

# **The New York City Administration For Children's Services**

**December 8, 2017**



## Table of Contents

<b>I.</b>	<b>Executive Summary</b> .....	1
<b>II.</b>	<b>Methodology</b> .....	3
<b>III.</b>	<b>Organizational Assessment</b> .....	5
<b>IV.</b>	<b>Findings and Recommendations</b> .....	7
<b>A.</b>	<b>Enterprise Risk Assessment and Internal Controls Review</b> .....	7
<b>B.</b>	<b>Investigative Consultant Program</b> .....	8
<b>C.</b>	<b>Conference Facilitator Program</b> .....	11
<b>D.</b>	<b>Technology Improvements</b> .....	15
<b>E.</b>	<b>OCFS Database System</b> .....	17
<b>F.</b>	<b>Predictive Analytics</b> .....	19
<b>G.</b>	<b>Reducing Response Time</b> .....	20
<b>H.</b>	<b>Board of Education-Related Issues</b> .....	22
<b>I.</b>	<b>Child Protection Casework Practice Requirements Manual</b> .....	25
<b>J.</b>	<b>Child Protection Case Management Practices</b> .....	25
<b>K.</b>	<b>Preventive Services Case Management Practices</b> .....	27

## I. Executive Summary

After reviewing a series of child fatalities in New York City during 2016, the New York State Office of Children and Family Services (“OCFS”) ordered the New York City Administration for Children Services (“ACS”) to take a number of actions to address OCFS’s concerns over how child protective services investigations were being conducted and how preventive services were being provided by ACS contractors. These actions included hiring an outside monitor to review, evaluate and assess the adequacy of ACS’s child protective and preventive services programs. At the end of February 2017, OCFS selected Kroll Associates Inc. (“Kroll”) to conduct the required assessment of ACS. The objective of Kroll’s review was to: (1) identify any organizational, operational or staffing issues adversely affecting ACS’s investigation of child abuse and neglect, and the provision of protective and preventive services; and (2) develop findings and recommendations to help ACS improve the quality of abuse and neglect investigations, case management practices, and the delivery of protective and preventive services.

Within days of Kroll’s selection, in March 2017, David Hansell was appointed as the new ACS Commissioner. In his brief tenure at ACS, Commissioner Hansell has taken a number of important steps to improve ACS’s operations and the morale of its staff. Commissioner Hansell has also fully cooperated with Kroll’s review by making staff available for interviews, promptly providing agency records and documentation, and closely collaborating with Kroll through regular meetings where we shared our developing recommendations with Commissioner Hansell and he shared his feedback with us in a joint effort to fulfill Kroll’s mandate and make significant and sustainable improvements to ACS’s performance. Under Commissioner Hansell’s leadership, ACS has already begun implementing the recommendations discussed in this report.

ACS faces daunting challenges as one of New York City’s largest and most complex government agencies charged with protecting and promoting the safety and well-being of New York City’s children and families by providing child welfare, juvenile justice, and early childcare and education services. Each year, ACS conducts more than 60,000 investigations of suspected child abuse or neglect, and determines what services can be offered to stabilize and improve the home environment and family dynamics of affected children. If children are unable to safely remain in their home, ACS is also responsible for placing them in foster care while efforts are made to either improve the home, or find a new, safe and permanent home for the children.

From a national perspective, ACS is at the forefront of child welfare agencies in its development of preventive services, evidence-based modeling, clinical consultations and predictive analytics. ACS has experienced and dedicated management and professional frontline staff who are genuinely devoted to ACS's mission of protecting and promoting the safety and well-being of New York City's children and families. ACS management is knowledgeable about cutting-edge ideas in the field of child welfare and regularly interacts with other child welfare agencies and experts to learn about emerging practices. Structurally, ACS has built a multi-faceted child welfare system that is designed to proactively work with and reactively intervene with families when safety issues arise.

Notwithstanding ACS's innovative programs and experienced and dedicated staff, Kroll's review has identified certain deficiencies in ACS's implementation and execution of key programs, and areas where ACS's programs could be enhanced. In addition, we have identified a number of interagency protocols that need to be strengthened and legislative changes that New York State should consider to enhance ACS's ability to perform timely and effective investigations of abuse and neglect. Finally, we believe that ACS's operations would significantly benefit from an agency-wide enterprise risk assessment and internal controls review to supplement ACS's current risk management and quality assurance program.

This report will detail these and other issues relating to ACS's protective and preventive services programs, and make recommendations to address those issues. Kroll looks forward to continue working closely with ACS to make significant and sustainable improvements to the quality of its abuse and neglect investigations, case management practices, and delivery of protective and preventive services.

## II. Methodology

Kroll's objective was to develop an in-depth understanding of ACS's overall structure, programs, policies and procedures, case management practices and child welfare staff job functions to identify organizational strengths and weaknesses and begin to develop recommendations. To achieve this, Kroll employed a multipronged approach which included, among other things: interviewing ACS employees; reviewing ACS policies and procedures; examining a statistically significant number of ACS child protective and preventive case files; and conferring with nationally recognized experts in child welfare. Specifically, Kroll has:

- A. **Interviewed nearly fifty ACS executives and staff members**, some multiple times, to obtain a detailed understanding of ACS's structure and operations. Our interviews of ACS executives and frontline staff included personnel from the Commissioner's staff and key departments including the Division of Child Protection, the Division of Preventive Services, the Division of Policy Planning and Measurement, Emergency Children's Services, Information Technology and Family Court Legal Services;
- B. **Reviewed ACS case practice manuals**, training materials, preventive services program materials, policies and procedures, and predictive analytic modeling methodologies;
- C. **Reviewed internal and external audits of case files conducted by ACS and OCFS** during 2015 and 2016 to identify recurring issues. Kroll then reviewed the corrective action plans developed by ACS in response to these audits to assess the sufficiency of ACS's response;
- D. **Reviewed 150 Child Protection case files** randomly selected from the period of January 2017 through February 2017 to assess ACS's case management practices. The number of cases reviewed from each of the five boroughs (Bronx, Brooklyn, Manhattan, Queens and Staten Island) was calculated based upon the percentage of that borough's caseload to ACS's total universe of cases, including both indicated and unfounded cases<sup>1</sup>;
- E. **Reviewed 97 Preventive Services cases**, 76 of which were opened during the period of April

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<sup>1</sup> If ACS determines that there is some credible evidence that abuse or maltreatment exists a case is "indicated" and if there is insufficient evidence that abuse or maltreatment exists the allegation is "unfounded."

2016 through June 2016 in which families were still receiving preventive services as of March 2017 so that Kroll could examine third-party provider agency case practices and the effectiveness of preventive services. We also reviewed 21 preventive services cases associated with 21 of the Child Protection cases we reviewed so that we could evaluate the entire life cycle of a sample of protection and preventive services cases;

- F. **Reviewed recommendations made to ACS** in prior reports by outside agencies to identify historical issues and assess whether these issues had been rectified through the implementation of recommendations made by the agencies;
- G. **Reviewed New York State laws** regarding child welfare, and OCFS procedural and case management policies and practices;
- H. **Interviewed nationally renowned child welfare experts** and reviewed reports on child welfare systems both domestically and internationally to determine best practices and identify emerging practices in the field;
- I. **Reviewed studies on the use of predictive analytics** in child welfare systems, including predictive modeling methodologies, and interviewed leading experts in the field; and
- J. **Reviewed fatality reports** prepared by OCFS from 2012 through 2017 to determine if there were common underlying issues in case management practices that contributed to the fatalities.

Kroll would like to acknowledge the assistance and cooperation of OCFS Acting Commissioner Sheila Poole and her staff, and ACS Commissioner David Hansell and his staff, in supplying Kroll with case files, documents and arranging access to personnel.

### III. Organizational Assessment

ACS is one of the largest child welfare agencies in the country and works with children and families from all five New York City boroughs. From August 2016 through August 2017, ACS's staff of approximately 1,700 CPS workers and 400 supervisors conducted 63,355 child abuse and neglect investigations involving 56,435 families and 82,247 children.

Throughout our interactions with ACS, we have been impressed with its experienced management and frontline staff who are genuinely devoted to ACS's mission of protecting and promoting the safety and well-being of New York City's children and families. ACS management is knowledgeable about cutting-edge ideas in the field of child welfare and regularly interacts with outside child welfare experts and agencies to learn about emerging practices. ACS's frontline staff is committed to their jobs despite working long hours under difficult circumstances.

Structurally, ACS has built a multi-faceted child welfare system that is designed to proactively work with and reactively intervene with families when safety issues arise. Either during or at the conclusion of an investigation, ACS has the ability to refer a family to a variety of protective or preventive services programs. These programs range from home-keeping services to programs focusing on high-risk populations. For example, ACS's preventive services options include 11 types of evidence-based model (EBM) programs. EBM programs target families and children with specific needs, and most EBM programs have licensed clinical staff with certifications in various specialties such as substance abuse or domestic violence. Clinical Diagnostic Teams conduct assessments of family members and determine the types of services and service plans that are needed. Examples of EBM programs include programs that work with children under the age of three; young children who have been exposed to trauma; adolescents and caretakers with substance abuse or mental health issues that destabilize the family; families with a history of domestic violence; and families with special medical needs. In total, ACS funds approximately 200 preventive services programs with 12,683 slots serving 19,897 families with 45,418 children annually, which are delivered by 56 contracted providers.

ACS is currently in the process of implementing Safe Measures Dashboard ("Safe Measures"), an innovative web-based data dashboard developed by the National Council on Crime and Delinquency ("NCCD"), a non-profit research organization. Safe Measures will provide ACS a platform for using

predictive analytic models recently developed by ACS and its academic partners at the University of Chicago, City University of New York and New York University. These predictive models utilize child welfare data to identify children likely to have repeat cases so that ACS can recommend intervention programs. The ACS predictive models use a variety of data points to determine what variables correlate to adverse outcomes and what combinations of variables indicate high-need families. The purpose of these analytic models is to provide enhanced services to high-need families rather than to identify children for removal from homes. This approach differentiates it from the more controversial predictive models used in some other child welfare agencies that have used modeling as a means for screening cases and identifying children who may need foster care services. In addition, Safe Measures Dashboard will allow ACS to monitor cases more closely and flag cases that require additional supervisory review or consultation.



#### **IV. Findings and Recommendations**

Although, as described above, ACS has innovative programs and an experienced and dedicated staff, Kroll's review has identified certain deficiencies in ACS's implementation and execution of key programs. These deficiencies appear to result from a variety of causes, including workload and staffing issues, inconsistent compliance with internal policies, and insufficient access to technology tools that adversely impact the ability of child welfare staff to effectively and efficiently perform their jobs. We have also identified areas where certain ACS programs could be enhanced. Moreover, we have identified a number of interagency protocols that need to be strengthened, as well as legislative changes that New York State should consider to enhance ACS's ability to perform timely and effective investigations of child abuse and neglect. Finally, we believe that ACS's operations would significantly benefit from an agency-wide enterprise risk assessment and internal controls review to supplement ACS's current risk management and quality assurance program.

##### **A. Enterprise Risk Assessment and Internal Controls Review**

ACS is one of the largest child welfare agencies in the country. In addition to child protection and preventive services, it provides a variety of juvenile justice programs and coordinates and funds programs and vouchers for close to 100,000 children eligible for subsidized care in its Early Care and Education Division. ACS has over 6,000 employees throughout the five boroughs of New York City, hundreds of third-party providers and delegate agencies, and has an annual budget of over \$2.9 billion dollars.

Despite the high-risk nature of its work, the breadth and complexity of the agency, and the multitude of contracted providers it utilizes, ACS has not performed an agency-wide enterprise risk assessment or internal controls review in recent years, and does not have a designated group within the agency responsible for performing those crucial functions. Based upon Kroll's initial review, it appears that there are opportunities within the Divisions of Child Protection and Preventive Services to enhance internal controls and increase compliance with ACS policies, eliminate redundancies, strengthen case management practices, and exert greater oversight of third-party agency providers.

**Kroll Recommendation:** ACS should conduct an agency-wide enterprise risk assessment and internal controls review to identify vulnerabilities, areas in need of increased compliance, and opportunities for cost savings and enhanced efficiencies. In addition, Kroll recommends that ACS assign responsibility over

conducting periodic enterprise-wide risk assessments and internal controls reviews to Commissioner Hansell's recently-created Accountability Office, which is currently responsible for centralizing the agency's internal oversight functions, streamlining responses to external oversight inquiries and supporting management reforms within the agency.

**ACS Response:** ACS agrees that comprehensive risk management and quality assurance are fundamental responsibilities of the agency in both its programmatic and administrative areas. Through its new Accountability Office, ACS intends to conduct additional enterprise risk assessment activities, and welcomes discussion with Kroll about the scope of those activities. They will supplement the agency's substantial quality assurance program that monitors the practice of its contracted preventive provider agencies, as well as a newly developed quality assurance system monitoring the work of child protective staff on high-risk investigations. ACS is developing a new monitoring unit to perform a routine review of case practice in each DCP zone, to support quality improvement. These are elements of fundamental programmatic risk management at ACS. In addition, the Accountability Office oversees internal and external audits of case practice, and has overall responsibility for reviewing the adequacy of the agency's internal controls.<sup>2</sup>

#### **B. Investigative Consultant Program**

Historically, one of the challenges ACS has faced with conducting thorough and effective child welfare investigations has been balancing the social-work component of understanding and addressing the needs of families in crisis along with the equally critical need to conduct in-depth investigations into serious allegations of abuse and neglect. CPS workers, who are trained social workers, are responsible for conducting child welfare investigations, but typically have no investigative experience when they join ACS. In recognition of the need to have experienced investigators participate in child welfare investigations, ACS created the Investigative Consultant ("IC") program in 2007 and began hiring former law enforcement personnel, typically with twenty years of investigative experience, to improve the quality and effectiveness of child welfare investigations. The initial objective of the program was for the ICs to help train CPS workers on investigative techniques and accompany CPS workers in the field on the most serious cases to assist with key investigative steps. Since 2007, the number of ICs has increased from 20 to 119 and ACS has recently approved the addition of another 46 IC positions in its budget. Currently, ICs are responsible for three principal functions: (1) running "clearance checks" on cases; (2) providing guidance to CPS workers

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<sup>2</sup> Kroll will be examining the effectiveness of ACS's existing quality assurance monitoring mechanisms in Phase II of this monitorship.

at the outset of investigations; and (3) assisting CPS workers with investigations in the field.

Clearance checks — which involve accessing and reviewing criminal justice and New York City welfare agency databases — provide critical information on individuals named in child abuse and neglect reports, including their criminal history, history with other New York City Welfare agencies, and Domestic Incident Reports associated with the family prepared by the New York City Police Department (“NYPD”). Ideally, clearance checks should be completed prior to the initial contact with a family for all individuals named in the report to the State Central Registry (“SCR”), which is New York State’s child welfare hotline, so that a CPS worker has pertinent background information, including information on potential safety concerns, regarding the family he or she is about to meet. To conduct a clearance check, multiple law enforcement and social welfare databases need to be checked on each case that ACS opens. This, by itself, creates an enormous amount of work for ICs. For example, in 2016 alone, ICs ran more than 146,000 clearance checks.

According to ACS executives interviewed by Kroll, the volume of clearance checks is so high that ICs primarily work at their desks conducting clearance checks and are only able to assist CPS workers with investigations in the field on a small fraction of the cases. Our interviews of ICs and CPS workers confirmed that ICs had limited time to assist with field work and serve mainly as advisors on cases if CPS workers seek their advice.<sup>3</sup> Both CPS workers and the ICs said that when ICs do accompany a CPS worker in the field, the IC is there in a supporting or advisory capacity and the CPS worker maintains primary responsibility for conducting the investigation, interviewing witnesses and gathering evidence. Those interviews also revealed that, because of the overwhelming volume of clearance checks, CPS workers rarely receive criminal clearance checks from the ICs prior to the initial home visit. In other words, as it is currently operating, the IC program is not fully achieving its objective of significantly improving the quality and effectiveness of child welfare investigations because of the overwhelming volume of clearance checks, the limited number of ICs, even with the recent increase in staffing, and the supporting, advisory role of the ICs.

Given the background and expertise of the ICs, the effectiveness of Child Protection investigations would

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<sup>3</sup> While ACS executives stated that IC consults were conducted at the outset of all cases, Kroll found limited documentation in case files that CPS workers consulted with an IC other than obtaining clearance checks.

be considerably enhanced if ICs were available to accompany CPS workers in the field and jointly work on high risk or complex cases. ICs should share responsibility for the outcome of investigations and be active participants in gathering and evaluating evidence, and interviewing witnesses and family members rather than serving in a passive advisory role. ICs could be utilized on cases that do not involve the NYPD or an Instant Response Team, but have unusual or complex factors where the experience of the ICs could prove invaluable in strengthening ACS's investigative capabilities.<sup>4</sup>

The challenge ACS has faced in having ICs assist CPS workers in the field, and provide criminal history checks before initial home visits, cannot currently be alleviated by having ACS staff without prior law enforcement experience assist with clearance checks because non-law enforcement personnel are not allowed to run certain types of clearance checks as a result of restrictions on eJustice, a New York State criminal database, and a Memorandum of Understanding with the NYPD that limits access to Domestic Incident Reports. Under New York Social Services Law § 424 6 (b), access to criminal history information is limited to Child Protection Managers and individuals with a law enforcement background, such as ICs, who are specifically designated by the ACS Commissioner. As a result, legislative changes to broaden access to this information will likely be required so that at least some clearance check responsibilities could be transferred to non-law enforcement personnel. Currently, the NYPD's Intelligence Division has allowed a unit of non-uniform intelligence research specialists to access law enforcement databases. Kroll believes a strong case can be made for granting similar access to certain law enforcement databases to specially-trained ACS analysts to free-up ICs to assist CPS workers in the field.

**Kroll Recommendation:** To fulfill the IC program's objective of adding investigatory expertise to child welfare investigations, Kroll recommends that ACS significantly expand the IC program and hire additional ICs whose principal responsibility will be to work in the field with CPS workers jointly investigating complex allegations of child abuse and neglect. ACS should either: (1) obtain legislative approval to transfer some clearance check responsibilities to non-law enforcement personnel and create a new unit of specially-trained ACS research analysts to perform critical law enforcement database checks under the guidance

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<sup>4</sup> Instant Response Teams respond to cases involving severe abuse and/or maltreatment and consist of personnel from ACS as well as the NYPD and District Attorney's office who work together to minimize trauma to children by coordinating interviews and medical exams and ensuring that evidence is appropriately gathered. From January 2017 until October 2017 on the approximate 50,000 investigations conducted by ACS during that period, ACS and the NYPD conducted 4,636 IRT joint responses and the NYPD assisted CPS workers on an additional 1,962 occasions.

and supervision of ICs<sup>5</sup>; or (2) hire significantly more ICs so that there are a sufficient number of ICs to perform clearance checks *and* assist CPS workers with investigative work in the field.

**ACS Response:** ACS agrees with Kroll's recommendation that there is a need to expand the opportunities for IC's to provide assistance and support to CPS staff in conducting investigations, interviews and home visits to enhance the quality and effectiveness of child welfare investigations, and that some clearance check responsibilities may need to be shifted to non-law enforcement personnel. Pursuant to Kroll's recommendation, ACS has begun a time-use analysis of the IC program to determine the staffing and organizational changes that will be needed to implement this recommendation. ACS's preference is to increase the number of ICs to both perform clearance checks and participate in more field investigations rather than to create a new unit of ACS analysts. Kroll and ACS have agreed to await the results of the time-use analysis to evaluate which course is more feasible.

ACS also agrees with Kroll's recommendation about the need to expand the categories of its staff who are allowed access to eJustice and Domestic Incident Reports. Kroll and ACS plan to meet with the appropriate government entities to discuss potential legislative changes and changes in ACS's Memorandum of Understanding with the NYPD to broaden the category of ACS personnel who can access criminal history information.

### **C. Conference Facilitator Program**

In 2007, with the approval of OCFS, ACS created the Improved Outcomes for Children Program ("IOC Program"), which delegated preventive services case management responsibilities to third-party agency providers. The rationale for this program was that agency providers were in a better position to make decisions regarding the preventive services they were providing to families than an ACS case management team that was not interacting directly with the families. Under the IOC Program, agency providers determine the types of services provided to families and then deliver the services.

To maintain high-level oversight of provider agencies, ACS established several monitoring mechanisms.

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<sup>5</sup> In prior legislative sessions, New York City was unsuccessful in its attempts to enact legislation to expand access to E-Justice and expand the category of ACS employees who can access criminal history information.

ACS monitors preventive cases through the Provider Agency Measurement System (“PAMS”) case review process; “Scorecard,” which combines data from PAMS and CONNECTIONS (New York State’s central child welfare database) to assess whether providers are meeting key performance goals; and the Collaborative Quality Improvement (“CoQI”) Program, which involves a review of data from PAMS and Scorecard and periodic meetings and phone calls with the provider agencies to discuss the data and to develop, implement and monitor annual improvement plans.<sup>6</sup>

ACS also created the role of Conference Facilitators who are licensed social workers assigned to work with agency providers and families by facilitating Family Team Conferencing. In a Family Team Conference, the family, representatives of the provider agency and an ACS Conference Facilitator work together to develop safety goals and plans. A Family Team Conference is held when a child’s safety and well-being have been preliminarily assessed to require removal, legal intervention or preventive services, or when permanency and other planning decisions must be made.

Conference Facilitators are supposed to be involved in a case during “key touch points” of the case. These key touch points may include the Safety Assessment, the 30-day Engagement Conference, the 45-day Follow-up Conference, Bi-annual Service Planning Reviews, Elevated Risk Conferences, Service Termination Conferences and Trial Discharge and Final Discharge Conferences. Until recently, however, Conference Facilitators were required to attend only a limited number of specific conferences.

Since late 2016, ACS began requiring Conference Facilitators to attend Service Termination Conferences on all high-risk cases. Due to an insufficient number of Conference Facilitators and an increased number of required conferences, however, ACS has encountered difficulties in maintaining consistent Conference Facilitator oversight on families and provider agencies. Currently, there are 179 Conference Facilitators and ACS plans on expanding that number to over 197 to provide oversight of the 19,897 families with 45,418 children who are receiving preventive services.

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<sup>6</sup> As noted above, Kroll will be examining the effectiveness of these monitoring mechanisms in Phase II of this monitorship.

Conference Facilitators are assigned to attend Family Conferences on a rotating basis based upon the needs of their department. This assignment system typically results in a different Conference Facilitator attending the various conferences held for a family during the life of its involvement with ACS. This rotational case assignment system potentially creates a number of risks, including:

- The Conference Facilitator is less likely to have a full and nuanced understanding of the family's dynamics and case history than if the Facilitator had been assigned to the family from the beginning of its involvement with ACS. Having multiple Conference Facilitators work on a case increases the risk that valuable insight into family dynamics, medical issues and case history may be lost. For example, if a Conference Facilitator has not worked with a particular family before, in advance of the conference he or she is expected to become familiar with the family and its issues simply by reviewing entries in CONNECTIONS and any assessments or evaluations provided by the CPS worker or provider agency. According to Conference Facilitators interviewed by Kroll, however, such additional documents are often not provided in advance of key conferences, so the Facilitator may be limited to reviewing the information in CONNECTIONS.
- It may be more difficult for a Conference Facilitator to guide discussions during conferences to assess a family's progress and ensure an adequate safety plan is in place if the Conference Facilitator has not established a relationship with the family at prior conferences and if the family knows that the Facilitator will likely not be at the next conference to follow up on their progress.
- Having a different Conference Facilitator attend each conference may result in a lack of consistent oversight of the family's needs and the quality of services being provided since it is challenging for a Conference Facilitator with no prior contact with a family to assess whether the family's needs are being met and whether the provided services are effective.
- Families may get frustrated with having to work with a new Conference Facilitator at every conference, thereby having to tell their story repeatedly to new Facilitators, which may lessen their cooperation and willingness to work towards a solution and may prompt frustration with ACS itself.

Finally, Conference Facilitators are not provided with laptops or tablets, and as a result, are forced to keep handwritten notes during Family Conferences, and then write out longhand multiple copies of the safety or other action plan resulting from the conference for themselves, the provider agency and the family. Then,

the Conference Facilitator must type their notes and action plan into CONNECTIONS. Although the Conference Facilitators now have smart phones with internet access, they do not have access to CONNECTIONS on their phones or access to any other ACS resources, such as ACS policies and procedures.

**Kroll Recommendation:** Kroll's review of preventive services case files and our interviews of ACS executives and Conference Facilitators have convinced us that the role of the Conference Facilitator should be expanded to provide more immediate, consistent and ongoing oversight of cases and provider agencies. Kroll therefore recommends that, in addition to hiring more Conference Facilitators, ACS should implement a new case assignment system for Conference Facilitators so that there is more consistent and effective Conference Facilitator oversight throughout the life of a family's case with ACS. In addition, the authority of Conference Facilitators should be expanded to include the authority to override provider agency decisions if the Conference Facilitator concludes that the family's needs are not being met by the services being provided.

Kroll also recommends that ACS provide Conference Facilitators with laptops or tablets with access to CONNECTIONS and other key ACS resources in order to perform their jobs more effectively and efficiently.

**ACS Response:** ACS agrees with Kroll's recommendations that there needs to be greater Conference Facilitator continuity on cases and that Facilitators should have the ultimate authority to make safety decisions on cases. ACS has already implemented policy and training to emphasize these points. To further implement these recommendations, ACS is in the process of developing a new Conference Facilitator case assignment system that will utilize a team approach and assign cases to teams of seven Conference Facilitators and one manager who will regularly confer about their assigned cases so that the team will be familiar with each of the families for which the team facilitates Family Conferences. The rationale for this approach is to ensure both greater continuity and effectiveness of Conference Facilitator oversight, while ensuring the availability of Conference Facilitators for assignment to Family Conferences, which at times need to be scheduled on short notice. When possible, the same Conference Facilitator will be assigned to a family's conferences, but each team will also have Facilitators with different specialized skill sets, such as expertise with domestic violence or sexual abuse, so that a team member with knowledge of the family and the appropriate expertise will be available to respond to any type of issue that arises during family conferencing.



ACS also agrees that Conference Facilitators need to be provided with tablets and is in the process of testing different types of tablets. ACS anticipates supplying all Conference Facilitators with tablets during the winter and spring of 2018.

#### **D. Technology Improvements**

During Kroll's interviews of ACS personnel and case reviews it quickly became clear that a major challenge faced by child welfare staff is insufficient technology, including: (1) a statewide child welfare database system, called CONNECTIONS, that is outdated, lacks critical functionalities and is time consuming to navigate; and (2) a lack of tools such as smart phones or tablets that have the functionality to document work or access critical documents, including case files, while CPS workers are in the field. CPS workers handle multiple cases and spend a significant amount of time working in the field, and Kroll believes that enhanced technology will help streamline workloads and improve the quality of investigations by allowing CPS workers to focus on their investigations rather than their voluminous administrative work. For example, the inability to document work in the field results in CPS workers having to make hand-written notes and then type them into CONNECTIONS when they return to the office, which is not only inefficient, but often forces CPS workers to extend their normal shift, which negatively impacts morale, increases the likelihood of workers taking the next day off, thereby causing staff shortages, and hinders ACS's ability to retain child welfare staff. Furthermore, the inability of CPS workers to access critical documents such as case files, family history and clearance check information may impede their ability to conduct an investigation effectively or discern patterns of behavior.

**Kroll Recommendation:** ACS needs to continue to leverage available technology to provide child welfare staff with the necessary tools to perform their duties effectively and efficiently. ACS should make and the State should enable functionality available for smart phones and tablets that would allow child welfare staff to work more productively in the field and afford them instantaneous access to critical information. These functionalities at a minimum should allow child welfare staff to:

- Access CONNECTIONS and all ACS case records;

- Access interview templates, Family Assessment Service Plan templates and Service Connection Instruments<sup>7</sup> so that child welfare staff can complete them while in the field and copy them into CONNECTIONS, rather than having to take handwritten notes in the field and then return to the office to complete the templates and upload them into CONNECTIONS;
- Access ACS's policy and procedure manual;
- Access open source investigative databases such as WebCrimis, Inmate Lookup, the New York State Sex Offender Registry and other open source criminal background databases;
- Access information on service providers including availability of preventive services placement slots;
- Conduct expedited clearance checks when children need to be placed with relatives during an emergency situation;
- Search for foster care placements and register children online;
- Take photographs and upload them to the case file;
- Have individuals sign relevant documents, such as a consent for release of medical records, with electronic signatures and upload the documents to the case file;
- Schedule and complete referrals for drug and alcohol testing;
- Dictate contemporaneous voice memos that would be translated to text; and
- Locate parents in emergency situations.

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<sup>7</sup> A Service Connection Instrument is the document used to refer a family to a preventive services provider.

ACS should also provide employees who need to write reports utilizing information from CONNECTIONS with a second computer monitor to eliminate the timely process of entering and exiting the screen shots. Finally, ACS should provide and train all child welfare staff on how to use talk-to-text technology to assist them in dictating notes while in the field.

**ACS Response:** ACS agrees with Kroll that it needs to provide child welfare staff with enhanced technology tools and platforms to assist them in performing their jobs effectively and efficiently. In the spring of 2017, ACS provided all child welfare staff with internet access on their smart phones, which has enabled them to access emails and applications such as Google maps. ACS plans on providing all child welfare staff with tablets during the winter and spring of 2018 and is exploring how to add the above functionalities to the tablets. In addition, ACS has agreed to make talk-to-text technology and second computer monitors available to child welfare staff who request them.

#### **E. OCFS Database System**

In 1996, CONNECTIONS was developed pursuant to federal Statewide Child Information System (“SACWIS”) regulations that were enacted by Congress in 1993. Since then, the State has continued to refine the system to address changing federal and state case practice and recording requirements and technological advances within federal funding restrictions. All New York State Social Services Districts, including ACS, are required to record information in CONNECTIONS. CONNECTIONS has some restrictions that limit ACS’s ability to compile investigative evidence, maintain a complete record of an investigation, and track a family throughout its interactions with ACS. For example, CPS workers are required to enter all information about investigations into CONNECTIONS to create a case file and preserve a record of the investigation in the event a family has a future case, there is a legal proceeding regarding the case, or a family needs preventive services. CONNECTIONS does not allow ACS, however, to upload audio files, scans, photographs or PDF’s, which forces CPS workers to maintain separate paper files with this type of information. As a result, information pertaining to a single case may be stored in several locations, and important documents may be lost or not readily available when needed. Moreover, CONNECTIONS is primarily designed to track the investigative, but not the preventive services aspects of a case. Therefore, ACS has had to create separate databases to monitor third-party providers, evaluate services, and track a family’s progress through the continuum of its interaction with ACS. Utilizing multiple databases to maintain confidential child welfare information poses challenges with data integrity and interoperability, which has made it difficult for ACS to compile and analyze data that could help it improve its programs and services.

OCFS and the State Office of Information Technology Services have been collaborating for several years with ACS and other local social services districts (“LSSDs”) on a statewide solution to enable documents and photographs to be uploaded into CONNECTIONS. The State conducted a comprehensive review of the available technologies and identified and developed a solution that ACS along with several other LSSDs will begin piloting in December with a plan for a statewide roll out in 2018.

Until recently, the federal regulations governing state child welfare information systems limited the ability of New York and other states to implement systems that were flexible enough to meet their needs. In August 2016, in response to multiple requests by New York and other states over the years, the federal Department of Health and Human Services (“DHHS”) issued new regulations that give Title IV-E agencies,<sup>8</sup> like OCFS, the option to upgrade their current systems to a new system called the Comprehensive Child Welfare Information System (“CCWIS”). The new CCWIS regulations provide more flexibility to states to collect data from multiple sources and to build systems that align more closely with their business needs and practices including determining the size, scope and functionality of their information system. OCFS is of the view, however, that there are several CCWIS federal data collection and implementation requirements that may have an impact on the potential usefulness of such a system in New York. Title IV-E agencies have until July 2018 to make a determination if they are going to upgrade to a CCWIS system and if they opt to do so, the federal government will pay approximately 50% of development costs of the system.

In April of 2017, OCFS submitted a request to DHHS for the federal government to share in the State’s costs of activities to assess the feasibility and alternatives for building a CCWIS including the benefits, costs, risks and opportunities of various approaches. In June 2017, DHHS approved OCFS’s request and OCFS subsequently retained the Center for Technology in Government to conduct the assessment.

**Kroll Recommendation:** Given the pervasive impact CONNECTIONS has on numerous ACS case management issues, Kroll recommends that ACS actively participate in New York State’s assessment of whether transitioning to a CCWIS under new federal guidelines would be beneficial.

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<sup>8</sup> Title IV-E agencies are agencies that are eligible to receive federal reimbursement for a portion of the maintenance and administrative costs of foster care for children who meet specified federal eligibility requirements pursuant to Title IV-E of the Social Security Act (42 U.S.C. §§ 671-679b).

**ACS Response:** ACS agrees with Kroll’s recommendation and has been invited by OCFS to participate in New York State’s CCWIS assessment process. ACS and many of its provider agencies are attending a series of state focus groups throughout November and December 2017. Given the long-standing and well-documented limitations created by the SACWIS regulations governing the State’s current system-of-record development, ACS believes that a full analysis of the potential benefits of modular implementation of a CCWIS-compliant system is warranted, and seeks to provide full support to the State in that effort.

#### **F. Predictive Analytics**

ACS is currently in the process of implementing Safe Measures, an innovative web-based data dashboard developed by the NCCD, a non-profit research organization. Safe Measures will provide ACS a platform for using predictive analytic models recently developed by ACS and its academic partners at the University of Chicago, City University of New York and New York University. Each of these predictive models uses approximately 170 different data points, such as: the number of prior ACS cases involving a family; the number of times the family received preventive services; the ages of the parents and children; the number of siblings; the types of allegations and priority codes, *etc.*, to determine what variables correlate to adverse outcomes and what combinations of variables are associated with the greater likelihood of such outcomes occurring. The goal of these predictive models is to provide enhanced services to high-need families rather than to identify children for removal from homes. This approach differentiates ACS’s predictive analytic models from models used by some other child welfare agencies, which tend to use modeling as a means of screening cases and identifying children who may need foster care services, inevitably creating difficult questions about the “false positive” rates the models produce.

Since ACS is using its own data, it has been able to develop a transparent analytical model with known risk factors thereby eliminating the concerns that accompany the use of “black box” modeling with purchased software. Furthermore, to ensure transparency and safeguard against discrimination and bias, ACS has created a Predictive Analytics Approval Committee that has established guidelines regarding the selection and use of risk factors and other characteristics in the agency’s predictive modeling.

The Safe Measures Dashboard provides a platform for using ACS’s analytic tools and will enable ACS to run reports in a more efficient manner and create accountability tools enabling ACS to more closely monitor

both the investigative and preventive services phases of a case by creating dashboards that chart out casework contact, supervisory sessions, caseloads, assignments, and clinical and investigative consultations. These charts will automatically identify and flag high-risk cases that need to receive additional review before the cases are closed; prioritize cases that need an ACS-led Family Team Conference; and prioritize and notify clinical and investigative consultants about high-need families so they can proactively contact the CPS worker to set up a consultation instead of waiting for a referral. In addition, Safe Measures will allow ACS to match the risk level of cases to the appropriate service providers and to evaluate case loads and match cases with services.

**Kroll Recommendation:** To support and expand the use of predictive analytics, Kroll recommends that ACS work with other city agencies such as the Department of Education, Human Resource Administration, Department of Homeless Services, Department of Mental Health and Hygiene, NYPD and New York City Housing Authority, to develop interagency protocols on data sharing that will allow ACS to expand the data sources for its analytic models so that agencies can actively work together to intervene and provide support to children and families before they reach the crisis level. The above city agencies regularly interact with families and children and maintain information that may represent red flags that a family, who may not have had prior contact with ACS, may be at heightened risk for abuse or neglect. These data points could be used by ACS, in combination with CONNECTIONS data, to develop additional predictive analytic models that would further identify factors that place families at risk. This would afford both ACS and the respective agency the opportunity to take corrective action proactively.

In addition, to extend the use of predictive analytics, Kroll recommends that ACS develop an early detection protocol whereby identified high-risk cases receive enhanced ongoing scrutiny to allow ACS to respond and intervene proactively with families who are rising to the crisis level.

**ACS Response:** ACS agrees with the need for continued improvement in data sharing. With the support of the Mayor's Center for Innovation through Data Intelligence ACS will work to enhance interagency protocols, both directly and through city agencies, to allow ACS to expand the data sources for its analytic models after the implementation of Safe Measures in the first quarter of 2018.

#### **G. Reducing Response Time**

New York State Social Service Law § 424 (6) requires that, within 24 hours of the receipt of a report to the SCR child welfare hotline, ACS must initiate a child protective proceeding, which includes an evaluation of

the home environment of the child named in the report and any other children in the same home; an assessment of the risk to such children if they remain in the home; and a determination of the nature, extent and cause of any condition described in the report. The objective of this law is to ensure that local social service districts such as ACS conduct timely safety assessments, which are typically conducted through a home visit by a CPS worker.

During Kroll's case reviews, we observed that while ACS either conducted or attempted to conduct the initial home visit within 24 hours, there were some delays between the receipt of the SCR report and the initial home visit due to numerous factors, some of which are not within ACS's control. The closer in time the initial home visit is to the SCR complaint, the higher the likelihood that the CPS worker will make successful contact with the family and conduct a timely safety and risk assessment. Having CPS workers respond to an SCR complaint involves numerous, time-consuming steps, including: receiving the report from the SCR hotline; ensuring a CPS worker is available to respond; running clearance checks to obtain background information on the family; arranging transportation and traveling to the home location in New York City traffic. An additional source of potential delay with SCR reports initiated by the NYPD is that NYPD officers responding to incidents often have many responsibilities and calling in a report to the SCR hotline may not always be a top priority, resulting in reports not being made until the officer returns to the precinct.

Possible solutions to mitigate delay in response time include establishing borough satellite offices for Emergency Children's Services ("ECS")<sup>9</sup>, currently based in Manhattan, which would reduce ECS delays in travelling to and from Manhattan; redeploying CPS workers among the various teams; providing additional cars for CPS workers to reduce persistent transportation delays and providing them with government issued parking placards to increase parking options. Kroll has been discussing all of these solutions with ACS to evaluate their cost, viability and impact on response time. Kroll has determined that another way to mitigate delay is to expedite notification to the SCR hotline of NYPD-initiated reports.

**Kroll Recommendation:** ACS should develop an enhanced protocol with the NYPD that would require police officers to prioritize contacting the SCR hotline on all incidents involving a child or incidents where a

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<sup>9</sup> ECS is a unit within the Division of Child Protection which handles SCR reports received after normal work hours and during the weekends.

child is present during the commission of a crime. This enhanced protocol will prevent a situation where a notification is first made when the officer returns to the precinct and will allow ACS to begin its investigative process as soon as possible. Mitigating delays in starting an investigation will improve the likelihood that ACS will be able to make contact with the family and make rapid child safety decisions. In conjunction with the enhanced protocol, the NYPD should provide training to officers regarding the need to call in reports expeditiously.

**ACS Response:** ACS concurs with Kroll's findings that there needs to be a more rapid notification process with the NYPD and there is a need to develop an enhanced protocol with the NYPD that would require officers to prioritize reports to the SCR hotline when they respond to situations where child abuse or neglect concerns are present. ACS also agrees that it needs to continue to look for ways to decrease the response time between the receipt of the SCR report and CPS staff's initial home visit. ACS has begun looking for ways to reduce transportation delays, including expanding its use of Zip cars, enhancing contracts with local car services and reviewing the efficacy of its internal transportation fleet. Kroll will continue to work with ACS in developing further means of reducing response time.

#### **H. Board of Education-Related Issues**

Over the past few months, ACS and the New York City Department of Education ("DOE") have been working to update "The Chancellor's Regulations," which set forth the information sharing and reporting requirements between the DOE and ACS. This update was approved on September 27, 2017. These regulations are critical as a significant number of cases called into the SCR hotline originate from school employees because they are in regular contact with children and are in a unique position to observe their physical and mental well-being. Pursuant to New York Social Services Law § 413, certain individuals, including most school employees, are deemed mandated reporters who are required to make a report to the SCR hotline if they have reasonable cause to suspect that a child is abused or maltreated. These mandated reporters are required to notify the person in charge of the school or their designated agent who "shall be responsible for the subsequent administration necessitated by the report."<sup>10</sup> Consequently, reports are often called into the SCR by school administrators who do not have first-hand knowledge of the incident or the safety risks posed to the child. Additionally, reports from schools are often not received and assigned

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<sup>10</sup> New York Social Services Law § 413 (b).



to a CPS worker until after school hours, which further impedes ACS's ability to gather information in a timely fashion.

Both New York State Social Services Law and ACS's Division of Child Protection Casework Practice Requirements Manual require that CPS workers contact *the reporting source* of an SCR report when the report contains identifying information about the source because obtaining first-hand information is a critical means by which CPS workers evaluate safety risks and determine how to develop further investigative information. During Kroll's case reviews we found numerous instances where the CPS worker was unable to contact a school employee source at the outset of the case, or in some cases, at any point during the investigation. Often, the CPS worker had to rely on information from guidance counselors or other administrative personnel who had limited or no information about the child other than attendance records because teachers were not reachable during school hours and did not provide personal contact information.

The updated Chancellor Regulations now clarify that it is the responsibility of the mandated reporter — as opposed to the principal/designee — to call the SCR and complete and submit a written report to ACS within 48 hours of making an oral report to the SCR. The regulations do not require the mandated reporter, however, to speak with ACS within any specified timeframe or require the mandated reporter to provide any personal contact information other than a business number.

Within the written report to the SCR, the mandated reporter is required to provide information about the abuse or neglect as well as the names of any other witnesses *that the mandated reporter is aware of*. Section 1 (a) (4) of the regulations states:

If the mandated reporter has reasonable cause to suspect child abuse or maltreatment and has direct knowledge that a report has already been made to SCR by another mandated reporter in the school based on the same facts, conditions or circumstances, he or she shall immediately either: (1) report the suspicion to SCR directly as set forth above; or (2) consult with the principal/designee. If the principal/designee confirms that another report has been made, he or she must immediately provide the "Call I.D." number to the mandated reporter. If the principal/designee does not confirm that another report has been made, the mandated reporter must immediately call in the report to SCR and follow the procedures set forth above. If the principal/designee provides such

confirmation but does not provide the mandated reporter with the “Call I.D.” number by the end of the school day, the mandated reporter must immediately call in the report to SCR and follow the procedures set forth above.

The rationale for this regulation appears to be to streamline reporting and minimize duplicative reports to the SCR. However, it lacks a mechanism to ensure that ACS receives the names of all witnesses in instances where a second reporter is not required to make an SCR report because they have been given a Call ID number by the principal/designee.

**Kroll Recommendation:** ACS should enhance its protocol with the DOE to require that all mandated reporters provide a personal contact number and be available for a phone call with a CPS worker within 24 hours of a complaint being called into the SCR hotline. Given the universal use of cell phones, it is reasonable for a reporter to provide a personal contact number. DOE personnel are city employees entrusted with safeguarding the welfare of New York City children and their responsibilities should include speaking with CPS workers on SCR reports *that they initiate*. Within the protocol, ACS and the DOE can establish the hours in which a CPS worker can call a school employee to minimize any inconvenience while still allowing the CPS worker to gather information in a timely fashion.

Kroll further recommends in those instances where a report has already been made by another mandated reporter to the SCR and the second mandated reporter is not required to call the SCR that the principal/designee be required to provide the second mandated reporter’s name and contact number to ACS to ensure that ACS is able to identify and contact all potential sources.

**ACS Response:** ACS agrees with enhancing its protocol with the DOE in order to ensure that there are clear and uniform standards in school settings regarding the manner in which DOE staff respond and share information as it relates to concerns of educational neglect and unexplained absences. To that end, ACS will consult with DOE leadership on Kroll’s recommendation.

### **I. Child Protection Casework Practice Requirements Manual**

As part of Kroll's policy and procedure review, we reviewed the Division of Child Protection Casework Practice Requirements Manual, which is a 172-page comprehensive guide that includes ACS policies and procedures, directions for data entry to CONNECTIONS and information on child developmental markers. Also, embedded within the guide are multiple links to additional guidelines, protocols, forms and child safety alerts that modify policies currently contained in the manual. The length and complexity of the manual along with the multiple additional linked documents impede the ability of child protective workers to quickly access policies and guidelines.

**Kroll Recommendation:** ACS should review its Division of Child Protection Casework Practice Requirements Manual to streamline it and ensure that all policies and procedures are current and consistent with State requirements. ACS should also develop a simplified "field" version of this manual accessible on both desktops and mobile devices so that employees can more readily access critical information and policy guidance.

**ACS Response:** ACS is in the process of developing a streamlined version of the Division of Child Protection Casework Practice Requirements Manual.

### **J. Child Protection Case Management Practices**

All local district child protective services in New York State are required by law to conduct an appropriate investigation of each report of suspected abuse or neglect. New York State Social Services Law and ACS's Division of Child Protection Casework Practice Requirements Manual define the minimum requirements and mandated time frames for all investigations. Investigative steps must include, but are not limited to: contact with the reporting source when the report contains identifying information about the source; contact with collateral sources; face-to-face contact with subjects of the report; face-to-face contact with "other persons named in the report" excluding children; a home visit; and an interview or observation of the children.

Kroll reviewed 150 child protection case files that were opened from November 2016 through December 2016 and closed from January 2017 through February 2017. During this time period, there was a surge in the number of SCR reports that ACS received and was required to investigate as a result of high profile media cases in the fall of 2016. It is common for such surges to occur when media awareness of child

welfare issues is increased.<sup>11</sup> In our case reviews, we evaluated whether ACS staff completed investigative steps within mandated times frames and in accordance with New York State and ACS requirements, and whether, overall, they conducted their investigations consistently and thoroughly. When we deemed investigative practices inadequate, we sought to determine what impact it had on the integrity of the investigation and potential risks to children. We found a number of cases where the quality of the investigation would have been improved by more consistent supervisory reviews; enhanced documentation, especially of critical investigative steps such as home visits, observations of children, and interviews of children, family members and collateral contacts; a stronger adherence to ACS internal policies; and additional contact and follow-up with collateral witnesses. In 10% of the child protection cases we reviewed, we determined that the investigation failed to address critical safety issues that posed an ongoing risk to children. In those instances, we immediately escalated the cases to OCFS for an additional review. OCFS agreed with Kroll's assessment in all of these cases and referred them back to ACS for further investigation.<sup>12</sup>

To determine the root cause of these case practice issues, Kroll interviewed a number of ACS executives, CPS workers and supervisors. During these interviews, Kroll was regularly told that staff shortages, large caseloads, lack of technology, repetitive paperwork, long waits for consultations and preventive services slots, and transportation issues all impacted child welfare staff's ability to conduct investigations and document investigative steps. ACS and Kroll have had extensive conversations about these issues and they form the basis for several of the above-described recommendations in this report.

**Kroll Recommendation:** Kroll's recommendations on ways to improve case management practices and facilitate the ability of CPS workers to document investigative steps are reflected in our preceding recommendations to: (1) revamp and refocus the IC program; (2) provide additional technology tools to child welfare staff so they can perform their duties more effectively and efficiently; (3) have ACS actively participate in New York State's assessment of whether transitioning to a CCWIS under new federal guidelines would be beneficial; (4) continue to expand the use of predictive analytics; (5) enhance

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<sup>11</sup> During the four months from November 2016 through February 2017, CPS workers responded to 24,317 SCR calls, a 14% increase over the same period one year earlier.

<sup>12</sup> ACS has advised Kroll that for each of the cases Kroll escalated to OCFS for review, ACS conducted an assessment of the case activities and followed up with the teams that conducted the investigations to ensure that the children were safe. ACS advised that in four of the cases where ACS determined that children might be unsafe, ACS called in additional SCR reports and confirmed that the children were safe.

transportation options for child welfare staff and strengthen protocols with the NYPD and DOE so response time is reduced and direct access to mandated reporters is increased; and (6) provide a more accessible and user-friendly version of ACS policies and procedures that CPS workers can actually use in the field.

**ACS Response:** ACS agrees with Kroll that some case management practices need to be enhanced and have taken a number of steps designed to improve the quality of investigations including: filling CPS worker and supervisor vacancies; developing the Safe Measures Dashboard to monitor high risk cases, case management practices and referrals; providing child welfare workers with tablets so they can document home visits and investigative steps in the field; and providing additional transportation options. Kroll will test the effectiveness and impact of these measures on case practices through on-going case reviews, interviews and analysis of ACS data. Kroll will also continue to work with ACS to determine how to more effectively investigate cases, balance caseloads, supervise cases and streamline documentation.

#### **K. Preventive Services Case Management Practices**

Under the IOC program, once a case has been referred for preventive services, one of ACS's 56 third-party agency providers becomes responsible for managing the case. Case Planners at these agencies are responsible for developing a service plan, coordinating and/or providing services and monitoring the progress of a family while it receives services — a process which may last from several months to several years. At the time of this report, Kroll had just completed its review of preventive services cases where we evaluated if third-party providers were: performing in accordance with New York State Law and ACS rules and policies; sufficiently monitoring families; and adapting their service plans to emerging risks or changed family circumstances. Kroll's case reviews raised some concerns about the sufficiency of some provider-agency case management practices, specifically in the areas of how provider agencies are documenting home visits and service plan goals and objectives; adapting and/or revising service plans when families are uncooperative or fail to progress; and coordinating and monitoring services provided by third-party agencies.<sup>13</sup> In addition, high staff turnover at provider agencies at times resulted in multiple case planners being assigned to a case which impacted continuity and was especially problematic when case planners left the agency without completing progress notes on a case.

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<sup>13</sup> Provider agencies sometimes need to refer families to outside agencies for services if the provider agency cannot provide a specific service.

In order to determine the root cause of these issues, Kroll interviewed ACS executives, CPS workers and Conference Facilitators. During these interviews, Kroll was told that the primary issues affecting the quality and consistency of preventive services cases were high provider agency turnover caused by low salaries and demanding caseloads, inexperienced case planners and insufficient training on ACS policies and procedures, as well as community-wide preventive services options.

**Kroll Recommendation:** Kroll's recommendation on ways to improve continuity and oversight of preventive services cases is incorporated in our recommendation to expand the role and authority of Conference Facilitators in Family Team Conferences to ensure that provider agencies are providing quality services that are individualized to the needs of the family. At the time of this report, Kroll had just completed its review of preventive services cases and is in the process of analyzing the data it has compiled. In its next report, Kroll will make further recommendations on ways to improve provider agency case management practices.

**ACS Response:** ACS agrees that many of its preventive provider agencies experience critical resource challenges. The ACS budget approved in June 2017 includes almost \$50 million annually in new funding to strengthen the provider programs' capacity to serve children at risk of abuse or neglect and their families. This new funding has been allocated to provide additional training for frontline staff; salary increases; conference facilitators; and other essential supports. ACS looks forward to further discussions with Kroll about our monitoring and oversight procedures for preventive providers.



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