the DCP Chief of Staff, and one of the five Borough Commissioners. In addition, we conducted walkthroughs at a borough office in each of the five boroughs, at the Emergency Children's Services unit, and at the Child Advocacy Center. During our visits, we interviewed staff in the Applications and Operations units, including Child Welfare Specialists, CPMs, CPSs (supervisors and workers), IRT Coordinators, Borough Commissioners, Directors, and Deputy Directors.

To obtain an understanding of the case practice guidelines governing the investigation of child abuse reports, we reviewed various DCP policies and procedures, flowcharts of the investigation process, ACS internal reports, and other relevant information obtained from the ACS website and other sources such as the Fiscal Year 2009 Mayor's Management Report. In addition, we reviewed New York Codes, Rules and Regulations Title 18, Social Services and a report issued on December 4, 2008, by the New York State Comptroller, *Status of the Action Plan to Protect Children* (2007-N-14). The criteria for our audit included the following: (1) DCP Casework Practice Guide, (2) CONNECTIONS Step-by-Step Guide, (3) ACRSplus Procedures Manual, and (4) ACS Random Review Tool Policy.

ACS provided us with an electronic file from CNNX listing 57,430 cases containing data of the intake reports it received and its subsequent investigations of child abuse and maltreatment during our scope period. We relied on the conclusion of the April 6, 2006, audit report of the New York State Comptroller, *Implementation of CONNECTIONS* (2004-S-70), which found that controls exist to confirm the system's consistent use. We therefore accepted the CNNX data as reliable for audit purposes.

We also reviewed a Joint Report issued in August 2007 by the New York City Department of Investigation (DOI) and ACS that examined 11 child fatalities and one near fatality that occurred between October 2005 and July 2006. We compared the current ACS practices to the recommendations made by DOI to determine to what extent ACS adopted the recommendations and the impact that the findings of that report had on ACS investigation practices.

We randomly selected a sample of 30 investigations that had been conducted based on the intake reports and obtained the corresponding Child Protective Record Summary (CPRS) for those investigations. We determined whether the following key documents were contained in the

CPRS: Call Narrative, Safety Assessments, RAP, and Investigation Conclusion Narrative. We also tested whether the case workers made face-to-face contact with the children involved in the allegation within 24 hours of receipt of the report for the 23 high priority cases in our sample and within 48 hours for the seven non-high priority cases in our sample. We also determined whether investigations for reports with high priority codes 1 (fatality) and 13 (four or more allegations) were approved by the CPM and whether all other high priority and non-high priority reports were approved by the unit supervisor.

To determine whether case workers completed their investigations and the supervisors performed their case reviews within the established timeframes, we reviewed the Investigation Progress Notes contained in the CPRS for our sample of 30 investigations. We noted the difference between the event date and the entry date of each progress note to determine whether the case workers made timely entries in CNNX. Based on the results of our review of the progress notes, we expanded our sample and randomly selected 20 additional investigations for a total sample of 50 case files.

We interviewed various CPMs to understand the process through which they perform the required weekly random reviews of open investigations. We also interviewed borough office Deputy Directors to learn how they monitor the completion of the random reviews. We judgmentally selected the three boroughs with the greatest number of reports of child abuse⁶ and then selected for each borough two weeks⁷ of random reviews performed by each CPM during the last quarter of Fiscal Year 2009 to determine whether the random reviews corresponding to this period were performed in the appropriate time. This selection resulted in a sample of 63 reviews that were required to be performed by a total of 13 CPMs.

The results of the above audit tests, while not projected to the populations from which the samples were drawn, provided a reasonable basis for us to satisfy our audit objective.

Discussion of Audit Results

The matters covered in this report were discussed with ACS officials during and at the conclusion of this audit. A preliminary draft report was sent to ACS officials and discussed at an exit conference held on September 14, 2010. We submitted this draft report to ACS officials with a request for comments. We received a written response from ACS officials on November 9, 2010. In their response, ACS officials agreed to implement the three recommendations in the report.

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

⁶ The three boroughs with the greatest number of child abuse reports were Brooklyn, Queens and the Bronx.

⁷ For each borough, we selected a different two-week time period pertaining to the last quarter of Fiscal Year 2009.

FINDINGS AND RECOMMENDATIONS

ACS generally ensured that investigations of child abuse and maltreatment reports were conducted in accordance with established guidelines and regulations. We found for our sampled investigations of child abuse reports that case workers made face-to-face contact with the children involved in the allegations of child abuse within the required time frames and that they completed the Safety Assessments, the RAP, and the Investigation Conclusion Narratives on a timely basis. Unit supervisors conducted the required pre-investigation conferences with the case workers and performed the necessary case reviews. In addition, the investigations of the sampled reports were properly approved.

However, our review of the progress notes of the sampled investigations showed that case workers were not always making timely entries in CNNX of the various investigative activities performed. The delayed recording of these events increases the risk that case workers may enter inaccurate or incomplete information. It can also interfere with the supervisors' ability to adequately oversee the investigations and offer meaningful directives in a timely manner. In addition, we found that ACS CPMs were inconsistent in the performance of random managerial reviews. These managerial reviews are of particular importance, since CPMs are not required to give final approvals for the closing of investigations (except for cases coded 1 and 13) and may not otherwise be familiar with how they are handled. Accordingly, failure to perform all of the required reviews increases the risk that some investigations may not be handled in accordance with established guidelines and that such occurrences may go undetected.

Required Investigative Activities Were Performed in Accordance with Established Guidelines and Regulations

ACS generally adhered to the requirements outlined in its DCP Case Practice Guide. Our review of the sampled investigations of child abuse reports provided reasonable assurance that ACS investigative teams followed established guidelines and regulations.

Assessment of Case Workers' Investigation Process

As previously stated, a home visit must take place within 24 hours for reports designated high priority and 48 hours for those designated as non-high priority. If the only child in the home is hospitalized, then the 24-hour contact may be made face-to-face at the hospital and a home assessment may be completed before the child returns to the home.

In addition, case workers are required to submit and obtain approval of a Safety Assessment report by days 7 and 55 of the investigation. The case worker is also required to submit a Safety Modification if at any point during the investigation there is a change in a family's circumstances that affects the child's safety. The case worker must complete the RAP between day 40 of the investigation and the date the investigation is closed. Finally, the case workers must submit and obtain approval of the Investigation Conclusion Narrative, which addresses each allegation for each child and subject.

Based on our testing of the investigations performed for the 30 sampled cases, we found that case workers made the required face-to-face contact with the children involved in the allegations of child abuse within 24 hours of receipt of the report for the 23 high priority cases in our sample and within 48 hours for the remaining 7 non-high priority cases. We also found that case workers completed the 7-day and 55-day Safety Assessments, the RAP, and the Investigation Conclusion Narratives as required by established guidelines and regulations.

Assessment of the Supervisory Review of the Investigation Process

As stated previously, unit supervisors are required to conduct a pre-investigation conference with the case workers to jointly develop a preliminary investigation plan and give the supervisors an opportunity to direct case workers regarding required courses of action to be conducted. Supervisors are also required to perform reviews by days 5, 25, and 50 of investigations to determine whether the required steps were taken. The review by the fifth day of the investigation should include determinations such as whether face-to-face contact was made with the children in the household and whether the children's initial safety assessments were submitted for approval. By the 25th day, the supervisor should determine whether, among other things, interviews were conducted, children's needs were assessed, and any dangerous conditions addressed. By the 50th day, the supervisor is required to determine whether there are any additional activities that need to be completed to support the determination of the allegations prior to closing the investigation.

Based on our testing of the investigations performed for the 30 sampled cases, we found that unit supervisors conducted the pre-investigation conferences, issued directives and guidance to the case workers, and performed the required case reviews on a timely basis and in accordance with established guidelines and regulations. Also, our sampled investigations for the 6 reports with high priority code 13 were approved by the CPMs as required, and the remaining 24 reports with other high priority codes and non-high priority were approved by the unit supervisors.

Overall, we found that investigations of child abuse and maltreatment reports were generally conducted in accordance with established guidelines and regulations, with the two exceptions noted below.

Untimely Update of Progress Notes

Although ACS case workers maintain progress notes to document the various activities (i.e., interviews, home visits, obtaining school and medical records) conducted throughout the investigations, they do not ensure that the information is documented in CNNX in a timely manner. For 74 percent of the cases that we reviewed, at least one of the entries in CNNX was entered 8 to 58 days after the performance of a particular activity. The late recording of these events can lead to case workers' entering inaccurate or incomplete information and can also interfere with the supervisors' ability to adequately oversee the investigations and offer meaningful directives.

As stated by ACS officials, progress notes allow the case worker to capture the information that is critical to the determination of the case and allow the unit supervisor to

review the status of the investigation to assess whether it is moving in the right direction. ACS guidelines state that progress notes must be recorded “as often and as currently as possible to ensure accurate and timely accounts of events.” ACS officials stated that the criterion of timeliness is that the progress notes be entered “contemporaneously” with the occurrence of the case worker’s performance of the activity. However, ACS has no specific protocol establishing the exact timeframe within which progress notes must be completed. For the purposes of our test, we selected a grace period of seven calendar days as a reasonable standard for timeliness and found that 37 (74%) of the 50 cases reviewed had late progress note entries ranging from 8 to 58 days after the date of the activity.

The 37 cases had a total of 160 late entries,⁸ 91 (57%) of which were entered in CNNX 21 to 58 days after the activity date. When we discussed this issue with ACS officials, they stated that unit supervisors are responsible for ensuring that case workers document their investigative activities in CNNX. When a unit supervisor notices a timeliness problem, the supervisor may arrange for the case worker to take an “Administrative Day,” consisting of a full day or a portion of a work day in the borough office for the specific purpose of updating the progress notes in CNNX.

One of the findings in the report issued by DOI was that ACS case workers often failed to document significant activities and critical reviews on a timely basis. The report concluded that ACS staff routinely made entries into CNNX long after the activities described. Since case workers are assigned, on average, 10 cases at one time, if they do not immediately record essential case details, they create an even greater risk that critical information may be overlooked to the possible peril of the children involved. ACS encourages the case workers to use notebooks to capture the details of the case, but does not *require* that they do so. As a result, case workers may often, or always, rely solely on their memory when they record the details of a case in CNNX.

The 34 case workers who made late entries in our sample of progress notes were assigned a range of 19 through 74 cases during the year⁹. Given this workload, it is not unreasonable that the particular details of a case may not be remembered after a certain period of time has passed. Delaying progress note updates increases the risk that certain pertinent details of a case may be inaccurately recorded or omitted altogether.

Recommendations

ACS should:

1. Ensure that case workers document entries into CNNX on a timely basis.

⁸ There were a total of 1,220 entries made for the 50 cases, of which 291 entries for 13 cases were completed on time. There were 929 entries made for the 37 cases with late entries, of which 160 represented late entries.

⁹ Of the 34 case workers with late entries, 12 case workers were assigned 19 to 40 cases during the year, 20 case workers were assigned 41 to 60 cases and two case workers were assigned 67 and 74 cases during the year, respectively.

ACS Response: “ACS will continue to ensure that child protective specialists document entries into CNNX in a timely manner. In addition to existing protocols and policies, ACS has convened a joint work group, with representatives from both ACS management and the union, to further examine reasonable timeframes for documentation.”

2. Continue to provide case workers with periods of time dedicated to entering into CNNX their investigative activities.

ACS Response: “ACS child protective managers and supervisors will continue to ensure that child protective specialists work towards timely documentation as they balance their competing priorities.”

Performance of Random Managerial Reviews by CPMs

ACS CPMs need to ensure that they perform all random managerial reviews required by ACS guidelines. We found no evidence that seven (11%) of the 63 selected random reviews were conducted during our test period¹⁰.

CPMs perform random managerial reviews of cases to assess the work of supervisors overseeing investigative teams of case workers. CPMs use the reports of the random reviews as a basis of their discussion with supervisors to identify and address areas that need improvement. The random review reports also allow CPMs an opportunity to provide directives (in the CNNX progress notes) for the investigative teams to follow while conducting their investigations.

As stated, CPMs are generally required to perform three random reviews per week of open investigations. There is no formal procedure requiring this, and we received differing information from ACS personnel regarding this policy. According to one ACS official, CPMs may be assigned fewer than three cases if their caseload for the week does not include at least three cases that meet a certain selection criterion¹¹. According to the CPMs and Deputy Directors that we interviewed, however, CPMs are required to perform three reviews per week and they were uncertain about the selection criterion. For the two-week period tested, the 13 CPMs in our sample of three borough offices (Queens, Brooklyn, and the Bronx) were assigned only 63 random reviews. ACS was able to provide the random review reports for 56 (89%) of them.

Of the three offices reviewed, only the Bronx office had review reports for all of its required reviews. The Queens office provided review reports for 18 (82%) of the required 22 reviews.¹² We found no evidence to indicate that the other four reviews were ever performed. The Brooklyn office provided review reports for 15 (83%) of the required 18 reviews. The three

¹⁰ Two of the seven cases were from the Family Services Unit, which is responsible for providing long-term services, as well as investigations of allegations for families already receiving services.

¹¹ According to the official, only cases that have active investigations and that are open for 1 to 30 days are considered in the selection process.

¹² Ten of the 18 reports were not immediately available; copies were provided approximately three weeks after our initial request. Officials attributed the delay to the unavailability of the staff (due to vacations, etc.) who maintained the copies. We were able to identify corroborating evidence of the reviews for seven of the cases in the related progress notes.

missing reviews were part of six assigned to one of the office's three CPMs. ACS officials stated that they have since resolved the matter and that disciplinary action is being considered.

Timely managerial reviews are an important control, facilitating CPMs' assessments of investigations and providing them a framework for offering additional guidance and directives to supervisors and case workers. In addition, since CPMs are not required to give final approvals for the closing of investigations (except for cases coded 1 and 13) and may not otherwise be familiar with how they are handled, these managerial reviews take on added importance. Accordingly, failure to perform all of the required reviews increases the risk that some investigations may not be handled in accordance with established guidelines, and that such occurrences may go undetected. Therefore, it is important that the CPMs perform all reviews assigned to them and that the Deputy Directors of each office, who are responsible for overseeing the managerial reviews, ensure that they are performed in a timely manner.

Recommendation

3. ACS should ensure that Deputy Directors follow up with CPMs to make certain that all random reviews selected by ACRSplus are performed and completed in a timely manner.

ACS Response: "ACS Borough Leadership and Deputy Directors will work with individual managers to ensure that managerial reviews continue to be completed in an appropriate and timely manner. ACS has also convened a work group to explore whether the current random review policies could be revised to provide staff with further guidance on the random review process."



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November 8, 2010

H. Tina Kim
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New York, NY 10007

**Re: Draft Audit Report on the Investigation of Child Abuse and
Maltreatment Allegations Received by the Administration for
Children's Services [MG10-059A]**

Dear Ms. Kim:

Attached please find the ACS Response to Audit Recommendations and the Audit Implementation Plan for the above-referenced audit. Please call or e-mail me if you have any questions regarding the attached documents. I can be reached at 212-676-8861 or by e-mail at: julie.bittman@dfa.state.ny.us.

Thank you,

A handwritten signature in black ink, appearing to read "Julie Bittman". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Julie Bittman
Director, ACS External Audit

cc: John Mattingly

November 15, 2010
ACS RESPONSE TO AUDIT RECOMMENDATIONS

City of New York, Office of the Comptroller
Audit on the handling of child abuse and maltreatment reports by the Administration for Children's Services
MG10-059A

RECOMMENDATION # 1 – ENSURE THAT CASE WORKERS DOCUMENT ENTRIES INTO CNNX ON A TIMELY BASIS

ACS RESPONSE

ACS will continue to ensure that child protective specialists document entries into CNNX in a timely manner. In addition to existing protocols and policies, ACS has convened a joint work group, with representatives from both ACS management and the union, to further examine reasonable timeframes for documentation. It is ACS' current expectation that this joint work group will have recommendations for ACS leadership by January 2011.

RECOMMENDATION # 2 – CONTINUE TO PROVIDE CASE WORKERS WITH PERIODS OF TIME DEDICATED TO ENTERING IN CNNX THEIR INVESTIGATIVE ACTIVITIES

ACS RESPONSE

ACS child protective managers and supervisors will continue to ensure that child protective specialists work towards timely documentation as they balance their competing priorities.

RECOMMENDATION # 3 – ACS SHOULD ENSURE THAT DEPUTY DIRECTORS FOLLOW UP WITH CPMS TO MAKE CERTAIN THAT ALL RANDOM REVIEWS SELECTED BY ACRSPUS ARE PERFORMED AND COMPLETED IN A TIMELY MANNER.

ACS RESPONSE

ACS Borough Leadership and Deputy Directors will work with individual managers to ensure that managerial reviews continue to be completed in an appropriate and timely manner. ACS has also convened a work group to explore whether the current random review policies could be revised to provide staff with further guidance on the random review process.

November 15, 2010
ADMINISTRATION FOR CHILDREN'S SERVICES AUDIT IMPLEMENTATION PLAN
NEW YORK CITY COMPTROLLER'S AUDIT ON
AUDIT ON THE HANDLING OF CHILD ABUSE AND MALTREATMENT REPORTS BY THE ADMINISTRATION FOR
CHILDREN'S SERVICES
AUDIT NUMBER: MG10-059A

RECOMMENDATION # 1: ENSURE THAT CASE WORKERS DOCUMENT ENTRIES INTO CNNX ON A TIMELY BASIS

RESPONSIBLE MANAGER'S NAME: JAN FLORY

CORRECTIVE ACTIONS TO BE TAKEN	RESPONSIBLE PERSON	DATES		COMMENTS
		START	END	
- ACS will continue to ensure that child protective specialists document entries into CNNX in a timely manner. - ACS will continue the work of its joint work group, with representatives from both ACS management and the union, to further examine reasonable timeframes for documentation.	Jan Flory	Ongoing	Ongoing	ACS had begun the activities listed in corrective actions prior to receiving the Comptroller's Audit Report and plans to continue this ongoing work in the future.
		Oct 2010	Jan 2011	

November 15, 2010
ADMINISTRATION FOR CHILDREN'S SERVICES AUDIT IMPLEMENTATION PLAN
NEW YORK CITY COMPTROLLER'S AUDIT ON
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CHILDREN'S SERVICES
AUDIT NUMBER: MG10-059A

RECOMMENDATION # 2: CONTINUE TO PROVIDE CASE WORKERS WITH PERIODS OF TIME DEDICATED TO ENTERING IN
CNNX THEIR INVESTIGATIVE ACTIVITIES

RESPONSIBLE MANAGER'S NAME JAN FLORY

CORRECTIVE ACTIONS TO BE TAKEN	RESPONSIBLE PERSON	START	END	COMMENTS
ACS child protective managers and supervisors will continue to ensure that child protective specialists work towards timely documentation as they balance their competing priorities.	Jan Flory	ongoing	ongoing	

November 15, 2010
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RECOMMENDATION # 3: ACS SHOULD ENSURE THAT DEPUTY DIRECTORS FOLLOW UP WITH CPMS TO MAKE CERTAIN THAT ALL RANDOM REVIEWS SELECTED BY ACRSPUS ARE PERFORMED AND COMPLETED IN A TIMELY MANNER.

RESPONSIBLE MANAGER'S NAME: JAN FLORY

CORRECTIVE ACTIONS TO BE TAKEN	RESPONSIBLE PERSON	DATES		COMMENTS
		START	END	
- ACS Borough Leadership and Deputy Directors will work with individual managers to ensure that managerial reviews continue to be completed in an appropriate and timely manner. - ACS has also convened a work group to explore whether the current random review policies could be revised to provide staff with further guidance on the random review process.	Jan Flory	Ongoing	Ongoing	ACS had begun the activities listed in corrective actions prior to receiving the Comptroller's Audit Report and plans to continue this ongoing work in the future.
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