



## Office of Children and Family Services

KATHY HOCHUL  
Governor

DAMIA HARRIS-MADDEN, Ed.D., MBA, M.S.  
Commissioner

September 27, 2024

Thomas DiNapoli, State Comptroller  
Office of the State Comptroller  
110 State Street  
Albany, N.Y. 12236

**Re: Audit 2022-S-13 – 180 Response to the Report**

Dear Mr. DiNapoli:

On behalf of the New York State Office of Children and Family Services (OCFS) and pursuant to Executive Law 170, please find the 180-day update pertaining to OCFS' response to the Office of the State Comptroller's (OSC) key recommendations detailed in audit report 2022-S-13 entitled "Oversight of Juvenile Justice Facilities." OSC's stated objective was to determine whether OCFS adequately operates juvenile justice facilities for court-placed youth to ensure they meet State standards and regulations for the health and safety of juveniles and staff. The audit covered the period from October 2018 through August 2023, and contained three key findings and resulting recommendations.

OCFS reviewed OSC's findings and recommendations with facility administrative teams as part of its continuous quality improvement efforts to better provide services to youth and support facility staff. With those reviews, OCFS Division of Juvenile Justice and Opportunities for Youth (DJJOY) has made both practice improvements and procedural efficiencies as described herein. OCFS is committed to continue its review and refinement of both policy and practice and to increase staffing levels through ongoing recruitment efforts, including those from Governor Hochul's NY HELPS initiative.

**Recommendation 1:** Review current administrative procedures and training curriculum and, where practicable, implement changes to enable staff to at a minimum (1) complete admission assessments and screenings on time, (2) meet training requirements and (3) complete restraint incident review record-keeping requirements.

**OCFS Response:** OCFS DJJOY has implemented several changes to current administrative procedures and training curriculum to enable staff to complete admission screenings on time pursuant to current policy and procedure.

- For nutrition and diet needs, OCFS DJJOY has revised and updated *OCFS-4672, Diet Order Form* to include separate boxes for Regular Diet and Vegetarian Diet. The Bureau of Health

Services (BHS) has retrained and educated appropriate medical staff that *OCFS-4672, Diet Order Form* must be completed for all youth admissions and submitted to kitchen staff for review and awareness. BHS revised *OCFS-5362, Medical and Dental Admission Checklist* to include mandatory completion of *OCFS-4672, Diet Order Form* for all youth admissions.

- BHS revised the *Medical and Dental Admission Checklist* and condensed two versions into a single version, thereby eliminating redundancy to streamline the assessment process, making form OCFS-5361 unnecessary.
- BHS categorized the tasks in the *Medical and Dental Admission Checklist* according to required time frames for completion and has reissued this guidance and retrained facility nurse administrators (RN Supervisors) regarding oversight. The RN Supervisors are now required to review and sign off on all completed *Medical and Dental Admission Checklist* forms. Additionally, the Assistant Director of Nursing (ADON) will review *Medical and Dental Admission Checklist* forms during each site visit.
- OCFS reviewed all policies to ensure there were no inconsistent mandates regarding screenings and assessments.

Regarding the recommendation for staff to complete training requirements timely:

- OCFS DJJOY has adopted a new first aid training curriculum that certifies staff for a 2-year period, versus the previous training that only certified staff for a 1-year period.
- OCFS DJJOY has adopted an option for staff to take numerous online trainings at home for overtime to increase training participation and compliance with required courses. DJJOY continues to monitor this new training option along with all other efforts to maintain a trained workforce.
- OCFS DJJOY continues to monitor facility training compliance and explore alternative solutions to enable staff to maintain compliance with their training requirements.

Regarding the recommendation to complete restraint incident reviews and adhere to record keeping requirements:

- OCFS DJJOY has reviewed the requirements for properly completing the administrative review of physical restraints with facility administrators.
- Quality Assurance and Improvement (QAI) oversight: QAI routinely reviews a broad sample of restraint documentation at each facility with an eye towards needed administrative reviews and will continue to follow up with individual facilities where site visits indicate the need for additional support.
- Record Keeping Requirements: OCFS DJJOY is reviewing the need to continue use of the restraint log, which is one of two places' restraints are documented. In addition to the physical logbook, staff must document each restraint within the Automated Restraint Tracking System (ARTS). This electronic system captures all aspects of the physical, bound logbook. OCFS will review the need to continue to use both the physical logbook and ARTS with an eye toward reducing redundancy.

**Recommendation 2:** Determine the sufficient staffing levels necessary to adequately provide for the health and safety of juveniles and staff and increase efforts and focus resources to meet those levels.

**OCFS Response:** OCFS DJJOY has identified staffing levels needed to adequately provide for the health and safety of youth and staff within our facilities. The aftermath of the COVID-19 hiring freeze, during which time facilities were prevented from hiring on pace with attrition, as well as lingering human services workforce impacts, continue to detrimentally affect hiring and retention. However, recently, DJJOY has implemented the following:

- Increased the use of online employment search sites which has shown promising results with opening a wider pool of candidates for consideration. OCFS DJJOY also continues recruitment efforts using facility and regional job fairs.
- Utilization of the recent hiring change as part of NY HELPS has afforded OCFS DJJOY the ability to fill certain titles that were previously difficult due to credential requirements. This change in hiring continues to yield positive results.

OCFS DJJOY appreciates the opportunity to provide an update regarding our continued efforts in these areas. Please contact myself or Deputy Commissioner Hall with any questions or concerns regarding this response.

Sincerely,



Dr. DaMia Harris-Madden, MBA, M.S.  
Commissioner  
New York State Office of Children and Family Services

Cc: Norman Hall, Deputy Commissioner – Division of Juvenile Justice and Opportunities for Youth  
Nicholas Steinbock-Pratt, Deputy Counsel - Division of Legal Affairs  
Christopher Schall, MPA, CFE, Director - Office of Audit and Quality Control