
**Thomas P. DiNapoli
COMPTROLLER**



**OFFICE OF THE
NEW YORK STATE COMPTROLLER**

**DIVISION OF STATE
GOVERNMENT ACCOUNTABILITY**

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**NEW YORK CITY
ADMINISTRATION FOR
CHILDREN'S SERVICES**

**STATUS OF THE ACTION
PLAN TO PROTECT
CHILDREN**

Report 2007-N-14

AUDIT OBJECTIVE

The objective of our audit was to determine the status of the New York City Administration for Children's Services' Action Plan designed to protect children from abuse, maltreatment and neglect.

AUDIT RESULTS - SUMMARY

The mission of the New York City Administration for Children's Services (ACS), which operates under the oversight of the New York State Office for Children and Family Services (OCFS), is to ensure the safety and well-being of New York City's children. According to a report issued by the New York City Department of Investigation in August 2007, between October 2005 and July 2006 there were 11 child fatalities and one near fatality while the parents were under investigation by ACS for abuse or neglect, or after ACS had completed investigations concerning the parents. One of these fatalities which took place in January 2006, was 7-year-old Nixzmary Brown. Following this incident, the Mayor directed ACS to review all open child welfare cases to look for improvement opportunities. As a result of that review, ACS developed an Action Plan (Plan) to help ensure that it was meeting its mandate to protect children. In March 2006, the Commissioner of ACS publicly issued the Plan titled, "Safeguarding Our Children."

The Plan was based on three overall goals for ACS: (1) keeping children safe by measuring results, (2) sharpening investigatory skills and supporting sound decisions and (3) focusing on child safety throughout Children's Services. ACS developed 22 individual initiatives to support these goals. As of September 26, 2008, we found that 17 of the initiatives were fully implemented, 4 were partially implemented, and one initiative was no longer applicable. Although these

individual initiatives were each designed to be a work-in-progress, it appears that ACS has made significant progress in implementing its overall Plan.

We also note that during our audit field work, ACS had not developed procedures to assess Plan effectiveness. However, after we issued our discussion document, ACS officials compiled statistics, program status reports and case assessment data, that can readily be used for this purpose. [Pages 3-9]

Our audit report contains three recommendations relating to Plan implementation and oversight.

ACS officials agree with the vast majority of our conclusions regarding the implementation status of Plan initiatives. They assert that they have already taken action on our recommendations.

This report, dated December 4, 2008, is available on our website at:

<http://www.osc.state.ny.us>.

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BACKGROUND

The New York City Administration for Children's Services (ACS) mission is to ensure the safety and well-being of New York City children. Among ACS' responsibilities are to protect children from abuse and neglect, and to provide preventive and foster care services to meet the needs of children and families. The New York State Office of Children and Family Services (OCFS) is the state agency responsible for overseeing ACS.

According to a report issued by the New York City Department of Investigation in August 2007, between October 2005 and July 2006, there were 11 child fatalities and one near fatality while their parents were under investigation by ACS for abuse or neglect, or after ACS had completed investigations concerning their parents. One of these fatalities which took place in January 2006, was 7-year-old Nixzmary Brown. Following this incident, the Mayor directed ACS to review all open child welfare cases. As a result of that review, ACS developed an Action Plan (Plan) to help ensure that it was meeting its mandate to protect children.

The Commissioner of ACS publicly issued the Plan in March 2006 titled, "Safeguarding Our Children." According to the Commissioner, "These systemic reforms go directly to the heart of how we identify, investigate and handle cases of child abuse and neglect. These changes are designed to help us make the most of every single opportunity we have to protect New York City's children." The Mayor's Management Report, issued in September 2006, noted that ACS had released the Plan and was working on implementing its initiatives.

The Plan states, "Safeguarding Our Children sets forth ACS' vision for 2006 and represents our commitment to take bold action to protect New York City's children from harm."

The Plan further states, "ACS must do more to keep children safe and reduce the risk of abuse and neglect." Specifically, ACS needs to:

- Build on the extensive performance data management systems that have guided agency operations over the past decade with new indicators that enhance accountability and more

precisely gauge key child safety outcomes and related trends;

- Enhance child protective investigatory practice among staff, supervisors and managers; and
- Ensure that every part of the ACS system of services - from child protection to family support to foster care - as well as every interaction ACS workers have with an at-risk or abused child, is focused foremost on ensuring safety."

The Plan was based on three overall goals for ACS: (1) keeping children safe by measuring results, (2) sharpening investigatory skills and supporting sound decisions and (3) focusing on child safety throughout Children's Services. To accomplish these goals, ACS developed 22 initiatives.

According to ACS officials, their Plan was designed to be a work in progress. As such, ACS has made minor revisions to some of the initiatives and released two updates since it was originally drafted; one in November 2006 and another in September 2007.

AUDIT FINDINGS AND RECOMMENDATIONS

Implementation Status of the Plan

We found that as of September 26, 2008, 17 of the 22 initiatives were fully implemented, 4 were partially implemented, and one initiative was no longer applicable. The following are the three goals and the implementation status of their associated initiatives.

Goal	Implemented	Partially Implemented	Not Implemented	Not Applicable
1	3			1
2	9	1		
3	5	3		
Totals	17	4		1

See Exhibit A for a detailed graphic presentation.

Keeping Children Safe by Measuring Results

According to ACS officials, “With readily available outcome data at hand, ACS will identify emerging trends in investigatory practice, community dynamics, and contract agency performance, and be positioned to act on these trends to keep children safe.” Following are the four initiatives ACS said it would implement to fully achieve this goal.

1. Institute CHILSTAT, a comprehensive system of performance data used to identify families at greatest risk and track results of decisions regarding services, supervision and removal.

Status - Implemented: ACS has been using CHILSTAT, a case review process that uses data and tracks results of decisions regarding services, family supervision and removal of children from dangerous homes. ACS provided us with a sample report used in weekly CHILSTAT meetings illustrating how the information received from ACS caseworkers regarding specific cases is summarized for discussion at the meetings (e.g., follow-up visits, assessments of child safety, etc.). ACS officials also used this data to discuss specific cases and identify ways of improving its own investigatory practices.

2. Use a balanced Scorecard for Safety to be given to each worker, supervisor and

manager on a monthly basis showing their success in achieving key indicators.

Status - Implemented: The Scorecard for Safety is used by ACS staff at CHILSTAT meetings.

3. Implement “Oversight and Accountability Project” directing staff resources from central office administrative functions into the field to ensure high quality services are provided to children in our care.

Status - Not Applicable: ACS replaced this initiative with a new one entitled “Improved Outcome for Children” intended to provide enhanced oversight of persons and organizations providing preventive and foster care. We did not assess the implementation status of this replacement initiative.

4. Create a new Quality Assurance/Quality Improvement Program for the Division of Child Protection to pinpoint units with problematic practice and develop and monitor corrective action plans.

Status - Implemented: ACS developed a process that calls for management to randomly select 100 cases from each borough and review how the cases were investigated, supervised and closed. ACS provided us with copies of forms, checklists and procedures used for this process, and the results of reviews conducted using these documents.

Sharpening Investigatory Skills and Supporting Sound Decisions

The Plan states: “ACS will provide additional training, support and resources to make certain that the best safety decision is made every time.” Following are the ten initiatives ACS developed to achieve this goal.

5. Establish New York City Leadership Academy for Child Safety to strengthen child protective management and develop a cadre of current and future leaders in this field.

Status - Implemented: The Leadership Academy conducted its first class in February 2007, and ACS provided us with documentation showing that their managers who attended the first class graduated from the Academy in December 2007.

6. Engage a consultant to conduct focus groups with workers about policies and other office practices that are duplicative, obsolete and/or inefficient. The consultant will recommend ways to streamline those practices to allow staff more time to work directly with families.

Status - Partially Implemented: ACS officials provided us with minutes of meetings with their consultant to discuss their office practices. However, these minutes focus on labor relations and union issues as opposed to streamlining office procedures.

7. Re-engineer field office operations by retaining a leading management consulting firm to streamline the offices' organizational structure and work processes and to build incentives for strong worker performance.

Status - Implemented: According to ACS officials, in April 2006, they decided not to retain a consulting group. Instead, they internally prioritized key leadership, administrative, and technical support staffing needs for the field offices. ACS officials stated that they hired 863 child protective specialists, 131 attorneys and 62 child protective managers as a result of

these needs analyses. They also created a new title of Assistant Commissioner for Child Protective Services and named eight Assistant Commissioners. As a result of these hirings and newly created positions, ACS notes that the number of cases per child protective specialist has decreased from an average of 22.3 cases in March 2006, to 12.6 cases per specialist in November 2007.

8. Leverage law enforcement expertise to help protective workers with decision making.

Status - Implemented: ACS hired 20 investigative consultants to coordinate with the police and district attorneys and to provide specialized consultation to child protective specialists. ACS provided us with the names and employee identification numbers of these consultants.

9. Strengthen Instant Response Team (IRT) protocol to enhance the effectiveness of ACS-NYPD joint investigations.

Status - Implemented: In order to improve coordination between ACS and law enforcement, ACS had developed an IRT protocol to gather the evidence quickly, effectively and in a coordinated manner, and to minimize trauma to children by reducing the number of interviews with them and conducting the interviews in more friendly settings. ACS also hired a senior advisor for investigations who issued Child Safety Alerts outlining the changes in the IRT protocol.

10. Refine educational neglect allegation procedure and build stronger ties between schools and child protective workers.

Status - Implemented: To refine the procedure, ACS, in conjunction with the New York City Department of Education (DOE), provided training to child protective specialists on how to use the DOE database to extract information regarding a child's attendance, performance and health and family demographics. ACS also assigned field office staff in each borough as DOE liaisons. Further, ACS' Casework Practice Guide issued in July 2007, reminds caseworkers of required investigation tasks.

11. Enhance interagency data sharing. Expand interagency collaboration.

Status - Implemented: According to ACS, the New York City Police Department (NYPD), Offices of the District Attorneys and DOE, along with ACS, have direct access to, and share, various databases such as Lexis Nexus and Locate Plus. ACS officials have collaborated with the NYPD, hospitals and child advocacy centers to utilize, train and promote better decision making by using the databases for the investigation of child protection cases.

12. Improve utilization of clinical experts (mental health, domestic violence, medical, substance abuse) in decision making.

Status - Implemented: The Senior Advisor, in her Child Safety Alert #7 issued in March 2006, reminded child protective specialists to seek the assistance of clinical experts in cases involving mental illness, domestic violence and substance abuse. A list of team coordinators was included in the alert. Also, ACS provided documentation showing an increase in the

use of clinical experts in the decision making process.

13. Set up a task force with Family Court administrators and judges to train on safety and risk assessment models.

Status - Implemented: ACS has prepared a comprehensive document outlining its plan to implement this initiative. Several meetings and presentations between the interested parties have taken place.

14. Analyze and improve CONNECTIONS, the statewide child welfare reporting system, in order to reduce barriers to its utility by field workers, managers and contract agency staff, and enhance time spent in the field.

Status - Implemented: This database is used by all social service industry employees and is updated by caseworkers on a regular basis throughout the State. The Plan required ACS to implement a plan to address the most urgent technological needs of field offices by March 2006. ACS officials provided us with a copy of this plan and documented associated implementation.

Focusing on Child Safety Throughout Children's Services

To achieve this third goal, the Plan states that "ACS will make strategic investments, refine and build accountability mechanisms, and partner with individuals and organizations in the community that can help keep children safe." Following are the eight initiatives ACS developed to achieve this goal:

15. Double the number of family oversight staff to reduce case loads, thereby allowing for more oversight of families and their safety plans.

Status - Implemented: In June 2006, ACS reported that they delayed these hirings due to an increase in abuse and neglect reports which necessitated the hiring of other staff to investigate these cases. However, they have since hired the necessary family oversight employees in June 2007 and January 2008 to achieve this initiative.

16. Implement performance-based management of preventive services contracts to ensure that services help families meet their safety obligations. Reallocate funding from weaker performing agencies to stronger agencies.

Status - Implemented: ACS provided us with a list of agencies it utilizes and the types of services each provided. We also received documents detailing how ACS measures the quality of services provided by these preventive agencies and the funding resulting from their assessments.

17. Institute safety reassessments, with reviews occurring when families do not follow their service plan or the services are ineffective.

Status - Implemented: ACS provided us with a model they developed to conduct the safety reassessments to be performed by the family oversight employees. Subsequent to our field work, we were provided with examples of reassessments performed.

18. Develop community partnerships consisting of ACS staff, community groups, other neighborhood resources, contract agencies and other governmental agencies to work together in delivering services to families in need within their own communities whenever possible. Integrate Child Care/Head Start programs

into the community partnerships and ensure full integration of child protective services as well as foster care and preventive programming.

Status - Partially Implemented: The Plan stated it would have partnerships in 19 communities by the fall of 2009. ACS has been developing community partnerships and provided us with copies of seven agreements it had already executed. ACS officials said they actually executed 11 community agreements, but did not provide us with copies of the remaining four.

19. Increase funding to preventive agencies to enhance services to families with a variety of needs and to increase services in geographic areas of high need.

Status - Implemented: ACS increased funding to agencies to enhance services for high risk families. Examples of these enhanced services include direct assistance to families (e.g. purchase of furniture, food, transportation etc.), interpreter services, and use of consultants in mental health, health care, and child development services.

20. Implement Phase II of the Congregate Care Plan, to encourage appropriate movements of teens from group settings to supportive family settings and to increase the percentage of teens initially placed into family settings.

Status - Partially Implemented: ACS has developed a plan to implement this initiative by August 2008. We received ACS placement statistics for children in general but no specific statistics on ACS' teenage population.

21. Establish Neighborhood Child Safety

Teams, whereby child protective managers, supervisors and line workers will operate in community teams that respond to specific needs of those areas.

Status - Partially Implemented: ACS established several Neighborhood Child Safety Teams to work with the community partnerships being developed as part of Initiative 18. However, we have not seen any evidence that these teams have begun to execute the goals of this initiative.

22. Deploy Safety Solutions Teams, made up of child protective experts available to address barriers to effective field office operations and advise on improving safety.

Status - Implemented: The Safety Solutions Teams have been created, staff were assigned to the teams, and the teams have been deployed to each of ACS' five borough offices. ACS has also developed a plan for the teams to follow regarding their role and responsibilities.

Oversight of Plan Implementation

Once ACS' Action Plan is fully implemented, it is imperative for ACS officials to monitor the continual progress of each plan initiative and assess the achievements there of. Such monitoring will allow ACS officials to determine whether their Plan initiatives are performing as intended and achieving the desired results, or whether revisions are needed to enhance Plan effectiveness.

At the time of our audit field work, ACS did not supply us with any Plan oversight procedures or measurement tools to assess Plan effectiveness. However, after the issuance of our discussion document, to document the implementation status of Plan

initiatives, ACS officials compiled statistics, program status reports and case assessments relating to Plan implementation. Together, these statistics, reports and assessments could provide the periodic oversight necessary to effectively monitor Plan implementation and assess the effectiveness of each initiative. We recommend that ACS officials prepare, summarize and review these documents periodically to achieve this objective.

In addition, although OCFS is the State oversight agency for ACS operations, we have not been provided with documentation that the Plan had been submitted to OCFS for its review and comment or, at the very least, for informational purposes.

Submitting the Plan to OCFS would provide ACS with the added benefit of expert feedback from an agency which deals with child protection issues on a State-wide basis.

In response to our discussion document, ACS officials said that a component of strategic change is ensuring that each initiative is not treated as separate or different, but is an integral part of a whole operation. They also stated that they have in fact shared the Plan with OCFS. However, they still have not provided us with support thereof.

Recommendations

1. Continue to roll out the ACS Action Plan as described within the individual Plan initiatives.
2. Once the Plan is fully implemented, utilize the available statistics, reports and assessments noted above to continually monitor the progress within each initiative and overall Plan effectiveness.
3. Obtain and maintain documentation that the Plan was shared with OCFS and the

ACS follow-up on any feedback received as a result thereof.

AUDIT SCOPE AND METHODOLOGY

We conducted our audit in accordance with generally accepted government auditing standards. We audited ACS to determine whether it had implemented all initiatives in its Plan to protect children from abuse, maltreatment and neglect. Our audit period was January 1, 2006 through September 26, 2008.

To accomplish our objective, we conducted interviews with ACS officials, reviewed the status of all initiatives, and compared them to the completion dates outlined in the Plan. Where available, we reviewed Requests for Proposals and documentation relating to the initiatives, follow-up Plans released by ACS, and news articles relating to the Plan. We also attended a CHILDSTAT meeting. Further, ACS provided us with the names of child protective specialists they said they hired from March 2006 through April 2007; attorneys hired between May 2006 through September 2007; and child protective managers hired from June 1996 through June 2007. We selected a random sample of these employees to determine whether they were hired on the dates indicated by ACS.

As is our practice, we notify agency officials at the outset of each audit that we will be requesting a representation letter in which agency management provides assurances, to the best of their knowledge, concerning the relevance, accuracy and competence of the evidence provided to the auditors during the course of the audit. The representation letter is intended to confirm oral representations made to the auditors and to reduce the likelihood of misunderstandings. In the representation letter, agency officials assert that, to the best of their knowledge, all

relevant financial and programmatic records and related data have been provided to the auditors. Agency officials further affirm that either the agency has complied with all laws, rules, and regulations applicable to its operations that would have a significant effect on the operating practices being audited, or that any exceptions have been disclosed to the auditors. However, officials at the New York City Mayor's Office of Operations have informed us that, as a matter of policy, mayoral agency officials do not provide representation letters in connection with our audits. As a result, we lack assurance from agency officials that all relevant information was provided to us during the audit.

In addition to being the State Auditor, the Comptroller performs certain other constitutionally and statutorily mandated duties as the chief fiscal officer of New York State. These include operating the State's accounting system; preparing the State's financial statements; and approving State contracts, refunds, and other payments. In addition, the Comptroller appoints members to certain boards, commissions and public authorities, some of whom have minority voting rights. These duties may be considered management functions for purposes of evaluating organizational independence under generally accepted government auditing standards. In our opinion, these functions do not affect our ability to conduct independent audits of program performance.

AUTHORITY

The audit was performed according to the State Comptroller's authority under Article V, Section 1 of the State Constitution and Article III of the General Municipal Law.

REPORTING REQUIREMENTS

We provided a draft copy of this report to ACS officials for their review and comment. Their comments were considered in preparing this final report and are attached in their entirety as Appendix A. State Comptroller's comments to the auditee's response are included in Appendix B.

In general, ACS officials agree with the vast majority of our conclusions, and assert that they have already taken action on our recommendations. However, they also believe that they have fully implemented the four initiatives we categorize herein as partially implemented.

Within 90 days of the final release of this report, we request that the Commissioner of ACS report to the State Comptroller, advising what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons therefor.

CONTRIBUTORS TO THE REPORT

Major contributors to this report include William Chalice, Frank Patone, Santo Rendon, Rita Verma, Carole LeMieux, Jonathan Bernstein, and Sue Gold.

EXHIBIT A

	2006 Action Plan: Safeguarding Our Children By Initiatives	Implementation Status			
		I	N	P	NA
Goal 1	Keeping Children Safe By Measuring Results	I	N	P	NA
Initiatives	1. Institute CHILDDSTAT a comprehensive system of performance data to identify families at greatest risk and track results of decisions regarding services, supervision and removal.	X			
	2. Use a balanced Scorecard for Safety to be given to each worker, supervisor and manager on a monthly basis showing their success in achieving key indicators.	X			
	3. Implement oversight and Accountability Project, directing staff resources from central office administrative functions into the field to ensure high quality services are provided to children in our care.				X
	4. Create a new Quality Assurance/Quality Improvement Program for the Division of Child Protection to pinpoint units with problematic practice and develop and monitor corrective action plans.	X			
Goal 2	Sharpening Investigatory Skills and Supporting Sound Decisions				
Initiatives	5. Establish New York City Leadership Academy for Child Safety to strengthen child protective management and develop current and future leaders in this field.	X			
	6. Engage consultant to conduct focus groups with workers about policies and other office practices that are duplicative or inefficient. This consultant will recommend ways to streamline those practices to allow staff more time to work directly with families			X	
	7. Re-engineer field office operations by retaining a leading management consulting firm to streamline the offices organizational structure and work processed and to build incentives for stronger work performance.	X			
	8. Leverage Law enforcement expertise to help protective workers with decision making.	X			
	9. Strengthen Instant Response Team (IRT) protocol to enhance the effectiveness of ACS/NYPD joint investigations.	X			
	10. Refine educational neglect allegation procedure and build stronger ties between schools and child protective workers	X			
	11. Enhance Interagency data sharing and expand inter agency collaboration.	X			
	12. Improve utilization of clinical experts (mental health, domestic violence, medical substance abuse) in decision making.	X			
	13. Set up a task force with Family Court administrators and judges to train on safety and risk assessment models.	X			
	14. Analyze and improve Connections the statewide child welfare reporting system in order to reduce barriers to its utility by field workers, managers and contract agency staff and enhance time spent in the field.	X			

	2006 Action Plan: Safeguarding Our Children By Initiatives	Implementation Status			
Goal 3	Focusing on Child Safety Throughout Children's Services	I	N	P	NA
Initiatives	15. Double the number of family oversight staff to reduce case loads, thereby allowing for more oversight of families and their safety plans.	X			
	16. Implement performance-based management of preventive services contract to ensure that services help families meet their safety obligations. Reallocate funding from weaker performing agencies.	X			
	17. Institute safety reassessments, with reviews occurring when families do not follow their service plan or the services are ineffective.	X			
	18. Develop community partnerships consisting of ACS staff, community groups other neighborhood resources, contract agencies and other governmental agencies to work together in delivering services to families in need. Integrate Child Care/Head Start programs into the community partnerships and ensure full integration of child protective services as well as foster care and preventive programming.			X	
	19. Increase funding to preventive agencies to enhance services to families with a variety of needs and to increase services in geographic areas of high need.	X			
	20. Implement Phase II of the Congregate Plan to encourage appropriate movements of teens from group setting to supportive family setting and to increase the percentage of teens initially placed into family settings.			X	
	21. Establish Neighborhood Child Safety Teams, whereby child protective managers and supervisors and line workers will operate in community teams that respond to specific needs of those areas.			X	
	22. Deploy Safety solutions teams made up of child protective experts available to address barriers to effective field office operations and advise on improving safety.	X			

Legend:

I = Implemented

N = Not Implemented

P = Partially Implemented

NA=Not Applicable

APPENDIX A - AUDITEE RESPONSE



John B. Mattingly
Commissioner

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October 15, 2008

Mr. Frank Patone
Office of the State Comptroller
Division of State Government Accountability
123 William Street, 21st Floor
New York, NY 10038

Dear Mr. Patone:

We are in receipt of the revised Draft Audit Report on the Administration for Children's Services (ACS) Status of the Action Plan to Protect Children (2007-N-14). We appreciate the opportunity to review and respond to your report.

In reviewing the Draft Report, ACS is happy to report our agreement with the vast majority of conclusions made by your office. However, ACS still contends that the four initiatives (#'s 6, 18, 20, & 21) that the OSC concluded to be "partially implemented" are in fact **fully implemented** and have been incorporated into the day-to-day functions of the various divisions within ACS.

ACS looks forward to working with your office again in the future as we focus on ensuring the safety, security, and well-being of the children of the City of New York.

Sincerely,



John B. Mattingly
Commissioner

**Office of the State Comptroller Audit
New York City Administration for Children's Services (ACS)
Status of the Action Plan to Protect Children
ACS' Response to
Draft Report 2007-N-14**

**ACS State Audit Response
10-15-08**

Children's Services developed Safeguarding Our Children as a dynamic blueprint designed to strengthen child safety practices agency-wide through the use of performance data, improved child protective investigatory practice and a strong focus on ensuring safety in all parts of the ACS service system. The Plan, which was created and initiated by Children's Services (and not imposed upon us by any outside authority), carefully laid out the very specific actions Children's Services would take to improve child safety practice and hold ourselves accountable to clear and well-defined outcomes. Our intent was to task ourselves with improving in every single way possible the practice and systems required to intervene appropriately when children are at risk – to strengthen everything from how decisions are made to how staff is trained and supervised, to how and which data is analyzed. For accountability's sake, as well as to continually keep ourselves focused and on track with reaching our goals, we have regularly issued updates to the Plan; the next update is due during the month of October, 2008.

At this time, we are proud to be able to report – as the Audit also notes -- that Children's Services has fully completed or is in the process of completing all of the initiatives outlined in the Plan – a significant achievement, especially as the workload for the agency has increased considerably during this time period due to a nearly 30% rise in reports of abuse and neglect Citywide since 2006.

The Draft Report submitted by the Office of the State Comptroller (OSC) states that in some cases the initiatives were partially implemented. We strongly urge you to review our summaries and to accurately and fully reflect our progress in your final report. Children's Services is justly proud of the progress we have made in accomplishing the vast majority of the tasks we set for ourselves in this Action Plan. In every way possible, the Agency's implementation of the Safeguarding Our Children plan has strengthened and vastly improved Children's Services' ability to keep children safe and reduce their risk of being harmed when the Agency has the opportunity to intervene. Additionally, Children's Services has already implemented every single one of the three purely procedural recommendations suggested by the Office of the State Comptroller.

Child welfare practice is complicated, critical work that demands ongoing attention and focus; it is also crucial that any child welfare system constantly make adjustments and improvements to its practice in order to maintain system excellence. We would welcome useful feedback toward that end.

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Below, please find summaries of Children's Services' current child safety initiatives that were noted in the draft report as being partially implemented.

Initiative #6 - Engage a consultant to conduct focus groups with workers about policies and other office practices that are duplicative, obsolete and/or inefficient

Status: Implemented and Continuing

The consultant's work on labor relations and union issues was instrumental to Children's Services' ability to streamline office procedures. The consultant's work in building labor and union relationships allowed Children's Services to eliminate outdated, duplicative, and inefficient procedures.

The most significant and broadest reaching example of this is the redesign of Supervisor II and Child Protective Managers' roles. Since any perceived change in an employee's work function triggered union involvement, Children's Services was unable to streamline its operations in a way that fully utilized staff without first working through its labor and union issues. As one example, the consultant's facilitation allowed Children's Services to reexamine and reconstruct the oversight mechanisms currently in place for every investigation. By redesigning the roles of supervisors and managers, Children's Services was able to eliminate the duplicative levels of investigative oversight. For cases involving domestic violence, two levels of inefficient and duplicative review and approval were removed. For all cases other than fatalities and cases involving families with four or more prior reports, the Child Protective Manager's approval of case decisions was eliminated—thereby reducing the percent of cases involving duplicative review from 60% to 20%.

* Comment 1

This initiative has in fact been implemented.

Initiative #18 - Develop community partnerships

Status: Implemented and Continuing

The Community Partnership Initiative was launched in eleven (11) community districts throughout New York City in three phases beginning in December 2006. Neighborhoods and Children's Services have developed Community Coalition networks of residents, community leaders, service providers, contracted child welfare agencies, and Children's Services child welfare and Head Start/Child Care staff to pursue this vision. Community Coalition members will harness their collective strengths to significantly impact Children's Services' core child welfare outcomes of safety, permanency and well being.

The Phase I communities: Bedford Stuyvesant, Highbridge and Jamaica launched their implementation in July 2007.

The Phase II communities: East Harlem and the Lower East Side launched their implementation phase in December 2007.

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* See State Comptroller's Comments, page 19

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The Phase III coalitions launched their implementation stage in March 2008; the communities are East New York, Bushwick, Mott Haven, Soundview, Elmhurst and Stapleton.

This initiative has in fact been implemented.

Initiative #20 - Implement Phase II of the Congregate Care Plan.
Status: Implemented and Continuing and On-Going

The residential (or congregate) care plan was released in October 2007 and sets forth Children's Services' values and principles related to residential care, detailing a number of activities to shape the residential care system and its linkages with family foster care into 2009. Working jointly with provider agencies, Children's Services kicked off the residential care plan and began the work in multiple ways to reduce the residential care census by 6/30/2009 from 2,650 to 1,750. All current and previous data related to the residential care numbers has been shared with the audit team.

In February 2008, an action plan was released outlining the following key elements:

- Capacity Building
- Permanency for Adolescents
- Services and Support
- Assessment
- Monitoring and Evaluation
- Services for pregnant and parenting teens

Children's Services facilitated forums and targeted workgroups to address the key elements of the action plans and great progress has been made in achieving our goals. Children's Services implemented the following initiatives to reduce the demand for residential placement of children.

- Implemented family team conferencing for children being referred to residential placement from a FBH setting
- Increased the Division of Child Protection's current use of intensive preventive slots for teens
- Increased DCP capacity to identify prospective foster families known to the youth and his/her family. (Direct work with a consultant and DCP staff)

In June 2008 Children's Services began individual reviews of 260 children residing in residential care. This included 11 agencies. Of this number 44 were reunited with their families; 43 transitioned to adulthood; 38 were replaced in a family-based setting; and 23 were replaced in another residential setting. Children's Services is continuing to plan for the 112 children remaining as a part of this review.

* Comment 2

* Comment 3

* See State Comptroller's Comments, page 19

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Children's Services continues to implement its action plan by:

- Ongoing communication with providers addressing capacity issues and service needs for children entering residential care

- Identifying available services for youth leaving residential care that will support discharge such as:
 - NY/NY III (support housing for adolescents)
 - B2H (Bridges to Health, home-based waiver program)
 - OMH Waiver (home-based waiver program)
 - TFBH (therapeutic foster boarding home)
 - Intensive Aftercare

- Building Capacity for foster home placements through:
 - Development of recruitment/retention targets for foster homes for teens for each agency
 - Review of vacancy numbers and streamlined placement process
 - Development of innovative recruitment tools to support youth and foster parents
 - Foster parent supports through support groups

Children's Services is continuing this ongoing work and seeks guidance from agencies, with input from parents, youth and other stakeholders, on how to proceed with each aspect of this plan. For example, Children's Services will discuss with agencies how to structure residential programs that will make use of enhanced rates from OCFS to provide family-centered residential care services to children with particularly intensive needs, and will solicit interest from residential care providers in joining with Children's Services in requesting enhanced rates for specific facilities. Children's Services will also seek input on how to develop family foster care resources using B2H, and other resources available.

It is very important to restate that the success of this plan rests on the coordinated implementation of the various aspects of the plan. For example, reduction in residential care usage depends on success in enhancing the family care network; shorter lengths of stay in residential care will stem in part from injecting resources and other supports into the residential system, as enumerated in the overall plan.

This initiative has in fact been implemented.

Initiative #21 - Establish Neighborhood Child Safety Teams
Status: Implemented and Continuing and On-Going

The staff from the Division of Child Protection is an integral part of each Community Partnership Initiative. In 11 CPIs across the city, DCP staff provides leadership, input and are partnering with organized community groups established by Children's Services. Children's Services has now reorganized child protective work in all of the boroughs. All boroughs are now organized into smaller geographic zones which combine several community districts. All the boroughs now have caseloads assigned by community districts and zones. This

* Comment 4

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* See State Comptroller's Comments, page 19

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allows staff to develop knowledge about their neighborhoods, including needs and resources, and foster community relationships.

Borough Commissioners, First Deputy Directors, Deputy Directors for Field Operations, and Child Protective Managers at all of the field offices establish relationships with stakeholders in their surrounding communities. By collaborating with schools, hospitals, local precincts, and community-based organizations, senior borough management set the groundwork for effective communication and interface at every level. Individual Child Protective Specialists (CPS) reap the benefits of these community building efforts since they can then rely on pre-existing organizational relationships. Two specific examples from the Bronx are the regular meetings with preventive services providers and the community fairs. With respect to the preventive service provider meetings, in addition to the quarterly borough-wide meeting, zone management meets monthly with representatives from preventive services providers who operate in the community districts within each zone. These meetings allow the hand-offs between individual CPS and preventive case planners to go more smoothly, strengthening case practice. Additionally, there have been a number of community fairs within individual zones in the Bronx. Although management personnel spearhead these fairs, individual CPS are actively involved in the fairs themselves and through the fairs interact positively with members of the communities they serve.

This ongoing work with community stakeholders is independent from the work on the Community Partnership Initiatives discussed in Initiative #18. This initiative has been completed in every borough in New York City.

APPENDIX B - STATE COMPTROLLER COMMENTS ON AUDITEE RESPONSE

1. We did not find documented recommendations from the consultation on streamlining office practices. Accordingly, we concluded the initiative was partially implemented.

2. We concluded this initiative was partially implemented, but acknowledge that its implementation is continuing and ongoing.

3. We concluded that this initiative was partially implemented as opposed to fully implemented because we could not find specific statistics regarding the teenage population.

4. The agency did not provide documentation to support the assertions in the response regarding this initiative.