

# AUDIT REPORT



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

## **Audit Report on the Coalition for Hispanic Family Services Foster Care Contract with the Administration for Children's Services**

*ME08-060A*

**June 26, 2008**



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 Coalition for Hispanic Family Services (CHFS) foster care contract with the Administration for Children's Services (ACS).

CHFS is a community-based, comprehensive family service agency that delivers services and programs to children and families in North Brooklyn. Under its contract with ACS, CHFS provides foster care services to approximately 270 foster children. We audit contracts such as this to ensure that entities with City contracts are providing required services to those they serve.

The results of our audit, which are presented in this report, 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.

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

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

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Services Foster Care Contract with the  
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**AUDIT REPORT IN BRIEF**

The audit determined whether the Coalition for Hispanic Family Services (CHFS) complied with major programmatic provisions of its foster care contract with the Administration for Children's Services (ACS) and whether CHFS days-of-care payment requests to ACS and special payments on behalf of foster children were adequately supported. The scope period of this audit was Fiscal Year 2007 (July 1, 2006 to June 30, 2007).

CHFS, established in 1986, is a community-based, comprehensive family service agency, serving North Brooklyn and adjacent communities. Its programs include foster boarding homes, independent living, adoption, family-based mental health treatment, and medical services. The largest program at CHFS is providing foster care services to Hispanic families in North Brooklyn. During Fiscal Year 2007, CHFS provided services to 270 foster children in 163 foster boarding homes. In January 2006, ACS renewed its contract with CHFS for three years, for a total of \$13.9 million. ACS paid CHFS \$4.3 million for foster care services provided during Fiscal Year 2007.

**Audit Findings and Conclusions**

Our audit revealed that CHFS complied with some of the major programmatic provisions of its foster care contract with ACS. For the 30 cases reviewed, applications to serve as foster parents were completed, the foster parents received the required background checks, and pre-placement inspections of the foster parents' homes were conducted.

However, there were significant weaknesses in certain areas that must be addressed. These weaknesses raise questions as to whether the level of CHFS interaction with its foster children and foster parents is sufficient to ensure the health and safety of the children. Several foster child case files lacked evidence that CHFS caseworkers conducted the required contacts and visits to foster children and foster parents. In addition, although all Family Assessment Service Plans (FASPs) and annual recertification reviews of the foster homes were completed, considering the insufficient evidence that caseworkers made all the required contacts and visits to the foster children and

parents, questions arise as to whether all of the FASPs and annual recertifications were properly completed. Furthermore, many foster parent case files lacked evidence that the foster parents received the required initial and annual refresher training. Finally, special payment expenditures made by CHFS were not adequately supported or supervised.

### **Audit Recommendations**

To address these issues, the audit recommends, among other things, that CHFS:

- Immediately perform visits to those foster children who have not been visited.
- Ensure that caseworkers consistently prepare progress notes in CONNECTIONS to document all contacts and visits with foster children and foster parents.
- Provide supervisory oversight to ensure that all required contacts and visits are conducted and documented.
- Ensure that safety assessments are performed whenever a criminal background check or State Central Register (SCR) review reveals concerns about an adult living in a foster care home.
- Ensure that criminal background checks and SCR reviews are done on all adult household members in the foster home.
- Ensure that the foster parents who have not received the required training are immediately trained.
- Ensure that there is an appropriate segregation of duties throughout the special payments process to prevent the misuse of special payment funds.

The audit also recommends, among other things, that ACS:

- Continue to closely monitor CHFS to ensure that the required number of visits to foster children are conducted.
- Conduct periodic reviews of foster parent training information in CONNECTIONS for all types of foster parents and notify CHFS when it identifies foster parents who have not received the required training.

### **Agency Response**

In its response, ACS agreed with 12 recommendations and stated that it believes that one is not applicable.

## **INTRODUCTION**

### **Background**

The New York City Administration for Children's Services endeavors to protect the well-being of the City's children and families. ACS provides preventive, foster care, and adoption services. It contracts with a network of 41 social service agencies to monitor and provide support services to about 17,000 foster care children. For Fiscal Year 2007, ACS had a budget of approximately \$187 million for its foster care program.

The Coalition for Hispanic Family Services, established in 1986, is a community-based, comprehensive family service agency, serving North Brooklyn and adjacent communities. Its programs include foster boarding homes, independent living, adoption, family-based mental health treatment, and medical services. The largest program at CHFS is providing foster care services to Hispanic families in North Brooklyn.

In addition to traditional foster care, CHFS has specialized foster care programs such as therapeutic foster boarding homes (TFBHs) and a supervised independent living program (SILP). TFBHs offer community-based placements for emotionally disturbed children. SILP provides apartments, formal training, and support services to adolescent clients aged 18 and over to encourage independence.

CHFS handles foster care placements for children who are removed from their primary families. ACS informs CHFS of a need for foster care placement of a child; CHFS confirms a foster care opening and handles the actual placement. After placement, CHFS monitors the children and provides support services while they are in foster care.

On a monthly basis, CHFS reports to ACS the number of children who were in foster care and the days of care the foster children received CHFS supervision. Based on the information for the prior month, ACS pays CHFS for the following month. The payment amount is calculated by multiplying the total days of care reported by CHFS by a per diem rate, which consists of two parts—an administrative rate for CHFS and a pass-through rate for the foster parents. The administrative rate is based on the level of difficulty in providing services to the child, while the pass-through rate, which is the rate at which CHFS pays its foster parents, is a composite rate based on the age of the foster child and the level of difficulty in taking care of the child. These rates are determined by the New York State Office of Children and Family Services and presented in its schedule of Maximum State Aid Rates (MSAR).

CHFS has its own computer system, EVOLV, a child welfare management software system that maintains information on children, medical services, and payments. CHFS also uses the New York State CONNECTIONS system to file Family Assessment and Service Plans (FASPs) and progress notes with ACS.

During Fiscal Year 2007, CHFS provided services to 270 foster children in 163 foster boarding homes. Of these, 245 foster children were placed in regular foster boarding homes (FBHs), 18 were placed in TFBHs, and 7 were placed in SILP. In January 2006, ACS renewed

its contract with CHFS for three years, for a total of \$13.9 million. ACS paid CHFS \$4.3 million for foster care services provided during Fiscal Year 2007.

### **Objectives**

The audit determined whether CHFS complied with major programmatic provisions of its foster care contract with ACS and whether CHFS days-of-care payment requests to ACS and special payments on behalf of foster children were adequately supported.

### **Scope and Methodology**

The scope period of this audit was Fiscal Year 2007 (July 1, 2006 to June 30, 2007). We endeavored to determine whether: foster child assessments and service plans were prepared and approved; caseworkers had regular contacts with foster children; caseworkers prepared reports on these contacts; background checks of foster parents were performed; pre-placement inspections of foster homes were conducted; training was provided to foster parents; CHFS days-of-care payment requests to ACS were adequately supported and in accordance with the MSAR schedule; and special payments on behalf of foster children were adequately supported.

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 made on foster parents' qualifications since such qualitative judgments would have required specialized expertise.

To gain an understanding of ACS foster care service and reimbursement requirements, we interviewed ACS officials and reviewed ACS policies and procedures and the contract with CHFS. To gain an understanding of CHFS foster care processes, we reviewed its procedures manual and organization chart, interviewed CHFS officials, performed a walkthrough of CHFS, and reviewed foster child and foster parent case files.

To determine whether EVOLV data were reliable, we randomly selected 30 cases from an EVOLV database and compared information in the database (the child's name, date of birth, placement date, and identification number) to information found in the corresponding hard-copy foster child case files. We also randomly selected 30 hard-copy foster child case files and compared the same types of information in the files to EVOLV data.

We relied on the 2006 determination of the New York State Comptroller that CONNECTIONS was reliable. Its April 6, 2006, audit report, entitled *Implementation of CONNECTIONS* (2004-S-70), concluded that controls had been implemented to verify that the system was being used as designed. We reviewed information from CONNECTIONS on Family Assessment Service Plans (FASPs) and progress notes prepared by CHFS.

To determine whether CHFS was in compliance with major programmatic provisions of its foster care contract with ACS, we reviewed a sample of 30 foster child cases randomly

selected from an EVOLV list of the foster children who received services from CHFS during Fiscal Year 2007. We selected 24 of the 245 children who were in a regular foster boarding home, 4 of the 18 children who were in a therapeutic foster boarding home, and 2 of the 7 children who were in a supervised independent living program during Fiscal Year 2007. We reviewed the case files for information on the number of visits and contacts made by CHFS caseworkers during our scope period. In addition, we reviewed the case files and CONNECTIONS data to determine whether initial and periodic FASPs were completed and whether progress notes were regularly prepared.

To determine whether CHFS met certain contract provisions relating to foster parents, we reviewed the files of the foster parents of the children in our sample to ensure that the required background checks were done, that pre-placement inspections of foster homes were conducted, and that the foster parents received the appropriate training. We also determined whether their annual recertifications were up to date.

To determine whether CHFS days-of-care payment requests to ACS were adequately supported, we assessed the accuracy of the days-of-care information submitted by CHFS for the 30 children in our sample. We also reviewed foster child case files to determine whether ACS had authorized special or exceptional boarding rates for the 7 of the 30 children in our sample for whom such rates were paid.<sup>1</sup> Based on this information and the MSAR schedule, we checked the accuracy of CHFS requests to ACS for days-of-care payments relating to the foster children in our sample. We also determined whether the foster parents in our sample received the correct pass-through payments from CHFS.

To determine whether CHFS monitored its annual Special Payment Budget Allocation, we reviewed a sample of the 186 special payments (totaling \$106,657) made during Fiscal Year 2007 on behalf of individual foster children. We randomly selected a sample of 9 special payments (totaling \$14,151) of the 41 special payments (totaling \$62,784) that were \$800 or more in value, and reviewed supporting documentation to determine whether the items purchased were allowable, legitimate, and covered by the budget allocation.

We determined whether the CHFS 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 CHFS compliance with the major provisions of its foster care contract with ACS.

Our audit was conducted in accordance with generally accepted government auditing standards (GAGAS) and included tests of records and other auditing procedures considered

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<sup>1</sup> In addition to the four children placed in TFBHs, three foster children in our sample were placed in regular foster boarding homes but were authorized to receive special care. These foster homes were converted to professional homes and supervised by Bonding Links – the family-based treatment program at CHFS that offers comprehensive clinical treatment within the professional homes.



necessary. This audit was performed in accordance with the audit responsibilities of the City Comptroller, as set forth in Chapter 5, §93, of the New York City Charter.

### **Discussion of Audit Results**

The matters covered in this report were discussed with ACS and CHFS officials during and at the conclusion of this audit. A preliminary draft report was sent to ACS officials on April 21, 2008, and discussed at an exit conference held on April 29, 2008. On May 16, 2008, we submitted a draft report to ACS officials with a request for comments. We received a written response from ACS officials dated June 2, 2008. In its response, ACS agreed with 12 recommendations and stated that it believes that one is not applicable.

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

## **FINDINGS AND RECOMMENDATIONS**

Our audit revealed that CHFS complied with some of the major programmatic provisions of its foster care contract with ACS. For the 30 cases reviewed, applications to serve as foster parents were completed, the foster parents received the required background checks, and pre-placement inspections of the foster parents' homes were conducted.

However, there were significant weaknesses in certain areas that must be addressed. These weaknesses raise questions as to whether the level of CHFS interaction with its foster children and foster parents is sufficient to ensure the health and safety of the children. Several foster child case files lacked evidence that CHFS caseworkers conducted the required contacts and visits to foster children and foster parents. In addition, although all FASPs and annual recertification reviews of the foster homes were completed, considering the insufficient evidence that caseworkers made all the required contacts and visits to the foster children and parents, questions arise as to whether all of the FASPs and annual recertifications were properly completed. Furthermore, many foster parent case files lacked evidence that the foster parents received the required initial and annual refresher training. Finally, special payment expenditures made by CHFS were not adequately supported or supervised.

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

### **Insufficient Evidence That Caseworkers Made All Required Contacts and Visits**

There was insufficient evidence to demonstrate that 9 (30%) of the 30 foster children in our sample received all the required caseworker contacts and visits during Fiscal Year 2007. Regular interaction between caseworkers and foster children and parents is important to ensure that there are appropriate living conditions in the foster home and to monitor the child's health, safety, and development.

According to ACS and CHFS policies and procedures, the minimum requirement for caseworker contacts with foster children and foster parents are two contacts per month for the first three months (with at least one of the two contacts being a home visit), and one contact per month thereafter (with at least one contact per quarter being a home visit). CHFS policies and procedures further state that the foster children in therapeutic foster homes and those in the supervised independent living program are expected to have weekly contacts and visits.

Progress notes prepared by the caseworker document caseworker contacts and visits with the foster child and foster parents and discuss the current condition of the child and the foster home. The progress notes are recorded in CONNECTIONS and provide documentation of all caseworker activities associated with the provision of child welfare services.

According to the CONNECTIONS Case Management Step-by-Step Guide, progress notes should document caseworker activities and update case information. Progress notes should be recorded as soon as possible after an event (such as a contact or a visit) or when case

information is received in order to provide an accurate account of pertinent information and to preserve the integrity of the information being recorded.

Progress notes for 9 of our sample of 30 foster children did not show that CHFS caseworkers had conducted many of the required contacts and visits with the foster children and parents. For the nine cases, there was no documentary evidence that the required number of contacts and visits were made, ranging from 2 to 8 required contacts per case not having been documented.<sup>2</sup> Of the 143 contacts and visits required for these nine cases, there was no documentary evidence that 45 (31%) were conducted. Without such progress notes, CHFS could not demonstrate, nor could we verify, that the required contacts and visits were made. In addition, there was no evidence that ACS periodically reviewed progress notes in CONNECTIONS and notified CHFS when it was not adhering to ACS rules concerning contacts and visits.

CHFS policies require that supervisors review and approve each caseworker's progress notes once per month. For the 30 foster child case files that we reviewed, we found 14 (47%) had no indication of supervisory review. The 16 case files that documented supervisory reviews of progress notes were not in compliance with CHFS policies because the reviews ranged from once to four times for the year, rather than monthly. The inconsistent reviews of these progress notes indicate that supervisors are not ensuring that caseworkers are appropriately documenting significant events on each case. Better supervisory oversight of caseworkers' progress notes would help to ensure that the required contacts and visits are being made and that each foster child is being closely monitored.

Regular interaction between caseworkers and foster children and parents is important to ensure that there are appropriate living conditions in the foster home and to monitor the child's health, safety, and development. Failure to regularly interact increases the risk that dangerous conditions can go undetected for an extended period of time. Furthermore, even if the required contacts and visits are made, without progress notes CHFS is hindered in ensuring that relevant issues are identified, documented, and followed up by the caseworkers or their supervisors in an appropriate and timely manner.

A June 2006 review of CHFS by ACS reported that "documentation of case activity was found to be consistently lacking, especially with respect to home visits." ACS reviews of CHFS in June 2007 and late 2007 reported problems with CHFS caseworkers not conducting the required number of contacts and visits with foster children. ACS reported that it held meetings with CHFS in July and August of 2007, to discuss, among other things, the need to improve the frequency of contacts with foster children. In September 2007, ACS placed CHFS on "probationary corrective action status" due in part to an insufficient number of foster care agency contacts with its foster children.

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<sup>2</sup> Eight of the nine foster children who did not receive the required number of contacts and visits were in regular foster homes, and one was in SILP. During Fiscal Year 2007, each of the eight foster children in regular foster homes required between 9 and 12 contacts and visits, and the one foster child in SILP required 52 contacts and visits.

## Recommendations

CHFS should:

1. Immediately perform visits to those foster children who have not been visited.

**ACS Response:** “In the summer of 2007 ACS conducted an APA audit of CHFS case records resulting in significant concerns regarding casework performance, safety assessments and recertification of foster homes. In response to this audit, CHFS implemented a corrective action plan with short term goals to result in significant improvement in casework practice and quality performance. ACS returned to audit 20 case records in November of 2007 and 30 case records in December of 2007. ACS has informed CHFS that they have noted significant improvement in our required case work contacts. Starting in October 2007 and moving forward, CHFS Quality Assurance staff has been tracking all casework contacts on a bi-weekly basis to compare required visits with actual visits taking place. Quality assurance reviews all connections records on a monthly basis to track compliance with required visits to foster homes/foster children. A monthly report is distributed for Executive director, director of foster care, foster care supervisors. Supervisors then plan with caseworkers to schedule any missed casework contacts. Starting in October 2007, director and supervisors are working with caseworkers to review monthly calendar and assure that required visits, Court dates, FASP’S and Permanency Hearing Reports are entered into the worker’s schedule. When worker’s court dates interfere with required visits a back-up plan is established. A safety assessment tool has been designed and implemented and all staff has been trained on how to use the tool. All foster homes receive a safety assessment on a quarterly basis for foster homes and more frequently if a safety risk is identified.”

2. Ensure that caseworkers consistently prepare progress notes in CONNECTIONS to document all contacts and visits with foster children and foster parents.

**ACS Response:** “Since October 2007 all progress notes for visits, face to face contacts are being entered into Connections and are tracked by our Quality Assurance (QA) department. To assure that contacts are properly documented in the correct section of Connections, QA held training with Casework Staff to review proper characterization of different types of documentation in Connections. A laminated contact requirement sheet and appropriate location for documenting in Connections was also distributed to staff. Quality Assurance staff is reviewing Connections case records on a monthly basis to assure that progress notes are being entered to reflect required visits and that they are being entered on a timely basis. Bi-weekly tracking reports are distributed to executive director, director of foster care, FC supervisors to reflect missing and completed progress notes. Email alerts for missing visits and corresponding progress notes are sent to supervisors and caseworkers as well.”

3. Provide supervisory oversight to ensure that all required contacts and visits are conducted and documented.

**ACS Response:** “As of October 2007, supervisors enter a monthly administrative note to reflect any supervisory directives and review of the record. As of June 2008, QA will be reviewing Connections on a bi-weekly basis, for supervisory notes in Connections. As of October 2007, program director does random review of case records on a regular basis and enters an administrative note as appropriate.”

ACS should:

4. Continue to closely monitor CHFS to ensure that the required number of visits to foster children are conducted.

**ACS Response:** “ACS Agency Program Assistance (APA) will continue to conduct safety assessment reviews of Coalition for Hispanic Family that includes a review of cases contacts. ACS Division of Research and Evaluation will continue to conduct case record reviews as part of the Provider Agency Management System (PAMS) process that includes a review of case work contacts as part of the child safety section.”

#### **CHFS Generally Ensured That FASPs Were Completed, But Questions Arise as to Whether All FASPs Were Properly Updated**

A FASP is a vitally important tool that specifies the goals for each child and family, including permanency goals, which relate to efforts to discharge the child to a permanent, stable living situation. The FASP, which is periodically updated, is based upon a Service Plan Review conference attended by representatives from CHFS and ACS, the foster parent, the foster child (if the child is over ten years of age), and parties interested in the foster child’s case (e.g., attorneys, doctors, grandparents). The FASP is prepared by a CHFS caseworker and reviewed by a CHFS supervisor.

The FASP consists of multiple components, including a natural family update and an analysis of the child’s strengths, needs, and risks. It also contains information regarding foster care issues, such as adjustments to foster care, life skills assessments, and progress toward permanency.

The initial FASP must be prepared within 30 days of the case-initiation date, which typically is the date the foster child was first placed in a foster care home. A follow-up FASP must be prepared within 90 days of the case-initiation date. A reassessment FASP must be completed within six months of the case-initiation date and subsequently at six-month intervals for as long as the case is active. FASPs are forwarded to ACS via CONNECTIONS for review and approval.

For the 30 foster children in our sample of children who received foster care services from CHFS during Fiscal Year 2007, the case files (which maintain, among other things, CONNECTIONS printouts of FASPs and progress notes) indicated that the required initial, 90-

day and six-month FASPs were completed during Fiscal Year 2007.<sup>3</sup> However, because there is insufficient evidence that caseworkers made all the required contacts and visits to the foster children and parents, and because the FASPs are prepared by caseworkers, it is doubtful that all of the FASPs were properly updated. Implementing the recommendations that ACS and CHFS ensure that caseworkers conduct all the required contacts and visits is essential to address this concern.

**CHFS Complied with Certain Contract Provisions  
Relating to Foster Parents, but Weaknesses Exist on  
Annual Recertifications, Background Checks, and Training**

CHFS complied with certain contract provisions relating to foster parents. For the foster parents of the children in our sample, CHFS ensured that criminal background checks and reviews of the State Central Register (SCR) for allegations of child abuse or neglect were done. In addition, applications to serve as foster parents were completed, and CHFS conducted the required pre-placement inspections of foster parents' homes.

However, although all annual recertification reviews of the foster homes were completed by the CHFS Homefinding Unit in consultation with caseworkers, considering the insufficient evidence that caseworkers made all the required contacts and visits to the foster children and parents, questions arise as to whether all of the annual recertifications were properly completed. In addition, one criminal background check of a foster parent lacked a safety assessment to determine whether the foster parent's criminal history posed an unacceptable risk to the child. Furthermore, a few foster homes did not have criminal background checks or SCR reviews for the other adult household members (although they had been done for the foster parents). Finally, many foster parent case files lacked evidence that the foster parents received the required initial and annual refresher training.

The CHFS Homefinding Unit is responsible for recruiting suitable foster parents and conducting the initial certification homestudy. The initial homestudy is conducted after each prospective foster parent has completed a detailed application form and attended an orientation meeting. The homestudy process involves a detailed review of the applicant's home and family, which includes an inspection of the applicant's home, a criminal background check of all adult household members, and a review of SCR to ensure that there were no prior allegations of child abuse or neglect.

Foster parents must be recertified each year on the anniversary of the date that the home was first certified by the New York State Department of Social Services. The recertification review is conducted by the Homefinding Unit in consultation with the caseworker who has primary responsibility for the child. The recertification reviews such issues as changes in the

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<sup>3</sup> One six-month FASP provided to the auditors was questionable. The six-month FASP was not in the foster child's file, and even though we informed CHFS of this on February 28 and March 25, 2008, the FASP was not provided to us until April 29, 2008. In addition, the signatures on the October 19, 2006 six-month FASP were dated September 17, 2007.

foster care household, living conditions in the foster home, the care provided to the child during the year, and the working relationship between the foster parents and CHFS. The completed recertification form is forwarded to the State to support the foster home's continued certification.

As part of the required criminal background check, fingerprints are obtained from the foster parent and any adult household member and sent to the New York State Division of Criminal Justice Services to conduct a search of its database. The agency would be notified if there is an arrest or conviction reported. In addition, a review of SCR is conducted to ensure that there were no prior allegations of child abuse or neglect. If the criminal background check reveals that a person was charged with or convicted of a crime, or if there is evidence of child abuse or neglect, the agency must perform a safety assessment of the conditions in the home and determine whether it is safe for the child to be placed or remain in the home.

CHFS records indicated that the foster parents in our sample had properly applied to serve as foster parents, that the required pre-placement inspections of the foster homes were conducted, that the required criminal background checks and SCR clearances had been done on the foster parents, and that the foster parents had received the required annual recertifications. However, the quality of the annual recertifications is questionable since they are based, in part, on observations made during the year and, as noted above, many required contacts and visits were not conducted. Implementing the recommendations that ACS and CHFS ensure that caseworkers conduct all the required contacts and visits is essential to address this concern.

In addition, there was no evidence that CHFS conducted a safety assessment of one foster parent with a criminal history to determine whether it was appropriate for the foster parent to provide foster care. Although the foster parent was charged with "theft by taking" in another state, the significance of this charge was not evaluated in terms of its relevance to the child's safety. In addition, there was no evidence that a criminal background check was done on 1 of the 21 other adults<sup>4</sup> in the foster homes in our sample or that an SCR review was done on 2 of the 21 other adults. To ensure the safety of the foster child, it is important that all adults in foster homes are checked for criminal histories and child abuse or neglect allegations, and that any such histories or allegations are carefully evaluated in terms of their significance to the safety of the foster child.

All foster parents must complete ACS-required initial and refresher training in order to provide foster care to the children in their custody. The Model Approach to Parenting Program (MAPP) is used in the foster parent training process. A full MAPP session is 30 hours<sup>5</sup> and a Mini-MAPP session, given to emergency licensed foster parents (who are usually relatives of the child), is 15 hours. In addition, foster parents with children who need special or exceptional care are required to receive an additional two to five hours of training. All foster parents need annual refresher training of four to five hours. According to CHFS procedures, training records are to be maintained in the foster parent files, including attendance records and copies of certificates of attendance or completion of required training.

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<sup>4</sup> Although there is evidence that the adult left the household in July 2006, the foster child was placed in this home in July 2004, and there is no evidence that a background check was ever done on this adult.

<sup>5</sup> ACS officials informed us that prior to 2000, ACS only required 15 hours of initial training.

However, there was no evidence that many of the foster parents in our sample received the required training. Of the 29 foster parent case files reviewed,<sup>6</sup> there was no evidence that 3 received any initial MAPP or Mini-MAPP training or that an additional 7 received the required number of hours of initial training, ranging from two to nine hours of initial training not received. New foster parents need training to understand their roles and responsibilities, obtain knowledge on the stages of child development, and learn how to become effective foster parents. Appropriate training is essential to help equip foster parents with the necessary skills to meet a foster child's needs. Consequently, insufficient training can increase the risk that foster parents will be unable to handle some of the special challenges associated with taking care of a foster child.

In addition, for calendar years 2006 and 2007, there was no evidence that 7 of the 29 foster parents completed any annual refresher training or that an additional 11 completed the required number of hours of refresher training, ranging from two to eight hours of refresher training not completed. Due to the importance of foster parents receiving ongoing training to enhance their understanding of their responsibilities, CHFS should actively follow up with these parents to ensure attendance.

Moreover, even though foster parent training information is maintained in CONNECTIONS, ACS's review of training information is limited. First, although ACS reviews training information as part of its annual evaluations of foster care agency performance, this review only leads to a numerical rating of the agency's foster parent training efforts. There was no evidence that ACS provided CHFS with detailed information about which foster parents had not received the required training. Furthermore, during the scope period of our audit, ACS's methodology for selecting a sample of foster parents for the annual review only included new foster parents and foster parents caring for foster children with special or exceptional needs. Of the 18 foster parents who we found did not receive sufficient refresher training, only 6 were new foster parents (in Calendar Years 2006 and 2007) and 2 were parents caring for foster children with special or exceptional needs. Therefore, 10 of the 18 who did not receive sufficient refresher training would not have been identified through ACS's annual review.

## **Recommendations**

CHFS should ensure that:

5. Safety assessments are performed whenever a criminal background check or SCR review reveals concerns about an adult living in a foster care home.

**ACS Response:** "CHFS requires a safety assessment to be performed whenever a criminal background check or SCR review reveals concerns about an adult living in a foster care home. To assure 100% compliance as of June 2008, Home finding staff will be responsible for completing all safety assessments that result from a "hit" on a criminal background check. Home finding managers conduct record reviews of all foster parent

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<sup>6</sup> There were only 29 foster parents in our review because 2 of the 30 children in our sample were in SILP and one child resided with two different foster parents during our audit period.



records on a quarterly basis to insure that required safety assessments and other supporting documents are in the record and are completed in a timely basis. QA staff reviews all foster parent records on a twice annual basis. Review includes timeliness and thoroughness of recertification, compliance with SCR's, fingerprints and safety assessments."

6. Criminal background checks and SCR reviews are done on all adult household members in the foster home.

**ACS Response:** "CHFS requires that criminal background checks and SCR reviews are done on all adult household members in the foster home. To insure that this policy is fully implemented, the following steps have been taken:

- Caseworkers have been trained on the importance of informing home finding and entering in Connections, any changes in adult household members that takes place during the period between recertification periods. QA department is tracking all children in foster care who turn 18 years of age so that they may be fingerprinted and cleared through the State Central Register.
- Home finding managers conduct quarterly record reviews of all foster parent records to insure that required SCR's, fingerprinting and other supporting documents are in the record and are completed in a timely basis.
- QA staff reviews all foster parent records on a twice annual basis. Review includes timeliness and thoroughness of recertification, compliance with SCR's, fingerprints and safety assessments."

7. The foster parents who have not received the required training are immediately trained.

**ACS Response:** "Multiple efforts have been made to engage Kinship parents in MAPP training. For those who have been non-compliant but remain certified as kinship parents, they will receive the home-based "Deciding Together " curriculum. Of the four parents who did not receive training, one home has been closed (2/08). Another home is located in South Carolina and required initial training was completed in South Carolina. The two remaining homes will receive home based training no later than June 30, 2008."

**Auditor Comment:** The audit concluded that there was no evidence that ten foster parents received all of the required initial training or that 18 foster parents received all of the required annual refresher training. CHFS and ACS should ensure that all of these parents receive the required amount of training.

8. All foster parents receive the required number of hours of initial and annual refresher training.

**ACS Response:** "MAPP and Mini MAPP trainings are offered in English and Spanish during daytime and evening hours multiple times each year. Regular foster parents must attend MAPP training in order to be licensed. Kinship foster parents must attend 15 hours of Mini-MAPP after having been approved through an ACS expedited home study

which occurs within 24 hours of the placement of the child (ren). Refresher trainings are offered multiple times each month, in both English and Spanish during daytime and evening hours. Foster parents receive monthly calendars for upcoming training and each year they are informed of the required hours of training that they are to attend. In addition, foster parents who are non-compliant receive individual letters, follow-up phone calls and meetings with the director of foster care. Regular foster parents and kinship parents who do not attend FP refresher training will be red flagged for a QA review and team conference to discuss their viability as a foster parent. For regular foster parents a decision will be made as to a time frame by which training must be completed and if not in compliance, whether the home should be closed. For Kinship parents, a decision will be made as to a time frame by which training must be completed and if not in compliance, whether a recommendation should be brought to the court that the home should be closed.”

ACS should:

9. Conduct periodic reviews of training information in CONNECTIONS for all types of foster parents and notify CHFS when it identifies foster parents who have not received the required training.

**ACS Response:** “This recommendation is not applicable due to additional documentation submitted to the NYCC.”

**Auditor Comment:** The documentation submitted to the Comptroller’s Office indicated that ACS’s methodology for selecting a sample of foster parents for their periodic reviews of training information only included new foster parents and foster parents caring for foster children with special or exceptional needs. The audit recommends that ACS include all types of foster parents in its reviews of foster parent training. In addition, there was no evidence in the documentation submitted that ACS provided CHFS with detailed information about which foster parents had not received the required training.

### **CHFS Requests for Reimbursement Were Inaccurate**

Each month CHFS reports to ACS the number of foster children and days of care the foster children were under CHFS supervision for that month. Based on the information for the prior month, ACS pays CHFS for the following month. The payment amount is calculated by multiplying the total days of care reported by CHFS by a per diem rate. This per diem rate consists of two parts—an administrative rate to compensate CHFS for its services and a pass-through rate that CHFS in turn pays to the foster parents.

ACS officials told us that the administrative rate is based on the certification of the boarding home to which the child is assigned. There are three main types of boarding home certifications: regular, special, and therapeutic. The pass-through rate is based on the age of the foster child and the level of difficulty in taking care of the child. There are three levels of difficulty: normal care (Level 1), special care (Level 2), and exceptional care (Level 3).

According to ACS officials, regular foster boarding homes serve children requiring normal care; special foster boarding homes can serve children requiring normal or special care; and therapeutic foster boarding homes can serve children requiring normal, special, or exceptional care. The levels of difficulty are determined by medical and mental health units at CHFS, and the determinations are sent to ACS for approval. Administrative rates increase with the level of care that a home is certified to provide, and pass-through rates increase with the level of difficulty.

To determine whether CHFS days-of-care payment requests to ACS were adequately supported, we reviewed the accuracy of the reported days of care for the children in our sample and the appropriateness of the administrative and pass-through rates that were used. Seven of the 30 children in our sample were approved by ACS for special or exceptional care.

For the 30 foster children in our sample, we determined that CHFS was due \$504,229 from ACS in administrative-rate and pass-through payments for Fiscal Year 2007. However, CHFS requested reimbursement from ACS for \$489,164 for the services provided to these children—a difference of \$15,065. According to CHFS officials, inaccurate requests for reimbursements were forwarded to ACS because of a problem in the EVOLV system. They stated that if a change in status occurs during a month, EVOLV automatically assumes that the change occurred on the first day of the month and calculates the number of days in this status accordingly. The officials stated that they generally are aware of any such discrepancies and make the necessary adjustments before they request reimbursement from ACS. However, there were 14 instances for the cases in our sample in which CHFS requested the incorrect reimbursement amount from ACS. CHFS officials stated that they will resubmit the bills for the administrative payments that are due to the agency. They also stated that the EVOLV system is in the process of being upgraded and that these discrepancies should not occur in the future.

### **Recommendation**

10. CHFS should ensure that its requests to ACS for reimbursement are accurate.

**ACS Response:** “CHFS is in the process of converting from an Evolv DOS based version to an Evolv Windows based version. This will eliminate the problems faced with the number of days billed. BTQ Financial will begin to enter the payments into the Evolv Windows system once the conversion is completed.”

### **CHFS Special Payments Were Not Adequately Supported or Supervised**

Special payments are expenditures made on behalf of a foster child for items that are necessary for the child but not covered by the regular foster payments made to the foster parents. During Fiscal Year 2007, CHFS made 186 special payments totaling \$106,657.

CHFS officials stated that special payments are usually not paid directly to a foster parent or foster child, but rather to a vendor or to a CHFS employee who shops with the foster parent.

The receipts for the items purchased are filed with the special payment request and a copy of the special payment check.

We reviewed the files of a randomly selected sample of 9 special payments (totaling \$14,151), of the 41 special payments (totaling \$62,784) that were \$800 or more in value, to determine whether the purchases were adequately supported. We subsequently learned that CHFS only sought ACS reimbursement for six of these nine special payments. We determined that the supporting documentation was inadequate for three of the six ACS-reimbursed special payments and one of the three non-ACS-reimbursed special payments.

Of the ACS-reimbursed special payments, a special payment check of \$2,200 that was supposed to be for initial clothing was actually used to a considerable degree for groceries and other miscellaneous items unrelated to clothing. In a second case, involving a special payment check of \$1,200, there was no evidence that \$142 in change from the purchases made with this check was returned or accounted for. (At the exit conference held on April 29, 2008, CHFS provided us with an April 28, 2008 receipt that indicated that CHFS received \$142 from the employee who both received the special payment check and handled the purchases in January 2007.) In a third case, there were no receipts to support a special payment of \$800 for emergency clothing and books for a foster child in college. Although CHFS provided evidence that it spoke to the child on several occasions in an effort to obtain the receipts, there is also evidence that a subsequent request from the child for funds was approved and an indication that the foster child did not provide receipts for this special payment either. ACS should review these cases and decide whether recoupment from CHFS would be appropriate.

In addition, some of the receipts in four of the nine cases did not identify the name of the store or the items that were purchased. CHFS officials stated that some of the local stores in which purchases were made are small and may not have receipts that identify the store's name or the items purchased. However, without this information, there is no proof that the purchase was legitimate.

Furthermore, supervisory controls over special payments were inadequate. When there is an identified need, special payment request forms are completed and signed by the CHFS employee who makes the request. The request form must be approved by a supervisor. However, the CHFS employee who is primarily responsible for special payment purchases is the same person who reviews the receipts, determines that the receipts are appropriate, and accounts for the use of the special payments funds. The person who reviews receipts and accounts for the use of special payment funds should not be involved in making special payment purchases. Without an appropriate segregation of duties in the special payments process, adequate controls do not exist to prevent the misuse of special payment funds.

### **Recommendations**

CHFS should ensure that:

11. The supporting documentation for special payments is adequate.

**ACS Response:** “A new policy was put into place for Special Payments. The policy requires Supervisors to review the receipts to make sure that the receipts are for the correct items and dates. The policy requires the Junior Accountant to review receipts and make sure that they are for the correct amount and to collect change from the caseworker. The policy requires BTQ to review special payments monthly.”

12. There is an appropriate segregation of duties throughout the special payments process to prevent the misuse of special payment funds.

**ACS Response:** “The following is a summary of the new policy and procedures which provides the segregation of duties:

1. Case Manager fills out request for special payment and includes documentation that supports the request (Court order, discharge approval, intake form, ACS approval, etc)
2. Program Manager, Assistant Director, or Supervisor approves the special payment request and submits to junior accountant.
3. Junior Accountant provides Case Manager with check for special payment and notifies Program Manager and Assistant Director of the amount.
4. Case Manager/Case Aid provides receipts for the special payment purchases to Supervisor.
5. Case Manager provides receipts to Junior Accountant.
6. Junior Accountant summarizes receipts and collects any change from Case Manager and deposits into foster care account.
7. Junior Accountant provides Case Manager with receipt for change.
8. Junior Accountant (Shirley Diaz) submits special payment request to ACS for payment.
9. BTQ reviews all special payment requests submitted to ACS.”

ACS should:

13. Review the three questioned ACS-reimbursed special payments and seek recoupment as appropriate.

**ACS Response:** “ACS reviewed the three questioned instances of reimbursed special payments. In one instance, \$142.05 of a special payment left unspent was returned to CHFS after the auditors pointed out the amount was outstanding. This was verified by a receipt for the funds to the worker and bank deposit slip and record. In the second case, a child in care in Florida stated that she sent the receipts to CHFS but they were not received. CHFS made at least seven requests for the receipts. An attestation has been requested from the foster child. In the third instance, an emergency placement of five children, part of the funds issued were spent on food rather than clothing, the purpose of the payment. Usually, the funds would have been given to a caseworker to oversee the payment. This did not occur due to the nature of the emergency. The funds were given directly to the foster parent.”



ADMINISTRATION FOR CHILDREN'S SERVICES  
FINANCIAL SERVICES  
150 William Street - 10<sup>th</sup> Floor  
New York, NY 10038

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

SUSAN NUCCIO  
*Deputy Commissioner  
Financial Services*

## MEMORANDUM

June 2, 2008

Mr. John Graham  
Deputy Comptroller  
Policy, Audits, Accountancy & Contracts  
The City of New York Office of the Comptroller  
Executive Offices  
1 Centre Street, Room 5000  
New York, New York 10007-2341

Re: NYC Comptroller's Draft Report ME08-060A Audit Report on the  
Coalition for Hispanic Family Services 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 (AIPs). ACS looks forward to 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.

Sincerely,

Tom Welsh

Attachments

New York City Comptroller Audit – Report on the  
Coalition for Hispanic Family Services (CHFS) Foster Care Contract  
With the Administration for Children's Services  
Report ME08-060A

**Administration for Children's Services (ACS)**  
**Response to Recommendations**  
June 2, 2008

ACS was pleased the auditors found that CHFS generally complied with some of the major programmatic provisions of its foster care contract with ACS. For the 30 cases reviewed, applications to serve as foster parents were completed, the foster parents received the required background checks, and pre-placement inspections of the foster parents' homes were conducted. However, there were some weaknesses in certain areas that must be addressed.

**RECOMMENDATION 1**

In the summer of 2007 ACS conducted an APA audit of CHFS case records resulting in significant concerns regarding casework performance, safety assessments and recertification of foster homes. In response to this audit, CHFS implemented a corrective action plan with short term goals to result in significant improvement in casework practice and quality performance. ACS returned to audit 20 case records in November of 2007 and 30 case records in December of 2007. ACS has informed CHFS that they have noted significant improvement in our required case work contacts. Starting in October 2007 and moving forward, CHFS Quality Assurance staff has been tracking all casework contacts on a bi-weekly basis to compare required visits with actual visits taking place. Quality assurance reviews all connections records on a monthly basis to track compliance with required visits to foster homes/foster children. A monthly report is distributed for Executive director, director of foster care, foster care supervisors. Supervisors then plan with caseworkers to schedule any missed casework contacts. Starting in October 2007, director and supervisors are working with caseworkers to review monthly calendar and assure that required visits, Court dates, FASP'S and Permanency Hearing Reports are entered into the worker's schedule. When worker's court dates interfere with required visits a back-up plan is established. A safety assessment tool has been designed and implemented and all staff has been trained on how to use the tool. All foster homes receive a safety assessment on a quarterly basis for foster homes and more frequently if a safety risk is identified.

**RECOMMENDATION 2**

Since October 2007 all progress notes for visits, face to face contacts are being entered into Connections and are tracked by our Quality Assurance (QA) department. To assure that contacts are properly documented in the correct section of Connections, QA held training with Casework Staff to review proper characterization of different types of documentation in Connections. A laminated contact requirement sheet and appropriate location for documenting in Connections was also distributed to staff. Quality Assurance staff is reviewing Connections case records on a monthly basis to assure that progress notes are being entered to reflect required visits and that they are being entered on a timely basis. Bi-weekly tracking reports are distributed to executive director, director of foster care, FC supervisors to reflect missing and completed progress notes. Email alerts for missing visits and corresponding progress notes are sent to supervisors and caseworkers as well.

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**RECOMMENDATION 3**

As of October 2007, supervisors enter a monthly administrative note to reflect any supervisory directives and review of the record. As of June 2008, QA will be reviewing Connections on a bi-weekly basis, for supervisory notes in Connections. As of October 2007, program director does random review of case records on a regular basis and enters an administrative note as appropriate.

**RECOMMENDATION 4**

ACS Agency Program Assistance (APA) will continue to conduct safety assessment reviews of Coalition for Hispanic Family that includes a review of cases contacts. ACS Division of Research and Evaluation will continue to conduct case record reviews as part of the Provider Agency Management System (PAMS) process that includes a review of case work contacts as part of the child safety section.

**RECOMMENDATION 5**

CHFS requires a safety assessment to be performed whenever a criminal background check or SCR review reveals concerns about an adult living in a foster care home. To assure 100% compliance as of June 2008, Home finding staff will be responsible for completing all safety assessments that result from a "hit" on a criminal background check. Home finding managers conduct record reviews of all foster parent records on a quarterly basis to insure that required safety assessments and other supporting documents are in the record and are completed in a timely basis. QA staff reviews all foster parent records on a twice annual basis. Review includes timeliness and thoroughness of recertification, compliance with SCR's, fingerprints and safety assessments.

**RECOMMENDATION 6**

CHFS requires that criminal background checks and SCR reviews are done on all adult household members in the foster home. To insure that this policy is fully implemented, the following steps have been taken:

- Caseworkers have been trained on the importance of informing home finding and entering in Connections, any changes in adult household members that takes place during the period between recertification periods. QA department is tracking all children in foster care who turn 18 years of age so that they may be fingerprinted and cleared through the State Central Register.
- Home finding managers conduct quarterly record reviews of all foster parent records to insure that required SCR's, fingerprinting and other supporting documents are in the record and are completed in a timely basis.
- QA staff reviews all foster parent records on a twice annual basis. Review includes timeliness and thoroughness of recertification, compliance with SCR's, fingerprints and safety assessments.



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**Response to Recommendations**

June 2, 2008

**RECOMMENDATION 7**

Multiple efforts have been made to engage Kinship parents in MAPP training. For those who have been non-compliant but remain certified as kinship parents, they will receive the home-based "Deciding Together" curriculum. Of the four parents who did not receive training, one home has been closed (2/08). Another home is located in South Carolina and required initial training was completed in South Carolina. The two remaining homes will receive home based training no later than June 30, 2008.

**RECOMMENDATION 8**

MAPP and Mini MAPP trainings are offered in English and Spanish during daytime and evening hours multiple times each year. Regular foster parents must attend MAPP training in order to be licensed. Kinship foster parents must attend 15 hours of Mini-MAPP after having been approved through an ACS expedited home study which occurs within 24 hours of the placement of the child (ren). Refresher trainings are offered multiple times each month, in both English and Spanish during daytime and evening hours. Foster parents receive monthly calendars for upcoming training and each year they are informed of the required hours of training that they are to attend. In addition, foster parents who are non-compliant receive individual letters, follow-up phone calls and meetings with the director of foster care. Regular foster parents and kinship parents who do not attend FP refresher training will be red flagged for a QA review and team conference to discuss their viability as a foster parent. For regular foster parents a decision will be made as to a time frame by which training must be completed and if not in compliance, whether the home should be closed. For Kinship parents, a decision will be made as to a time frame by which training must be completed and if not in compliance, whether a recommendation should be brought to the court that the home should be closed.

**RECOMMENDATION 9**

This recommendation is not applicable due to additional documentation submitted to the NYCC.

**RECOMMENDATION 10**

CHFS is in the process of converting from an Evolv DOS based version to an Evolv Windows based version. This will eliminate the problems faced with the number of days billed. BTQ Financial will begin to enter the payments into the Evolv Windows system once the conversion is completed.

**RECOMMENDATION 11**

A new policy was put into place for Special Payments. The policy requires Supervisors to review the receipts to make sure that the receipts are for the correct items and dates. The policy requires the Junior Accountant to review receipts and make sure that they are for the correct amount and to collect change from the caseworker. The policy requires BTQ to review special payments monthly.

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**Administration for Children's Services (ACS)**  
**Response to Recommendations**  
June 2, 2008

**RECOMMENDATION 12**

The following is a summary of the new policy and procedures which provides the segregation of duties:

1. Case Manager fills out request for special payment and includes documentation that supports the request (Court order, discharge approval, intake form, ACS approval, etc)
2. Program Manager, Assistant Director, or Supervisor approves the special payment request and submits to junior accountant.
3. Junior Accountant provides Case Manager with check for special payment and notifies Program Manager and Assistant Director of the amount.
4. Case Manager/Case Aid provides receipts for the special payment purchases to Supervisor.
5. Case Manager provides receipts to Junior Accountant.
6. Junior Accountant summarizes receipts and collects any change from Case Manager and deposits into foster care account.
7. Junior Accountant provides Case Manager with receipt for change.
8. Junior Accountant (Shirley Diaz) submits special payment request to ACS for payment.
9. BTQ reviews all special payment requests submitted to ACS.

**RECOMMENDATION 13**

ACS reviewed the three questioned instances of reimbursed special payments. In one instance, \$142.05 of a special payment left unspent was returned to CHFS after the auditors pointed out the amount was outstanding. This was verified by a receipt for the funds to the worker and bank deposit slip and record. In the second case, a child in care in Florida stated that she sent the receipts to CHFS but they were not received. CHFS made at least seven requests for the receipts. An attestation has been requested from the foster child. In the third instance, an emergency placement of five children, part of the funds issued were spent on food rather than clothing, the purpose of the payment. Usually, the funds would have been given to a caseworker to oversee the payment. This did not occur due to the nature of the emergency. The funds were given directly to the foster parent.

**ADMINISTRATION FOR CHILDREN'S SERVICES AUDIT IMPLEMENTATION PLAN**  
**THE CITY OF NEW YORK OFFICE OF THE COMPTROLLER**  
**AUDIT REPORT ON THE COALITION FOR HISPANIC FAMILY SERVICES FOSTER CARE CONTRACT**  
**WITH THE ADMINISTRATION FOR CHILDREN'S SERVICES**  
**AUDIT NUMBER – ME08-060A**

RECOMMENDATION # 1: CHFS should immediately perform visits to those foster children who have not been visited.

RESPONSIBLE MANAGER'S NAME: DENISE ROSARIO, EXECUTIVE DIRECTOR CHFS

CORRECTIVE ACTIONS TO BE TAKEN	RESPONSIBLE PERSON	DATES		DOCUMENTATION	COMMENTS
		START	END		
<p>In the summer of 2007 ACS conducted an APA audit of Coalition case records resulting in significant concerns regarding casework performance, safety assessments and recertification of foster homes. In response to this audit the coalition implemented a corrective action plan with short term goals to result in significant improvement in casework practice and quality performance. ACS returned to audit 20 case records in November of 2007 and 30 case records in December of 2007. ACS has informed the Coalition that they have noted significant improvement in our required case work contacts.</p> <ul style="list-style-type: none"> <li>Starting in October 2007 and moving forward, our Quality Assurance staff has been tracking all casework contacts on a bi-weekly basis to compare required visits with actual visits taking place. Quality assurance reviews all connections records on a monthly basis to track compliance with required visits to foster homes/foster children. A monthly report is distributed for Executive director, director of foster care, foster care supervisors. Supervisors then plan with caseworkers to schedule any missed casework contacts.</li> <li>Starting in October 2007 Director and supervisors are working with caseworkers to review monthly calendar and assure that required visits, Court dates, FASP'S and Permanency Hearing Reports are entered into the worker's schedule. When worker's court dates interfere with required visits a back-up plan is established.</li> <li>A safety assessment tool has been designed and implemented and all staff has been trained on how to use the tool. All foster homes receive a safety assessment on a quarterly basis for foster homes and more frequently if a safety risk is identified.</li> </ul>	Sonia Rodriguez, Quality Assurance Manager, compliance Coordinator	October 2007	Ongoing	Monthly Tracking Report	As is the case through out the NYC child welfare system, Coalition experienced a high turn over of staff during FY 2006-07. As such, the challenges of recruiting and hiring staff in the foster care program directly impacted on the program's ability to maintain low caseloads and meet all required contacts.
	Mildred Gonzalez, Director  SW supervisors	October 2007	Ongoing	Weekly/Monthly calendar	
	Mildred Gonzalez, Sonia Rodriguez, Supervisors, Caseworkers, home finding staff	September 2007	Ongoing	Quarterly Safety Assessment tool in the record and in Connections	

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**RECOMMENDATION # 2:** CHFS should ensure that caseworkers consistently prepare progress notes in CONNECTIONS to document all contacts and visits with foster children and foster parents.

**RESPONSIBLE MANAGER'S NAME:** DENISE ROSARIO, EXECUTIVE DIRECTOR CHFS

CORRECTIVE ACTIONS TO BE TAKEN	RESPONSIBLE PERSON	DATES START      END	DOCUMENTATION	COMMENTS
<p>Since October 2007 all progress notes for visits, face to face contacts are being entered into Connections and are tracked by our Quality Assurance (QA) department.</p> <p>To assure that contacts are properly documented in the correct section of Connections, QA held training with Casework Staff to review proper characterization of different types of documentation in Connections. A laminated contact requirement sheet and appropriate location for documenting in Connections was also distributed to staff.</p> <p>Quality Assurance staff is reviewing Connections case records on a monthly basis to assure that progress notes are being entered to reflect required visits and that they are being entered on a timely basis. Bi-weekly tracking reports are distributed to executive director, director of foster care, FC supervisors to reflect missing and completed progress notes. Email alerts for missing visits and corresponding progress notes are sent to supervisors and caseworkers as well.</p>	<p>Sonia Rodriguez, QA manager, compliance coordinator</p>	<p>October 2007      Ongoing</p>	<p>Monthly tracking reports, emails and progress notes in connections</p>	

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RECOMMENDATION # 3: CHFS should provide supervisory oversight to ensure that all required contacts and visits are conducted and documented.

RESPONSIBLE MANAGER'S NAME: DENISE ROSARIO, EXECUTIVE DIRECTOR CHFS

CORRECTIVE ACTIONS TO BE TAKEN	RESPONSIBLE PERSON	DATES		DOCUMENTATION	COMMENTS
		START	END		
As of October 2007 supervisors enter a monthly administrative note to reflect any supervisory directives and review of the record.	CW supervisors and/or Director of FC	October 2007	Ongoing	Supervisory progress note in connections	
As of June 2008 QA will be reviewing Connections on a bi-weekly basis, for supervisory notes in Connections.		June 2008	Ongoing	Tracking report	
As of October 2007 program director does random review of case records on a regular basis and enters an administrative note as appropriate.	Director of FC	October 2007	Ongoing	Director's administrative note in connections	

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RECOMMENDATION # 4: ACS should continue to closely supervise CHFS to ensure that it conducts the required number of visits to foster children.

RESPONSIBLE MANAGER'S NAME: JESS DANNHAUSER, ASSISTANT COMMISSIONER, AGENCY PROGRAM ASSISTANCE ACS

CORRECTIVE ACTIONS TO BE TAKEN	RESPONSIBLE PERSON	DATES		DOCUMENTATION	COMMENTS
		START	END		
ACS Agency Program Assistance (APA) will continue to conduct safety assessment reviews of Coalition for Hispanic Family that includes a review of cases contacts.	Erin Clark- McCann	7/1/08	6/30/09	Case review report	ACS APA will forward a copy of the review results when it is complete.
ACS Division of Research and Evaluation will continue to conduct case record reviews as part of the Provider Agency Management System (PAMS) process that includes a review of case work contacts as part of the child safety section.	Osa Adonri	7/1/08	6/30/09	PAMS Results	ACS APA will forward a copy of the review results when it is complete.

**ADMINISTRATION FOR CHILDREN'S SERVICES AUDIT IMPLEMENTATION PLAN**  
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**RECOMMENDATION # 5:** CHFS should ensure that safety assessments are performed whenever a criminal background check or SCR review reveals concerns about an adult living in a foster care home.

**RESPONSIBLE MANAGER'S NAME:** DENISE ROSARIO, EXECUTIVE DIRECTOR CHFS

CORRECTIVE ACTIONS TO BE TAKEN	RESPONSIBLE PERSON	DATES		DOCUMENTATION	COMMENTS
		START	END		
Coalition requires a safety assessment to be performed whenever a criminal background check or SCR review reveals concerns about an adult living in a foster care home. To assure 100% compliance as of June 2008, Home finding staff will be responsible for completing all safety assessments that result from a "hit" on a criminal background check.	Home finding coordinator, home finder	June 2008	Ongoing	Progress note in Connections indicating that safety assessment was completed as well as the results of the assessment.	During the Comptroller's Audit, one out of thirty cases was out of compliance. This is a rare occurrence for the agency.
Home finding managers conduct record reviews of all foster parent records on a quarterly basis to insure that required safety assessments and other supporting documents are in the record and are completed in a timely basis.	Home finding Coordinator & supervisor	October 2007	Ongoing	Documentation in record	
QA staff reviews all foster parent records on a twice annual basis. Review includes timeliness and thoroughness of recertification, compliance with SCR's, fingerprints and safety assessments.	Sonia Rodriguez, QA manager, Compliance Coordinator	October 2007	Ongoing	Tracking documentation	

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**AUDIT NUMBER - ME08-060A**

**RECOMMENDATION # 6:** CHFS should ensure that criminal background checks and SCR reviews are done on all adult household members in the foster home.

**RESPONSIBLE MANAGER'S NAME:** DENISE ROSARIO, EXECUTIVE DIRECTOR CHFS

CORRECTIVE ACTIONS TO BE TAKEN	RESPONSIBLE PERSON	DATES		DOCUMENTATION	COMMENTS
		START	END		
Coalition requires that criminal background checks and SCR reviews are done on all adult household members in the foster home. To insure that this policy is fully implemented, the following steps have been taken:  Caseworkers have been trained on the importance of informing home finding and entering in Connections, any changes in adult household members that takes place during the period between recertification periods. QA department is tracking all children in foster care who turn 18 years of age so that they may be fingerprinted and cleared through the State Central Register.	Sonia Rodriguez, Director of QA Mildred Gonzalez, Director of Foster Care	Fall 2007			
Home finding managers conduct quarterly record reviews of all foster parent records to insure that required SCR's, fingerprinting and other supporting documents are in the record and are completed in a timely basis.	Home finding Supervisor, Home finding Coordinator	October 2007			
QA staff reviews all foster parent records on a twice annual basis. Review includes timeliness and thoroughness of recertification, compliance with SCR's, fingerprints and safety assessments.	Sonia Rodriguez, Director of QA, QA Manager, Compliance Coordinator	October 2007			



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RECOMMENDATION # 7: CHFS should ensure that the foster parents who have not received the required training are immediately trained.

RESPONSIBLE MANAGER'S NAME: DENISE ROSARIO, EXECUTIVE DIRECTOR CHFS

CORRECTIVE ACTIONS TO BE TAKEN	RESPONSIBLE PERSON	START	DATES END	DOCUMENTATION	COMMENTS
Multiple efforts have been made to engage Kinship parents in MAPP training. For those who have been non-compliant but remain certified as kinship parents, they will receive the home-based "Deciding Together" curriculum. Of the four parents who did not receive training, one home has been closed (2/08). Another home is located in South Carolina and required initial training was completed in South Carolina. The two remaining homes will receive home based training no later than June 30, 2008.	Home finder	June 1, 2008	June 30, 2008	Documented training hours, Certificate of Completion	Many Kinship parents are difficult to engage in training since they become an approved home prior to being trained. In addition, many kinship placements are restricted by the court and it makes it difficult to Hold kinship parents accountable without the court's support and reinforcement.

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RECOMMENDATION # 8: CHFS should ensure that all foster parents receive the required number of hours of initial and annual refresher training.

RESPONSIBLE MANAGER'S NAME: DENISE ROSARIO, EXECUTIVE DIRECTOR CHFS

CORRECTIVE ACTIONS TO BE TAKEN	RESPONSIBLE PERSON	DATES START END	DOCUMENTATION	COMMENTS
<p>MAPP and Mini MAPP trainings are offered in English and Spanish during daytime and evening hours multiple times each year. Regular foster parents must attend MAPP training in order to be licensed. Kinship foster parents must attend 15 hours of Mini-MAPP after having been approved through an ACS expedited home study which occurs within 24 hours of the placement of the child (ren).</p> <p>Refresher trainings are offered multiple times each month, in both English and Spanish during daytime and evening hours. Foster parents receive monthly calendars for upcoming training and each year they are informed of the required hours of training that they are to attend. In addition, foster parents who are non-compliant receive individual letters, follow-up phone calls and meetings with the director of foster care.</p>	<p>Training Department, Consultants</p>	<p>2000</p> <p>Ongoing</p>	<p>Training Log Training Certificates of completion</p>	
<p>Regular foster parents and kinship parents who do not attend FP refresher training will be red flagged for a QA review and team conference to discuss their viability as a foster parent. For regular foster parents a decision will be made as to a time frame by which training must be completed and if not in compliance, whether the home should be closed.</p>	<p>Training Coordinator, QA staff, Director of FC, Supervisor</p>	<p>June 2008</p> <p>Ongoing</p>	<p>Documentation in Case record/connections</p>	<p>The closing of a foster home due to poor training participation is further complicated by the length of time that a child may have been in the foster home. The closing of a foster home will result in the movement of the child.</p>
<p>For Kinship parents, a decision will be made as to a time frame by which training must be completed and if not in compliance, whether a recommendation should be brought to the court that the home should be closed.</p>	<p>Same as above</p>	<p>June 2008</p> <p>Ongoing</p>		

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RECOMMENDATION # 9: ACS should conduct periodic reviews of training information in CONNECTIONS for all types of foster parents and notify CHFS when it identifies foster parents who have not received the required training.

RESPONSIBLE MANAGER'S NAME: NOT APPLICABLE

CORRECTIVE ACTIONS TO BE TAKEN	RESPONSIBLE PERSON	DATES START END	DOCUMENTATION	COMMENTS
This recommendation is not applicable.				This recommendation will be removed due to additional documentation submitted to the NYCC.

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RECOMMENDATION # 10: CHFS should ensure that its requests to ACS for reimbursement are accurate.

RESPONSIBLE MANAGER'S NAME: SONIA RODRIGUEZ/MARYBETH MCGOWAN, BTQ FINANCIAL SERVICES (BTQ)

CORRECTIVE ACTIONS TO BE TAKEN	RESPONSIBLE PERSON	DATES		DOCUMENTATION	COMMENTS
		START	END		
1. The agency is in the process of converting from an Evolv DIOS based version to an Evolv Windows based version. This will eliminate the problems faced with the number of days billed.	Sonia Rodriguez	July 2008	Ongoing	Contract with Evolv Monthly Billing reports	We anticipate running both system simultaneously as of July 2008 in order to assure that Data is correct in the conversion process
2. BTQ Financial will begin to enter the payments into the Evolv Windows system once the conversion is completed.	Marybeth McGowan	TBD			

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RECOMMENDATION # 11: CHFS should ensure that the supporting documentation for special payments is adequate.

RESPONSIBLE MANAGER'S NAME: MILDRED GONZALEZ/NAIMA CHISOLM (BTQ)

CORRECTIVE ACTIONS TO BE TAKEN	RESPONSIBLE PERSON	DATES		DOCUMENTATION	COMMENTS
		START	END		
<p>A new policy was put into place for Special Payments.</p> <ul style="list-style-type: none"> <li>The policy requires Supervisors to review the receipts to make sure that the receipts are for the correct items and dates.</li> <li>The policy requires the Junior Accountant to review receipts and make sure that they are for the correct amount and to collect change from the caseworker.</li> <li>The policy requires BTQ to review special payments monthly.</li> </ul>	Supervisor	4/15/08	Ongoing	Policy and Procedures document	
	Junior accountant (CHFS)				
	Controller (BTQ)				

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**RECOMMENDATION # 12:** CHFS should ensure that there is an appropriate segregation of duties through out the special payments process to prevent the misuse of special payment funds.

**RESPONSIBLE MANAGER'S NAME:** MILDRED GONZALEZ/NAIMA CHISOLM (BTQ)

CORRECTIVE ACTIONS TO BE TAKEN	RESPONSIBLE PERSON	DATES		DOCUMENTATION	COMMENTS
		START	END		
<p>The following is a summary of the new policy and procedures which provides the segregation of duties:</p> <ol style="list-style-type: none"> <li>1. Case Manager fills out request for special payment and includes documentation that supports the request (Court order, discharge approval, intake form , ACS approval, etc)</li> <li>2. Program Manager, Assistant Director, or Supervisor approves the special payment request and submits to junior accountant.</li> <li>3. Junior Accountant provides Case Manager with check for special payment and notifies Program Manager and Assistant Director of the amount.</li> <li>4. Case Manager/Case Aid provides receipts for the special payment purchases to Supervisor.</li> <li>5. Case Manager provides receipts to Junior Accountant.</li> <li>6. Junior Accountant summarizes receipts and collects any change from Case Manager and deposits into foster care account.</li> <li>7. Junior Accountant provides Case Manager with receipt for change.</li> <li>8. Junior Accountant (Shirley Diaz) submits special payment request to ACS for payment.</li> <li>9. BTQ reviews all special payment requests submitted to ACS.</li> </ol>	<p>Case Manager</p> <p>Program Manager Assistant Director Supervisor</p> <p>Junior Accountant</p> <p>Case Manager Case Aide</p> <p>Case Manager</p> <p>Junior Accountant</p> <p>Junior Accountant</p> <p>Junior Accountant</p> <p>Junior Accountant</p> <p>Client Manager Controller (BTQ)</p>	4/15/08	Ongoing	Policy and Procedures document	

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RECOMMENDATION # 13: ACS should Review the three questioned ACS-reimbursed payments and seek recoupment as appropriate.

RESPONSIBLE MANAGER'S NAME: TOM WELSH, ASSISTANT COMMISSIONER ACS

CORRECTIVE ACTIONS TO BE TAKEN	RESPONSIBLE PERSON	DATES		DOCUMENTATION	COMMENTS
		START	END		
<p>ACS reviewed the three questioned instances of reimbursed special payments. In one instance, \$142.05 of a special payment left unspent was returned to CHFS after the auditors pointed out the amount was outstanding. This was verified by a receipt for the funds to the worker and bank deposit slip and record.</p> <p>In the second case, a child in care in Florida stated that she sent the receipts to CHFS but they were not received. CHFS made at least seven requests for the receipts. An attestation has been requested from the foster child.</p> <p>In the third instance, an emergency placement of five children, part of the funds issued were spent on food rather than clothing, the purpose of the payment. Usually, the funds would have been given to a caseworker to oversee the payment. This did not occur due to the nature of the emergency. The funds were given directly to the foster parent.</p>	Not Applicable	Not Applicable	Not Applicable		<p>An addendum to the Special Payments bulletin regarding what constitutes appropriate documentation has been forwarded to all foster care providers. No recoupment is indicated for the three instances reported.</p>