



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF HUMAN SERVICES
LANSING



MAURA D. CORRIGAN
DIRECTOR

September 23, 2011

Mr. Doug Ringler, Director
Office of Internal Audit Services
Office of the State Budget
George W. Romney Building
111 South Capitol, 6th Floor
Lansing, Michigan 48913

Dear Mr. Ringler:

In accordance with the State of Michigan, Financial Management Guide, Part VII, the Department of Human Services is enclosing a summary table identifying the department's responses and the corrective action plans to address recommendations identified in the Office of the Auditor General's Performance Audit of the Statewide Central Registry.

If you have questions regarding the summary table or corrective action plans, please contact me at osgac@michigan.gov or 517-335-4087.

Sincerely,

Signature Redacted

Cynthia T. Osga, CGFM
Internal Control Officer

c: Executive Office
Office of the Auditor General
House Fiscal Agency
Senate Fiscal Agency
House and Senate Appropriation Sub-Committees
House and Senate Standing Committees



State of Michigan
DEPARTMENT OF HUMAN SERVICES
Response to the Auditor General's Report
Performance Audit of the Statewide Electronic Central Registry
OAG Reference No. 431-21000-08
DHS Reference No. 2009-252

1. Findings Agreed With

a. Corrective Action Has Been Implemented

1a, 2a, 2b, 3a, 3b, 5b, 5c, 5e, 5g, 5h, 6a, 6b, 6c, 6d, 6e, 8a1, 8a2,
8a3, 8a4, 8a5, 8c, 8d, 8f, 9d

b. Corrective Action to be Implemented

1b, 3c, 4, 5a, 5f, 7a1, 7a2, 7a3, 7a4, 7b, 8e, 8g, 9a 9b, 9c

c. No Corrective Action to be Taken

5d, 5h, 8b

2. Findings Disagreed With

None

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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Adding Perpetrators to the Central Registry-Utilization of Activity Reports		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	1/1/2011	Status Requested	
Status Contact	stjohnl	Last Updated	9/23/2011
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding :</p> <p>DHS did not routinely generate and utilize activity reports to monitor DHS's need to add perpetrators to the Central Registry. The results of the DHS investigations are recorded in the SWSS-CPS. This system also contains the Central Registry. DHS stated that SWSS-CPS had the capability to generate numerous reports to help monitor activity within the system; however, DHS did not generate and use the reports to help identify situations in which the results of CPS investigations required the addition of a perpetrator to the Central Registry but the Central Registry was not updated.</p> <p>At the OAG's request, DHS generated a SWSS-CPS activity report for review that compared all perpetrators that DHS identified during Category I and Category II CPS investigations for the period November 2007 through September 2008 with the perpetrators DHS added to the Central Registry during the same period. The OAG analyzed this report and identified 364 perpetrators of CA/N that DHS had identified during CPS investigations but failed to add to the Central Registry. The CPL requires that DHS add to the Central Registry all perpetrators DHS identifies during Category I or Category II CPS investigations.</p> <p>The OAG notified DHS of these 364 perpetrators so that DHS could add them to the Central Registry. DHS informed us that it omitted some of these perpetrators from the Central Registry because of a SWSS-CPS system error, and others were omitted from the Central Registry as a result of DHS staff error. Generating and utilizing SWSS-CPS activity reports could help DHS ensure that it adds all perpetrators of CA/N to the Central Registry as required by the CPL.</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: DHS cross referenced the list of 364 perpetrators between SWSS, Central Registry, and local office files. Corrective actions were taken in regards to the list in March 2009. It was determined a system error allowed a worker to choose whether a perpetrator was placed on the Central Registry resulted in the identified deficiency. The system error has been corrected. DHS will generate a quarterly report that will match dispositions against Central Registry to ensure accuracy of perpetrator information.</p> <p>Anticipated Implementation Date: The report has been developed and generated for validation. Beginning January 2011, quarterly reports will be generated and provided to Field Services for dissemination.</p> <p>Barriers: n/a</p> <p>09-23-11 Update: This report has been generated and provided to program office for review with Field Services. This will be done quarterly as stated in the corrective action plan.</p> <p>Responsible Administration: Children's Services</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services</p>		
Recoupment Recommended			
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Adding Perpetrators to the Central Registry-ID of Licensed or Registered Childcare Providers		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	3/1/2012	Status Requested	
Status Contact	stjohnl	Last Updated	9/13/2011
Status	Open	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding:</p> <p>DHS had not established procedures to help DHS ensure that it effectively identified situations in which perpetrators from Category III CPS investigations were also licensed or registered childcare providers. DHS reported that it primarily relies on investigation interviews to learn that a perpetrator from a Category III CPS investigation is a licensed or registered childcare provider. The review disclosed:</p> <ol style="list-style-type: none"> 1. DHS did not perform periodic automated comparisons of the substantiated perpetrators identified in Category III investigations to the DHS licensing system information for licensed or registered childcare providers. Routinely performing a comparison of this nature could help DHS effectively identify licensed or registered childcare providers that DHS substantiated as perpetrators in Category III CPS investigations but did not add to the Central Registry at case disposition. Note: This is for completed investigations. 2. DHS had not established an electronic communication process between DHS's SWSS-CPS and DHS's licensing data systems to help identify perpetrators from Category III CPS investigations who are also licensed or registered childcare providers during the CPS investigation disposition process. Note: This is for ongoing investigations. 3. DHS did not require staff to perform manual searches of DHS's internal licensing data systems or DHS's public Web site information during the CPS investigation disposition process. Performing searches of this nature could help DHS ensure that it identifies perpetrators from Category III CPS investigations that are licensed or registered childcare providers so that DHS can add them to the Central Registry. 4. DHS did not systematically flag individuals that DHS determined were licensed or registered childcare providers during the CPS investigation. Systematically flagging these individuals could help DHS establish system controls that help DHS ensure that a flagged perpetrator, who is also substantiated as a perpetrator in a Category III CPS investigation, is added to the Central Registry. <p>Response:</p> <p>DHS agrees with the finding.</p> <p>Corrective Action Plan:</p> <p>DHS amended policy, effective February 1, 2010, to require CPS intake to inquire in an attempt to verify the licensing status of persons associated with the complaint. The reporting person must be asked if anyone affiliated with the case is a licensed foster care provider, licensed day care provider, or a relative provider. A systems work request has been approved which will include appropriate designation of individuals identified as perpetrators by CPS, flagging of persons whom DHS has approved for the care of children, and automatic notification to numerous offices within DHS as to both the allegations and outcomes of CPS complaints of these individuals.</p> <p>Anticipated Implementation Date:</p> <p>The work request is pending prioritization. The next meeting is December 2, 2010. Once the work request is initialized, the end product will be available within three to six months.</p> <p>Update: 09-13-11</p> <p>Since these audit findings were issued on 09-24-10, meetings with SWSS, DTMB and program office staff have been held to determine system changes needed in order to comply with the corrective action plans as submitted and approved. Resultant work requests were submitted to DTMB in the fall of 2010 for these changes. Timeframes were provided by SWSS and DTMB staff that those work request changes would be completed within 3-6 months. Follow-up occurred between the CPS program office and the SWSS/CPS staff in April 2011 and August 2011.</p> <p>The latest information provided to the CPS program office is that as a result of the prioritization of SACWIS, all work requests are being held in abeyance pending high-level DHS re-prioritization. The program office received this information via e-mail on August 10, 2011.</p>		

Deficiencies identified with SWSS application will be evaluated as part of the SACWIS application development. The anticipated implementation date is changed to March 1, 2012, to follow-up with the SACWIS development team to determine confirm that the deficiency is addressed in the new system.

Barriers:
IT staffing resources.

Responsible Administration(s):
Children's Services
Technology and Project Services

Responsible Individual(s), Name(s), Title(s):
Steve Yager, Acting Director, Children's Services
Suzanne Stiles Burke, Director, Bureau of Child Welfare
Colin Parks, Acting Manager, Children's Protective Services
Teresa Spalding, Director, Bureau of Technology and Project Services
Laurie Johnson, SACWIS Project Manager

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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Completing and Reviewing CPS Investigations--Completion within SOP		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS did not always complete CPS investigations within the established 30-day standard of promptness and requests for extensions were common. As a result, DHS increased the risk that perpetrators of child abuse and neglect would not be identified in a timely manner and perpetrators could go undetected by DHS when performing a Central Registry clearance.</p> <p>DHS stated 63,000 CPS complaints were assigned for investigation during the period November 19, 2007 through September 30, 2008 and 13,100 (21 percent) CPS investigations resulted in at least one perpetrator being added to the Central Registry.</p> <p>Of the 13,100 CPS investigations that resulted in at least one perpetrator addition to the Central Registry, DHS did not complete 4,350 (33 percent) within the 30-day SOP. DHS had granted extension requests for 690 (5 percent) of those 4,350 investigations.</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: The standard of promptness is monitored on a monthly basis via the caseload count that each local office is required to submit. Any staff member over the 10 percent threshold must have an individual corrective action plan developed so the standard of promptness is met.</p> <p>Anticipated Implementation Date: implemented</p> <p>Barriers: n/a</p> <p>Responsible Administration: Children's Services Field Services</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Scott Parrott, Director, Child Welfare Field Operations Terry Beurer, Acting Director, Field Services Local Office Directors</p>		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Completing and Reviewing CPS Investigations—Supervisory Review within SOP		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS did not always perform supervisory reviews of completed CPS investigations within the 30-day standard of promptness. As a result, DHS could not ensure that DHS identified and corrected erroneous investigation conclusions regarding a case member's Central Registry perpetrator status and could not ensure that all perpetrators that should have been added to the Central Registry were added timely.</p> <p>During the period November 19, 2007 through September 30, 2008, DHS completed 53,200 CPS investigations.</p> <p>Of the 53,200 CPS investigations completed, DHS supervisors did not review and approve 15,350 (29 percent) of the case dispositions within the 30-day standard of promptness.</p> <p>Further, 2,100 (14 percent) investigations that were completed as of September 30, 2008 were still pending supervisory review and approval at the time of our review in February 2009.</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: The standard of promptness is being monitored via the monthly caseload count that each local office is required to submit. Any supervisor that has been identified as having over 20 cases pending review must have an individual corrective action plan developed which includes how the number will be reduced to below the threshold. The local office director must report the progress made on a monthly basis to the central office.</p> <p>Anticipated Implementation Date: A process has been implemented.</p> <p>Barriers: n/a</p> <p>Responsible Administration: Children's Services Field Services</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Scott Parrott, Director, Child Welfare Field Operations Terry Beurer, Acting Director, Field Services Local Office Directors</p>		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Expunging Perpetrators from the Central Registry-Secondary Review or Approval		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS did not require secondary review or approval of Central Registry expungement transactions. Although DHS limited the capability to expunge records from the Central Registry to supervisory staff, DHS did not require additional review or approval of expungements processed by the supervisory staff. As of September 30, 2008, DHS had 380 supervisory staff with capability to expunge Central Registry perpetrator records. DHS expunged approximately 1400 perpetrator records from its Central Registry during the fiscal year ended 09/30/2008.</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: DHS performed a review of the expunged perpetrator records identified in the audit finding and found the expungements were appropriate. In addition, DHS amended CPS policy, effective February 1, 2010, to require a secondary review of all requests and decisions for expungement of a person's name from Central Registry.</p> <p>Anticipated Implementation Date: n/a, corrective action has been implemented</p> <p>Barriers: n/a</p> <p>Responsible Administration: Children's Services</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services</p>		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Expunging Perpetrators from the Central Registry--Monitor for Appropriateness		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS did not actively monitor Central Registry expungements for appropriateness. DHS reported that although the system had the capability to produce reports of Central Registry expungement activity, it did not generate the reports in order to monitor expungements for appropriateness.</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: The CPS program office and the SWSS design staff developed a report to assist the local office and central office administration in the review of the data related to cases in which a person had been removed from Central Registry. As of January 2010, the local office directors receive a monthly report of expungement decisions to ensure appropriate decisions. This is a third level of review of the expungement of persons from Central Registry.</p> <p>Anticipated Implementation Date: n/a, corrective action has been implemented</p> <p>Barriers: n/a</p> <p>Responsible Administration: Children's Services</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services</p>		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Expunging Perpetrators from the Central Registry-Monitor Access Granting Activities		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	3/1/2012	Status Requested	
Status Contact	stjohnl	Last Updated	9/14/2011
Status	Open	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS did not track or monitor the access granting activities of DHS local office security coordinators. Local office security coordinators grant access and the capability to staff in the local offices to perform Central Registry expungement transactions. DHS reported it did not maintain records of the local office security coordinator activity, such as the access and transaction capabilities the local office security coordinator created or modified for staff. In addition, DHS reported although the system had the capability to record local office security coordinator granting activities, it had not implemented the processes to do so. As of September 30, 2009, DHS had 200 local office security coordinators located in 114 local offices throughout the state.</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: DHS Application Security conducted a review of all records with local office security officer access and supervisor level access. The accounts of 23 users with LOSEC level access and 14 users with Supervisor level access were closed as the users no longer appeared active in the Agency's Human Resource Management Network (HRMN) system.</p> <p>It is necessary for supervisors to have access as the expungement process is a local office function and all CPS supervisory staff have the role of review and decision making on requests for expungement</p> <p>In May 2009, DHS Application Security reviewed and updated security policies and procedures for users and local office security coordinators. These have not been released to the DHS intranet yet. These procedures include reviewing accounts on a monthly basis to ensure accounts for departed staff have been closed.</p> <p>The work request is pending prioritization. The next meeting is December 2, 2010.</p> <p>Barriers: Prioritization of the work request has not occurred.</p> <p>Anticipated Implementation Date: Once the work request is initialized, the end product will be available within three to six months.</p> <p>Update: 09-13-11 Since these audit findings were issued on 09-24-10, meetings with SWSS, DTMB and program office staff have been held to determine system changes needed in order to comply with the corrective action plans as submitted and approved. Resultant work requests were submitted to DTMB in the fall of 2010 for these changes. Timeframes were provided by SWSS and DTMB staff that those work request changes would be completed within 3-6 months. Follow-up occurred between the CPS program office and the SWSS/CPS staff in April 2011 and August 2011.</p> <p>The latest information provided to the CPS program office is that as a result of the prioritization of SACWIS, all work requests are being held in abeyance pending high-level DHS re-prioritization. The program office received this information via e-mail on August 10, 2011.</p> <p>Deficiencies identified with SWSS application will be evaluated as part of the SACWIS application development. The anticipated implementation date is changed to March 1, 2012, to follow-up with the SACWIS development team to determine confirm that the deficiency is addressed in the new system.</p> <p>Barriers: IT staffing resources.</p> <p>Responsible Administration(s): Children's Services Field Services</p>		

	Technology and Project Services Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Scott Parrott, Director, Child Welfare Field Operations Terry Beurer, Acting Director, Field Services Local Office Directors Teresa Spalding, Director, Bureau of Technology and Project Services Laurie Johnson, SACWIS Project Manager
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Adding Enrolled Child Day Care Provider Perpetrators to the CPL - Amend Legislation		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	11/1/2011	Status Requested	
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Open	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding No. 4: DHS needs to seek amendatory legislation to specifically add enrolled child day-care providers to Section 8d (3) of the CPL. Such an amendment would provide DHS the statutory authority to include enrolled child day-care providers in the Central Registry when DHS identifies these individuals as perpetrators of CA/N in Category III CPS investigations. A change in legislation would improve DHS's ability to carry out the intent of the CPL to safeguard and enhance the welfare of children.</p> <p>Section 8d(3) of the CPL provides DHS with the statutory authority to include in the Central Registry perpetrators of CA/N from Category III CPS investigations who are owners, operators, volunteers, or employees of a licensed or registered childcare organization*. However, the CPL does not specifically provide DHS with the statutory authority to include, in the Central Registry, perpetrators of CA/N that it identifies during Category III CPS investigations who are enrolled child day-care providers. It is important for the CPL to specifically, provide DHS with the statutory authority to include enrolled child day-care providers in the Central Registry from Category III CPS investigations because enrolled child day-care providers have direct and regular contact with children in much the same manner as other individuals specified in Section 8d(3) of the CPL, i.e., owners, operators, volunteers, or employees of licensed or registered childcare organizations.</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: DHS is currently involved in a multidisciplinary committee from the Court Improvement Project (CIP), the Permanency Options Workgroup (POW), where Central Registry is on the agenda for review and discussion related to the length of time individuals who are placed on Central Registry must remain on Central Registry. As part of this workgroup, DHS will use the legal and protective service expertise of the members of the group to investigate, discuss and determine the appropriateness of placing enrolled day care providers on Central Registry when they are determined to be perpetrators of abuse and neglect and the risk level scores out as low or moderate, which would typically place the perpetrator in Category III without being placed on Central Registry.</p> <p>If it is determined that enrolled day care providers are to be placed on Central Registry, in line with licensed day care providers, DHS will work through the Office of the Legislative Liaison to draft language which will appropriately amend the Child Protection Law.</p> <p>If it is determined that a legislative change is needed, DHS will work through the Office of the Legislative Liaison to draft language which to amend the Child Protection Law with an anticipated implementation date of approximately 6 months from language draft.</p> <p>Anticipated Implementation Date: June 1, 2011</p> <p>Update 09/2011: Children's Services is completing its analysis to determine the course of action to be taken.</p> <p>Barriers: If the Child Protection Law must be amended, the legislative process timeline is difficult to estimate.</p> <p>Responsible Administration: Children's Services Legislative Services</p> <p>Responsible Individual(s), Name(s), Title(s): Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare</p>		

	Colin Parks, Acting Manager, Children's Protective Services Karyn Ferrick, Director, Legislative Services
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Obtaining and Maintaining Perpetrator Identifying Information--Proof of Identification		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	3/1/2012	Status Requested	
Status Contact	stjohnl	Last Updated	9/14/2011
Status	Open	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding No. 5a: DHS did not require DHS staff to obtain proof of identification from alleged perpetrators during the CPS investigation process, when possible. In addition, when DHS staff did obtain a driver's license or State identification number from alleged perpetrators, DHS did not require or provide a place in SWSS-CPS for DHS staff to record the information. DHS informed us that DHS staff will sometimes review the identifying documentation of alleged perpetrators, such as a driver's license or State identification card, during a CPS investigation; however, DHS does not require DHS staff to do so when possible. Obtaining information from a driver's license or State identification card from alleged perpetrators could provide DHS with identifying information such as last name, first name, middle name, current address, date of birth (DOB), sex, height, and eye color. A driver's license or State identification card issued by the Department of State contains a photo of the licensee or cardholder and displays the unique identification number for the individual issued by the Department of State. Requiring DHS staff to obtain and review a driver's license issued by the Department of State for each alleged perpetrator associated with an investigation would help significantly reduce the risk of DHS recording improper and/or false identifying information in the Central Registry. Also, DHS could record and utilize the unique identification number issued by the Department of State as a key identification element to more effectively help detect situations in which perpetrators of CA/N could be in contact with children in vulnerable situations. Approximately 90% of Michigan residents over 18 years of age have a driver's license issued by the Department of State.</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: DHS policy, PSM 713-1, effective February 1, 2010 requires the CPS worker to observe and document each caregiver and alleged perpetrator's photo identification (including, but not limited to, a driver's license or state-identification card); thereby ensuring that CPS workers are provided with the actual date of birth of the alleged perpetrator. The CPS worker is then required to document the correct date of birth in SWSS. DHS has prepared a systems work request that will allow for a CPS worker/user to enter a verification source field and text box field for driver's license, state identification, or other identification.</p> <p>Anticipated Implementation Date: The work request is pending prioritization. The next meeting is December 2, 2010. Once the work request is initialized, the end product will be available within three to six months.</p> <p>Update: 09-13-11 Since these audit findings were issued on 09-24-10, meetings with SWSS, DTMB and program office staff have been held to determine system changes needed in order to comply with the corrective action plans as submitted and approved. Resultant work requests were submitted to DTMB in the fall of 2010 for these changes. Timeframes were provided by SWSS and DTMB staff that those work request changes would be completed within 3-6 months. Follow-up occurred between the CPS program office and the SWSS/CPS staff in April 2011 and August 2011.</p> <p>The latest information provided to the CPS program office is that as a result of the prioritization of SACWIS, all work requests are being held in abeyance pending high-level DHS re-prioritization. The program office received this information via e-mail on August 10, 2011.</p> <p>Deficiencies identified with SWSS application will be evaluated as part of the SACWIS application development. The anticipated implementation date is changed to March 1, 2012, to follow-up with the SACWIS development team to determine confirm that the deficiency is addressed in the new system.</p> <p>Barriers: IT staffing resources.</p> <p>Responsible Administration(s): Children's Services</p>		

	Technology and Project Services
	Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Teresa Spalding, Director, Bureau of Technology and Project Services Laurie Johnson, SACWIS Project Manager
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Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Obtaining and Maintaining Perpetrator Identifying Information--Electronic Sec of State ID Information		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	3/1/2011	Status Requested	
Status Contact	stjohnl	Last Updated	
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS did not regularly obtain electronic Department of State identifying information for alleged perpetrators when inspection of the individual's driver's license or State identification card was not possible. DHS informed us that each local DHS office has access to electronic Department of State driver's license and State identification information; however, DHS typically uses the electronic Department of State information in only limited circumstances. For example, DHS reported that it used the electronic Department of State information to help identify alleged perpetrators in situations in which DHS received reports of alleged child abuse occurring in a parking lot and the reporter had only a vehicle license plate number. DHS informed us that DHS staff did not use the electronic Department of State identifying information on a routine basis to obtain and/or validate identifying information for alleged perpetrators</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: DHS will work with the Secretary of State to determine what improvements can be made to the process of obtaining electronic information from the Secretary of State.</p> <p>The work request is pending prioritization. The next meeting is December 2, 2010.</p> <p>Anticipated Implementation Date: Once the work request is initialized, the end product will be available within three to six months.</p> <p>The DMU will assist CPS program office in determining anticipated implementation dates related to systems changes that will ensure accurate information is input into Central Registry.</p> <p>Barriers: Prioritization of the work request has not occurred.</p> <p>08-10-11 Workers are required to verify, via photo identification, all adult clients at the time of complaint investigation. If workers are unable to verify identification by photo id, other sources are used for this verification including but not limited to the Secretary of State database, SWSS file information, law enforcement records, BRIDGES and court records.</p> <p>Responsible Administration(s): Children's Services</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services</p>		
Recoupment Recommended	N/A		
Recoupment Comments			
OIA Status	Approved		
OIA Comments			

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View Audit 2009252 Finding 05c - 9/22/2011

Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Obtaining and Maintaining Perpetrator Identifying Information-Periodic Updates of Perpetrator Info		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	3/1/2011	Status Requested	
Status Contact	stjohnl	Last Updated	
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS did not periodically obtain and/or update perpetrator identifying information in the Central Registry database. The CPL requires DHS to maintain records for perpetrators of CA/N in the Central Registry until the perpetrator's death or the perpetrator has the Central Registry record expunged. However, DHS did not have a process to periodically obtain and record updated identifying information for Central Registry perpetrators from either the perpetrators or other external sources. As a result, DHS's Central Registry likely contains a significant amount of outdated and/or incorrect key identifying information for substantiated perpetrators of CA/N. For example, DHS's Central Registry likely contains the incorrect last name for female perpetrators who married and changed their last name subsequent to their substantiation as a perpetrator of CA/N.</p> <p>DHS should consider periodically performing an electronic comparison of its Central Registry database perpetrator identifying information to the Department of State driver's license information. Performing periodic comparisons of Central Registry perpetrator identifying information to Department of State identifying information could help DHS obtain updated and validated identifying information for Central Registry perpetrators. Section 257.208c (3)(a) of the Michigan Compiled Laws allows the Department of State to provide names, addresses, driver's license numbers, and telephone numbers from its driver file to DHS to carry out DHS's State agency functions.</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: DHS will work with the Secretary of State to determine what improvements can be made to the process of obtaining electronic information from the Secretary of State.</p> <p>Anticipated Implementation Date: The work request is pending prioritization. The next meeting is December 2, 2010. Once the work request is initialized the end product will be available within three to six months.</p> <p>Barriers: Prioritization of the work request has not occurred.</p> <p>Update 08-10-11: DHS has studied the various options available for updating and/or validating information on all perpetrators on the Central Registry database. Policy requires that all client information be updated as it becomes known to DHS via a variety of sources. Information is updated and/or validated on everyone involved in a complaint including those already listed on the Registry. While it is true that the MCL allow the Department of State to provide information from their files, given that the number of individuals on the Registry is in the hundreds of thousands, State resources do not allow ongoing validation for each one at all times.</p> <p>Responsible Administration(s): Children's Services</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services</p>		
Recoupment Recommended	N/A		
Recoupment Comments			
OIA Status	Approved		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Obtaining and Maintaining Perpetrator Identifying Information – Social Security Numbers		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS did not require CPS workers to attempt to obtain social security number (SSN) information for alleged perpetrators. It is important for DHS to obtain SSN information for alleged perpetrators because DHS often relies on SSN information as a key identification element to help detect and prevent situations in which substantiated perpetrators of CA/N could gain access to children in vulnerable situations. For example, DHS relies on SSNs to identify perpetrators of CA/N who are applying to become, or currently are, enrolled child day-care providers or unlicensed foster care providers. However, as of September 30, 2008, 84,586 (25%) of DHS's Central Registry perpetrator records did not contain an SSN for the perpetrator. As a result, DHS failed to detect and prevent situations in which substantiated perpetrators of CA/N had access to vulnerable children in enrolled child day-care and unlicensed foster care settings (see Findings 8 and 9).</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: The SWSS application provides for a cross reference regarding information input into SWSS with the Bridges Master Client Index. The SWSS application edits for a match with the person's name and date of birth. When a match occurs, the SWSS application then fills the social security number and recipient ID from Bridges into the SWSS-CPS case. SWSS does not require a social security number. DHS will not require workers to request social security number information from alleged perpetrators.</p> <p>Anticipated Implementation Date: implemented</p> <p>Barriers: None.</p> <p>Responsible Administration(s): Children's Services</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services</p>		
Recoupment Recommended			
Recoupment Comments			
OIA Status	Approved		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Obtaining and Maintaining Perpetrator Identifying Information--Validating Social Security Numbers		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS did not have a process established with SSA to validate the social security numbers that DHS recorded in the Central Registry for substantiated perpetrators of child abuse and neglect. DHS relies on a system control which confirms that the nine-digit social security number combination entered by DHS staff is a possible social security number digit combination used by the SSA. However, DHS's system control did not validate that the social security number entered by DHS staff was a valid social security number issued by the SSA and that the social security number entered belonged to the perpetrator for whom it was entered.</p> <p>DHS had a process in place to validate social security numbers recorded for individuals in other DHS systems with the SSA; however, DHS had not established a similar process for the social security numbers recorded in the Central Registry for substantiated perpetrators of child abuse and neglect. DHS also stated that the social security number information maintained in the Central Registry for some perpetrators was obtained from CIMS and those social security numbers were validated with the SSA (see part g. of this finding).</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: The SWSS application provides for a cross reference regarding information input into SWSS with the Bridges Master Client Index. The SWSS application edits for a match with the person's name and date of birth. When a match occurs, the SWSS application then fills the social security number and recipient ID from Bridges into the SWSS-CPS case. SWSS does not require a social security number.</p> <p>Anticipated Implementation Date: implemented</p> <p>Barriers: n/a</p> <p>Responsible Administration(s): Children's Services</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services</p>		
Recoupment Recommended			
Recoupment Comments			
OIA Status	Approved		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Obtaining and Maintaining Perpetrator Identifying Information--Date of Birth		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	3/1/2012	Status Requested	
Status Contact	stjohnl	Last Updated	9/14/2011
Status	Open	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding:</p> <p>DHS did not require its staff to obtain and record a perpetrator's actual date of birth in the Central Registry, and it permitted staff to enter an estimated date of birth without indicating that the date of birth recorded for the perpetrator was estimated and not actual. As a result, an undeterminable number of perpetrator records currently exist in the Central Registry with an estimated, and potentially inaccurate, date of birth. DHS relies on the date of birth information recorded in the Central Registry as a key identification element for perpetrators when conducting clearances of the Central Registry. For example, DHS uses the date of birth information recorded in the Central Registry to help detect situations in which perpetrators of CAVN are applying to become, or currently are, licensed or registered childcare providers or unlicensed foster care providers. Consequently, it is important for DHS to obtain actual date of birth information for perpetrators whenever possible and to identify records with estimated date of birth information.</p> <p>DHS staff commonly entered a January 1, 1901 date of birth when a perpetrator's date of birth was not known. The auditor reviewed the Central Registry perpetrator date of birth information as of September 30, 2008, and determined that 11,187 (3 percent) perpetrator records contained a birth date of January 1, 1901, a date of birth of January 1 in other years in a much higher frequency than would normally be expected. Prior to July 2007, DHS did not require DHS staff to identify a Central Registry perpetrator record with estimated date of birth information. As a result, DHS cannot determine the total number of Central Registry records that contain an inaccurate date of birth for the perpetrator.</p> <p>In July 2007, DHS enacted policy and established SWSS-CPS system controls to help ensure that DHS staff entered actual date of birth information for perpetrators. However, DHS stated staff could easily circumvent the SWSS-CPS system controls established in July 2007 and enter an estimated date of birth for a perpetrator.</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: DHS policy, PSM 713-1, effective February 1, 2010 requires the CPS worker to observe and document each caregiver and alleged perpetrator's photo identification (including, but not limited to, a driver's license or state-identification card); thereby ensuring that CPS workers are provided with the actual date of birth of the alleged perpetrator. The CPS worker is then required to document the correct date of birth in SWSS. DHS has prepared a systems work request that will allow for a CPS worker/user to enter a verification source field and text box field for driver's license, state identification, or other identification.</p> <p>The SWSS application provides a cross reference regarding information input into SWSS with the Bridges master client index application. Therefore the SWSS application edits for a match with the person's name and date of birth. When the cross reference between SWSS and Bridges indicates more than one possible match, the CPS worker is to verify the actual date of birth based on the information received when the alleged perpetrator's identification was viewed. The CPS worker then chooses the correct match which is then connected to the appropriate recipient ID ensuring that the actual date of birth is correct.</p> <p>This corrective action has been partially completed as the policy is in place for workers to view identification of the alleged perpetrator. This piece will act to ensure that, until the systems work request is completed, workers are verifying the identity of the person, which includes their date of birth.</p> <p>The work request is pending prioritization. The next meeting is December 2, 2010.</p> <p>Anticipated Implementation Date: Once the work request is initialized the end product will be available within three to six months.</p> <p>Update: 09-13-11 Since these audit findings were issued on 09-24-10, meetings with SWSS, DTMB and program office staff have been held to determine system changes needed in order to comply with the corrective action plans as</p>		

submitted and approved. Resultant work requests were submitted to DTMB in the fall of 2010 for these changes. Timeframes were provided by SWSS and DTMB staff that those work request changes would be completed within 3-6 months. Follow-up occurred between the CPS program office and the SWSS/CPS staff in April 2011 and August 2011.

The latest information provided to the CPS program office is that as a result of the prioritization of SACWIS, all work requests are being held in abeyance pending high-level DHS re-prioritization. The program office received this information via e-mail on August 10, 2011.

Deficiencies identified with SWSS application will be evaluated as part of the SACWIS application development. The anticipated implementation date is changed to March 1, 2012, to follow-up with the SACWIS development team to determine confirm that the deficiency is addressed in the new system.

Barriers:
IT staffing resources.

Responsible Administration(s):
Children's Services

Responsible Individual(s), Name(s), Title(s):
Steve Yager, Acting Director, Children's Services
Suzanne Stiles Burke, Director, Bureau of Child Welfare
Colin Parks, Acting Manager, Children's Protective Services

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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Obtaining and Maintaining Perpetrator Identifying Information--Limited or Non-Validated Information		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS relied on limited and often nonvalidated identifying information from other DHS internal data systems as a primary source of identifying information for alleged perpetrators. DHS staff used SWSS-CPS and CIMS as primary sources to obtain identifying information for alleged perpetrators of CA/N. However, the identifying information available in these DHS internal data systems is limited and only included information for individuals who either were associated with a previous CPS investigation or were previously a DHS assistance client.</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: CPS policy, PSM 713-1 states the following: "During the investigation, CPS must attempt to verify the information listed in the Case Member tab of the Investigation module of SWSS CPS. Special attention must be given to obtaining proper/legal names and accurate birthdates. If information entered at intake is incorrect, update the information in the Case Member tab prior to disposing of the case." This policy in addition to the previously mention systems interface mechanisms will provide the validation recommended.</p> <p>Anticipated Implementation Date: implemented</p> <p>Barriers: n/a</p> <p>Responsible Administration(s): Children's Services Technology and Project Services</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Teresa Spalding, Director, Bureau of Technology and Project Services Laurie Johnson, SACWIS Project Manager</p>		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Obtaining and Maintaining Perpetrator Identifying Information-Secondary Review/Approval Key ID Info		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS did not require secondary review and/or supervisory approval of the key identifying information recorded for perpetrators of CA/N prior to transferring the identifying information from SWSS-CPS to the Central Registry. When DHS substantiates that an individual is a perpetrator of CA/N, the identifying information recorded in SWSS-CPS by DHS staff during the investigation is automatically transferred to the Central Registry. It is important for DHS to require review and/or approval of key identifying fields for substantiated perpetrators of CA/N, prior to inclusion in the Central Registry, to help ensure that the key identifying information DHS relies on during Central Registry clearances is accurate and complete.</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: The SWSS and Bridges systems interface occurs automatically at the point that the worker completes that disposition work for the CPS investigation as well as when the supervisor approves the disposition. It would be duplicative for a secondary review of the information that has already been validated electronically. Supervisory approval periods have been changed via policy from a 30 day standard of promptness to a 14 day standard of promptness as of August 1, 2010.</p> <p>Anticipated Implementation Date: n/a</p> <p>Barriers: n/a</p> <p>Responsible Administration(s): Children's Services Field Services Technology and Project Services</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Scott Parrott, Director, Child Welfare Field Operations Terry Beurer, Acting Director, Field Services Local Office Directors Teresa Spalding, Director, Bureau of Technology and Project Services Laurie Johnson, SACWIS Project Manager</p>		
Recoupment Recommended			
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OIA Status	Approved		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Converting Electronic Perpetrator Records--Processing Log		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding:</p> <p>1. DHS did not maintain a processing log of the Central Registry perpetrator data conversion process. A processing log of the multiple data conversion processes is a necessary tool to provide management with evidence that the conversion has been executed as planned.</p> <p>2. DHS and DTMB did not maintain documentation of the analysis and correction of errors that occurred during conversion. Therefore, DHS and DTMB had no evidence of the coding associated with errors that occurred during the conversion, corrective action taken, the person who made the corrections, or the date and times the data was corrected.</p> <p>3. DHS and DTMB did not prepare data conversion test plans or maintain results of the tests. It is important for DHS and DTMB to document data conversion test plans and test results so that DHS management can maintain oversight through approval of conversion plans and review and acceptance of conversion testing results, and provide evidence of a successful data conversion.</p> <p>DHS and DTMB did not perform quality reviews to ensure the accurate and complete conversion of Central Registry perpetrator data. DTMB did not perform a structured walkthrough of the program logic and DHS did not continuously update the Central Registry requirements specification document. Structured walkthroughs could have helped DHS and DTMB identify errors in their program logic that caused conversion errors. For example, a review of the program logic found that DHS and DTMB incorrectly loaded the Central Registry aliases table with the same information contained in the database for the perpetrator's primary name, rather than loading the table with the perpetrator's alias(es).</p> <p>Response: DHS agrees with the finding, in part.</p> <p>Corrective Action Plan: DHS agrees a log was not maintained. However, DHS and DTMB ensured that data counts were verified between old files and new files. DHS randomly reviewed records to ensure the conversion was correct. DHS and DTMB will maintain conversion documentation according to established standards for new projects.</p> <p>Anticipated Implementation Date: n/a</p> <p>Barriers: n/a</p> <p>Responsible Administration(s): Children's Services Technology and Project Services DTMB</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Teresa Spalding, Director, Bureau of Technology and Project Services Laurie Johnson, SACWIS Project Manager Jim Hogan, Information Officer, DTMB</p>		
Recoupment Recommended			
Recoupment Comments			
OIA Status	Approved		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Converting Electronic Perpetrator Records–Project Plan		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS and DTMB did not prepare and use a project plan for the electronic conversion of Central Registry perpetrator database records. As a result, DHS and DTMB could not ensure and/or demonstrate that perpetrator records were accurately and completely converted from the former database to the current SWSS-CPS Central Registry database.</p> <p>DHS and DTMB did not prepare written documents of the information needs of the Central Registry databases. For example, DHS and DTMB did not document mapping procedures between the databases. DHS and DTMB could have used mapping procedures as a tool to demonstrate how perpetrator data from the former Central Registry database was transformed and identified in the current SWSS-CPS Central Registry database.</p> <p>Response: DHS and DTMB agree with the finding.</p> <p>Corrective Action Plan: DHS and DTMB will maintain conversion documentation according to established standards for new projects.</p> <p>Anticipated Implementation Date: n/a</p> <p>Barriers: n/a</p> <p>Responsible Administration(s): Children's Services Technology and Project Services DTMB</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Teresa Spalding, Director, Bureau of Technology and Project Services Laurie Johnson, SACWIS Project Manager Jim Hogan, Information Officer, DTMB</p>		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Converting Electronic Perpetrator Records—Segregation of Duties		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding:</p> <p>1. DTMB did not maintain segregation of duties for the data extraction process. Rather than assigning the extraction process to DTMB's Data Center Operations (DCO) staff, who are responsible for performing, controlling, and scheduling production jobs on the mainframe, DTMB's Software Support staff performed the extraction of the Central Registry perpetrator data from the former Central Registry database for loading into the SWSS-CPS Central Registry database. Segregation of duties between DTMB's DCO staff and DTMB's Software Support staff is necessary to ensure that only appropriately verified and approved programs are run. Such segregation ensures that those familiar with detailed processes and controls of a system, such as DTMB's Software Support staff, are not in a position to access and modify that system when it is processing live production data.</p> <p>2. DTMB did not maintain a segregation of duties between the development of the SWSS-CPS Central Registry database and the transformation and load of perpetrator data into the SWSS-CPS Central Registry database. DTMB reported that the same employee who developed the SWSS-CPS Central Registry database was also responsible for transforming and loading the Central Registry data into the SWSS-CPS Central Registry database. It is important for DTMB to maintain proper segregation of duties to help reduce the risk of errors and data manipulation during the conversion of Central Registry perpetrator records.</p> <p>Response: DTMB agrees with the finding.</p> <p>Corrective Action Plan: DTMB will maintain separation of duties for new projects.</p> <p>Anticipated Implementation Date: n/a</p> <p>Barriers: n/a</p> <p>Responsible Administration: DTMB</p> <p>Responsible Individual(s), Name(s), Title(s): Jim Hogan, Information Officer, DTMB</p>		
Recoupment Recommended			
Recoupment Comments			
OIA Status	Approved		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Converting Electronic Perpetrator Records—Reconciliations During Conversion		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DTMB did not perform reconciliations of key database fields at the date of conversion to help ensure that the perpetrator data was accurately and completely converted.</p> <p>DTMB did not use control totals on key fields of the original file and the converted SWSS-CPS files to ensure that data transferred accurately and completely</p> <p>Response: DTMB agrees with the finding, in part.</p> <p>DTMB agrees documentation was not maintained. However, DTMB did do reconciliations and DHS randomly reviewed records to ensure the conversion was correct.</p> <p>Corrective Action Plan: DTMB will maintain conversion documentation according to established standards for new projects.</p> <p>Anticipated Implementation Date: n/a</p> <p>Barriers: n/a</p> <p>Responsible Administration: DTMB</p> <p>Responsible Individual(s), Name(s), Title(s): Jim Hogan, Information Officer, DTMB</p>		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Converting Electronic Perpetrator Records--Maintaining Records in a Secured Environment		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DTMB did not maintain the Central Registry perpetrator data in a secure environment during the conversion. As a result, DTMB significantly increased the risk that perpetrator data was not accurately and completely converted from the former database to DHS's current SWSS-CPS Central Registry database.</p> <p>DTMB's Systems Development staff transferred the Central Registry perpetrator data to their personal workstation from the more secured mainframe environment during conversion. DTMB staff informed us that they transformed, and in some cases corrected, perpetrator data on their personal workstation before transferring it to the more secured SWSS-CPS database server. For example, after DTMB's Systems Development staff ran the initial conversion program, the program identified invalid characters in several SSNs. The systems developer manually corrected these invalid characters on the personal workstation and then re-ran the conversion program to complete the conversion. It is important for DTMB to transfer, transform, and load data in a secure environment so that changes to the data made during the conversion process are tracked and can be monitored (see part a. of this finding).</p> <p>Response: DTMB agrees with the finding.</p> <p>Corrective Action Plan: DTMB will perform conversions in secure environments for future projects. All data changes will be approved by DHS and the changes will be tracked and monitored.</p> <p>Anticipated Implementation Date: n/a</p> <p>Barriers: n/a</p> <p>Responsible Administration: DTMB</p> <p>Responsible Individual(s), Name(s), Title(s): Jim Hogan, Information Officer, DTMB</p>		
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View Audit 2009252 Finding 07a1 - 9/22/2011

Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Accessing and Editing Perpetrator Records--User Access with No Approver Name		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	3/1/2012	Status Requested	
Status Contact	stjohnl	Last Updated	9/14/2011
Status	Open	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS had not established a system control to prevent a user from obtaining SWSS-CPS access if the approver's name was not also entered into the system. DHS granted access to 125 (24 percent) of the 515 local office SWSS-CPS users with supervisory level access during the period October 1, 2005 through September 30, 2008 without an approver's name entered into the system. Although DHS had established a SWSS-CPS system control that prevented worker level users from obtaining SWSS-CPS access when the approver's name was not entered into the system, DHS had not established the same system control for SWSS-CPS supervisory level users. Both worker and supervisory level SWSS-CPS users have the capability to edit perpetrator identifying information [see part b.(1) of this finding].</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: DHS has prepared a systems work request that includes a change to SWSS staff profiles. Currently, SWSS has a supervisor field under worker relationships that is required to be completed for a worker only. However, when the system change is implemented this field will be a mandatory field for all profiles.</p> <p>The work request is pending prioritization. The next meeting is December 2, 2010.</p> <p>Anticipated Implementation Date: Once the work request is initialized the end product will be available within three to six months.</p> <p>Update: 09-13-11 Since these audit findings were issued on 09-24-10, meetings with SWSS, DTMB and program office staff have been held to determine system changes needed in order to comply with the corrective action plans as submitted and approved. Resultant work requests were submitted to DTMB in the fall of 2010 for these changes. Timeframes were provided by SWSS and DTMB staff that those work request changes would be completed within 3-6 months. Follow-up occurred between the CPS program office and the SWSS/CPS staff in April 2011 and August 2011.</p> <p>The latest information provided to the CPS program office is that as a result of the prioritization of SACWIS, all work requests are being held in abeyance pending high-level DHS re-prioritization. The program office received this information via e-mail on August 10, 2011.</p> <p>Deficiencies identified with SWSS application will be evaluated as part of the SACWIS application development. The anticipated implementation date is changed to March 1, 2012, to follow-up with the SACWIS development team to determine confirm that the deficiency is addressed in the new system.</p> <p>Barriers: IT staffing resources.</p> <p>Responsible Administration(s): Children's Services Field Services Technology and Project Services</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Scott Parrott, Director, Child Welfare Field Operations Terry Beurer, Acting Director, Field Services Local Office Directors Teresa Spalding, Director, Bureau of Technology and Project Services</p>		

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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Accessing and Editing Perpetrator Records—User and Approver with Same Name		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	3/1/2012	Status Requested	
Status Contact	stjohnl	Last Updated	9/14/2011
Status	Open	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS had not established a system control to prevent SWSS-CPS access for users whose own name was entered as the approver for their access. DHS granted SWSS-CPS access to 13 users whose own name was entered as the approver for the access.</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: DHS has prepared a systems work request that includes a change to SWSS staff profiles, which currently allows for the same name under user and Supervisor. The work request provides for an edit to ensure that the name entered into the supervisor field is not the same as the user.</p> <p>The work request is pending prioritization. The next meeting is December 2, 2010. Anticipated</p> <p>Implementation Date: Once the work request is initialized the end product will be available within three to six months.</p> <p>Update: 09-13-11 Since these audit findings were issued on 09-24-10, meetings with SWSS, DTMB and program office staff have been held to determine system changes needed in order to comply with the corrective action plans as submitted and approved. Resultant work requests were submitted to DTMB in the fall of 2010 for these changes. Timeframes were provided by SWSS and DTMB staff that those work request changes would be completed within 3-6 months. Follow-up occurred between the CPS program office and the SWSS/CPS staff in April 2011 and August 2011.</p> <p>The latest information provided to the CPS program office is that as a result of the prioritization of SACWIS, all work requests are being held in abeyance pending high-level DHS re-prioritization. The program office received this information via e-mail on August 10, 2011.</p> <p>Deficiencies identified with SWSS application will be evaluated as part of the SACWIS application development. The anticipated implementation date is changed to March 1, 2012, to follow-up with the SACWIS development team to determine confirm that the deficiency is addressed in the new system.</p> <p>Barriers: IT staffing resources.</p> <p>Responsible Administration(s): Children's Services Field Services Technology and Project Services</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Scott Parrott, Director, Child Welfare Field Operations Terry Beurer, Acting Director, Field Services Local Office Directors Teresa Spalding, Director, Bureau of Technology and Project Services</p>		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Accessing and Editing Perpetrator Records--Terminating System Access When Job Functions Change		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	3/1/2012	Status Requested	
Status Contact	stjohnl	Last Updated	9/14/2011
Status	Open	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS had not established internal control to help ensure that it always terminated SWSS-CPS access when the user changed job functions within DHS and access to SWSS-CPS was no longer appropriate. DHS generated a monthly report of departed employees to help ensure that SWSS-CPS access is terminated for users who leave DHS employment. However, DHS's monthly report did not identify users who transferred positions within DHS and no longer required SWSS-CPS access.</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: DHS has prepared a systems work request that will provide the local offices the ability to print a report for the local office security coordinators that can then be reconciled with current persons on staff to ensure that when a person leaves their job in children's services, they no longer have access to SWSS and Central Registry.</p> <p>The work request is pending prioritization. The next meeting is December 2, 2010.</p> <p>Anticipated Implementation Date: Once the work request is initialized the end product will be available within three to six months.</p> <p>Update: 09-13-11 Since these audit findings were issued on 09-24-10, meetings with SWSS, DTMB and program office staff have been held to determine system changes needed in order to comply with the corrective action plans as submitted and approved. Resultant work requests were submitted to DTMB in the fall of 2010 for these changes. Timeframes were provided by SWSS and DTMB staff that those work request changes would be completed within 3-6 months. Follow-up occurred between the CPS program office and the SWSS/CPS staff in April 2011 and August 2011.</p> <p>The latest information provided to the CPS program office is that as a result of the prioritization of SACWIS, all work requests are being held in abeyance pending high-level DHS re-prioritization. The program office received this information via e-mail on August 10, 2011.</p> <p>Deficiencies identified with SWSS application will be evaluated as part of the SACWIS application development. The anticipated implementation date is changed to March 1, 2012, to follow-up with the SACWIS development team to determine confirm that the deficiency is addressed in the new system.</p> <p>Barriers: IT staffing resources.</p> <p>Responsible Administration(s): Children's Services Field Services Technology and Project Services</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Scott Parrott, Director, Child Welfare Field Operations Terry Beurer, Acting Director, Field Services Local Office Directors Teresa Spalding, Director, Bureau of Technology and Project Services</p>		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Accessing and Editing Perpetrator Records--Monitoring Access Granting Activity		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	3/1/2012	Status Requested	
Status Contact	stjohnl	Last Updated	9/14/2011
Status	Open	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS did not monitor the access granting activities of the local office security coordinators and application security staff that provided or modified access capability levels for SWSS-CPS users. DHS stated that it could not determine which local office security coordinators and application security staff member granted SWSS-CPS access to users or modified the users' capabilities.</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: DHS has prepared a systems work request that will provide the local offices the ability to print a report for the local office administration showing staff access adds and modifications that can then be reconciled with current staff to ensure that when a person leaves their job in children's services, they no longer have access to SWSS and Central Registry. This report will also allow administrators to review and monitor the activities of the local office security coordinator.</p> <p>The work request is pending prioritization. The next meeting is December 2, 2010.</p> <p>Anticipated Implementation Date: Once the work request is initialized the end product will be available within three to six months.</p> <p>Update: 09-13-11 Since these audit findings were issued on 09-24-10, meetings with SWSS, DTMB and program office staff have been held to determine system changes needed in order to comply with the corrective action plans as submitted and approved. Resultant work requests were submitted to DTMB in the fall of 2010 for these changes. Timeframes were provided by SWSS and DTMB staff that those work request changes would be completed within 3-6 months. Follow-up occurred between the CPS program office and the SWSS/CPS staff in April 2011 and August 2011.</p> <p>The latest information provided to the CPS program office is that as a result of the prioritization of SACWIS, all work requests are being held in abeyance pending high-level DHS re-prioritization. The program office received this information via e-mail on August 10, 2011.</p> <p>Deficiencies identified with SWSS application will be evaluated as part of the SACWIS application development. The anticipated implementation date is changed to March 1, 2012, to follow-up with the SACWIS development team to determine confirm that the deficiency is addressed in the new system.</p> <p>Barriers: IT staffing resources.</p> <p>Responsible Administration(s): Children's Services Field Services Technology and Project Services</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Scott Parrott, Director, Child Welfare Field Operations Terry Beurer, Acting Director, Field Services Local Office Directors Teresa Spalding, Director, Bureau of Technology and Project Services</p>		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009

Finding Description	Accessing and Editing Perpetrator Records—Edits to Key Perpetrator Identification Fields		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	3/1/2012	Status Requested	
Status Contact	stjohnl	Last Updated	9/14/2011
Status	Open	Last Updated By	stjohnl

Corrective Action Plan	<p>Finding: DHS needs to improve internal control to help ensure that edits made to key perpetrator identification fields by SWSS-CPS users and Central Registry custodians are appropriate.</p> <ol style="list-style-type: none"> DHS did not require secondary review or supervisory approval of edits made by SWSS-CPS users to key perpetrator identification fields via the corrections made in the SWSS-CPS investigations module. DHS did not require secondary review of edits made by Central Registry database custodians to key perpetrator identification fields either using the SWSS-CPS investigations module or making edits directly to the Central Registry database. DHS did not monitor the edits made to key perpetrator identification fields by either SWSS-CPS users or database custodians. DHS did not maintain a historical record, or generate periodic reports, of edits made affecting key perpetrator identification fields in the Central Registry. Without a historical record or periodic reports of edits, DHS could not monitor edits to key perpetrator identification fields for propriety. <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: DHS has prepared a systems work request so SWSS CPS stores inquiry information in the Central Registry module. The inquiry information that will be stored is: who completed the search, the date and time it was completed, the names in the search, and any modifications made to perpetrator information. Once the report has been created DHS will develop procedures for using the report to monitor edit activity.</p> <p>The work request is pending prioritization. The next meeting is December 2, 2010.</p> <p>Anticipated Implementation Date: Once the work request is initialized the end product will be available within three to six months.</p> <p>Update: 09-13-11 Since these audit findings were issued on 09-24-10, meetings with SWSS, DTMB and program office staff have been held to determine system changes needed in order to comply with the corrective action plans as submitted and approved. Resultant work requests were submitted to DTMB in the fall of 2010 for these changes. Timeframes were provided by SWSS and DTMB staff that those work request changes would be completed within 3-6 months. Follow-up occurred between the CPS program office and the SWSS/CPS staff in April 2011 and August 2011.</p> <p>The latest information provided to the CPS program office is that as a result of the prioritization of SACWIS, all work requests are being held in abeyance pending high-level DHS re-prioritization. The program office received this information via e-mail on August 10, 2011.</p> <p>Deficiencies identified with SWSS application will be evaluated as part of the SACWIS application development. The anticipated implementation date is changed to March 1, 2012, to follow-up with the SACWIS development team to determine confirm that the deficiency is addressed in the new system.</p> <p>Barriers: IT staffing resources.</p> <p>Responsible Administration(s): Children's Services Field Services Technology and Project Services</p> <p>Responsible Individual(s), Name(s), Title(s):</p>
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	Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Scott Parrott, Director, Child Welfare Field Operations Terry Beurer, Acting Director, Field Services Local Office Directors Teresa Spalding, Director, Bureau of Technology and Project Services
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Automated Clearance Processes--Social Security Number		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS's automated Central Registry clearance processes for enrolled child day-care providers and unlicensed child foster care providers excluded Central Registry perpetrator records that did not contain an SSN and for which an SSN was also not found in DHS's Customer Information Management System (CIMS) for the perpetrator. In addition, DHS and DTMB excluded Central Registry perpetrator records from these processes when the record contained an invalid SSN (see Finding 5, part d.). As a result, DHS and DTMB routinely excluded approximately 85,000 (25%) Central Registry perpetrator records from both of the automated clearance processes.</p> <p>Response: DHS and DTMB agree with the finding.</p> <p>Corrective Action Plan: While the clearance process for unlicensed foster care providers did not provide all of the information needed, there is child welfare policy in place which ensures that the appropriate DHS staff members are aware of any situation in which an unlicensed child foster care provider has been placed on Central Registry subsequent to foster children being placed into the provider's home.</p> <p>CPS policy requires the CPS worker to contact the foster care worker when investigating a situation involving foster children in the home of either a licensed or unlicensed provider. The foster care worker is therefore aware of the allegations and that an investigation is taking place. If, during the course of the CPS investigation, it is determined that the children in the provider's home are at imminent risk of harm, CPS must take action to ensure child safety. This action may result in the children being removed from the provider's home. When the CPS investigation is completed, a copy of the CPS Safety Assessment and the CPS Investigation Summary (DHS-154) must be forwarded to the DHS or private agency foster care supervisor(s) of the worker with the active foster care case(s) for the children in the provider's home, and if appropriate, the DHS or private agency foster home certification supervisor, within two (2) working days of completion of the report. Therefore, all persons responsible for the safety and well being of any children within the provider's home are notified of the outcome of the CPS investigation.</p> <p>An automated search function now occurs daily and provides matches on numerous identifiers, such as SSN, name (including those using a middle name or middle initial), date of birth, etc.</p> <p>Anticipated Implementation Date: n/a, implemented</p> <p>Barriers: n/a</p> <p>Responsible Administration(s): Children's Services Technology and Project Services DTMB</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Teresa Spalding, Director, Bureau of Technology and Project Services Laurie Johnson, SACWIS Project Manager Jim Hogan, Information Officer, DTMB</p>		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Automated Clearance Processes--Middle Name or Initial		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS's automated Central Registry clearance process for unlicensed child foster care providers did not include Central Registry perpetrator records that contained a middle name or middle initial. As a result, DHS and DTMB routinely excluded approximately 134,000 (40%) Central Registry perpetrator records from the automated clearance process.</p> <p>Response: DHS and DTMB agree with the finding.</p> <p>Corrective Action Plan: An automated search function now occurs daily and provides matches on numerous identifiers, such as SSN, name (including those using a middle name or middle initial), date of birth, etc.</p> <p>Anticipated Implementation Date: implemented</p> <p>Barriers: n/a</p> <p>Responsible Administration(s): Children's Services Technology and Project Services DTMB</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Teresa Spalding, Director, Bureau of Technology and Project Services Laurie Johnson, SACWIS Project Manager Jim Hogan, Information Officer, DTMB</p>		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Automated Clearance Processes--Same Social Security Number		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS's automated Central Registry clearance process for unlicensed child foster care providers did not include Central Registry perpetrator records when the record had the same SSN as another Central Registry perpetrator record. DHS and DTMB eliminated the records even when the records contained name and DOB information. As a result, DHS and DTMB routinely excluded 2,100 (less than 1%) Central Registry perpetrator records from the automated clearance process.</p> <p>Response: DHS and DTMB agree with the finding.</p> <p>Corrective Action Plan: While the match criteria is as stated, there is child welfare policy in place which ensures that the appropriate DHS staff members are aware of any situation in which an unlicensed child foster care provider(s) has been placed on Central Registry, subsequent to foster children being placed into the provider's home.</p> <p>The policy requires the CPS worker to contact the foster care worker when investigating a situation involving foster children in the home of either a licensed or unlicensed provider. The foster care worker is therefore aware of the allegations and that an investigation is taking place. If, during the course of the CPS investigation, it is determined that the children in the provider's home are at imminent risk of harm, CPS must take action to ensure child safety. This action may result in the children being removed from the provider's home. When the CPS investigation is completed, a copy of the CPS Safety Assessment and the CPS Investigation Summary (DHS-154) must be forwarded to the DHS or private agency foster care supervisor(s) of the worker with the active foster care case(s) for the children in the provider's home, and if appropriate, the DHS or private agency foster home certification supervisor, within two (2) working days of completion of the report. Therefore all persons responsible for the safety and well being of any children within the provider's home, are notified of the outcome of the CPS investigation.</p> <p>An automated search function now occurs daily and provides matches on numerous identifiers, such as SSN, name (including those using a middle name or middle initial), date of birth, etc.</p> <p>Anticipated Implementation Date: implemented</p> <p>Barriers: n/a</p> <p>Responsible Administration(s): Children's Services Technology and Project Services DTMB</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Teresa Spalding, Director, Bureau of Technology and Project Services Laurie Johnson, SACWIS Project Manager Jim Hogan, Information Officer, DTMB</p>		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Automated Clearance Processes--Inclusion of Records for Prior Eight Days		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS's automated Central Registry clearance process for licensed child day-care providers, licensed foster care providers, individuals associated with licensed child day-care providers and licensed foster care providers, active chief administrators and licensees of children's camps, child caring institutions, and child placing agencies did not include perpetrator records added to the Central Registry prior to the last eight calendar days. Consequently, the automated clearance process only included, on average, 285 new perpetrators that DHS added to the Central Registry database within the previous eight calendar days rather than the entire population of 337,000 Central Registry perpetrators (also see part f. of this finding).</p> <p>DHS also relied on its manual Central Registry clearance process performed at the initial application and licensure of these providers, and associated individuals, to detect persons that DHS added to the Central Registry as perpetrators prior to licensure. However, internal control weaknesses existed in DHS's manual Central Registry clearance process, and DHS could not ensure that the process effectively identified perpetrators of CA/N (see Finding 9). Therefore, if DHS failed to detect an applicant's or associated individual's Central Registry perpetrator status at the time of the initial application and licensure using the manual Central Registry clearance process, DHS would likely fail to ever detect the provider's or associated individual's Central Registry perpetrator status.</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: The automated Central Registry clearance for licensed child care providers, licensed foster care providers, individuals associated with licensed child care providers and licensed foster care providers, active chief administrators and licensees of children's camps, child caring institutions, and child placing agencies was 99.9 percent effective in identifying perpetrators on the Central Registry. To immediately strengthen this process the Central Registry records from the prior eight days are saved and included in the ongoing automated clearance process. The Bureau of Children and Adult Licensing (BCAL) has always conducted checks on aliases at initial application and manually documenting the results on the licensing record clearance (BCAL-1326) but will now include checks with SSNs and aliases on the automated process to further strengthen this process.</p> <p>Anticipated Implementation Date: implemented</p> <p>Responsible Administration: Children's Services Bureau of Child and Adult Licensing</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services James Gale, Director, Bureau of Child and Adult Licensing</p>		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Automated Clearance Processes--Inclusion of Records During Conversion		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS and DTMB did not include approximately 4,000 new perpetrators in the automated Central Registry processes that were added between the November 2007 conversion and March 2008. As a result, DHS and DTMB did not detect the Central Registry perpetrator status of 60 individuals whom DHS authorized for child day-care or foster care situations for times ranging from 1 week to over 4 months during this time.</p> <p>In November 2007, DHS and DTMB converted the former Central Registry perpetrator database to the new SWSS-CPS database and began adding records of new perpetrators to the SWSS-CPS database (see Finding 6). However, from November 2007 until March 2008, DHS and DTMB continued to extract and use perpetrator information from the former Central Registry database for the automated clearance processes rather than redirecting the extraction process to the new SWSS-CPS database.</p> <p>Response: DHS and DTMB agree with the finding.</p> <p>Corrective Action Plan: This issue was brought to the attention of the CPS Program Office and Field Operations Administration at the time it was occurring in late 2007. The local offices were issued instructions that required staff to complete manual Central Registry checks in both the new SWSS CPS system as well as the previous CIMS system to ensure that all history was appropriately noted and considered. DHS and DTMB redirected the extraction process to the new SWSS-CPS database in March 2008.</p> <p>Anticipated Implementation Date: Completed in March 2008</p> <p>Responsible Administration(s): Children's Services Field Services</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Scott Parrott, Director, Child Welfare Field Operations Terry Beurer, Acting Director, Field Services Local Office Directors</p>		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Automated Clearance Processes--Inclusion of Adult Household Members in the Clearance Processes		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS did not include the adult household members of enrolled child day-care providers or unlicensed foster care providers in the automated Central Registry clearance processes and relied solely on the manual Central Registry clearance process to determine the Central Registry status of these individuals at initial enrollment and thereafter. Therefore, because internal control weaknesses existed in DHS's manual Central Registry clearance process and DHS did not include the adult household members in the automated Central Registry clearance processes, DHS could not ensure that it effectively detected situations in which adult household members of enrolled child day-care providers and unlicensed foster care providers were Central Registry perpetrators either at initial enrollment or thereafter (also see Finding 9). DHS stated that it relied on the manual Central Registry clearance process to determine the Central Registry status of these adult household members because DHS did not always collect data on these individuals in an electronic format.</p> <p>Response: DHS agrees with the finding, in part. The facts are correct as stated. However, all household members receive a Central Registry check at initial placement. The named caregivers are also required to inform DHS when there are changes to the household composition and the DHS worker then completes manual checks of the new members of the household. Policy also requires the DHS worker to run quarterly manual checks of other adult household members as long as they remain in the home. In addition, there is policy in place which ensures that the appropriate DHS staff members are aware of a situation in which a provider(s) has been placed on Central Registry subsequent to foster children being placed into the home. CPS is required to contact the foster care worker when investigating a situation involving foster children in the home of either a licensed or unlicensed provider. Therefore, the foster care worker is aware of the allegations and the investigation that is taking place. If, during the course of the CPS investigation, it is determined that the children are at imminent risk of harm, CPS must take action to ensure child safety; often times by removal of the child(ren) from the provider's home. At the completion of the CPS investigation, a copy of the Safety Assessment and the Investigation Summary (DHS-154) must be forwarded to the DHS or private agency foster care supervisor(s) with the active foster care case(s) and if appropriate, the DHS or private agency foster home certification supervisor within two (2) working days of completion of the report. Therefore all persons responsible for the safety and well being of that child are notified as to the outcome of the CPS investigation.</p> <p>Anticipated Implementation Date: n/a</p> <p>Barriers:</p> <p>Responsible Administration(s): Children's Services Field Services</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Scott Parrott, Director, Child Welfare Field Operations Terry Beurer, Acting Director, Field Services Local Office Directors</p>		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Automated Clearance Processes--Use of Also Known As Information		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS and DTMB did not use available "also known as" (a.k.a.) name information in the automated Central Registry clearance processes. As a result, DHS and DTMB could not ensure that the automated Central Registry clearance processes identified perpetrators who had changed their names, e.g., female perpetrators who married and changed their last names. DHS and DTMB had access to a.k.a. name information for 276,000 perpetrators in the Central Registry database. In addition, DHS and DTMB had access to a.k.a. name information for 47,000 licensed childcare providers, licensed foster care providers, adult household members of licensed childcare and foster care providers, and the chief administrators and licensees of children's camps, childcaring institutions, and child placing agencies in the Bureau Information Tracking System (BITS) database.</p> <p>Response: DHS and DTMB agree with the finding.</p> <p>Corrective Action Plan: An automated search function now occurs daily and provides matches on numerous identifiers, such as SSN, name (including those using a middle name or middle initial), date of birth, etc.</p> <p>The automated Central Registry clearance for licensed child care providers, licensed foster care providers, individuals associated with licensed child care providers and licensed foster care providers, active chief administrators and licensees of children's camps, child caring institutions, and child placing agencies was 99.9% effective in identifying perpetrators on the Central Registry. To immediately strengthen this process the Central Registry records from the prior eight days are saved and included in the ongoing automated clearance process. The Bureau of Children and Adult Licensing (BCAL) has always conducted checks on aliases at initial application and manually documenting the results on the licensing record clearance request (BCAL-1326) but will now include checks with SSNs and aliases on the automated process to further strengthen this process.</p> <p>Anticipated Implementation Date: implemented</p> <p>Barriers: n/a</p> <p>Responsible Administration(s): Children's Services Technology and Project Services DTMB</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Teresa Spalding, Director, Bureau of Technology and Project Services Laurie Johnson, SACWIS Project Manager Jim Hogan, Information Officer, DTMB</p>		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009

Finding Description	Automated Clearance Processes--Use of Key Identification Information		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl

Corrective Action Plan	<p>Finding: DHS and DTMB did not always use all key identifying information available for Central Registry perpetrators as matching criteria in the automated Central Registry clearance match processes (see the "Description of Process" column in the table at the beginning of this finding). For example, DHS and DTMB used SSNs only to match enrolled child day-care providers to the Central Registry perpetrator file and disregarded name and DOB information for the automated match of enrolled child day-care providers with Central Registry perpetrators. Conversely, DHS and DTMB disregarded SSN information during the automated match of licensed and registered child day-care providers, licensed foster care providers, and chief administrators and licensees of children's camps, childcaring institutions, and child placing agencies to the Central Registry perpetrator file and relied solely on name and DOB information. Using highly restrictive criteria and ignoring available key identifying information significantly diminished the effectiveness of DHS's automated Central Registry clearance processes.</p> <p>In order to help improve effectiveness, DHS and DTMB should consider using an automated match process of Central Registry perpetrators to the individuals whom DHS has authorized to care for children, which compares multiple criterion and measures the degree of reliability for each match using a score of 0 percent to 100 percent. The process could then combine the scores for each match to determine an overall score and rank. This type of process could help DHS increase the effectiveness of its automated Central Registry match process in two ways: (1) utilizing all available identifying information contained in the Central Registry and the various other internal databases will produce more possible matches and (2) ranking the reliability of each match could help DHS allocate its limited resources.</p> <p>Response: DHS and DTMB agree with the finding.</p> <p>Corrective Action Plan: An automated search function now occurs daily and provides matches on numerous identifiers, such as SSN, name (including those using a middle name or middle initial), date of birth, etc.</p> <p>The automated Central Registry clearance for licensed child care providers, licensed foster care providers, individuals associated with licensed child care providers and licensed foster care providers, active chief administrators and licensees of children's camps, child caring institutions, and child placing agencies was 99.9% effective in identifying perpetrators on the Central Registry. To immediately strengthen this process the Central Registry records from the prior eight days are saved and included in the ongoing automated clearance process. The Bureau of Children and Adult Licensing (BCAL) has always conducted checks on aliases at initial application and manually documenting the results on the licensing record clearance request (BCAL-1326) but will now include checks with SSNs and aliases on the automated process to further strengthen this process.</p> <p>Anticipated Implementation Date: implemented</p> <p>Barriers: n/a</p> <p>Responsible Administration(s): Children's Services Technology and Project Services DTMB</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Teresa Spalding, Director, Bureau of Technology and Project Services</p>
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	Laurie Johnson, SACWIS Project Manager Jim Hogan, Information Officer, DTMB
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Automated Clearance Processes--Commands to Produce Control Totals		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	3/1/2012	Status Requested	
Status Contact	stjohnl	Last Updated	9/14/2011
Status	Open	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS and DTMB did not include commands to produce control totals in the automated Central Registry clearance processing logic. As a result, DHS and DTMB could not ensure the completeness of the extraction process.</p> <p>Response: DHS and DTMB agree with the finding.</p> <p>Corrective Action Plan: CWIB will submit a change request for the technical logic to be fixed. The BCW program office will work directly with CWIB staff to ensure accurate policy is implemented through the new requirements. The CWIB business model will execute the necessary steps within the change request process that includes; writing requirements in systems engineering methodology format, testing logic, reviewing reports, design of future monitoring report and tracking requirements completion.</p> <p>Anticipated Implementation Date: October 1, 2011</p> <p>Update: 09-13-11 Since these audit findings were issued on 09-24-10, meetings with SWSS, DTMB and program office staff have been held to determine system changes needed in order to comply with the corrective action plans as submitted and approved. Resultant work requests were submitted to DTMB in the fall of 2010 for these changes. Timeframes were provided by SWSS and DTMB staff that those work request changes would be completed within 3-6 months. Follow-up occurred between the CPS program office and the SWSS/CPS staff in April 2011 and August 2011.</p> <p>The latest information provided to the CPS program office is that as a result of the prioritization of SACWIS, all work requests are being held in abeyance pending high-level DHS re-prioritization. The program office received this information via e-mail on August 10, 2011.</p> <p>Deficiencies identified with SWSS application will be evaluated as part of the SACWIS application development. The anticipated implementation date is changed to March 1, 2012, to follow-up with the SACWIS development team to determine confirm that the deficiency is addressed in the new system.</p> <p>Barriers: IT staffing resources.</p> <p>Responsible Administration(s): Children's Services Technology and Project Services DTMB</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Teresa Spalding, Director, Bureau of Technology and Project Services Laurie Johnson, SACWIS Project Manager Jim Hogan, Information Officer, DTMB</p>		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Automated Clearance Processes--Record of Weekly Central Registry Clearance Results		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	11/23/2010 
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS and DTMB did not have system controls to help ensure that DHS and DTMB always maintained a record of each week's automated Central Registry clearance results for licensed child day-care providers, licensed foster care providers, individuals associated with licensed child day-care providers and licensed foster care providers, active chief administrators and licensees of children's camps, childcaring institutions, and child placing agencies. The automated clearance process contains a command that sends an automatic e-mail notification to DHS staff to indicate that the match results report is available for printing, and the results report remains available for printing until the next weekly report is produced. However, each week when the next process occurs, the previous week's match results are automatically cleared from the system and the current week's results are inserted, thus erasing the previous week's match results. DHS and DTMB informed us that the weekly automated clearance process did not contain a command either to electronically save the prior week's match results or to alert DHS staff in the event the results report had not been printed.</p> <p>It is important that a historical record of the weekly perpetrator match results for this process is maintained because DHS and DTMB include a perpetrator's record in this automated process only during the first eight calendar days the perpetrator's record is a part of the Central Registry. Therefore, a perpetrator who is also a licensed child day-care provider, a licensed foster care provider, an individual associated with licensed child day-care provider or licensed foster care provider, an active chief administrator and/or licensee of a children's camp, childcaring institution, or child placing agency would not appear on any subsequent weekly match results reports after the first eight days the individual was included in the Central Registry (also see part a.(3) of this finding).</p> <p>Response: DHS and DTMB agree with the finding.</p> <p>Corrective Action Plan: An automated search function now occurs daily and provides matches on numerous identifiers, such as SSN, name (including those using a middle name or middle initial), date of birth, etc.</p> <p>The automated Central Registry clearance for licensed child care providers, licensed foster care providers, individuals associated with licensed child care providers and licensed foster care providers, active chief administrators and licensees of children's camps, child caring institutions, and child placing agencies was 99.9% effective in identifying perpetrators on the Central Registry. To immediately strengthen this process the Central Registry records from the prior eight days are saved and included in the ongoing automated clearance process. The Bureau of Children and Adult Licensing (BCAL) has always conducted checks on aliases at initial application and manually documenting the results on the licensing record clearance request (BCAL-1326) but will now include checks with SSNs and aliases on the automated process to further strengthen this process</p> <p>Anticipated Implementation Date: implemented</p> <p>Barriers: n/a</p> <p>Responsible Administration(s): Children's Services Technology and Project Services DTMB</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Teresa Spalding, Director, Bureau of Technology and Project Services</p>		

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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Automated Clearance Processes--Quality Improvements		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	3/1/2012	Status Requested	
Status Contact	stjohnl	Last Updated	9/14/2011
Status	Open	Last Updated By	stjohnl
Corrective Action Plan	<p>DHS management did not routinely monitor and/or recommend quality improvements for the automated Central Registry clearance processes. As a result, DHS management did not identify and address the internal control weaknesses noted in this finding and significantly diminished the effectiveness of the automated Central Registry clearance processes.</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: CWIB will submit a change request for the technical logic to be fixed. The BCW program office will work directly with CWIB staff to ensure accurate policy is implemented through the new requirements. The CWIB business model will execute the necessary steps within the change request process that includes; writing requirements in systems engineering methodology format, testing logic, reviewing reports, design of future monitoring report and tracking requirements completion.</p> <p>Anticipated Implementation Date: October 1, 2011</p> <p>Update: 09-13-11 Since these audit findings were issued on 09-24-10, meetings with SWSS, DTMB and program office staff have been held to determine system changes needed in order to comply with the corrective action plans as submitted and approved. Resultant work requests were submitted to DTMB in the fall of 2010 for these changes. Timeframes were provided by SWSS and DTMB staff that those work request changes would be completed within 3-6 months. Follow-up occurred between the CPS program office and the SWSS/CPS staff in April 2011 and August 2011.</p> <p>The latest information provided to the CPS program office is that as a result of the prioritization of SACWIS, all work requests are being held in abeyance pending high-level DHS re-prioritization. The program office received this information via e-mail on August 10, 2011.</p> <p>Deficiencies identified with SWSS application will be evaluated as part of the SACWIS application development. The anticipated implementation date is changed to March 1, 2012, to follow-up with the SACWIS development team to determine confirm that the deficiency is addressed in the new system.</p> <p>Barriers: IT staffing resources.</p> <p>Responsible Administration(s): Children's Services Technology and Project Services DTMB</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Teresa Spalding, Director, Bureau of Technology and Project Services Laurie Johnson, SACWIS Project Manager Jim Hogan, Information Officer, DTMB</p>		
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009

Finding Description	Manual Clearance Process—Recording Results of Clearances		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	3/1/2012	Status Requested	
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Open	Last Updated By	stjohnl

Corrective Action Plan	<p>Finding: DHS did not systematically record the results of the manual Central Registry clearances it performed. As a result, DHS could not ensure that it always performed a required Central Registry clearance prior to authorizing certain individuals' contact with children, and DHS could not effectively monitor its manual Central Registry clearance results for accuracy. For example, the audit determined that DHS did not prevent 78 substantiated perpetrators of CA/N from contact with children in licensed or registered childcare organizations. These 78 perpetrators were all listed in DHS's Central Registry prior to the perpetrator entering a childcare organization. Because DHS did not systematically record the results of manual Central Registry clearances, DHS could not determine if it failed to perform the required Central Registry clearance for these individuals prior to their contact with children or if DHS's manual Central Registry clearance search results were inaccurate for these 78 perpetrators.</p> <p>Systematically recording the results of manual Central Registry clearances would allow DHS to create system controls to prevent DHS from authorizing individuals for situations with access to children if a record of a Central Registry clearance is not present in the system. Further, systematically recording results would provide DHS with a record of the criteria DHS staff entered during manual clearance searches, thereby allowing DHS to more effectively monitor the accuracy of manual Central Registry results</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: DHS has prepared a systems work request so SWSS-CPS stores inquiry information in the Central Registry module. The inquiry information that will be stored is: who completed the search, the date and time it was completed, the person names in the search and any modifications made for perpetrators. Once the report has been created DHS will develop procedures for internal monitoring using the report.</p> <p>The manual Central Registry clearance for licensed child care providers, licensed foster care providers, individuals associated with licensed child care providers and licensed foster care providers, active chief administrators and licensees of children's camps, child caring institutions, and child placing agencies was 99.9% effective in identifying perpetrators on the Central Registry. BCAL policy for manual CPS clearances at application is that a clearance is processed on anyone 18 years of age or older. A Licensing Record Clearance Request (BCAL-1326) form is filled out and submitted to the Bureau of Children and Adult Licensing (BCAL). SWSS is reviewed for a match based on the Last Name, First Name and date of Birth. The same search is conducted on all Also Known As listed on the Licensing Record Clearance Request; this includes Aliases, Maiden Names and Previous Married Names. The social security number is searched separately, as well, for a match. The results of the SWSS check are handwritten on the Licensing Record Clearance Request form with an "X" to the box of "NO" or an "X" to the box of "YES"; these boxes are blank on the Licensing Record Clearance form waiting to be filled in based on the SWSS search. In addition, the operator's initials and date SWSS clearance was ran is handwritten on the Licensing Record Clearance Request. The SWSS results are electronically entered on the Bureau of Information Tracking System (BITS) database. If the operator marks the "YES" box, this is forwarded for further processing. The addition of matching on social security numbers and aliases at the initial application and licensure has further strengthened this process.</p> <p>The work request is pending prioritization. The next meeting is December 2, 2010.</p> <p>Anticipated Implementation Date: Once the work request is initialized the end product will be available within three to six months, assuming no other departmental priorities take precedence.</p> <p>Update: 09-13-11 Since these audit findings were issued on 09-24-10, meetings with SWSS, DTMB and program office staff have been held to determine system changes needed in order to comply with the corrective action plans as submitted and approved. Resultant work requests were submitted to DTMB in the fall of 2010 for these</p>
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changes. Timeframes were provided by SWSS and DTMB staff that those work request changes would be completed within 3-6 months. Follow-up occurred between the CPS program office and the SWSS/CPS staff in April 2011 and August 2011.

The latest information provided to the CPS program office is that as a result of the prioritization of SACWIS, all work requests are being held in abeyance pending high-level DHS re-prioritization. The program office received this information via e-mail on August 10, 2011.

Deficiencies identified with SWSS application will be evaluated as part of the SACWIS application development. The anticipated implementation date is changed to March 1, 2012, to follow-up with the SACWIS development team to determine confirm that the deficiency is addressed in the new system.

Barriers:
IT staffing resources.

Responsible Administration(s):
Children's Services
Technology and Project Services
DTMB

Responsible Individual(s), Name(s), Title(s):
Steve Yager, Acting Director, Children's Services
Suzanne Stiles Burke, Director, Bureau of Child Welfare
Colin Parks, Acting Manager, Children's Protective Services
Teresa Spalding, Director, Bureau of Technology and Project Services
Laurie Johnson, SACWIS Project Manager
Jim Hogan, Information Officer, DTMB

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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009

Finding Description	Manual Clearance Process—Processing Timeliness		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	3/1/2012	Status Requested	
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Open	Last Updated By	stjohnl

Corrective Action Plan	<p>Finding: DHS did not always process Central Registry clearance requests in a timely manner. As a result, substantiated perpetrators of child abuse and neglect listed on DHS's Central Registry may have gained access to children in numerous situations. DHS policy stated that Central Registry clearance requests would be processed within five business days, and DHS reported that it received approximately 1,300 Central Registry clearance requests between January and June 2008. As of 07/01/2008 DHS had processed 357 (27 percent) of the requests and that an estimated 943 (73 percent) of the requests remained unprocessed. A review of the 357 requests DHS had processed disclosed that 37 (10 percent) were processed more than 10 days after the receipt of the requests and 4 (11 percent) of those 37 clearances revealed that the individual had a substantiated history of child abuse and neglect in Michigan. All 4 of these requests originated from other states</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: The CPS program office has created a process to ensure consistency and timeliness at all levels of the department when a central registry clearance is requested. The process will be disseminated to the local offices via L-Letter by January 1, 2011.</p> <p>DHS and DIT will work to make systematic changes within the Central Registry that will maintain an internal log regarding all Central Registry checks completed and the timeliness of the completion. This will ensure DHS documentation regarding the performance and timeliness of required Central Registry clearances.</p> <p>The CPS program office is in discussion with Urban Field Operations and Outstate Field Operations regarding the tracking and timeliness of Central Registry requests at the local offices. At this point, documentation is not consistent between the local offices. DHS is also reviewing the possibility of review those Central Registry checks at the central office which is at a 96 percent timeliness rate. Of the 4 percent of requests that were overdue, most were because the requestor did not provide the information needed to process the request and had to be contacted to obtain the necessary information.</p> <p>Anticipated Implementation Date: 01/01/2011 – L-Letter to be determined – system changes</p> <p>Update: 09-13-11 Since these audit findings were issued on 09-24-10, meetings with SWSS, DTMB and program office staff have been held to determine system changes needed in order to comply with the corrective action plans as submitted and approved. Resultant work requests were submitted to DTMB in the fall of 2010 for these changes. Timeframes were provided by SWSS and DTMB staff that those work request changes would be completed within 3-6 months. Follow-up occurred between the CPS program office and the SWSS/CPS staff in April 2011 and August 2011.</p> <p>The latest information provided to the CPS program office is that as a result of the prioritization of SACWIS, all work requests are being held in abeyance pending high-level DHS re-prioritization. The program office received this information via e-mail on August 10, 2011.</p> <p>Deficiencies identified with SWSS application will be evaluated as part of the SACWIS application development. The anticipated implementation date is changed to March 1, 2012, to follow-up with the SACWIS development team to determine confirm that the deficiency is addressed in the new system.</p> <p>Barriers: IT staffing resources.</p> <p>Responsible Administration(s):</p>
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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Manual Clearance Process--Known Aliases		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	3/1/2012	Status Requested	
Status Contact	stjohnl	Last Updated	9/14/2011
Status	Open	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS did not ensure that Central Registry manual clearance results always included known aliases for perpetrators. As a result, perpetrators of CA/N using aliases could go undetected by DHS during a manual Central Registry clearance and gain access to children in vulnerable situations.</p> <p>In November 2007, DHS and DTMB electronically converted the Central Registry perpetrator records from DHS's previous Central Registry perpetrator database to DHS's current SWSS-CPS Central Registry database (see Finding 6). However, DHS and DTMB staff stated they did not load the perpetrator aliases from the former database into the SWSS-CPS Central Registry database until February 2008. In addition, after DTMB and DHS loaded the aliases into the perpetrator aliases database and they were available for the manual Central Registry clearance process, DHS did not ensure that the known aliases for a matched perpetrator were automatically displayed to DHS staff during a basic manual Central Registry clearance. In order to obtain potential aliases for a matched perpetrator, DHS staff had to independently choose a separate "search AKA names" command, and DHS did not provide a system prompt to remind staff to perform the separate search for possible perpetrator aliases during the manual Central Registry clearance process.</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: DHS has prepared a systems work request so SWSS-CPS stores inquiry information in the Central Registry module. The inquiry information that will be stored is: who completed the search, the date and time it was completed, the person names in the search and any modifications made for perpetrators. Once the report has been created DHS will develop procedures for internal monitoring using the report.</p> <p>The work request is pending prioritization. The next meeting is December 2, 2010.</p> <p>Anticipated Implementation Date: Once the work request is initialized, the end product will be available within three to six months.</p> <p>Update: 09-13-11 Since these audit findings were issued on 09-24-10, meetings with SWSS, DTMB and program office staff have been held to determine system changes needed in order to comply with the corrective action plans as submitted and approved. Resultant work requests were submitted to DTMB in the fall of 2010 for these changes. Timeframes were provided by SWSS and DTMB staff that those work request changes would be completed within 3-6 months. Follow-up occurred between the CPS program office and the SWSS/CPS staff in April 2011 and August 2011.</p> <p>The latest information provided to the CPS program office is that as a result of the prioritization of SACWIS, all work requests are being held in abeyance pending high-level DHS re-prioritization. The program office received this information via e-mail on August 10, 2011.</p> <p>Deficiencies identified with SWSS application will be evaluated as part of the SACWIS application development. The anticipated implementation date is changed to March 1, 2012, to follow-up with the SACWIS development team to determine confirm that the deficiency is addressed in the new system.</p> <p>Barriers: IT staffing resources.</p> <p>Responsible Administration(s): Children's Services Technology and Project Services DTMB</p> <p>Responsible Individual(s), Name(s), Title(s):</p>		

Steve Yager, Acting Director, Children's Services
Suzanne Stiles Burke, Director, Bureau of Child Welfare
Colin Parks, Acting Manager, Children's Protective Services
Teresa Spalding, Director, Bureau of Technology and Project Services
Laurie Johnson, SACWIS Project Manager
Jim Hogan, Information Officer, DTMB

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Audit Title	CENTRAL REGISTRY PERFORMANCE AUDIT (OAG)		
Auditing Agency	OFFICE OF THE AUDITOR GENERAL	Begin Date	10/1/2005
Report Issuance Date	9/24/2010	End Date	3/31/2009
Finding Description	Manual Clearance Process—Clearance Screen Message		
Administration Area	BUREAU OF CHILDREN'S SERVICES		
Report Implementation Date	10/1/2010	Status Requested	
Status Contact	stjohnl	Last Updated	11/29/2010
Status	Completed	Last Updated By	stjohnl
Corrective Action Plan	<p>Finding: DHS's manual Central Registry clearance screen inaccurately displayed a "no matches found" message, in certain circumstances, to DHS staff rather than displaying the details of a perpetrator's record. As a result, DHS staff performing manual Central Registry clearances could have incorrectly determined that some individuals were not listed in the Central Registry as perpetrators of CA/N. DHS local office staff informed us that when a user requested the system to display further details for a matched perpetrator during a manual Central Registry clearance and the clearance results screen displayed the message "no matches found," this meant the matched perpetrator's record had been expunged from Central Registry and the individual should not be considered a perpetrator. However, in some instances, the system could display the message "no matches found" when a matched perpetrator's record was still active in the Central Registry. DHS and DTMB informed stated this was a result of a system error. DHS is unable to determine how often this error occurred or how many times local office staff may have incorrectly determined that individuals were not perpetrators of CA/N during manual Central Registry clearances because DHS does not systematically record the results of its manual Central Registry clearances (see part a. of this finding).</p> <p>Response: DHS agrees with the finding.</p> <p>Corrective Action Plan: The system error has been corrected.</p> <p>Anticipated Implementation Date: implemented</p> <p>Barriers: n/a</p> <p>Responsible Administration(s): Children's Services Technology and Project Services DTMB</p> <p>Responsible Individual(s), Name(s), Title(s): Steve Yager, Acting Director, Children's Services Suzanne Stiles Burke, Director, Bureau of Child Welfare Colin Parks, Acting Manager, Children's Protective Services Teresa Spalding, Director, Bureau of Technology and Project Services Laurie Johnson, SACWIS Project Manager Jim Hogan, Information Officer, DTMB</p>		
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