



# MICHIGAN

OFFICE OF THE AUDITOR GENERAL

## AUDIT REPORT



THOMAS H. McTAVISH, C.P.A.  
AUDITOR GENERAL

The auditor general shall conduct post audits of financial transactions and accounts of the state and of all branches, departments, offices, boards, commissions, agencies, authorities and institutions of the state established by this constitution or by law, and performance post audits thereof.

– Article IV, Section 53 of the Michigan Constitution

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# Michigan Office of the Auditor General REPORT SUMMARY

## Performance Audit

### Statewide Electronic Central Registry

#### Department of Human Services (DHS)

Report Number:  
431-2100-08

Released:  
September 2010

*Michigan's Child Protection Law (CPL) requires DHS to maintain a Statewide electronic Central Registry to record information about perpetrators of child abuse and/or neglect (CA/N) that DHS identifies during Children's Protective Services (CPS) investigations. DHS and other entities rely on DHS's Central Registry perpetrator information to help identify and prevent a variety of potentially harmful situations in which perpetrators of CA/N have, or could obtain, access to children. As of September 30, 2008, DHS's Central Registry contained a total of 337,000 perpetrator records.*

#### **Audit Objective:**

To assess the effectiveness of DHS's efforts to establish internal control to help ensure that the Central Registry includes all perpetrators of CA/N that are required to be listed in the Central Registry.

#### **Audit Conclusion:**

We concluded that DHS's efforts to establish internal control to help ensure that the Central Registry included all perpetrators of CA/N that were required to be listed in the Central Registry were not effective. We noted three material conditions (Findings 1 through 3) and one reportable condition (Finding 4).

#### **Material Conditions:**

DHS had not established effective internal control to help ensure that it always added the substantiated perpetrators of CA/N to the Central Registry that DHS identified during CPS investigations (Finding 1).

DHS had not established effective internal control to ensure that it completed and reviewed CPS investigations timely (Finding 2).

DHS had not established effective internal control to help DHS ensure that it prevented

the improper expungement of perpetrator records from the Central Registry (Finding 3).

#### **Reportable Condition:**

DHS needs to seek amendatory legislation to specifically add enrolled child day-care providers to Section 8d(3) of the CPL (Finding 4).

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#### **Audit Objective:**

To assess the effectiveness of DHS's efforts to establish internal control to help ensure that the Central Registry contains sufficient, accurate, and complete information to identify perpetrators of CA/N.

#### **Audit Conclusion:**

We concluded that DHS's efforts to establish internal control to help ensure that the Central Registry contained sufficient, accurate, and complete information to identify perpetrators of CA/N were not effective. We noted three material conditions (Findings 5 through 7).

#### **Material Conditions:**

DHS had not established effective internal control to help ensure that it obtained and maintained sufficient, accurate, and complete identifying information for substantiated

perpetrators of CA/N in its Central Registry (Finding 5).

DHS, in conjunction with the Department of Technology, Management & Budget, had not established effective internal control for the processes used to electronically convert Central Registry perpetrator records from DHS's previous Central Registry perpetrator database to DHS's current Services Worker Support System - Children's Protective Services (SWSS-CPS) Central Registry perpetrator database (Finding 6).

DHS had not established effective internal control over system access for users with the capability to edit key Central Registry perpetrator identifying information fields. In addition, DHS had not established effective internal control over the monitoring of edits made to Central Registry perpetrator information. (Finding 7)

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**Audit Objective:**

To assess the effectiveness of DHS's efforts to establish internal control to help ensure that DHS's Central Registry clearance procedures appropriately identify perpetrators listed in the Central Registry.

**Audit Conclusion:**

We concluded that DHS's efforts to establish internal control to help ensure that DHS's Central Registry clearance procedures appropriately identify perpetrators listed in the Central Registry were not effective. We noted two material conditions (Findings 8 and 9).

**Material Conditions:**

DHS, in conjunction with the Department of Technology, Management & Budget, had not established effective internal control over DHS's automated Central Registry clearance processes (Finding 8).

DHS had not established effective internal control over DHS's manual Central Registry clearance process (Finding 9).

**Audit Summary:**

Our review was limited to the Central Registry perpetrator information that DHS recorded and maintained in the Central Registry at the time of our audit. DHS recorded and maintained those records under the material conditions we report in Findings 1, 2, 3, 5, 6, and 7 (see also Exhibit 2). As a result of the control weaknesses we found to exist related to the sufficiency, accuracy, and completeness of DHS's Central Registry perpetrator information, readers of our report are advised that the actual number of CA/N perpetrators that DHS did not detect in potentially vulnerable situations with children likely exceeded the number we could identify and report in Findings 8 and 9.

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**Agency Response:**

Our audit report includes 9 findings and 11 corresponding recommendations. DHS's preliminary response indicates that it agrees with all of the recommendations.

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THOMAS H. McTAVISH, C.P.A.  
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September 24, 2010

Mr. Ismael Ahmed, Director  
Department of Human Services  
Grand Tower  
Lansing, Michigan

Dear Mr. Ahmed:

This is our report on the performance audit of the Statewide Electronic Central Registry, Department of Human Services.

This report contains our report summary; description of agency; audit objectives, scope, and methodology and agency responses; comments, findings, recommendations, and agency preliminary responses; three exhibits, presented as supplemental information; and a glossary of acronyms and terms.

Our comments, findings, and recommendations are organized by audit objective. The agency preliminary responses were taken from the agency's responses subsequent to our audit fieldwork. The *Michigan Compiled Laws* and administrative procedures require that the audited agency develop a formal response within 60 days after release of the audit report.

We appreciate the courtesy and cooperation extended to us during the audit.

AUDITOR GENERAL



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## Description of Agency

Michigan's Child Protection Law\* (CPL) requires the Department of Human Services (DHS) to maintain a Statewide electronic Central Registry\* to record information about perpetrators\* of child\* abuse\* and/or child neglect\* (CA/N) that DHS identifies during Children's Protective Services\* (CPS) investigations\* when the investigation concludes that accurate and *relevant evidence\** exists that CA/N occurred and the perpetrator was a *person responsible for a child's health or welfare\**. Further, the CPL requires DHS to maintain a Central Registry record for perpetrators of CA/N that DHS identified during CPS investigations completed prior to July 1, 1999 and the CPS investigation disposition\* was classified as substantiated\*. The CPL requires DHS to maintain a perpetrator's record in the Central Registry until DHS expunges\* the record because the perpetrator dies or when the perpetrators request the expungement of their record and upon a review of the case record, DHS finds no accurate and relevant evidence of CA/N exists.

The CPL, the Adam Walsh Child Protection and Safety Act of 2006, the *Michigan Administrative Code*, and DHS policy require DHS to use the perpetrator information that DHS maintains in the Central Registry to help identify numerous situations, in Michigan and/or other states, in which children may be in potentially vulnerable situations with a perpetrator of CA/N (see Exhibit 1). DHS uses both manual\* and automated\* Central Registry clearance\* processes to help identify perpetrators of CA/N that already have, or could obtain, access to children in a variety of settings (see table of DHS automated clearance processes in Finding 8, page 42, and table of DHS manual clearance process in Finding 9, page 49, for more detail).

DHS obtains a perpetrator's identifying information\* during the CPS complaint\*, intake\*, and investigation processes from four sources; verbal statements from the perpetrator; verbal statements from outside parties; observation of identification documentation provided by the perpetrator; and, in some instances, from DHS internal data systems. DHS records the identifying information in the Services Worker Support System - Children's Protective Services\* (SWSS-CPS) and then transfers the information to the Central Registry perpetrator database for use in the manual and automated match process.

\* See glossary at end of report for definition.

In general, DHS uses manual Central Registry clearances to identify prior perpetrators of CA/N who are seeking to be in a situation with access to a child(ren). For example, DHS uses a manual Central Registry clearance process to help identify applicant child day-care providers\*, prospective foster care providers\*, and prospective adoptive parents who are perpetrators of CA/N (see table of DHS manual clearance process in Finding 9, page 49, for more detail). DHS performs a manual Central Registry clearance by hand-keying a specific individual's identifying information into the appropriate Central Registry screen at a computer terminal and then engaging the Central Registry search function. The search function compares the manually input identifying information to the Central Registry's perpetrator database identifying information. Information on potential matches is displayed on the computer terminal screen for the person conducting the manual clearance.

DHS uses automated Central Registry clearances to help identify individuals who DHS has authorized for situations with continuing access to children and who subsequently become listed in the Central Registry as perpetrators of CA/N. For example, DHS uses automated Central Registry clearance processes to help identify active child day-care providers and foster care providers that become listed in the Central Registry while caring for children. DHS's automated Central Registry clearances are computerized data matches\* of identifying information contained in DHS's databases for enrolled\* child day-care providers, unlicensed\* foster care providers, and licensed or registered\* childcare providers\* and their adult household members\* to the identifying information contained in the Central Registry perpetrator database (see table of DHS automated clearance processes in Finding 8, page 42, for more detail). The automated clearance processes generate reports of potential matches which are distributed to the appropriate DHS unit for follow-up.

In November 2007, DHS, in conjunction with the Michigan Department of Information Technology (now part of the Department of Technology, Management & Budget [DTMB]), electronically converted\* DHS's Central Registry perpetrator records from the former database to the SWSS-CPS Central Registry database. This change was part of DHS's overall system upgrade to SWSS-CPS. DHS and DTMB currently maintain the Central Registry perpetrator database within SWSS-CPS.

DHS added 14,400 new perpetrators to the Central Registry during the fiscal year ended September 30, 2008. DHS's Central Registry contained a total of 337,000 perpetrator records as of September 30, 2008.

\* See glossary at end of report for definition.

## Audit Objectives, Scope, and Methodology and Agency Responses

### Audit Objectives

Our performance audit\* of the Statewide Electronic Central Registry, Department of Human Services (DHS), had the following objectives:

1. To assess the effectiveness\* of DHS's efforts to establish internal control\* to help ensure that the Central Registry includes all perpetrators of child abuse and/or neglect (CA/N) that are required to be listed in the Central Registry.
2. To assesses the effectiveness of DHS's efforts to establish internal control to help ensure that the Central Registry contains sufficient, accurate, and complete information to identify perpetrators of CA/N.
3. To assess the effectiveness of DHS's efforts to establish internal control to help ensure that DHS's Central Registry clearance procedures appropriately identify perpetrators listed in the Central Registry.

### Audit Scope

Our audit scope was to examine the program and other records of the Department of Human Services' Statewide Electronic Central Registry. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. However, our review was limited to the information DHS recorded and maintained in the Central Registry at the time of our audit. Therefore, readers of this audit report should remain aware that the Central Registry records we used for our review and testing were recorded and maintained under the conditions we cited in Findings 1, 2, 3, 5, 6, and 7 (see also Exhibit 2). As a result, it is likely that the actual number of perpetrators of CA/N that DHS did not detect in potentially vulnerable situations with children exceeds the number we could identify and report in Findings 8

\* See glossary at end of report for definition.

and 9. Our audit procedures, conducted during the period April 2008 through September 2009, generally covered the period October 2005 through March 2009.

Supplemental information is presented as Exhibit 1. Our audit was not directed toward expressing an opinion on this information and, accordingly, we express no opinion on it.

### Audit Methodology

We conducted a preliminary review to gain an understanding of DHS's Central Registry activities and establish our audit objectives. Our preliminary review included discussions with various DHS and Department of Technology, Management & Budget (DTMB) staff regarding their functions and responsibilities related to the Central Registry, examinations of DHS records and policies and procedures related to Central Registry activities, analytical reviews of Central Registry information, observation of Central Registry methods of input and outputs, and research of laws and statutes applicable to the Central Registry. We limited our audit objectives to include only objectives with a direct impact on the safety of children.

To accomplish our first audit objective, we interviewed DHS and DTMB staff regarding processes applicable to adding and removing perpetrators to and from the Central Registry. We reviewed the Michigan Child Protection Law (CPL) to determine which perpetrators DHS is required to include in the Central Registry and which perpetrators DHS may remove from the Central Registry. We reviewed and obtained an understanding of DHS policies and procedures for adding and removing perpetrators to and from the Central Registry. We analyzed and compared DHS's Children's Protective Services investigation disposition records and Central Registry perpetrator records.

To accomplish our second audit objective, we interviewed DHS and DTMB staff regarding processes applicable to obtaining, recording, and maintaining Central Registry perpetrator identifying information; using perpetrator identifying information elements during manual and automated Central Registry clearances; accessing and editing Central Registry perpetrator identifying information; and electronically converting the Central Registry database of perpetrator records. We reviewed and obtained an understanding of the Control Objectives for Information and Related Technology\* (COBIT) standards applicable to electronic system conversion processes. We reviewed and obtained an understanding of DHS policies and procedures applicable to obtaining,

\* See glossary at end of report for definition.

recording, and maintaining Central Registry perpetrator identifying information and accessing and editing Central Registry perpetrator identification. In addition, we analyzed identifying information contained in DHS's Central Registry perpetrator records, and we reviewed the Services Worker Support System - Children's Protective Services (SWSS-CPS) user\* access and capability reports.

To accomplish our third audit objective, we interviewed DHS and DTMB staff regarding Central Registry clearance processes. We reviewed and obtained an understanding of the laws, statutes, and DHS policies and procedures applicable to Central Registry clearance processes. We obtained and reviewed DHS's and DTMB's program logic\* for the automated Central Registry clearance processes. We electronically compared the identifying information contained in DHS's databases for enrolled child day-care providers, unlicensed foster care providers, and licensed or registered childcare providers and their adult household members to the identifying information in the SWSS-CPS Central Registry perpetrator database.

When selecting activities or programs for audit, we use an approach based on assessment of risk and opportunity for improvement. Accordingly, we focus our audit efforts on activities or programs having the greatest probability for needing improvement as identified through a preliminary review. Our limited audit resources are used, by design, to identify where and how improvements can be made. Consequently, we prepare our performance audit reports on an exception basis.

#### Agency Responses

Our audit report includes 9 findings and 11 corresponding recommendations. DHS's preliminary response indicates that it agrees with all of the recommendations.

The agency preliminary response that follows each recommendation in our report was taken from the agency's written comments and oral discussion subsequent to our audit fieldwork. Section 18.1462 of the *Michigan Compiled Laws* and the State of Michigan Financial Management Guide (Part VII, Chapter 4, Section 100) require DHS to develop a formal response to our audit findings and recommendations within 60 days after release of the audit report.

\* See glossary at end of report for definition.

## **COMMENTS, FINDINGS, RECOMMENDATIONS, AND AGENCY PRELIMINARY RESPONSES**

## **ESTABLISHING INTERNAL CONTROL TO HELP ENSURE THE CENTRAL REGISTRY INCLUDES ALL PERPETRATORS OF CA/N THAT ARE REQUIRED TO BE LISTED IN THE CENTRAL REGISTRY**

### **COMMENT**

**Audit Summary:** Our audit disclosed several weaknesses in the Department of Human Services' (DHS's) and the Department of Technology, Management & Budget's (DTMB's) internal control over the Central Registry. Our report presents these weaknesses individually for clarity; however, readers of this report should also consider the combined impact of the weaknesses. For example, the internal control weaknesses we report related to the sufficiency, accuracy, and completeness of Central Registry perpetrator data (see Findings 1, 2, 3, 5, 6, and 7 and Exhibit 2) have a direct impact on the effectiveness of DHS's Central Registry clearance processes because DHS directly relies on the integrity\* of the perpetrator data to identify perpetrators of child abuse and/or neglect (CA/N) in, or seeking to be in, situations with access to children (see Findings 8 and 9).

Readers of this audit report should remain aware that our review was limited to the information that DHS recorded and maintained in the Central Registry under the control weaknesses related to the sufficiency, accuracy, and completeness of data that we noted in Findings 1, 2, 3, 5, 6, and 7 (see also Exhibit 2). Therefore, it is likely that the actual number of perpetrators of CA/N that DHS did not detect with its clearance processes exceeds the number we reported in Findings 8 and 9.

**Audit Objective:** To assess the effectiveness of DHS's efforts to establish internal control to help ensure that the Central Registry includes all perpetrators of CA/N that are required to be listed in the Central Registry.

**Audit Conclusion:** We concluded that DHS's efforts to establish internal control to help ensure that the Central Registry included all perpetrators of CA/N that

\* See glossary at end of report for definition.

were required to be listed in the Central Registry were not effective. Our assessment disclosed three material conditions\*:

- DHS had not established effective internal control to help ensure that it always added the substantiated perpetrators of CA/N to the Central Registry that DHS identified during Children's Protective Services (CPS) investigations (Finding 1).
- DHS had not established effective internal control to ensure that it completed and reviewed CPS investigations timely (Finding 2).
- DHS had not established effective internal control to help DHS ensure that it prevented the improper expungement of perpetrator records from the Central Registry (Finding 3).

Our assessment also disclosed one reportable condition\* related to adding enrolled child day-care provider perpetrators to the Child Protection Law (CPL) (Finding 4).

## **FINDING**

### **1. Adding Perpetrators to the Central Registry**

DHS had not established effective internal control to help ensure that it always added the substantiated perpetrators of CA/N to the Central Registry that DHS identified during CPS investigations. As a result, DHS failed to add to the Central Registry 364 substantiated perpetrators of CA/N that DHS identified during Category I\* or Category II\* CPS investigations during the period November 2007 through September 2008. In addition, DHS failed to add an undeterminable number of substantiated perpetrators of CA/N from Category III\* CPS investigations to the Central Registry who were licensed or registered childcare providers.

DHS and many other entities directly rely on DHS's Central Registry perpetrator information to help detect and prevent situations in which substantiated perpetrators of CA/N have, or could obtain, access to children in potentially vulnerable situations (see Exhibit 1). Therefore, it is critical that DHS adds to the Central Registry all of the substantiated perpetrators of CA/N that the CPL requires. When DHS fails to add the names of substantiated perpetrators of CA/N

\* See glossary at end of report for definition.

to the Central Registry, those perpetrators cannot be detected during DHS's Central Registry clearance processes.

The CPL requires DHS to maintain a Central Registry that contains the records of substantiated perpetrators of CA/N identified through CPS investigations. Section 8d of the CPL requires DHS to add to the Central Registry all perpetrators that DHS identifies during Category I or Category II CPS investigations. In addition, Section 8d of the CPL requires DHS to add to the Central Registry perpetrators identified during Category III CPS investigations if the perpetrator is a licensed or registered childcare provider.

We reviewed DHS's processes to help ensure that DHS adds to the Central Registry all perpetrators of CA/N that DHS identified in Category I, Category II, and Category III CPS investigations, as required by the CPL. Our review disclosed:

- a. 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 Services Worker Support System (SWSS) - CPS. This system also contains the Central Registry. DHS informed us 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.

At our request, DHS generated a SWSS-CPS activity report for our 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. We 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.

We 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.

- b. 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 to us 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. Our review disclosed:
  - (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.
  - (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.
  - (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.

### **RECOMMENDATION**

We recommend that DHS establish effective internal control to help ensure that it always adds the substantiated perpetrators of CA/N to the Central Registry that DHS identifies during CPS investigations.

### **AGENCY PRELIMINARY RESPONSE**

DHS agrees with the recommendation. DHS reported to us that it took action on the identified cases to ensure that all persons were placed on the Central Registry, as appropriate. In addition, DHS reported to us that it resolved the system error that caused the deficiency and will generate a quarterly report that will match dispositions against the Central Registry to help ensure the accuracy of perpetrator information.

DHS also reported to us that it provided direction to DHS field staff in October 2009 and amended policy, effective February 2010, requiring CPS intake workers to inquire as to the licensing status of persons associated with each CPS complaint. The reporting person must now be asked by the CPS intake worker if any adult affiliated with the case is a licensed foster care provider, licensed day-care provider, or a relative provider, and the CPS intake worker must also conduct a systems check to verify if any child listed on the complaint is documented within the DHS system as a foster child. In addition, DHS reported to us that it will generate additional direction to field staff requiring CPS intake workers to complete additional system checks to verify whether any adult affiliated with the case is an enrolled or licensed day-care provider. Further, DHS reported to us that a SWSS-CPS systems work request has been approved to automatically flag those DHS providers of day care and foster care who are the subject of a CPS complaint and to provide automatic notification of both the allegations and the investigation outcome to key offices in DHS responsible for the care and safety of children.

\* See glossary at end of report for definition.

## **FINDING**

### **2. Completing and Reviewing CPS Investigations**

DHS had not established effective internal control to ensure that it completed and reviewed CPS investigations timely. As a result, perpetrators could go undetected by DHS's Central Registry clearance processes and potentially obtain or maintain access to children in a variety of situations (see table of DHS automated clearance processes in Finding 8, page 42, and table of DHS manual clearance process in Finding 9, page 49, for more detail and see Exhibit 1.)

DHS policy establishes a standard of promptness (SOP) for completing CPS investigations as 30 calendar days from the receipt of the CPS complaint. However, for some extenuating circumstances, DHS policy also allows DHS supervisors to approve a 30-day extension to the SOP. Further, DHS policy requires CPS supervisors to review and approve all completed CPS investigation reports within 30 calendar days of completion by the worker. It is important for DHS to complete and review CPS investigations as soon as possible so that DHS can help ensure that substantiated perpetrators of CA/N are added to the Central Registry and included in the Central Registry clearance processes. DHS's timely identification and addition of perpetrators to the Central Registry is particularly important in situations in which DHS may perform only a one-time manual clearance of the Central Registry, e.g., employment screenings for childcare situations and adoptive placements\* (see Finding 9).

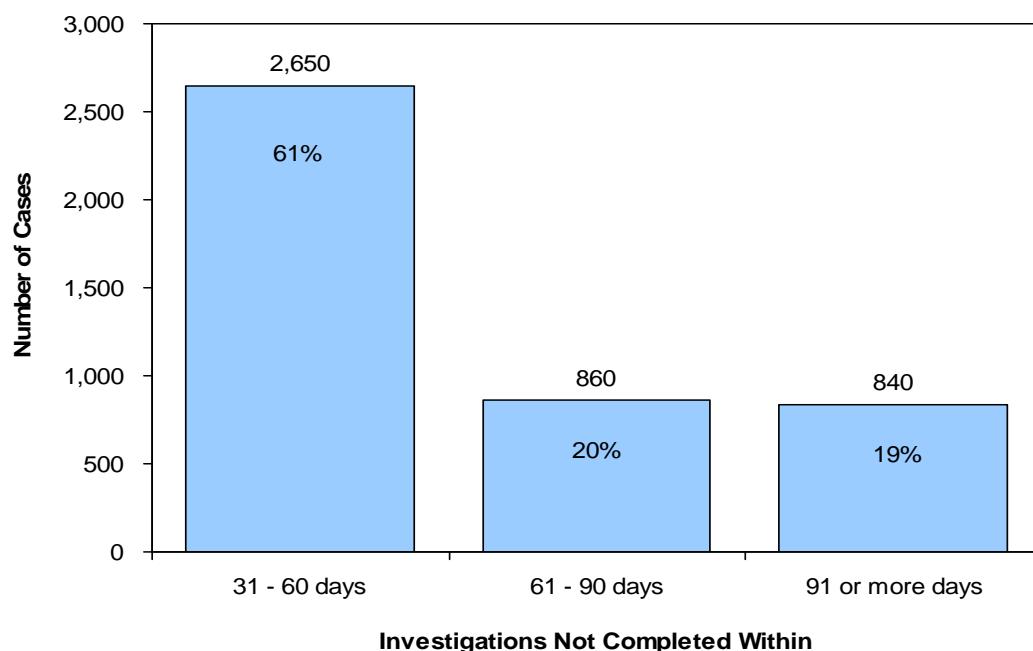
Our review disclosed:

- a. DHS did not always complete CPS investigations within the established 30-day SOP, and requests for extensions were common. As a result, DHS increased the risk that perpetrators of CA/N would not be identified in a timely manner and perpetrators could go undetected by DHS when performing a Central Registry clearance.

DHS informed us that 63,000 CPS complaints were assigned for investigation during the period November 19, 2007 through September 30, 2008 and 13,100 (21%) CPS investigations resulted in at least one perpetrator being added to the Central Registry.

\* See glossary at end of report for definition.

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%) within the 30-day SOP. DHS had granted extension requests for 690 (15%) of those 4,350 investigations. The following table shows the breakdown of the 4,350 cases by the range of days late:

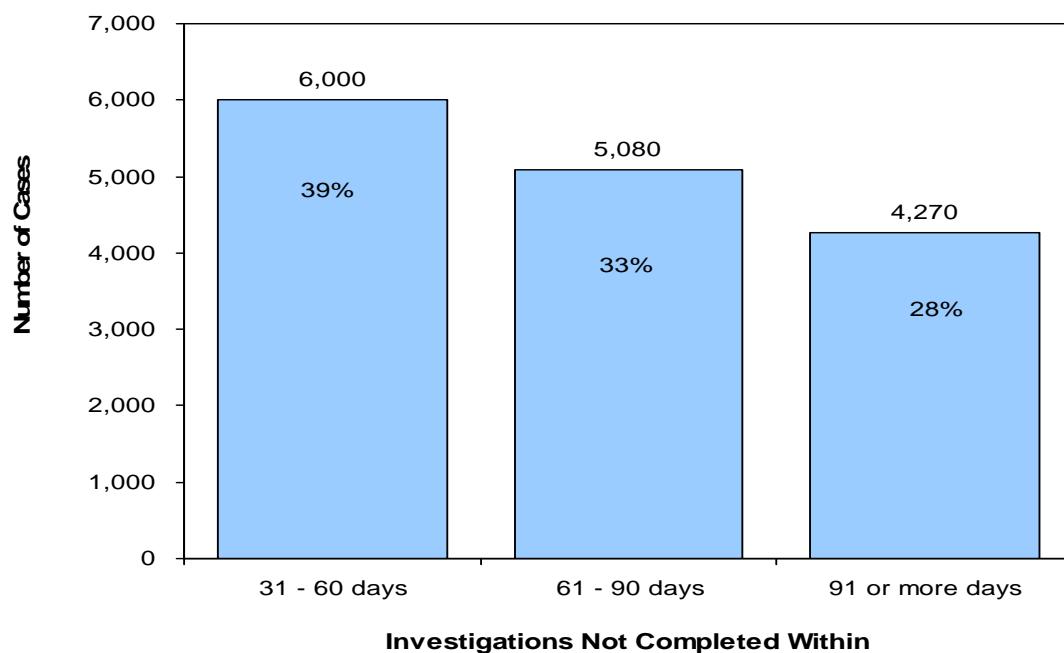


- b. DHS did not always perform supervisory reviews of completed CPS investigations within the 30-day SOP. As a result, DHS could not ensure that DHS identified and corrected erroneous investigation conclusions regarding a case member's Central Registry perpetrator status and could not ensure that all perpetrators that should have been added to the Central Registry were added timely.

During the period November 19, 2007 through September 30, 2008, DHS completed 53,200 CPS investigations.

Of the 53,200 CPS investigations completed, DHS supervisors did not review and approve 15,350 (29%) of the case dispositions within the 30-day SOP.

The following table shows the breakdown of the 15,350 cases by the range of days late:



Further, 2,100 (14%) 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.

## **RECOMMENDATION**

We recommend that DHS establish effective internal control to ensure that it completes and reviews CPS investigations timely.

## **AGENCY PRELIMINARY RESPONSE**

DHS agrees with the recommendation. DHS reported to us that it now monitors the SOP on a bimonthly basis via the caseload counts submitted to DHS central office Field Operations by each local office. DHS reported to us that when it determines that a CPS worker is over a 10% threshold for completion of CPS investigations, within the established 30-day SOP, the CPS worker must have an individual corrective action plan developed to help ensure that the SOP is met. In addition, DHS reported to us that it is currently developing a monthly SWSS-CPS management report in order for local office directors to monitor supervisory SOP

and initiate corrective action when necessary. Further, DHS reported to us that it has amended its 30-day SOP for supervisory case review to a 14-day SOP.

## **FINDING**

### **3. Expunging Perpetrators From the Central Registry**

DHS had not established effective internal control to help DHS ensure that it prevented the improper expungement of perpetrator records from the Central Registry. As a result, perpetrator records could be improperly expunged from the Central Registry, which could result in substantiated perpetrators of CA/N gaining access to children.

The CPL requires DHS to expunge the records of substantiated perpetrators of CA/N from the Central Registry under two circumstances: (1) when perpetrators die and (2) when perpetrators request expungement of their Central Registry record and, upon a review of the case record, DHS finds that no accurate and relevant evidence of CA/N exists.

Our audit identified the following internal control weaknesses in DHS's Central Registry expungement processes:

- a. 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 the capability to expunge Central Registry perpetrator records. DHS expunged 1,400 perpetrator records from its Central Registry during the period October 1, 2007 through September 30, 2008.

A sound and effective internal control system would include a secondary review and approval of expungements of perpetrator records from the Central Registry.

- b. DHS did not actively monitor Central Registry expungements for appropriateness. DHS reported to us that, although SWSS-CPS had the capability to produce reports of Central Registry expungement activity, DHS

did not generate the reports in order to monitor expungements for appropriateness.

A sound and effective internal control system would include active monitoring of expungements of perpetrator records from the Central Registry.

- c. DHS did not track or monitor the access-granting activities of DHS local office security coordinators (LOSCs). LOSCs grant access and capability to DHS staff in the local offices to perform Central Registry expungement transactions. DHS reported to us that it did not maintain records of LOSC activity, such as the access and transaction capabilities the LOSCs created or modified for DHS staff. In addition, DHS reported to us that, although its system had the capability to record LOSC access-granting activities, DHS had not implemented the processes to do so. As of September 30, 2008, DHS had 200 LOSCs located in 114 local offices throughout the State.

A sound and effective internal control system would include tracking and monitoring of system access and capability granting activities.

DHS's weaknesses in internal control over Central Registry expungements significantly increased the risk that DHS could inappropriately remove perpetrator records from the Central Registry and fail to detect the improper removals.

### **RECOMMENDATION**

We recommend that DHS establish effective internal control to help DHS ensure that it prevents the improper expungement of perpetrator records from the Central Registry.

### **AGENCY PRELIMINARY RESPONSE**

DHS agrees with the recommendation. DHS reported to us that it performed a review of the expunged perpetrator records identified and determined that expungements were appropriate. In addition, DHS reported to us that it amended CPS policy, effective February 2010, to require a second-line supervisor review of all requests and decisions for expungement of a person's name from the Central Registry.

DHS also reported to us that a monthly Central Registry report has been created to assist the local office and central office administration in the review of data related to cases in which a person has been removed from the Central Registry. DHS reported that, in January 2010, local office directors began receiving the Central Registry report with direction to review and approve that appropriate decisions are made as a third-level review of expungements.

In addition, DHS reported to us that the DHS Application Security Office conducted a review of all records with local office security officer access and supervisor level access and took action to ensure that staff persons with access to amend the Central Registry were the appropriate staff. Further, DHS reported to us that it is reviewing and updating security policies and procedures for users and LOSCs.

## **FINDING**

### **4. Adding Enrolled Child Day-Care Provider Perpetrators to the CPL**

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.

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 who 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

\* See glossary at end of report for definition.

individuals specified in Section 8d(3) of the CPL, i.e., owners, operators, volunteers, or employees of licensed or registered childcare organizations.

### **RECOMMENDATION**

We recommend that DHS seek amendatory legislation to specifically add enrolled child day-care providers to Section 8d(3) of the CPL.

### **AGENCY PRELIMINARY RESPONSE**

DHS agrees with the recommendation. DHS reported to us that it is carefully considering enrolled day-care providers on the Central Registry when they are determined to be perpetrators of CA/N and the risk level is low or moderate (Category III). DHS reported that it is a part of a workgroup of the Children's Law Section of the State Bar of Michigan and is participating in a broader discussion of Section 8d(3) of the CPL and, if it is determined through that discussion that a legislative change is appropriate, DHS will work through the Office of the Legislative Liaison to draft language to amend the CPL.

## **ESTABLISHING INTERNAL CONTROL TO HELP ENSURE THE CENTRAL REGISTRY CONTAINS SUFFICIENT, ACCURATE, AND COMPLETE INFORMATION TO IDENTIFY PERPETRATORS OF CA/N**

### **COMMENT**

**Audit Objective:** To assess the effectiveness of DHS's efforts to establish internal control to help ensure that the Central Registry contains sufficient, accurate, and complete information to identify perpetrators of CA/N.

**Audit Conclusion:** We concluded that DHS's efforts to establish internal control to help ensure that the Central Registry contained sufficient, accurate, and

**complete information to identify perpetrators of CA/N were not effective.** Our assessment disclosed three material conditions:

- DHS had not established effective internal control to help ensure that it obtained and maintained sufficient, accurate, and complete identifying information for substantiated perpetrators of CA/N in its Central Registry (Finding 5).
- DHS, in conjunction with DTMB, had not established effective internal control for the processes used to electronically convert Central Registry perpetrator records from DHS's previous Central Registry perpetrator database to DHS's current SWSS-CPS Central Registry perpetrator database (Finding 6).
- DHS had not established effective internal control over system access for users with the capability to edit key Central Registry perpetrator identifying information fields. In addition, DHS had not established effective internal control over the monitoring of edits made to Central Registry perpetrator information. (Finding 7)

## **FINDING**

### **5. Obtaining and Maintaining Perpetrator Identifying Information**

DHS had not established effective internal control to help ensure that it obtained and maintained sufficient, accurate, and complete identifying information for substantiated perpetrators of CA/N in its Central Registry. As a result, DHS significantly increased the risk that substantiated perpetrators of CA/N could have direct, and potentially harmful, contact with children in vulnerable situations.

The CPL requires DHS to maintain a Central Registry database of CA/N perpetrators. In addition, the CPL, the Adam Walsh Child Protection and Safety Act of 2006, the *Michigan Administrative Code*, and DHS policy require DHS to use Central Registry perpetrator information to help detect and prevent situations in which children may be in a variety of potentially vulnerable situations with perpetrators of CA/N. DHS directly relies on the perpetrator identifying information it obtains and maintains in the Central Registry to carry out the intent of these requirements and help protect the safety of potentially vulnerable children.

The identifying information DHS maintains in the Central Registry for perpetrators is obtained by DHS staff during the CPS complaint intake and investigation processes. DHS staff obtain the identifying information for alleged perpetrators

primarily through verbal statements from the individuals under investigation; verbal statements from outside parties; observation of identifying documentation provided by individuals under investigation; and, in some instances, identifying information from DHS internal data systems. DHS staff record the identifying information they obtain during a CPS investigation into the investigations module\* of SWSS-CPS. When DHS staff substantiate that an individual under investigation is a perpetrator of CA/N, the identifying information the CPS worker recorded in the investigations module of SWSS-CPS is transferred to the Central Registry. After the identifying information is transferred to the Central Registry, DHS relies on selected portions of the identifying information to detect perpetrators of CA/N in a variety of situations in which the perpetrators could gain access to children in vulnerable situations as described in the following table:

DHS's Use of Central Registry Perpetrator Identifying Information

Central Registry Perpetrator Identifying Information	Central Registry Identifying Information Used for Manual Clearances? (1)	Central Registry Identifying Information Used for Automated Central Registry Clearances? (1)		
		Enrolled Child Day-Care Providers	Unlicensed Foster Care Providers	Licensed or Registered ChildCare Providers
Last name	Yes	No (2)	Yes	Yes
First name	Yes	No (2)	Yes	Yes
Date of birth	Yes	No (2)	Yes	Yes
Client identification	Yes	Yes	Yes	No
Social security number	Yes	Yes	Yes	No

- (1) In general, DHS uses manual Central Registry clearances to determine if an individual is listed in the Central Registry as a perpetrator of CA/N prior to the individual's contact with children. DHS uses automated Central Registry clearances to determine if an individual becomes listed on the Central Registry as a perpetrator of CA/N subsequent to DHS approving continual contact with children. See Findings 8 and 9.
- (2) See Finding 8, part a.(1).

\* See glossary at end of report for definition.

Our review of DHS's processes used to help ensure that the identifying information for perpetrators that DHS obtained was sufficient, accurate, and complete disclosed:

- a. 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.
- b. 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.

- c. 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.

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.

- d. 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).

- e. DHS did not have a process established with the Social Security Administration\* (SSA) to validate the SSNs that DHS recorded in the Central Registry for substantiated perpetrators of CA/N. DHS informed us that it currently relies on a system control which confirms that the nine-digit SSN combination entered by DHS staff is a possible SSN digit combination used by the SSA. However, DHS's system control did not validate that the SSN entered by DHS staff was a valid SSN issued by the SSA and that the SSN entered belonged to the perpetrator for whom it was entered.

DHS informed us that it had a process in place to validate SSNs recorded for individuals in other DHS systems with the SSA; however, DHS had not established a similar process for the SSNs recorded in the Central Registry for substantiated perpetrators of CA/N. DHS also informed us that the SSN information maintained in the Central Registry for some perpetrators was obtained from DHS's Customer Information Management System\* (CIMS) and those SSNs were validated with the SSA (see part g. of this finding).

- f. DHS did not require DHS staff to obtain and record a perpetrator's actual DOB in the Central Registry, and it permitted DHS staff to enter an estimated DOB without indicating that the DOB 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, DOB. DHS relies on the DOB 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 DOB information recorded in the Central Registry to help detect situations in which perpetrators of CA/N are applying to become, or currently are, licensed or registered childcare providers or unlicensed foster care providers.

\* See glossary at end of report for definition.

Consequently, it is important for DHS to obtain actual DOB information for perpetrators whenever possible and to identify records with estimated DOB information.

DHS informed us that DHS staff commonly entered a January 1, 1901 DOB when a perpetrator's DOB was not known. We reviewed the Central Registry perpetrator DOB information as of September 30, 2008 and determined that 11,187 (3%) perpetrator records contained a January 1, 1901 DOB or a January 1 DOB 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 DOB information. As a result, DHS cannot determine the total number of Central Registry records that contain an inaccurate DOB for the perpetrator.

In July 2007, DHS enacted policy and established SWSS-CPS system controls to help ensure that DHS staff entered actual DOB information for perpetrators. However, DHS informed us that DHS staff could easily circumvent the SWSS-CPS system controls established in July 2007 and enter an estimated DOB for a perpetrator.

- g. 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 informed us that 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 was limited and only included information for individuals who either were associated with a previous CPS investigation or were previously a DHS assistance client.
- h. 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.

It is critical that DHS obtain and maintain sufficient, accurate, and complete identifying information for substantiated perpetrators of CA/N so that DHS can effectively detect and prevent these perpetrators from gaining access to children in potentially vulnerable situations in Michigan and other states.

### **RECOMMENDATION**

We recommend that DHS establish effective internal control to help ensure that it obtains and maintains sufficient, accurate, and complete identifying information for substantiated perpetrators of CA/N in its Central Registry.

### **AGENCY PRELIMINARY RESPONSE**

DHS agrees with the recommendation. DHS reported to us that it has amended policy to require CPS workers to take additional steps to verify the identity and role of each caregiver and alleged perpetrator by viewing and documenting the person's driver's license or other legally recognized photo identification. DHS also reported that it has submitted work requests for system changes to utilize current technology to help provide as much information and verification as possible related to the identity of persons listed on the Central Registry. Further, DHS reported to us that it is consulting with other state and federal departments to determine how to obtain information to verify the identity of individuals while ensuring individual privacy is protected, financial resources are used appropriately, and compliance with State and federal statutes is achieved.

### **FINDING**

#### **6. Converting Electronic Perpetrator Records**

DHS, in conjunction with DTMB, had not established effective internal control for the processes used to electronically convert Central Registry perpetrator records from DHS's previous Central Registry perpetrator database to DHS's current SWSS-CPS Central Registry perpetrator database. As a result, DHS cannot ensure that its current SWSS-CPS Central Registry database contains all of the perpetrator records that DHS previously maintained in the Central Registry database and that the SWSS-CPS Central Registry contains accurately converted perpetrator information.

As of September 30, 2008, 316,628 (94%) of the total 337,190 perpetrator records contained in DHS's SWSS-CPS Central Registry database were perpetrator records that DHS converted from the former Central Registry database.

In November 2007, DTMB performed the electronic conversion of the Central Registry database for DHS. Both DHS and DTMB staff indicated to us that the overall conversion plan and processes were generally informal, performed outside of a secure environment, and not well documented. Neither DHS nor DTMB maintained detailed documentation of the electronic conversion processes or results. Sound internal control over an electronic conversion process would include a formal and well documented plan that dictates the process be performed in a secure environment.

Our review identified the following internal control weaknesses in DHS's processes used to convert the Central Registry perpetrator records from the former database to the current SWSS-CPS database:

- a. DHS did not maintain management oversight of the overall conversion process. As a result, DHS failed to determine if all Central Registry perpetrator records were properly extracted from its former database, unaltered during the data transformation process, and loaded to DHS's current SWSS-CPS Central Registry database. For example, at the date of conversion, DHS records indicated that the former Central Registry contained a total of 340,301 perpetrator records; however, DTMB loaded a total of 316,628 perpetrator records into the SWSS-CPS Central Registry database. DTMB was unable to provide evidence to demonstrate the content of the 23,673 (7%) records or to provide documentation that DTMB and DHS planned to remove these perpetrator records from the Central Registry at the time of conversion (see Exhibit 2). At the time of our audit, DTMB staff informed us that they believed the difference was a result of DTMB excluding alias\* perpetrator records from the conversion process. In October 2009, subsequent to our audit fieldwork and the written notification of this finding, DHS and DTMB performed an analysis indicating that the records were likely duplicate perpetrator records and/or records for unknown perpetrators.

\* See glossary at end of report for definition.

We identified the following industry controls related to management oversight that were missing from the conversion process:

- (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.
- (2) DHS and DTMB did not maintain documentation of the analysis and correction of errors that occurred during conversion. It is important that DHS and DTMB maintain documentation of the analysis and correction of conversion errors so that accountability and management oversight for all data manipulations that occurred during the conversion can be evaluated.
- (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.

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, our 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).

- b. 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

\* See glossary at end of report for definition.

accurately and completely converted from the former database to the current SWSS-CPS Central Registry database.

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.

- c. DTMB did not maintain proper segregation of duties\* during the overall conversion process, including the processes to extract the Central Registry perpetrator data from the former database or to transfer, transform, and load the perpetrator data into the SWSS-CPS Central Registry database. Our review disclosed:
  - (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.
  - (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 to us that the same employee who developed the SWSS-CPS Central Registry database was also responsible for

\* See glossary at end of report for definition.

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.

- d. 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.

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.

- e. 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.

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).

As a result of the internal control weaknesses discussed in this finding, DHS significantly increased the risk that it could fail to identify perpetrators of CA/N whose records DHS entered into the Central Registry prior to November 2007 and

prevent those perpetrators from gaining access to children in potentially vulnerable situations.

## **RECOMMENDATIONS**

We recommend that DHS, in conjunction with DTMB, establish effective internal control for the processes used to electronically convert data from one database to another.

We also recommend that DHS and DTMB investigate the accuracy and completeness of the SWSS-CPS Central Registry perpetrator records converted from the former Central Registry database to help ensure the safety of children in potentially vulnerable situations with perpetrators of CA/N.

## **AGENCY PRELIMINARY RESPONSE**

DHS and DTMB agree with the recommendations. DHS and DTMB reported to us that they will maintain conversion documentation according to established standards for new projects. In addition, DHS reported to us that it has a newly established Child Welfare Improvement Bureau within the Children's Services Administration that will work with DTMB on children's services systems projects so that future projects, including conversions, will be completed in a technologically secure environment and with the appropriate management oversight.

## **FINDING**

### **7. Accessing and Editing Perpetrator Records**

DHS had not established effective internal control over system access for users with the capability to edit key Central Registry perpetrator identifying information fields. In addition, DHS had not established effective internal control over the monitoring of edits made to Central Registry perpetrator information. As a result, DHS could not ensure that it prevented unauthorized edits to the Central Registry database.

In order to obtain access to the investigations module of SWSS-CPS, DHS staff must complete an SWSS profile security agreement to indicate the SWSS-CPS security level access needed and to document supervisory approval for the access. Once the agreement is completed, it is forwarded to either the applicable DHS LOSC or DHS Applications Security staff member to grant system access. LOSCs

grant system access to SWSS-CPS for DHS local office staff, and Applications Security staff grant system access to SWSS-CPS for DHS central office staff.

A perpetrator's identifying information in the Central Registry originates from the data entered into the investigations module of SWSS-CPS by CPS workers during investigations. When a perpetrator from an investigation is placed on the Central Registry, the perpetrator's identifying information entered by the CPS worker in the investigations module of SWSS-CPS is automatically transferred into the Central Registry database record for the perpetrator. After the perpetrator's information is recorded in the Central Registry database, there are two ways it can be edited: (1) SWSS-CPS users with edit capability can modify the information using the system's investigations module corrections mode\* (when perpetrator identifying information is edited in SWSS-CPS in this manner, the related Central Registry database fields are automatically updated with the edited information) or (2) SWSS-CPS database custodians had the capability to directly edit most fields in the SWSS-CPS and Central Registry databases, including fields containing perpetrator identifying information (DHS informed us that there were five database custodians).

We reviewed DHS's internal control over user access and edit capabilities of perpetrator identifying information within the SWSS-CPS and Central Registry systems. Our review disclosed:

- a. DHS needs to improve internal control over access to SWSS-CPS for users with edit capabilities:
  - (1) 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.

We noted that DHS granted access to 125 (24%) 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

\* See glossary at end of report for definition.

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).

- (2) 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.

We noted that DHS granted SWSS-CPS access to 13 users whose own name was entered as the approver for the access.

- (3) 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 reported to us that it 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.
  - (4) DHS did not monitor the access granting activities of LOSCs and Application Security staff that provided or modified access capability levels for SWSS-CPS users. DHS reported to us that it could not determine which LOSC or Application Security staff member granted SWSS-CPS access to users or modified the users' capabilities.
- b. 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:
- (1) DHS did not require secondary review or supervisory approval of edits made by SWSS-CPS users to key perpetrator identification fields via the corrections mode in the SWSS-CPS investigations module.
  - (2) 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.

Sound internal control would include supervisory approval for edits to key perpetrator identification fields.

- (3) 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.

Sound internal control would include maintaining historical records of edits made to key fields and monitoring of edits for propriety.

It is important for DHS to maintain sound internal control to help prevent unauthorized access and edits to the Central Registry database that could compromise the integrity of Central Registry perpetrator identifying information.

## **RECOMMENDATIONS**

We recommend that DHS establish effective internal control over system access for users with the capability to edit key Central Registry perpetrator identifying information fields.

We also recommend that DHS establish effective internal control over the monitoring of edits made to Central Registry perpetrator information.

## **AGENCY PRELIMINARY RESPONSE**

DHS agrees with the recommendations. DHS reported to us that it has prepared numerous systems work requests which include specific requirements for staff profiles that must be completed appropriately for access to be approved. DHS also reported to us that it is creating a local office management report to enable DHS to reconcile staff with Central Registry access to current staff listings to help ensure proper termination of access when it is no longer appropriate and monitor the activities of LOSCs. In addition, DHS reported to us that it has prepared a systems

work request to ensure that SWSS-CPS stores inquiry information in the Central Registry module to allow for second line review and oversight. DHS reported to us that, when the work is completed, DHS will then develop procedures for use of the information to monitor changes made within the Central Registry.

**ESTABLISHING INTERNAL CONTROL TO  
HELP ENSURE THAT DHS'S CENTRAL REGISTRY  
CLEARANCE PROCEDURES APPROPRIATELY  
IDENTIFY PERPETRATORS LISTED IN THE  
CENTRAL REGISTRY**

**COMMENT**

**Audit Objective:** To assess the effectiveness of DHS's efforts to establish internal control to help ensure that DHS's Central Registry clearance procedures appropriately identify perpetrators listed in the Central Registry.

**Audit Conclusion:** We concluded that DHS's efforts to establish internal control to help ensure that DHS's Central Registry clearance procedures appropriately identify perpetrators listed in the Central Registry were not effective. Our assessment disclosed two material conditions:

- DHS, in conjunction with DTMB, had not established effective internal control over DHS's automated Central Registry clearance processes (Finding 8).
- DHS had not established effective internal control over DHS's manual Central Registry clearance process (Finding 9).

**FINDING**

8. **Automated Clearance Processes**

DHS, in conjunction with DTMB, had not established effective internal control over DHS's automated Central Registry clearance processes. As a result, DHS did not identify 356 perpetrators of CA/N listed in the Central Registry and authorized the individuals for foster care, child day-care, and/or children's camp\* situations with

\* See glossary at end of report for definition.

direct access to at least 279 children during the period March 2006 through February 2009.

DHS relies on its automated Central Registry clearance processes to help detect situations in which childcare providers, foster care providers, adult household members of some childcare and foster care providers, and the chief administrators and licensees of children's camps, childcaring institutions\*, and child placing agencies\* become listed in the Central Registry as a perpetrator of CA/N after DHS authorizes them to provide these services. DHS routinely performs three separate automated Central Registry clearance processes for three different program areas within DHS: the Child Development and Care (CDC) program area, the Bureau of Children and Adult Licensing (BCAL), and the Children's Foster Care (CFC) program area. We noted that, in each of the three DHS program areas, staff were responsible for providing the basic design and establishing criteria for the automated clearance for their respective areas, and DTMB staff were responsible for the programming and maintenance of the logic to execute the automated clearances based on the design and criteria provided by the respective DHS program area staff. We also noted that all three DHS program areas used a different basic design and criteria for their respective automated Central Registry

\* See glossary at end of report for definition.

clearance processes. The following table describes each of DHS's three automated Central Registry clearance processes:

<u>Automated Central Registry Clearance Processes</u>		Number of Providers and Associated Individuals Included in Process at September 30, 2008
Providers and Associated Individuals Included in Automated Process	Description of Process	
Enrolled child day-care providers, day-care family home providers, and day-care group home providers (responsible DHS unit: CDC).	DHS matches all perpetrators on the Central Registry to the Model Payments System active day-care provider file by SSN, weekly.	45,012
Licensed day-care center providers, day-care group home providers, and foster care home applicants and active licensee providers; day-care family home applicants and active registrant providers; adult household members of applicant and active licensed foster home providers, licensed group day-care home providers, and registered day-care family home providers; and applicant and active chief administrators and licensees of children's camps, childcaring institutions, and child placing agencies (responsible DHS unit: BCAL).	DHS matches the perpetrators added to the Central Registry during the previous eight calendar days to the Bureau Information Tracking System (BITS) database by (1) full name and DOB and (2) first name and last name, weekly.	33,530
Unlicensed foster care providers currently caring for one or more children and licensed foster care providers currently caring for one or more children (responsible DHS unit: CFC).	DHS matches all perpetrators on the Central Registry to the SWSS foster care provider with children file by (1) SSN or (2) full name and DOB, monthly.	6,643
		<u>85,185</u>

We identified the following internal control weaknesses in DHS's automated Central Registry clearance processes:

- a. DHS and DTMB did not include all Central Registry perpetrators in the automated Central Registry clearance processes (see Exhibit 3). As a result, DHS and DTMB greatly increased the risk that the automated Central Registry clearance processes would fail to detect situations in which perpetrators of CA/N had, or could obtain, access to children in foster care, child day-care,

and various other childcare situations as indicated in the preceding table. Our review disclosed:

- (1) 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.
- (2) 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 a middle initial. As a result, DHS and DTMB routinely excluded approximately 134,000 (40%) Central Registry perpetrator records from the automated clearance process.
- (3) 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.
- (4) 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, childcaring 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).

DHS informed us that it 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.

- (5) 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.

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.

- b. 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 informed us 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.

- c. 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.
- d. 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.

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% to 100%. 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.

- e. 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.
- f. 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.

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).

- g. 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.

To determine the effect of these weaknesses, we compared DHS's Central Registry perpetrator database information to DHS's database information for childcare providers, foster care providers, adult household members of some childcare and foster care providers, and the chief administrators and licensees of children's camps, childcaring institutions, and child placing agencies. We determined that DHS and DTMB failed to identify 356 Central Registry perpetrators of CA/N in situations with access to children during our audit period. As a result, DHS authorized foster care, child day-care, and/or children's camp situations in which these 356 perpetrators of CA/N had direct access to at least 279 children.

DHS and DTMB relied on the automated Central Registry clearance processes as primary tools to help protect children from potentially vulnerable situations with known perpetrators of CA/N. Therefore, it is critical that DHS and DTMB maintain sound internal control over the automated Central Registry clearance processes to help ensure that DHS and DTMB effectively identify perpetrators of CA/N in situations in which children's safety could be jeopardized. The numerous internal control weaknesses that existed in DHS's automated Central Registry clearance processes, as described in this finding, combined with the DHS's weaknesses in internal control over Central Registry perpetrator data, as presented in Findings 5,

6, and 7, had a compounding effect that significantly increased the risk that DHS could fail to identify perpetrators of CA/N who are placed in vulnerable situations with children.

## **RECOMMENDATION**

We recommend that DHS, in conjunction with DTMB, establish effective internal control over DHS's automated Central Registry clearance processes.

## **AGENCY PRELIMINARY RESPONSE**

DHS agrees with the recommendation. DHS and DTMB reported to us that they reviewed and amended an existing systems work request, written prior to this audit, to ensure that the concerns related to this audit were included. DHS and DTMB reported to us that this work request was completed in March 2009 and currently pending closure as DHS and DTMB monitor its accuracy and effectiveness. DHS reported to us that the automated Central Registry search function now occurs daily and provides matches for enrolled day care providers and unlicensed foster care providers base on numerous identifiers such as SSN, name, and DOB. In addition, DHS reported to us that automated matches for BCAL have also been enhanced, and the matches from previous searches are now maintained.

## **FINDING**

### **9. Manual Clearance Process**

DHS had not established effective internal control over DHS's manual Central Registry clearance process. As a result, DHS could not ensure that its manual Central Registry clearance process effectively identified perpetrators of CA/N.

The CPL, the Adam Walsh Child Protection and Safety Act of 2006, the *Michigan Administrative Code*, and DHS policy require DHS to perform Central Registry clearances for certain individuals in specific situations. DHS is required to perform Central Registry clearances on adults who are the subject of a CPS CA/N investigation. Also, DHS is required to perform Central Registry clearances on prospective adoptive placements, foster care providers, or child day-care providers and their adult household members, when appropriate. In addition, DHS must conduct Central Registry clearances for individuals who request information on themselves. Individuals often request a Central Registry clearance on themselves for employment purposes when the employment will place the individuals in direct

contact with children. Further, some employers and volunteer agencies may also request DHS to conduct manual Central Registry clearances on individuals who are employees, potential employees, volunteers, or potential volunteers.

DHS relies on its manual Central Registry clearances to help detect and prevent numerous situations in which a perpetrator of CA/N could obtain or maintain access to children in potentially vulnerable situations. The following table describes DHS's manual Central Registry clearances:

Manual Central Registry Clearances

Individuals Subject to a DHS Manual Central Registry Clearance	When DHS Performs a Manual Clearance of Central Registry for the Individual	Number of Manual Clearances DHS Performed During Fiscal Year 2007-08
Individuals associated with and persons responsible for the child's health or welfare that are the subject of a CPS investigation.	Upon receipt of complaints of alleged CA/N	240,129 (1)
Enrolled child day-care providers	At application	29,331 (2)
Adoptive placements	Between application and final family assessment	4,156 (3)
Licensed or registered childcare providers	At application	3,040 (4)
All new DHS staff, including departmental transfers	At hire, then yearly if staff have direct contact with children	218 (5)
		<u><u>276,874</u></u>
Adult household members of adoptive placements	Between application and final family assessment	Undeterminable (6)
Unlicensed foster care providers	At the time of a child's placement with the individual and during the family assessment	Undeterminable (6)
Adult household members of unlicensed foster care providers	At application, during family assessment, when DHS is notified of a change, and quarterly	Undeterminable (6)
Adult household members of enrolled child day-care providers	At application and when DHS is notified of a change	Undeterminable (6)
Adult household members of licensed or registered childcare providers	At application	Undeterminable (6)

Individuals requesting Central Registry clearances on themselves, often for employment purposes that would place them in direct contact with children	As requested	Undeterminable	(6)
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Employers and volunteer agencies requesting Central Registry clearances on individuals who are employees, potential employees, volunteers, or potential volunteers	As requested	Undeterminable	(6)
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- (1) DHS's SWSS-CPS.
- (2) DHS's Model Payments System.
- (3) DHS Adoption Services Division.
- (4) DHS Bureau of Children and Adult Licensing's Bureau Information Tracking System (BITS).
- (5) Michigan Department of Civil Service Annual Workforce Report - Fiscal Year 2007-08.
- (6) DHS does not maintain records of manual Central Registry clearances (see part a. of this finding). In addition, DHS was unable to provide statistics on unlicensed foster care providers and adult household members of any type. All other figures on this table were approximations of manual clearances performed based on statistics obtained from the sources described previously.

Our audit identified the following internal control weaknesses in DHS's manual Central Registry clearance process:

- a. 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, our 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.

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.

- b. DHS did not always process Central Registry clearance requests in a timely manner. As a result, substantiated perpetrators of CA/N 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 to us that DHS received approximately 1,300 Central Registry clearance requests between January and June 2008. As of July 1, 2008, our review determined that DHS had processed 357 (27%) of the requests and that an estimated 943 (73%) of the requests remained unprocessed. We further reviewed the 357 requests DHS had processed and found that 37 (10%) were processed more than 10 days after the receipt of the requests and 4 (11%) of those 37 clearances revealed that the individual had a substantiated history of CA/N in Michigan. All 4 of these requests originated from other states.
- c. 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.

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 informed us that 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.

- d. 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, we determined that, 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 us that 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).

DHS uses its manual Central Registry clearance process as an important tool to help protect children from situations with substantiated perpetrators of CA/N in Michigan and elsewhere. Therefore, it is critical that DHS maintains sound internal control over its manual Central Registry clearance process to ensure that it effectively identifies perpetrators of CA/N.

### **RECOMMENDATION**

We recommend that DHS establish effective internal control for DHS's manual Central Registry clearance process.

### **AGENCY PRELIMINARY RESPONSE**

DHS agrees with the recommendation. DHS reported to us that, since July 2009, DHS has maintained a tracking and monitoring system to ensure that all requests for Central Registry checks from the public are documented and completed timely.

In addition, DHS reported to us that systems changes that have been made, and ones that are planned, will ensure the improved accuracy of manual Central Registry clearances. Further, DHS reported to us that it has completed a systems work request that will ensure that SWSS-CPS stores inquiry information within the Central Registry module. This information will include who completed the Central Registry search, the date and time the search was conducted, the search results, any modifications made for perpetrator entry, and who modified the entry.



## SUPPLEMENTAL INFORMATION

STATEWIDE ELECTRONIC CENTRAL REGISTRY  
Department of Human Services (DHS)

Uses of Central Registry Perpetrator Information  
As of March 2009

		Users are:			
Information Used for:		User	State of Michigan DHS	Other Entities Within Michigan	Entities Outside of Michigan
Determining the Perpetrator Status of:	Licensed or registered childcare organizations and all applicable adult household members	Bureau of Children and Adult Licensing (BCAL)	✓		
	Foster care provider applicants and licensees, employees of foster care applicants and licensees, adult household members of applicants or licensees, and other persons responsible for the children's health or welfare	Family divisions of circuit court staff		✓	✓
	Unlicensed foster care providers	Children's Foster Care (CFC) - Program Office and Local Office	✓		
	Adult household members of unlicensed foster care providers	CFC - Local Office	✓		
	Prospective foster care providers	Legally mandated public or private child placement agencies that screen prospective foster homes		✓	✓
	Enrolled child day-care providers	Child Development and Care (CDC) - Local Office and Program Office, Reconciliation and Recoupment Section	✓		
	Adult household members of enrolled child day-care providers	CDC - Local Office and Reconciliation and Recoupment Section	✓		
	Adult household members of prospective unlicensed foster care providers	Legally mandated public or private child placement agencies that screen prospective foster homes	✓	✓	✓
	Prospective adoptive placements and any adult household members	Legally mandated public or private child placement agencies that screen prospective adoptive homes	✓	✓	✓
	All DHS employees, including departmental transfers	Office of Human Resources	✓		
Investigating Individuals for:	Central Registry status of employees, potential employees, volunteers, and potential volunteers	Employers and volunteer organizations		✓	✓
	Known or suspected child abuse and/or child neglect	Legally mandated public or private child protective agencies	✓		✓
		Police or other law enforcement agencies		✓	✓
	Office of the Children's Ombudsman	Office of the Children's Ombudsman		✓	
	County medical examiners	County medical examiners or deputy county medical examiners		✓	✓
	Child fatality cases in which the perpetrator has an additional child	Children's Protective Services (CPS) Local Office	✓		
	Complaints against licensed or registered child care providers	BCAL	✓		
	Child(ren) in protective custody cases who the user reasonably suspects may be abused or neglected	Persons legally authorized to place a child in protective custody		✓	✓

STATEWIDE ELECTRONIC CENTRAL REGISTRY  
Department of Human Services (DHS)

Uses of Central Registry Perpetrator Information  
As of March 2009  
(Continued)

		Users are:		
		State of Michigan DHS	Other Entities Within Michigan	Entities Outside of Michigan
<b>Legal and Policy Recommendations Regarding:</b>		User		
		Deciding issues before the court	Courts that determine the information is necessary to decide an issue before the court	✓ ✓
		Grand jury official business	Grand juries	✓ ✓
		Information for a court case	Lawyers-guardians ad litem or other attorney	✓ ✓
		General or specific information for the Legislature	Standing or select committees or appropriations subcommittees of either house of the Legislature having jurisdiction over child protective services matters	✓ ✓
		Investigation and review of child deaths	Child fatality review teams	✓ ✓ ✓
		CPS information limited to what DHS determines necessary to carry out the prescribed duties of the citizen review panel	Citizen review panels	✓ ✓ ✓
<b>Medical Purposes, Helping to:</b>		Custody or parenting time issues regarding a child	Local friend of the court offices	✓ ✓
		Meeting the requirements of the Foster Care Review Boards Act	A foster care review board	✓
<b>Disclosures to Individuals Regarding:</b>		Develop a reliable, medical opinion on the child and provide appropriate treatment	Physicians who are treating a child who the physicians reasonably suspect may be abused or neglected	✓ ✓
		Provide information for a diagnosis, assessment, consultation, and treatment authorized by DHS or court	Persons, agencies, or organizations, including multidisciplinary case consultation teams, authorized to diagnose, care for, treat, or supervise a child or family who is the subject of a report or record under the Child Protection Law or who is a person responsible for the child's health or welfare	✓ ✓
<b>Other Disclosures, Including:</b>		CPS cases to which the requesting individual is related	All parents (custodial/noncustodial, birth, or adoptive) and legal guardians of children who are the subject of CPS complaints; a child(ren) victim who is (are) an adult at the time of the request; or other persons responsible for the child's health or welfare (e.g., adult household members or nonparent adults) that are alleged or substantiated perpetrators	✓ ✓
		Central Registry status	Individuals requesting information on themselves	✓ ✓
		Specified information released with the approval of the director	Any person, agency, or organization	✓ ✓
		Nonidentifying information related to a bona fide research or evaluation project (unless written consent is obtained from the individual who is the subject of the investigation)	Persons, agencies, or organizations engaged in a bona fide research or evaluation project	✓ ✓

Source: Auditor prepared based on information obtained during the audit and information from Michigan's Child Protection Law (Sections 722.621 - 722.638 of the *Michigan Compiled Laws*), the Adam Walsh Child Protection and Safety Act of 2006, and Public Law 109-248.

**STATEWIDE ELECTRONIC CENTRAL REGISTRY**  
 Department of Human Services

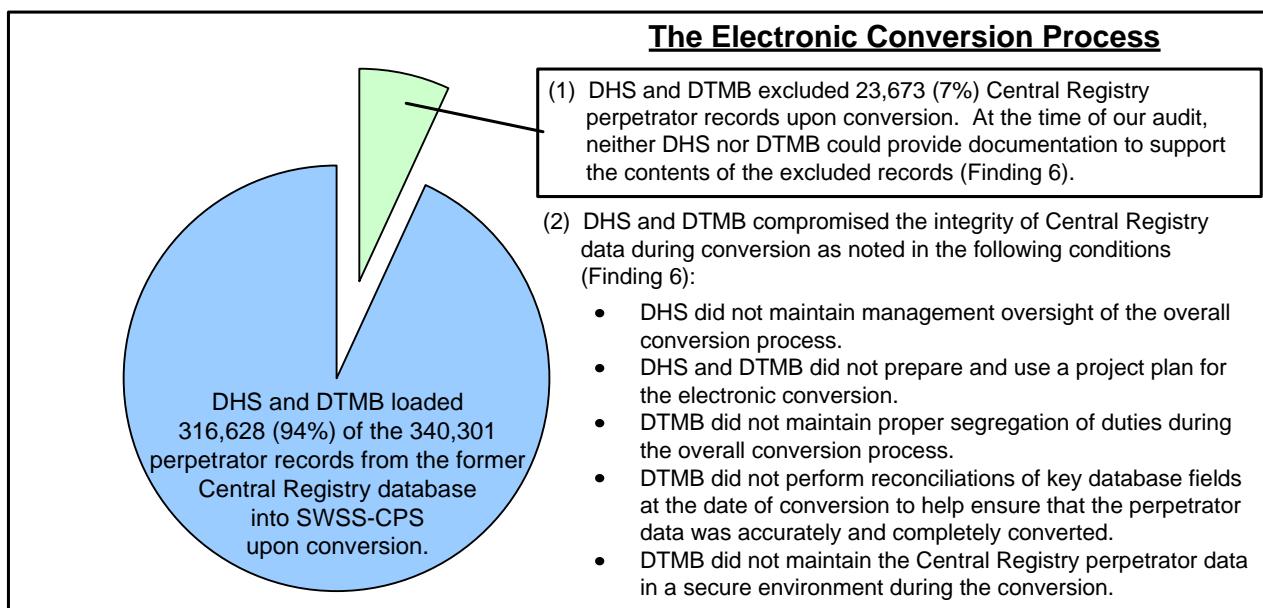
Exhibit 2

Weaknesses in Internal Control Over Central Registry Perpetrator Records

<b>Internal Control Weaknesses</b>	<b>Former Central Registry Database 340,301 records as of November 2007</b>	<b>SWSS-CPS Central Registry 337,190 records as of September 2008</b>
DHS had not established effective internal control to help ensure that it always added the substantiated perpetrators of CA/N to the Central Registry that DHS identified during CPS investigations (Finding 1).		✓
DHS had not established effective internal control to ensure that it completed and reviewed CPS investigations timely (Finding 2).		✓
DHS had not established effective internal control to help ensure that it prevented the improper expungement of perpetrator records from the Central Registry (Finding 3).		✓
DHS had not established effective internal control to help ensure that it obtained and maintained sufficient, accurate, and complete identifying information for substantiated perpetrators of CA/N in the Central Registry (Finding 5).	✓	
DHS had not established effective internal control over system access for users with the capability to edit key Central Registry perpetrator identifying A12information fields. In addition, DHS had not established effective internal control over the monitoring of edits made to Central Registry perpetrator information. (Finding 7)		✓

*These weaknesses in internal control over Central Registry perpetrator records significantly decreased DHS's ability to effectively identify perpetrators of CA/N in vulnerable situations with children (Findings 8 and 9).*

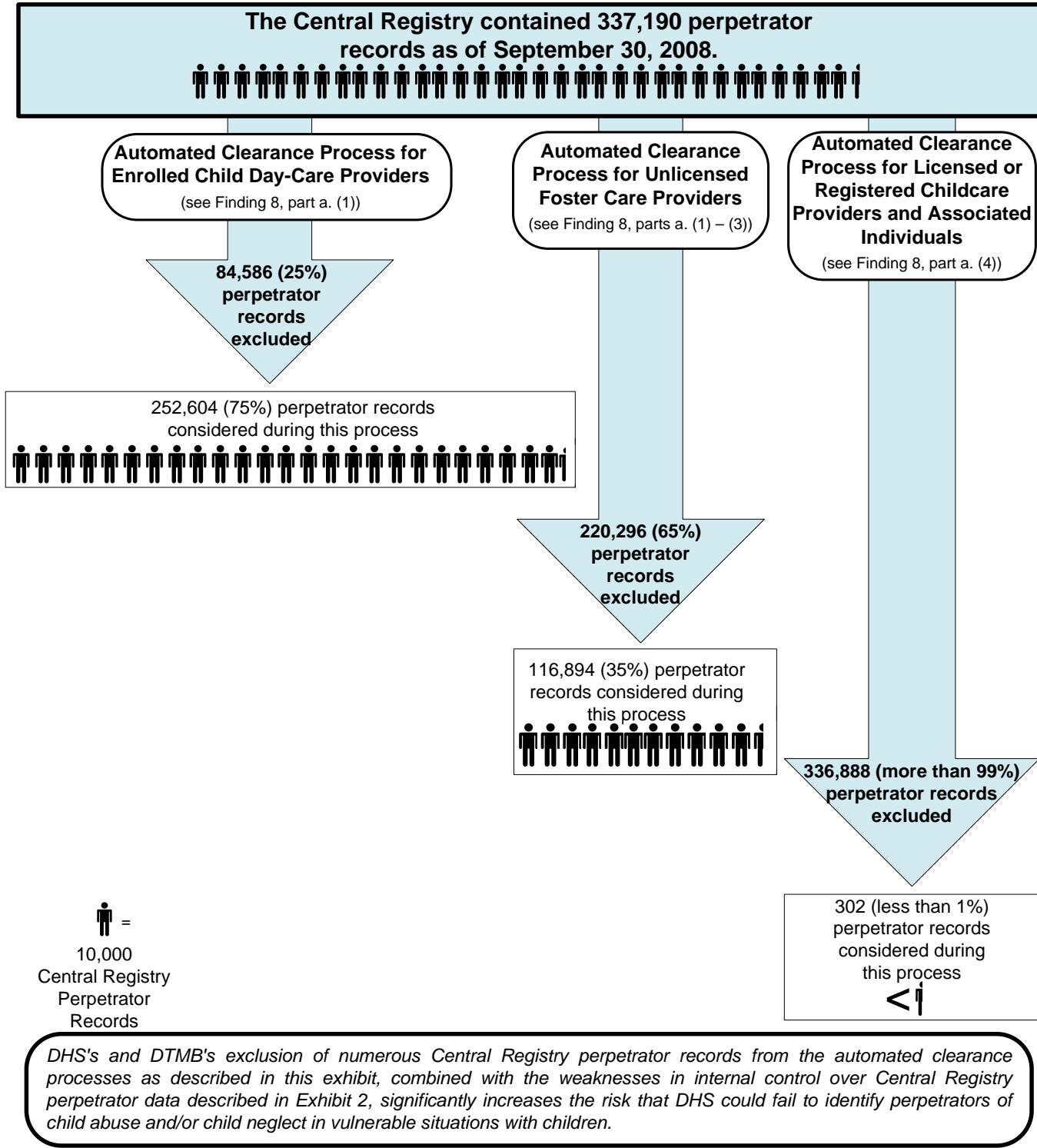
**Finding 6**



Source: Auditor prepared based on information obtained during the audit.

**STATEWIDE ELECTRONIC CENTRAL REGISTRY**  
Department of Human Services

Central Registry Perpetrator Records Considered During the Automated Clearance Processes



Source: Auditor prepared based on information obtained during the audit.

# GLOSSARY

## Glossary of Acronyms and Terms

adoptive placement	Permanent placement of a child with an approved family as ordered by a court.
adult household member	A person, 18 years of age or older, who resides in the home with a licensed or registered childcare provider, unlicensed foster care provider, or enrolled child day-care provider.
a.k.a.	also known as.
alias	An additional or assumed name.
automated	In regard to clearances of the Central Registry database, one or more of DHS's three scheduled periodic electronic matches of identifying information contained in various DHS databases of enrolled child day-care providers, unlicensed foster care providers, and licensed or registered childcare providers and associated individuals to identifying information in the Central Registry database to determine if any of these providers are substantiated perpetrators of CA/N. Automated clearances are performed subsequent to DHS's approval of an individual to become an enrolled child day-care provider, an unlicensed foster care provider, or a licensed or registered childcare provider.
BCAL	Bureau of Children and Adult Licensing.
CA/N	child abuse and/or child neglect.
Category I	Court petition required. DHS determines that there is evidence of CA/N and one or more of the following are true: (i) a court petition is required under another provision of this act; (ii) the child is not safe and a petition for removal is needed; (iii) DHS previously classified the investigation as Category II and the child's family does not voluntarily

participate in services; or (iv) there is a violation, involving the child, of a crime listed or described in Sections 8a(1)(b), (c), (d), or (f) of the CPL or of child abuse in the first or second degree as prescribed by Section 136b of the Michigan Penal Code, Act 328, P.A. 1931 (Section 750.136b of the *Michigan Compiled Laws*). In response to a Category I classification, DHS must do all of the following: (a) if a court petition is not required under another provision of this act, submit a petition for authorization by the court under Section 2(b) of Chapter XIIA of the Probate Code of 1939, Act 288, P.A. 1939, Section 712A.2 of the *Michigan Compiled Laws*; (b) open a protective services case and provide the services necessary under the CPL; and (c) list the perpetrator of the CA/N, based on the report that was the subject of the field investigation, on the Central Registry, either by name or as "unknown" if the perpetrator has not been identified.

Category II CPS services required. DHS determines that there is evidence of CA/N and the structured decision-making tool indicates a high or intensive risk of future harm to the child. DHS shall open a protective services case and provide the services necessary under the CPL. DHS shall also list the perpetrator of CA/N, based on the report that was the subject of the field investigation, on the Central Registry either by name or as "unknown" if the perpetrator has not been identified.

Category III Community services needed. DHS determines that there is a preponderance of evidence of CA/N and the structured decision-making tool indicates a low or moderate risk of future harm to the child. DHS must assist the child's family in receiving community-based services commensurate with the risk to the child. If, following a field investigation, DHS determines that there is a preponderance of evidence that an individual who is a licensed childcare provider or nonparent adult who lives outside the child's home was the perpetrator

of CA/N, DHS must list the perpetrator of the CA/N on the Central Registry.

Category IV	Community services recommended. Following a CPS investigation, DHS determines that there is not a preponderance of evidence of CA/N, but the structured decision-making tool indicates that there is future risk of harm to the child. DHS must assist the child's family in voluntarily participating in community-based services commensurate with the risk to the child.
Category V	Services not needed. Following a CPS investigation, DHS determines that there is no evidence of CA/N.
CDC	Child Development and Care.
Central Registry	The system maintained at DHS that is used to keep a record of all reports filed with DHS pursuant to the CPL in which relevant and accurate evidence of CA/N is found to exist.
CFC	Children's Foster Care.
child(ren)	A person(s) under 18 years of age.
child abuse	Harm or threatened harm to a child's health or welfare that occurs through nonaccidental physical or mental injury, sexual abuse, sexual exploitation, or maltreatment by a parent, a legal guardian, or any other person responsible for the child's health or welfare or by a teacher, a teacher's aide, or a member of the clergy.
childcare organization	A governmental or nongovernmental organization having as its principal function receiving minor children for care, maintenance, training, and supervision, notwithstanding that educational instruction may be given; includes organizations commonly described as childcaring institutions, child placing agencies, children's camps, children's campsites, children's

	therapeutic group homes, childcare centers, day-care centers, nursery schools, parent cooperative preschools, foster homes, group homes, or childcare homes.
childcare provider	An owner, operator, employee, or volunteer of a childcare organization.
childcaring institution	A childcare facility that is organized for the purpose of receiving minor children for care, maintenance, and supervision, usually on a 24-hour basis, in buildings maintained by the childcaring institution for that purpose, and operates throughout the year.
child day-care provider	A person or agency licensed, registered, or enrolled by DHS to provide child day-care services.
child neglect	Harm or threatened harm to a child's health or welfare by a parent, legal guardian, or any other person responsible for the child's health or welfare that occurs through either of the following: (i) negligent treatment, including the failure to provide adequate food, clothing, shelter, or medical care or (ii) placing a child at an unreasonable risk to the child's health or welfare by failure of the parent, legal guardian, or other person responsible for the child's health or welfare to intervene to eliminate that risk when that person is able to do so and has, or should have, knowledge of the risk.
child placing agency	A governmental organization or an agency organized under the Nonprofit Corporation Act, Sections 450.2101 - 450.3192 of the <i>Michigan Compiled Laws</i> (Act 162, P.A. 1982), for the purpose of receiving children for placement in private family homes for foster care or for adoption.
Child Protection Law (CPL)	Sections 722.621 - 722.638 of the <i>Michigan Compiled Laws</i> (Act 238, P.A. 1975, as amended).

children's camp	A residential, day, troop, or travel camp that provides care and supervision and is conducted in a natural environment for more than four children, apart from the children's parents, relatives, or legal guardians, for 5 or more days in a 14-day period.
Children's Protective Services (CPS)	Program services designed to rectify conditions that threaten the health and safety of children because of the actions or inactions of persons responsible for their care. These services include investigating a report, determining the danger to the child and taking immediate steps to remove the danger, providing or arranging for needed services for the child and family, and when appropriate initiating legal action to protect the child.
clearance	A manual or automated check of the Central Registry database using identifying information to determine if individuals are substantiated CA/N perpetrators.
complaint	Communication to DHS of an allegation of CA/N. The term "complaint" as used in this audit report is interchangeable with the term "report" as used in the CPL.
Control Objectives for Information and Related Technology (COBIT)	A framework, control objectives, and audit guidelines published by the IT Governance Institute as a generally applicable and accepted standard for good practices for controls over information technology.
convert	To electronically extract, transform, and load database records from a previously used system to a new system.
corrections mode	A function in SWSS-CPS that allows DHS staff to edit investigation information subsequent to the disposition. Any changes made in corrections mode would result in corresponding adjustments to any Central Registry records related to the investigation.

Customer Information Management System (CIMS)	The transaction processing system that supports a Statewide network of remote terminals and provides inquiry and interactive maintenance capabilities.
DCO	Data Center Operations.
DHS	Department of Human Services.
disposition	The results or findings of a CPS investigation that is categorized as noted in the Category I, Category II, Category III, Category IV, or Category V definitions.
DOB	date of birth.
DTMB	Department of Technology, Management & Budget.
effectiveness	Program success in achieving mission and goals.
enrolled	Child day-care providers who provide child day-care services to only eligible Child Development and Care children and not the general public. DHS does not regulate enrolled providers.
expunge	To physically remove or eliminate and destroy a record or report.
flag	To electronically mark for attention.
foster care provider	A person or entity authorized by DHS to provide 24-hour substitute care for children to be placed away from their parents or guardians for whom DHS has placement and care responsibility, including, but not limited to, placements supervised by a licensed private child placing agency under contract with DHS; placements in foster family homes, relative homes, group homes, emergency shelters, residential facilities, and childcare institutions; and pre-adoptive placements.

identifying information	Information that may lead to positive identification of a perpetrator of CA/N listed on the Central Registry. This information may include, but is not limited to, name, DOB, and SSN.
intake	Process of receiving a complaint; recording a complaint; and making a decision to assign, reject, or transfer a complaint.
integrity	Accuracy, completeness, and timeliness of data in an information system.
internal control	The plan, policies, methods, and procedures adopted by management to meet its mission, goals, and objectives. Internal control includes the processes for planning, organizing, directing, and controlling program operations. It includes the systems for measuring, reporting, and monitoring program performance. Internal control serves as a defense in safeguarding assets and in preventing and detecting errors; fraud; violations of laws, regulations, and provisions of contracts and grant agreements; or abuse.
investigation	An intense time-limited process of gathering and evaluating information to assess the level of risk to a child and to reach a disposition regarding complaint allegations.
licensed or registered	Childcare organizations that are regulated by BCAL and may provide childcare services to DHS children as well as the general public.
LOSC	local office security coordinator.
manual	In regard to clearances of the Central Registry database, the process in which DHS staff hand-key identifying information of individuals and execute a search function in the Central Registry module of SWSS-CPS to determine if individuals are substantiated perpetrators of CA/N. Manual clearances are performed prior to DHS's approval of an individual to become

	an enrolled child day-care provider, an unlicensed foster care provider, or a licensed or registered childcare provider.
mapping procedures	The process of making logical connections between two entities.
match	When DHS's Central Registry clearances identify an individual whose identifying information coincides with identifying information contained in the Central Registry.
material condition	A reportable condition that could impair the ability of management to operate a program in an effective and efficient manner and/or could adversely affect the judgment of an interested person concerning the effectiveness and efficiency of the program.
module	A portion of SWSS-CPS that carries out a specific function and may be used alone or combined with other modules of SWSS-CPS (e.g., investigations module and Central Registry module).
nonparent adult	A person who is 18 years of age or older and who, regardless of the person's domicile, meets all of the following criteria in relation to a child: (i) has substantial and regular contact with the child, (ii) has a close personal relationship with the child's parent or with a person responsible for the child's health or welfare, and (iii) is not the child's parent or a person otherwise related to the child by blood or affinity to the third degree.
performance audit	An economy and efficiency audit or a program audit that is designed to provide an independent assessment of the performance of a governmental entity, program, activity, or function to improve program operations, to facilitate decision making by parties responsible for overseeing or initiating corrective action, and to improve public accountability.

perpetrator	A person responsible for a child's health and welfare that has been substantiated by DHS, based on a preponderance of evidence (see definition), as having abused or neglected that child and is consequently listed on the Central Registry.
person responsible for the child's health or welfare	A parent, legal guardian, person 18 years of age or older who resides for any length of time in the same home in which the child resides, or, except when used in Section 7(2)(e) or 8(8) of the CPL, nonparent adult (see definition); or an owner, operator, volunteer, or employee of one or more of the following: (i) a licensed or registered childcare organization, or (ii) a licensed or unlicensed adult foster care family home or adult foster care small group home as defined in the Adult Foster Care Facility Licensing Act, Section 400.703 of the <i>Michigan Compiled Laws</i> (Act 218, P.A. 1979).
preponderance of evidence	Evidence that is of great weight or more convincing than the evidence that is offered in opposition to it.
program logic	A set of coded instructions that enables a computer to perform a desired sequence of operations (e.g., sorting, comparing, and matching).
project plan	A document that describes the technical and management approach to be followed for a project. The plan typically describes the work to be done, the resources required, the methods to be used, the procedures to be followed, the schedules to be met, and the way the project will be organized.
relevant evidence	Evidence having a tendency to make the existence of a fact that is at issue more probable than it would be without the evidence.
reportable condition	A matter that, in the auditor's judgment, falls within any of the following categories: an opportunity for improvement within the context of the audit objectives; a deficiency in internal

control that is significant within the context of the objectives of the audit; all instances of fraud; illegal acts unless they are inconsequential within the context of the audit objectives; significant violations of provisions of contracts or grant agreements; and significant abuse that has occurred or is likely to have occurred.

segregation of duties	Separation of management or execution of certain duties or areas of responsibility to prevent or reduce opportunities for unauthorized modification or misuse of data or service.
Services Worker Support System - Children's Protective Services (SWSS-CPS)	An information system used by DHS beginning in November 2007 to track reported, investigated, and substantiated cases involving CA/N.
Social Security Administration (SSA)	A division of the federal Department of Health and Human Services that administers federal Social Security programs.
SOP	standard of promptness.
SSN	social security number.
substantiated	A CPS investigation classified as a Central Registry case.
test plan	A document specifying the scope, approach, resources, and schedule of intended testing activities. The plan identifies test items, the features to be tested, the testing tasks, who will do each task, and any risks requiring contingency planning.
unlicensed	Unrelated or relative foster care providers who are not regulated by BCAL but are authorized by DHS to provide foster care services. These providers do not receive payment from DHS.

user	Within the context of information systems, the general population of individuals who use a software product or system. User activities can include data entry; read only; add, change, and delete capabilities; querying; and report generation.
walkthrough	An analysis technique in which a team of subject matter experts review a segment of program logic, documentation, or other work product; ask questions; and make comments about possible errors, violation of development standards, and other problems.





