

# PERFORMANCE AUDIT REPORT

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## Pennsylvania Department of Human Services ChildLine

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October 2016



Commonwealth of Pennsylvania  
Department of the Auditor General

Eugene A. DePasquale • Auditor General

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EUGENE A. DePASQUALE  
AUDITOR GENERAL

October 11, 2016

The Honorable Tom Wolf  
Governor  
Commonwealth of Pennsylvania  
Harrisburg, PA 17120

Dear Governor Wolf:

This report contains the results of the Department of the Auditor General's performance audit of the Pennsylvania Department of Human Services (DHS) with regard to evaluating DHS' duties and responsibilities related to administering the Statewide Child Abuse Hotline (ChildLine). This audit covered the period January 1, 2014, through June 30, 2016, unless otherwise noted, with updates through the report's release. This audit was conducted under the authority of Section 402 of The Fiscal Code, 72 P.S. § 402, and in accordance with applicable 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.

Our performance audit had two objectives, from which we report eight findings within two issue areas and 24 recommendations. Briefly, our objectives covered the following: (1) determine the effectiveness of DHS' intake process for ChildLine; and (2) determine whether child abuse/neglect calls to ChildLine are processed in accordance with applicable laws, regulations, and policies.

During the course of our audit, we identified an alarming rate of 22 percent of calls (or 41,990 calls) to ChildLine not answered by DHS caseworkers in 2015, along with inadequate staffing for the hotline and a severe lack of monitoring of hotline calls, thereby putting potentially abused children further at risk. DHS appeared to be aware of many of these circumstances, but was not addressing the issues quickly enough while children were at risk. We considered these situations to be significant within the context of our audit objectives and issued DHS management an interim report of significant matters, released on May 23, 2016, so that immediate corrective action could be taken.

Since our interim report, DHS has made improvements by hiring additional staff for ChildLine leading to only 3.3 percent of calls to ChildLine going unanswered in June 2016.

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Additionally as a result of our interim report, DHS also implemented formal call monitoring procedures in the last two weeks of June 2016, and management stated that all calls began being tracked on August 1, 2016, subsequent to our audit period. These improvements will help to ensure an effective call intake process; however, more improvement is needed.

We also found delays with ChildLine transmitting the reports of suspected child abuse or neglect to the county and law enforcement agencies responsible for investigating the reports. Additionally, we found county agencies are not always submitting investigation outcomes back to ChildLine within the required 60 days, and in many cases outcomes were not submitted at all, with no documented follow-up by ChildLine during 2015. These significant deficiencies are unacceptable with vulnerable children at risk.

We further found that DHS did not have an established on-going training program for ChildLine employees specific to their job-related duties, and there was a lack of documentation supporting the training that was received during the period January 1, 2014 through June 30, 2016. Without adequate on-going training, there is an increased risk that reports of suspected child abuse may not be properly received, processed, and transmitted to appropriate investigating agencies, and subsequently tracked to the outcome, ultimately putting children at risk.

Finally, the data file we obtained of all referral reports of suspected child abuse or neglect received by ChildLine during calendar year 2015, which included any investigation outcomes submitted by the investigating county agencies as of March 15, 2016, had nearly 11,000 missing and deleted records, and more than 12,000 referral reports with no investigation outcomes. Without full accountability of all report numbers and investigation outcomes, risk increases that an actual child abuse report could be mishandled. Even one mishandled report could be a life or death situation given that one neglected or abused child in the commonwealth is one too many.

In closing, I want to thank DHS for its cooperation and assistance during the audit. DHS is in agreement with the findings and recommendations and is in varying stages of implementing our recommendations. We will follow up at the appropriate time to determine whether and to what extent all recommendations have been implemented.

Sincerely,

A handwritten signature in black ink, appearing to read "Eugene A. DePasquale". The signature is fluid and cursive, with a long horizontal stroke at the end.

Eugene A. DePasquale  
Auditor General

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## Executive Summary

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**T**he Pennsylvania Department of Human Services (DHS) is responsible for overseeing the administration and operations of Pennsylvania's child abuse hotline known as ChildLine. ChildLine operates within the DHS' Office of Children, Youth, and Families. DHS staffs ChildLine 24-hours a day, seven days a week to take calls about allegations of potential child abuse/neglect, and then makes referrals to the appropriate county and law enforcement investigating agencies.

Our performance audit had two objectives, including determining the effectiveness of DHS' caller intake process for ChildLine and determining whether child abuse/neglect calls to ChildLine were processed in accordance with applicable laws, regulations, and policies. Our audit period was January 1, 2014, through June 30, 2016, unless otherwise noted, with updates through the report's release.

During the course of our audit, we identified an alarming rate of calls to ChildLine not answered by DHS caseworkers in 2015, along with inadequate staffing for the hotline and a severe lack of monitoring of hotline calls, thereby putting potentially abused children further at risk. DHS appeared to be aware of many of these circumstances but was not addressing the issues quickly enough while children were at risk. We considered these situations to be significant within the context of our audit objectives and issued DHS management an interim report of significant matters, released on May 23, 2016, so that immediate corrective action could be taken.

In response to our interim report of significant matters, DHS began implementing corrective action to address our recommendations. We evaluated the status of DHS' actions through June 30, 2016. These matters relate to our first objective of determining the effectiveness of DHS' intake process for ChildLine and are addressed in Issue Area 1 and summarized below. After our interim report was released, we continued to evaluate our second objective of determining whether child abuse/neglect calls to ChildLine are processed in accordance with applicable law, regulations, and policies. Findings related to our second objective are addressed in Issue Area 2 and summarized below.

This audit report contains a total of eight findings, and 24 recommendations. Overall, DHS agrees with the audit report's findings and recommendations, and is in varying stages of addressing our recommendations.

**PA Department of Human Services****Objective 1*****Issue Area 1:  
Unanswered calls,  
failure to track  
calls, and scant  
monitoring of calls  
leave children at  
risk.***

Nearly 58,000 calls to ChildLine went unanswered, including 22 percent of all calls, or 41,990 calls, in 2015 alone. Additionally, wait times for calls not immediately answered that enter a holding queue were excessive with wait times exceeding 50 minutes in 2015, and 40 minutes in both 2014 and 2016. DHS attributed the high volume of unanswered calls and long wait times to changes brought about by amendments to the Child Protective Services Law (CPSL), largely effective December 31, 2014, along with implementing the new Child Welfare Information Solutions (CWIS) system on December 27, 2014. However, we also found ChildLine was understaffed during this same time period. DHS has slowly been increasing its approved complement and number of filled caseworker positions throughout our audit period from 37 filled positions with 4 vacant positions at March 31, 2014, to 60 filled positions with 12 vacant positions at June 30, 2016. With the increase in staff, ChildLine made notable improvements with only 3.3 percent of calls going unanswered in June 2016. While this was a significant improvement, June is typically a low call volume month. With 12 vacant caseworker positions, or 17 percent of its approved complement at June 30, 2016, these positions should be filled as needed to handle higher call volume months, as any unanswered calls are considered to be life or death situations given that even one neglected or abused child in the commonwealth is **one too many**.

We also found that DHS failed to document the purpose of nearly 124,000 calls during the period January 1, 2014 through June 30, 2016. DHS claims that these calls in general did not involve suspected child abuse or neglect, but without tracking and documenting all calls, we could not verify that none of the calls involved suspected abuse or neglect. Additionally, this large volume of calls answered not concerning child abuse or neglect takes time away from caseworkers' ability to answer other calls which involve the welfare of children. After our interim report was issued, DHS management stated it began tracking all calls on August 1, 2016, subsequent to our audit period.

Finally, we found that only 103 of more than 380,000 answered calls were monitored by ChildLine supervisors during the period January 1, 2014 through June 30, 2016, with only 7 calls monitored in 2015. Without adequate monitoring of calls, there is a much higher risk that calls may not be processed efficiently and accurately, and subsequently referred to county and law enforcement agencies. After our interim

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report was issued, DHS did implement new formal call monitoring procedures beginning in the last two weeks of June 2016.

**Objective 2*****Issue Area 2:  
ChildLine's  
ineffective tracking  
system and  
inadequate  
training leave  
vulnerable children  
at risk for harm.***

ChildLine serves as the primary collection point for reporting allegations of child abuse and neglect in Pennsylvania. The child abuse and neglect reports received through ChildLine are processed, evaluated, and referred to the appropriate county and law enforcement agencies. The county agencies have the responsibility for investigation and assessment determinations (outcomes) of both Child Protective Services (CPS)<sup>1</sup> and General Protective Services (GPS)<sup>2</sup> reports. The CPSL<sup>3</sup> requires the investigations to be completed within 60 days from the date of the initial report and DHS regulations also require the county agencies to submit the outcomes to ChildLine within the same 60-day period.<sup>4</sup>

Unfortunately, our review of 85 referral reports received by ChildLine during calendar year 2015 revealed significant delays with ChildLine transmitting the reports to the county and law enforcement agencies. We found 22 of the 85 referrals reviewed included timeframes for transmission exceeding two hours, including 2 referrals which took over a day to transmit. Any delay with providing the reports to the investigating agencies could be the difference between life and death for a child that is in an abusive situation. Additionally, we found county agencies are not always submitting investigation outcomes back to ChildLine within the required 60 days, and in many cases outcomes have not been submitted at all. DHS did not timely follow-up with these county agencies.

We also found that DHS did not have an established on-going training program for ChildLine employees specific to their job-related duties, and there was a lack of documentation supporting the training that was received during the period January 1, 2014 through June 30, 2016.

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<sup>1</sup> Services provided for cases of child abuse.

<sup>2</sup> Services to prevent the potential for harm to a child. The county agency will initially screen a GPS referral to determine if an investigation is necessary. If the county agency determines that an investigation is not necessary then no outcomes for these reports these reports are required. However, the county agency must provide ChildLine the reason for why the report was screened out from requiring an investigation.

<sup>3</sup> 23 Pa.C.S. § 6301 *et seq.*

<sup>4</sup> 23 Pa.C.S. § 6368(n) and 55 Pa. Code § 3490.34(c). DHS is considering a waiver of the regulation at § 3490.34(c) which requires the status determination to be submitted to ChildLine, within 60-calendar days from the date of the initial report. This waiver is discussed within Finding 2.2.



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Without adequate on-going training, there is an increased risk that reports of suspected child abuse may not be properly received, processed, and transmitted to appropriate investigating agencies, and subsequently tracked to the outcome, ultimately putting children at risk.

Finally, in order to evaluate whether reports of child abuse and neglect received by ChildLine are processed in accordance with applicable laws, regulations, and policies, we obtained data from CWIS of all referral reports received by ChildLine during calendar year 2015. This data file included any investigation outcomes submitted by the investigating county agencies as of March 15, 2016. In analyzing this data file, we found significant issues, including nearly 11,000 missing and deleted records, and more than 12,000 referral reports with no investigation outcomes. Without full accountability of all report numbers and investigation outcomes, risk increases that an actual child abuse report could be mishandled. Even one mishandled report could be a life or death situation given that one neglected or abused child in the commonwealth is one too many.

**PA Department of Human Services****Introduction  
and  
Background**

The Department of the Auditor General conducted this performance audit in order to provide an independent assessment of ChildLine, a Pennsylvania Department of Human Services' (DHS) operated "hotline" which serves as the central contact point for reporting suspected instances of child abuse and/or neglect.

We conducted our work under the authority of Section 402 of The Fiscal Code<sup>5</sup> and in accordance with applicable *Government Auditing Standards* as issued by the Comptroller General of the United States.<sup>6</sup>

Our audit had two audit objectives (see Appendix A – *Objectives, Scope, and Methodology* for more information). Our objectives were as follows:

- To determine the effectiveness of the DHS' intake process for ChildLine.
- To determine whether child abuse/neglect calls to ChildLine are processed in accordance with applicable laws, regulations, and policies.

Our audit covered the period January 1, 2014, through June 30, 2016, unless otherwise noted. During the course of our audit fieldwork, we identified significant matters directly related to our first audit objective. As a result, we issued an interim audit report to DHS on May 23, 2016.<sup>7</sup> The matters we identified included the following: an alarming rate of unanswered calls to ChildLine, inadequate hotline staffing in 2015, and a severe lack of hotline call monitoring. In our opinion, these conditions risked the safety and welfare of Pennsylvania's children and required DHS' immediate attention.

In response to our interim audit report, DHS has implemented corrective actions to address our recommendations. Specifically, DHS hired additional staff to answer calls made to the hotline, upgraded processes to document all calls to the hotline, and implemented procedures to regularly monitor caseworker call volume. Within this current audit, we evaluated the status of DHS' corrective actions through June 30, 2016.

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<sup>5</sup> 72 P.S. § 402.

<sup>6</sup> *Government Auditing Standards*, December 2011 revision, issued by the Comptroller General of the United States, United States Government Accountability Office, Washington D.C.

<sup>7</sup> *Government Auditing Standards*, paragraph 6.78, states that, "for some matters early communication to those charged with governance or management may be important because of their relative significance and the urgency for corrective follow-up action."

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*Government Auditing Standards* state that auditors should provide background information to establish the context for the overall message and to help the reader understand the findings and the significance of the issues discussed.<sup>8</sup> To that end, in the sections that follow, we present background information about ChildLine and the process used to report suspected instances of child abuse. Additional information about DHS' ChildLine can also be found at its website: <http://www.dhs.pa.gov/provider/childwelfareservices/childlineandabusregistry/>

### Background information on ChildLine

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Protecting citizens from harm is a primary focus of government, and the protection of citizens most at risk of harm—like children—is an especially significant responsibility. Because of the magnitude of this important duty to shield vulnerable children from harm, many states have developed centralized reporting systems and/or rely on “hotlines” whereby callers may report suspected instances of child abuse and neglect. These systems and/or hotlines are proactive attempts taken by governmental authorities to ensure that reported instance of child abuse do not “fall through the cracks.”

The Commonwealth established ChildLine to serve as the primary collection point for reporting allegations of child abuse and neglect in Pennsylvania. ChildLine operates within the Department of Human Services' Office of Children, Youth, and Families. DHS staffs ChildLine 24-hours a day, seven days a week to take calls about allegations of potential child abuse/neglect, and then makes referrals to the appropriate authorities.

Anyone may call ChildLine to report suspected instances of child abuse and neglect. Callers may report their concerns anonymously. If you have suspected concerns about potential child abuse/neglect, please contact ChildLine at:

**1-800-932-0313.**

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<sup>8</sup> Ibid., paragraph 7.17.

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The child abuse and neglect reports received through ChildLine are referred to counties, which have the responsibility for investigation and assessment determinations of both Child Protective Services (CPS)<sup>9</sup> and General Protective Services (GPS)<sup>10</sup> reports.

**Reporting Suspected Child Abuse Under the Child Protective Services Law**

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The Pennsylvania Child Protective Services Law<sup>11</sup> (CPSL) provides that any person may make an oral or written report of suspected child abuse to the DHS.<sup>12</sup> Further, suspected instances of child abuse may be submitted electronically to DHS, or may be made to the appropriate county agency, or to a law enforcement agency, if a person has reasonable cause to suspect that a child is a victim of child abuse.<sup>13</sup>

Effective December 31, 2014, a series of legislative amendments made significant changes to the CPSL.<sup>14</sup> One major change to the law was that it broadened the number of individuals that are required to report suspected child abuse. For example, the CPSL now requires certain adults, known as mandated reporters, to report suspected child abuse under penalty of law.<sup>15</sup>

Mandated reporters include professionals who come into contact with children during the course of their employment, occupation or practice. All mandated reporters are required to report suspected child abuse suspicions, whenever they have reasonable cause to suspect that a child is being abused.

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<sup>9</sup> Services provided for cases of child abuse.

<sup>10</sup> Services to prevent the potential for harm to a child.

<sup>11</sup> 23 Pa.C.S. § 6301 *et seq.*

<sup>12</sup> 23 Pa.C.S. § 6312.

<sup>13</sup> *Ibid.*

<sup>14</sup> The CPSL's 2013, 2014, and 2015 amendments were included within 24 pieces of legislation. The amendments change "how Pennsylvania responds to child abuse. These changes will significantly impact the reporting, investigation, assessment, prosecution and judicial handling of child abuse and neglect cases. The new laws will expand and further define mandatory reporters and the reporting process, increase penalties for those mandated to report suspected child abuse who fail to do so, and provide protections from employment discrimination for filing a good faith report of child abuse." See <http://keepkidssafe.pa.gov/laws/index.htm> last accessed on September 2, 2016. Please note that although this particular DHS' keepkidssafe.pa.gov link only refers to 23, instead of 24, pieces of legislation, we were able to confirm that the link should actually refer to 24 pieces of legislation, just as in the following DHS' link: <http://keepkidssafe.pa.gov/index.htm>

<sup>15</sup> 23 Pa.C.S. §§ 6311, 6319.

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Section 6311(a) of the CPSL defines mandated reporters to include the following individuals who have “reasonable cause to suspect that a child is a victim of child abuse”:

1. A person licensed or certified to practice in any health-related field under the jurisdiction of the Department of State.
2. Medical examiners, coroners and funeral directors.
3. Employee of a healthcare facility licensed by the Department of Health.
4. School employees.
5. Childcare employees.
6. Members of the clergy.
7. Paid and unpaid individuals who have regularly scheduled programs and activities with children.
8. Social services employees.
9. Law enforcement.
10. Emergency medical services provider certified by the Department of Health.
11. Public librarians who have direct contact with children through employment.
12. Individuals supervised by individuals listed in numbers 1 through 11 and 13.
13. An independent contractor.
14. Attorney affiliated with an agency, institution, organization or other entity, including a school or regularly established religious organization that is responsible for the care, supervision, guidance or control of children.
15. Foster parents.
16. An adult family member who is a person responsible for the child's welfare and provides services to a child in a family living home, community home for individuals with an intellectual disability or host home for children which are subject to supervision or licensure by the Department of Human Services.<sup>16</sup>

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<sup>16</sup> 23 Pa.C.S. § 6311(a).

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**ChildLine Suspected Child Abuse Reporting and Referral Process**

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ChildLine accepts all referrals or reports from individuals regardless of whether they choose to identify themselves. All information obtained during the phone call or electronic transmission to ChildLine is transmitted electronically to the appropriate state or county Office of Children, Youth, and Family (OCYF) or law enforcement agency to aid in the investigation of the allegations.

Specially trained intake specialists (caseworkers) answer each call to the hotline and obtain specific details to determine the most appropriate course of action. Actions include assessing whether the allegations involve child abuse or relate to the general protective care of the child. Upon receiving a call, the caseworker prepares an intake report referred to as a *CY 47* report, which documents the caller's concerns. The caseworker then forwards the *CY 47* report to a county agency for investigation, or if necessary, forwards the report directly to law enforcement officials. If the call is unrelated to a suspected child abuse allegation, but involves some other social services need, then the caseworker may refer the caller to another appropriate agency to aid in obtaining social services including counseling, financial aid, and legal services.

Prior to December 27, 2014, DHS caseworkers manually prepared a hard copy of the *CY 47* report and then entered it into the DHS' tracking system. After implementation of CWIS (discussed in the section that follows), referral intake information is entered directly into the CWIS system by the ChildLine caseworker taking a call, a mandated reporter completing a self-service referral report through DHS's on-line portal, or the county OCYF transmitting referrals it received directly to CWIS. Once in the tracking system, the caseworker transmits the file to the appropriate county child welfare authorities to conduct an investigation.

When the county authorities complete their investigation, they document the results on a *CY 48* form and upload the results into the ChildLine and Abuse Registry.<sup>17</sup> This registry is the central

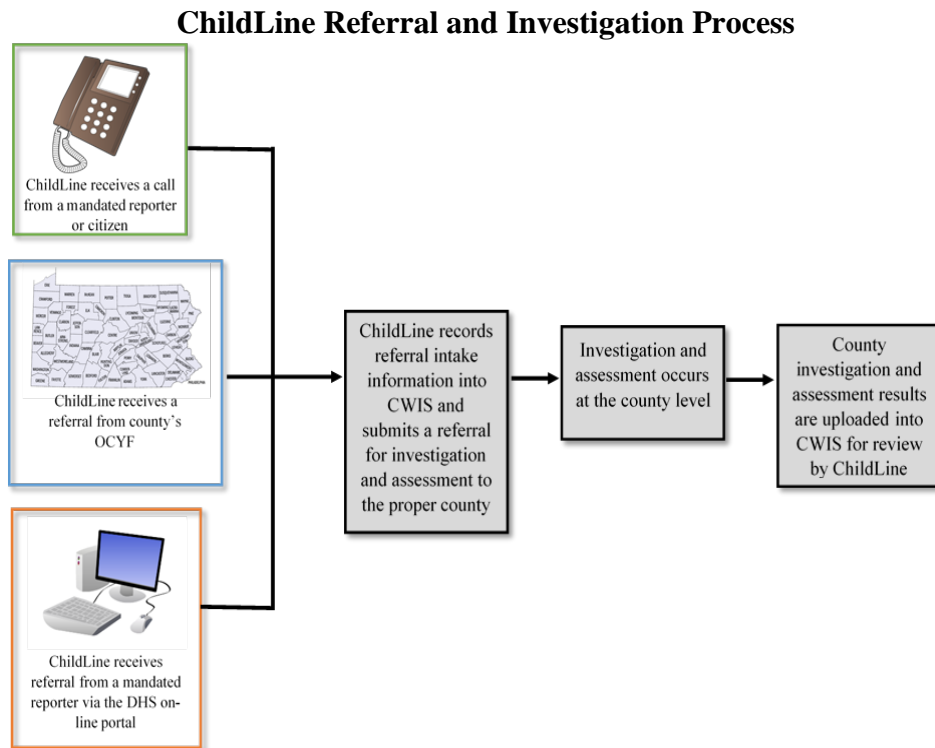
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<sup>17</sup> Similar to the *CY 47* report, with the implementation of CWIS, beginning on December 27, 2014, the *CY 48* form has been changed to an electronic data submission to CWIS in order to capture investigation outcome determination information.

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clearinghouse where all investigated reports are maintained for a specific time period as provided in the CPSL.

The ChildLine suspected child abuse referral process from receipt through referral to county for investigation is depicted in the exhibit that follows:



*Source: Developed by Department of the Auditor General staff from information provided by DHS.*

**Child Welfare Information Solution (CWIS)**

DHS fully implemented the automated CWIS referral tracking system on December 27, 2014. CWIS allows Pennsylvanians to apply for background check clearances and mandated reporters to make reports of suspected child abuse electronically. CWIS also allows county children and youth agencies to obtain information on families that were served in other counties within the commonwealth.<sup>18</sup>

<sup>18</sup> Pennsylvania Department of Human Services, *Annual Child Abuse Report*, 2014.

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The CWIS was designed to improve the efficiency and effectiveness of Pennsylvania's child welfare programs through systematic automation and process automation, and to improve the timeliness of child welfare reporting. CWIS allows for real-time electronic sharing of information between ChildLine and County Children and Youth Agencies. The shared information is critical to administering the child welfare program in Pennsylvania.

### ChildLine Referral/Reporting Volume

ChildLine call volumes for calendar years 2014 and 2015 and the first six months of 2016 are presented in the exhibit that follows:

#### ChildLine - Description of Calls Answered 2014 - 2016

Referral Type	2014 Count	Percentage of Calls Answered	2015 Count	Percentage of Calls Answered	2016 Count <sup>f/</sup>	Percentage of Calls Answered
Child Protective Services <sup>a/</sup>	29,520	19%	27,641	19%	15,635	20%
General Protective Services <sup>b/</sup>	<sup>e/</sup> 47,854	30%	59,279	41%	35,085	45%
Law Enforcement Only <sup>c/</sup>	<sup>e/</sup> 7,397	5%	8,743	6%	5,437	7%
Supplemental <sup>d/</sup>	241	<1%	7,969	5%	6,056	8%
Complaint/Other	1,123	1%	3,486	2%	2,168	3%
Other – Not Referred	71,996	45%	39,249	27%	12,746	17%
<b>Total Calls Answered</b>	<b>158,131</b>	<b>100%</b>	<b>146,367</b>	<b>100%</b>	<b>77,127</b>	<b>100</b>

Notes:

a/ Services and activities provided by DHS and each county agency for child abuse cases.

b/ Services provided to prevent the potential for harm to a child.

c/ A law enforcement issue that does not involve child protective services and general protective services, as defined by DHS regulations.

d/ A report that relates to a previous referral of a child protective service, general protective service, or law enforcement only.

e/ These counts were obtained from DHS' 2014 Annual Child Abuse Report.

f/ Includes only six months from January 1, 2016, through June 30, 2016.

*Source: DHS hotline call statistical data compiled from Verizon call reports and other information provided by DHS. Verizon call reports are of undetermined reliability as noted in Appendix A. However, this data is the best data available and we performed certain tests of the reasonableness of this data.*



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## Issue Area

## 1

**Unanswered calls, failure to track calls, and scant monitoring of calls leave children at risk.****Issue summary: Findings 1.1 — 1.4**

During the course of our current audit, we identified an alarming rate of calls to ChildLine<sup>19</sup> not answered by Pennsylvania Department of Human Services (DHS) caseworkers in 2015, along with inadequate staffing for the hotline and a severe lack of monitoring of hotline calls, thereby putting abused children further at risk. DHS appeared aware of many of these circumstances but was not addressing the issues quickly enough while children were at risk.

We considered these situations to be significant within the context of our audit objectives and issued DHS management an interim report of significant matters so that immediate corrective action could be taken. A draft interim report was issued to DHS on April 18, 2016, with a request for a response from DHS, and the final interim report was released on May 23, 2016.

In this issue area, we address the matters described in the interim report which examined data from 2014 and 2015, as well as analyzing data through June 2016 to determine the status of the matters and DHS's corrective action taken related to our interim report recommendations.

DHS did make notable improvements by June 2016 in the number of calls not answered and increasing staffing levels, but monitoring and tracking of calls continued to be lacking. DHS is in the process of implementing new procedures to address these two areas.

We requested and obtained DHS' hotline call statistical data for the period covering January 2014 through June 2016, including detailed Verizon call reports for four months in each of 2014 and 2015 and two months in 2016. We also obtained DHS' staffing data for ChildLine and reports of calls monitored by supervisors for the same period.

<sup>19</sup> ChildLine is an organizational unit of the DHS which operates a Statewide toll-free system for receiving reports of suspected child abuse established under Section 6332 of the Child Protective Services Law (relating to establishment of Statewide toll-free telephone number) that refers the reports for investigation and maintains the reports in the appropriate file. See 23 Pa.C.S. § 6332.

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Based on our analysis of this data, along with interviews of DHS' management, we identified the following findings as described below. Any unanswered calls are considered to be life or death situations given that even one neglected or abused child in the commonwealth is **one too many**.

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**Finding 1.1****Nearly 58,000 calls unanswered over 2 ½ years leave children at risk.**

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The following table shows the number of calls made to the ChildLine hotline in calendar years 2014 and 2015 and the first six months of 2016. A call coming into the hotline may ultimately be answered, abandoned, or deflected. If an incoming call cannot be immediately answered by a ChildLine caseworker, it enters a queue. If the caller terminates the call before a caseworker picks up, then the call is considered abandoned. When the number of callers placed in the queue reaches the maximum limit, subsequent incoming calls will be deflected. A deflected call is automatically terminated. Prior to October 2015, DHS was unable to provide specifics on the maximum number of callers that could be placed on hold in the queue, as it varied over time and could be changed daily; however, as of October 1, 2015, DHS set the maximum limit of the queue to 30 callers.

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**ChildLine Hotline Call Summary**

For Years Ending December 31, 2014 and 2015, and  
January 1, 2016 through June 30, 2016

	2014 Call Count	Percentage of Total Calls Received	2015 Call Count	Percentage of Total Calls Received	2016 Call Count <sup>a/</sup>	Percentage of Total Calls Received
Calls Answered	158,131	96.0%	146,367	78%	77,127	89%
Calls Abandoned	4,222	2.5%	23,789	13%	9,121	11%
Calls Deflected	2,558	1.5%	18,201	9%	103	<1%
Total Calls Received	164,911	100%	188,357	100%	86,351	100%

Notes:

a/ Includes only six months from January 1, 2016 to June 30, 2016.

Source: DHS hotline call statistical data compiled from Verizon call reports. Verizon call reports are of undetermined reliability as noted in Appendix A. However, this data is the best data available and we performed certain tests of the reasonableness of this data. Although this determination may affect the precision of the numbers we present, there is sufficient evidence in total to support our finding, conclusions, and recommendations.

DHS' management stated its goal is for 4 percent or less of the hotline calls to go unanswered on a monthly basis. While it appears this goal was met overall for 2014, this was not the case for 2015, with an alarming 41,990, or 22 percent, of the calls never being answered. ChildLine hotline calls received in 2015 increased by 23,446 from 2014, while the actual calls answered decreased by 11,764.

Unanswered calls for the first six months in 2016, while better than 2015, continued to be exceptionally high at 9,224, or 11 percent, of the calls were not answered. Each one of these unanswered calls could potentially be a child abuse allegation going unreported, putting children at risk.

We also reviewed call statistics provided by DHS regarding wait times for calls that are not immediately answered and enter the holding queue.<sup>20</sup> These calls may eventually be answered by a case worker or the caller may abandon the call before it is answered. We noted that the longest wait time until a call was answered was approximately 51 minutes in 2015 in comparison to 48 minutes in 2014. The longest wait time until an unanswered call was eventually abandoned was

<sup>20</sup> DHS call statistical data compiled from Verizon call reports. Verizon call reports are of undetermined reliability as noted in Appendix A. However, this data is the best data available. Although this determination may affect the precision of the numbers we present, there is sufficient evidence in total to support our finding, conclusions, and recommendations.

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approximately 53 minutes in 2015 in comparison to 29 minutes in 2014. In other words, a caller in 2015 with a potential allegation of child abuse was held on the line waiting for over 50 minutes until eventually giving up and abandoning the call. DHS was not able to provide information as to whether the callers abandoning calls attempted to call back at a different time.

We selected four months to evaluate the average wait times in each of 2014 and 2015, and two months in 2016, as shown in the following table:

### Queue Wait Times in Minutes

Month	Average Wait Time	Longest Wait Time for Month	Monthly Average Longest Wait Time <sup>a/</sup>
April 2014	0.8	33.3	12.3
June 2014	0.6	27.8	11.7
October 2014	0.6	34.3	9.8
November 2014	0.8	48.0	11.7
April 2015	2.6	31.2	17.4
June 2015	1.6	36.4	20.3
October 2015	6.7	42.1	27.0
November 2015	5.7	39.7	25.5
March 2016	2.9	43.2	18.4
June 2016	0.9	46.3	20.5

Notes:

a/ The monthly average longest wait time was calculated using the longest wait time for each day of the month recorded on DHS's "Incoming Calls Waiting Report."

Source: Call statistical data compiled from Verizon call reports. Verizon call reports are of undetermined reliability as noted in Appendix A. However, this data is the best data available and we performed certain tests of the reasonableness of this data. Although this determination may affect the precision of the numbers we present, there is sufficient evidence in total to support our finding, conclusions, and recommendations.

For the months reviewed, we noted that average wait times were below 1 minute in 2014, but increased to between 1.6 and 6.7 minutes in 2015. We also noted that the average longest wait time each day increased from 2014 to 2015 by a range of 5 to 17 minutes for the respective four months. As a follow up to our interim report issued in May 2016, we noted that the average wait time was improved to below one minute in June 2016; however, there was no improvement in the average longest wait times each day and there was at least one caller who waited on the line for over 46 minutes.

DHS attributed the high volume of unanswered calls and long wait times to be mostly due to changes brought about by amendments to the

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Child Protective Services Law (CPSL),<sup>21</sup> largely effective December 31, 2014, along with implementing the new Child Welfare Information Solutions (CWIS) system on December 27, 2014. DHS management stated the following:

In 2014, the only method to report a child abuse referral was by calling the hotline and verbally providing the information. With the passage of 24 bills amending the Child Protective Services Law (CPSL), ChildLine also became responsible for registering GPS [General Protective Services] information, as well as CPS [Child Protective Services] information. The laws also lowered the threshold for what constitutes child abuse, expanded who could be a perpetrator, and who is considered mandated reporters... All staff needed to be retrained on the CPSL and a brand new system prior to it going live on December 27, 2014...

CWIS was designed to allow referrals to be electronically submitted by mandated reporters and counties, in addition to receiving referrals over the phone. Because the electronically submitted referrals already had the data entered, they were to take substantially less time than a traditional report taken over the phone. It was calculated that the expected increase in volume would be offset by the new system efficiencies. When the system went live, the volume of calls was substantially more than expected, with fewer self-service referrals being received than estimated. Additionally, there were system errors and defects that initially impacted the hotline workers' ability to enter and transmit referrals as planned, causing delays in transmission and in being able to take an additional call. Process changes were also implemented. This included increasing the time between calls from 45 seconds in 2014 to five minutes in 2015 in order to review, finalize and transmit referral information between calls.

While the amendments to the CPSL<sup>22</sup> and the implementation of the new CWIS system undoubtedly created challenges and contributed to

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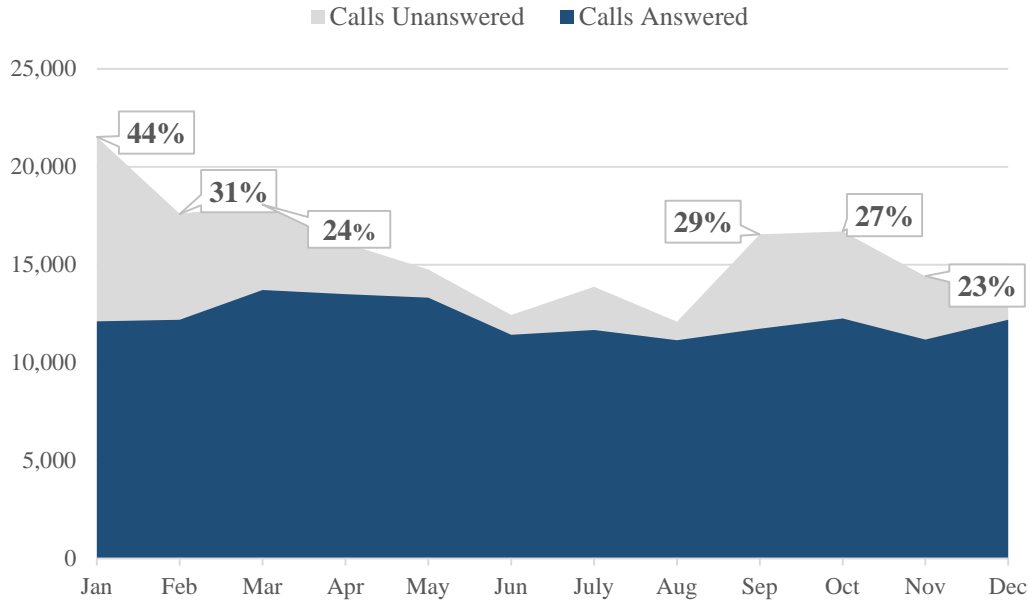
<sup>21</sup> As stated in our Introduction and Background section, the CPSL was extensively amended in 2013, 2014, and 2015 with 24 pieces of legislation.

<sup>22</sup> The last major amendments were enacted with Act 15 of 2015, effective July 1, 2015. Act 15 was enacted for the purpose of, among others, to help clarify and make more explicit the law's recently added provisions. *See* <http://keepkidssafe.pa.gov/laws/index.htm> accessed April 13, 2016.

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the high percent of unanswered calls early in 2015, we found that the large number of unanswered calls continued throughout the entire 2015 calendar year with over 20 percent of calls going unanswered in the later months of 2015, as noted in the following chart.

**2015 ChildLine Calls Answered and Unanswered**



	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sep	Oct	Nov	Dec
Received	21,517	17,588	18,064	16,096	14,758	12,432	13,877	12,907	16,546	16,697	14,415	13,460
Unanswered	9,418	5,398	4,357	2,608	1,444	1,012	2,212	1,773	4,817	4,445	3,240	1,266
% Unanswered	44%	31%	24%	16%	10%	8%	16%	14%	29%	27%	23%	9%

*Source: DHS hotline call statistical data compiled from Verizon call reports. Verizon call reports are of undetermined reliability as noted in Appendix A. However, this data is the best data available and we performed certain tests of the reasonableness of this data. Although this determination may affect the precision of the numbers we present, there is sufficient evidence in total to support our finding, conclusions, and recommendations.*

The numbers and percent of hotline calls going unanswered is still exceptionally high and therefore potentially abused and neglected children are remaining at risk.

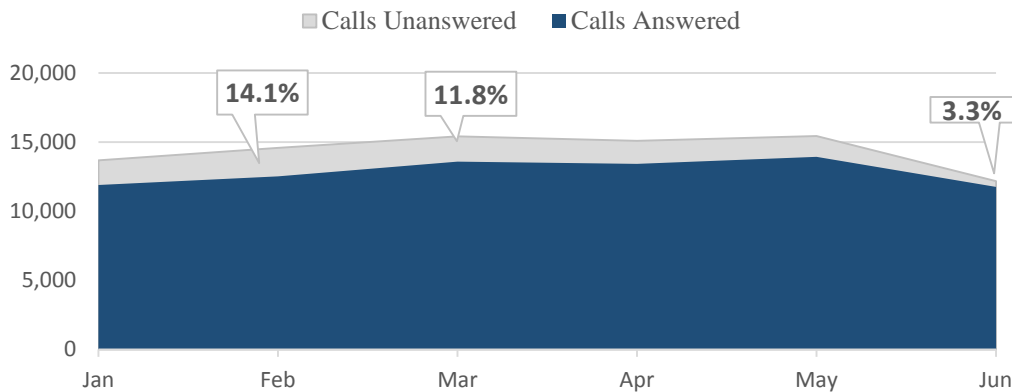
DHS did not achieve its goal of no more than four percent of calls going unanswered in any month during 2015. In fact, the DHS call statistics indicate that over 20 percent of calls went unanswered in 6 of the 12 months in 2015. The chart above shows that the number of calls answered each month to be fairly steady, while any increase in the volume of calls went unanswered. DHS has been slowly

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increasing the number of ChildLine caseworker staff available to answer more calls; however, DHS was not addressing the issues quickly enough to ensure risk to children is minimized.

Subsequent to issuing our interim report of significant matters, we analyzed call data for the first six months of 2016 as shown in the chart below.

**2016 ChildLine Calls Answered and Unanswered**



	Jan	Feb	Mar	Apr	May	Jun
Received	13,672	14,575	15,413	15,090	15,439	12,162
Unanswered	1,776	2,052	1,825	1,671	1,499	401
% Unanswered	13.0%	14.1%	11.8%	11.1%	9.7%	3.3%

*Source: DHS hotline call statistical data compiled from Verizon call reports. Verizon call reports are of undetermined reliability as noted in Appendix A. However, this data is the best data available and we performed certain tests of the reasonableness of this data. Although this determination may affect the precision of the numbers we present, there is sufficient evidence in total to support our finding, conclusions, and recommendations.*

While the percent of unanswered calls decreased from 2015, the rate of unanswered calls still remained near or above 10 percent from January through May 2016. After our interim report was issued in May 2016, DHS did achieve its goal of no more than four percent of calls going unanswered, with only 3.3 percent of calls unanswered in June 2016, which was a notable improvement. This was at least in part due to the increased number of filled caseworker positions available to work in June 2016. However, June is typically a lower call volume month, which was the case in 2016<sup>23</sup>. This lower call volume would also contribute to having only 3.3 percent of calls going unanswered, and therefore, DHS should continue to implement corrective action related

<sup>23</sup> There was a 21 percent decrease in the number of calls received in June 2016 compared to May 2016.

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to our interim report and fill caseworker position vacancies as needed to also handle higher call volume months going forward.

### Finding 1.2

#### ChildLine understaffing persists while children remain at risk.

The following table summarizes ChildLine caseworker staffing levels at the end of each quarter during our audit period beginning January 2014 through June 2016.

**ChildLine Staffing  
2014-2016**

Quarter Ended	Caseworkers Salary Filled	Caseworkers Wage Filled	Total Caseworkers Filled	Total Caseworkers Vacant	Percent of Vacant Positions	Annuitants <sup>a/</sup>
Mar. 31, 2014	37	0	37	4	9.8%	0
Jun. 30, 2014	37	0	37	5	11.9%	0
Sept. 30, 2014	37	1	38	4	9.5%	0
Dec. 31, 2014	37	1	38	4	9.5%	0
Mar. 31, 2015	38	4	42	11	20.8%	3
Jun. 30, 2015	35	6	41	11	21.2%	3
Sept. 30, 2015	32	10	42	6	12.5%	3
Dec. 31, 2015	34	14	48	9	15.8%	3
Mar. 31, 2016	37	16	53	20	27.4%	5
Jun. 30, 2016	37	23	60	12	16.7%	5

Notes:

a/ Annuitants may only work a maximum of 95 days in a calendar year.

Source: Developed by Department of the Auditor General staff from ChildLine personnel complement information provided by DHS.

While we noted that ChildLine's complement and filled positions has increased throughout our audit period, the number of unanswered calls also increased while the number of calls answered decreased through 2015. The expectation would be the reverse, and therefore, we analyzed these staffing levels further. We did note some improvement with a decrease in unanswered calls during the first six months in 2016, as DHS increased the size of ChildLine's approved complement and caseworker positions filled. DHS management sets minimum staffing levels necessary to provide 24/7 coverage on the hotline. Minimum staffing levels are set for various weekday and weekend time periods. We inquired of DHS management as to how minimum staffing levels are set, especially in regard to the large number of unanswered calls. In regard to staffing levels for 2014 and 2015, DHS stated the following:



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There were not enough hotline caseworkers to increase the minimums from 2014 until October 2015. Additional hotline coverage was obtained [during this time period] through preplanned overtime to provide additional hotline coverage and a buffer for call offs...

Because overtime was being used on each shift, minimums couldn't be increased, which would have further increased overtime hours. As additional staff were brought on, the mandatory overtime was decreased instead of increasing the minimums because the overtime resulted in a higher turnover rate, which exacerbated the situation. During 2015, prescheduled overtime was reduced, which allowed a lower turnover rate. Once the overtime was reduced, the goal was to raise minimums as additional staff was hired and trained.

Beginning in October 2015, there were enough new caseworkers to increase the minimums without requiring more overtime...

The minimums for the hotline are calculated based on the average call volume per hour and the number of ChildLine caseworker positions filled. As the number of filled positions increase, the minimums are reassessed and increased to align with volume.

**In other words, during 2014 and 2015 minimum staffing levels were not set based on the expected volume of child abuse and neglect calls, but rather on staff availability and the desire to keep overtime hours minimized.**

Management's analysis of the hotline call volumes appeared to be a secondary consideration. ChildLine management did periodically evaluate staffing levels and call volumes, and adjusted staffing levels during peak calling times. However, due to the staffing minimums being based on available staff and not the appropriate number of staff needed to process the expected call volumes, the levels were inadequate to answer the number of calls being received on the hotline. Every unanswered call potentially inhibits a suspected abused or neglected child from getting the proper care and follow up necessary to prevent further abuse and/or neglect.

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**ChildLine was staffed under the already insufficient minimum level of 77 percent of the days and times tested in 2014 and 2015.**

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While we found that minimum staffing levels set are not adequate to handle the call volumes, we also found that for a selection of days and time periods tested, ChildLine was staffed under the already insufficient minimum levels, further exacerbating the problem of calls going unanswered. We randomly selected a total of 32 days from the four months in 2014 and 2015 previously reviewed for wait times (April, June, October, and November), including 16 days in both 2014 and 2015. From these 32 days, we judgmentally selected 256 time slots split equally between 2014 and 2015 to test if minimum staffing levels were met. Specifically, we judgmentally selected time slots to ensure coverage of various time periods throughout the 24-hour days. We found that staffing levels were below the minimum levels for 197 of the 256 time slots tested, or 77 percent,<sup>24</sup> including 99 timeslots from 2014 and 98 time slots in 2015. We further found that, of the timeslots tested, ChildLine was staffed at least 10 caseworkers or more below the minimum staffing levels 21 percent and 17 percent of the time in 2014 and 2015, respectively.

We also found that for each quarter from March 2014 to December 2015 the number of vacant caseworker positions ranged from 4 to 11 positions, or 10 to 21 percent of the total approved complement going unfilled, while thousands of calls of potential allegations of child abuse and neglect went unanswered.

In our interim report of significant matters, we informed DHS that it is absolutely imperative that management analyze the minimum number of staff actually needed based on call volumes to enable caseworkers to answer calls and keep unanswered calls to an absolute minimum. Based on this analysis, management should ensure that ChildLine is always staffed at these determined to be necessary minimum levels to ensure that children are not being put at risk. As noted earlier, any unanswered calls are to be considered life or death situations given that even one neglected or abused child in Pennsylvania is **one too many**.

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<sup>24</sup> The results of testing described in this paragraph should not be projected to the entire population of time slots due to the selection of time slots being made judgmentally rather than randomly or haphazardly.

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**Improvements made in June 2016; however, ChildLine continued to be understaffed.**

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When our interim report was released in May 2016, DHS was in the process of hiring and training additional staff and adjusting its staffing formula to identify minimum levels needed to answer calls, process self-service referrals, and process referrals received from counties. DHS builds overstaffing into the formula to account for an average number of staff that may call off work and account for additional staff needed to complete paperwork, finalize outcomes, and complete special projects. DHS also identifies absolute staffing minimums that are needed to handle just calls, self-service referrals, and referrals from counties. DHS stated that a written policy will be developed by the end of August 2016 as the process continues to be refined; however, the new staffing formulas began being utilized by ChildLine on June 18, 2016.

Using the new formulas, we analyzed ChildLine's actual staffing levels for the period June 18, 2016 through June 30, 2016. For these 13 days, we selected four one-hour time periods for each day, and found based on DHS' analysis that minimum staffing levels to handle calls to the hotline, self-service referrals, and referrals from counties were not met for 2 of the 52 time periods reviewed, or four percent.

DHS' formula further broke down minimum staff necessary to just answer hotline calls. We compared these minimums to the number of staff signed on to the call system and found for the same 52 time periods reviewed, the minimums were not met for 5 of the 52 time periods, or 10 percent, by one to four caseworkers. This is a significant improvement from 2014 and 2015 staffing levels, and undoubtedly contributed to the improvement of only 3.3 percent of the calls received in June 2016 going unanswered. However, as previously noted, June is typically a lower call volume month, which contributed to having only 3.3 percent of calls going unanswered.

We found in June 2016 there were still 12 vacant caseworker positions, or 17 percent of the approved complement unfilled. Management stated that they are still in the process of filling these additional positions. These positions should be filled as needed to handle the higher call volume months going forward.

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**Finding 1.3****DHS failed to document the purpose of nearly 124,000 calls that did not result in a referral report.**

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When hotline calls are answered by a ChildLine caseworker, the call of suspected child abuse can generate one of the following types of referral reports:

- Child protective service (CPS)<sup>25</sup>
- General protective service (GPS)<sup>26</sup>
- Law enforcement only (LEO) issue<sup>27</sup>
- Supplemental report for a CPS, GPS, or LEO<sup>28</sup>
- Complaint

These reports are referred to county children and youth agencies and/or law enforcement. Complaints may be referred to other appropriate DHS offices. However, based on statistics provided by DHS, we noted that there are a large percentage of calls received on the hotline which do not generate a referral report and are not tracked by DHS. In fact, there were 123,991 calls received from January 2014 through June 2016 which did not generate a referral report, as shown in the following table:

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<sup>25</sup> Those services and activities provided by DHS and each county agency for child abuse cases.

<sup>26</sup> Those services and activities provided by each county agency for cases requiring protective services, as defined by DHS in regulations.

<sup>27</sup> A case that is a law enforcement issue but does not involve child protective services or general protective services, as defined by DHS regulations.

<sup>28</sup> A case that relates to a previous referral of a child protective service or general protective service or law enforcement only.

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## Description of Calls Answered

Referral Type	2014 Count	Percentage of Calls Answered	2015 Count	Percentage of Calls Answered	2016 Count <sup>b/</sup>	Percentage of Calls Answered
Child Protective Services	29,520	19%	27,641	19%	15,635	20%
General Protective Services	<sup>a/</sup> 47,854	30%	59,279	41%	35,085	45%
Law Enforcement Only	<sup>a/</sup> 7,397	5%	8,743	6%	5,437	7%
Supplementals	241	<1%	7,969	5%	6,056	8%
Complaints/Other	1,123	1%	3,486	2%	2,168	3%
Other – Not Referred	71,996	45%	39,249	27%	12,746	17%
<b>Total Calls Answered</b>	<b>158,131</b>	<b>100%</b>	<b>146,367</b>	<b>100%</b>	<b>77,127</b>	<b>100.0%</b>

## Notes:

a/ These counts were obtained from DHS' 2014 Annual Child Abuse Report.

b/ Includes only six months from January 1, 2016 to June 30, 2016.

Source: DHS hotline call statistical data compiled from Verizon call reports and other information provided by DHS. Verizon call reports are of undetermined reliability as noted in Appendix A.

However, this data is the best data available and we performed certain tests of the reasonableness of this data. Although this determination may affect the precision of the numbers we present, there is sufficient evidence in total to support our finding, conclusions, and recommendations.

DHS does not track all calls and was not able to provide the specific purposes of the "Other – Not Referred" calls in the table above. Management stated that it attempted to track these calls at one time years ago, and while the information was beneficial, the process was time intensive and not continued. Management stated in general that these calls did not involve suspected child abuse or neglect and provided the following explanation:

There are phone calls received on the ChildLine hotline which do not result in a report being generated, tracked or identified in any manner. These calls do not provide information or concerns regarding a child(ren). Examples of these types of calls include callers asking for phone numbers only, mandated reporters asking for the address of a county CYS agency so they can mail their paper CY47 form, emergency phone clearances for county CYS staff, questions for other ChildLine units (clearances, appeals, requests for copies of referrals, etc.), wrong phone numbers, questions regarding what resources are available for mandated reporter training, and general questions regarding online reporting...

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However, without tracking all calls or documenting them in some manner, we could not verify, and there is no way to know for sure, that none of the calls involved suspected abuse or neglect which could have potentially been screened by the caseworker intentionally or unintentionally before a report is generated. Additionally, as we note in Finding 1.4 below, there was very little supervisor monitoring of calls taken by ChildLine caseworkers in 2014 and 2015, which further compounds the issue as to whether these untracked calls were processed properly by the caseworker and truly did not involve any allegations of children being neglected or abused.

Further, the large volume of calls answered by the ChildLine caseworkers, which DHS stated does not involve allegations of child abuse or neglect, take time away from the caseworkers' ability to answer other calls which do involve allegations of abuse or neglect. Considering 9,224, 41,990 and 6,780 calls went unanswered in 2016 (through June), 2015, and 2014, respectively, as noted in Finding 1.1, it is imperative that these calls are tracked to determine the purpose of the calls received so that DHS management can take action to reduce the number of calls not involving allegations of child abuse or neglect to the hotline to allow more time for caseworkers to process calls involving suspected child abuse.

As a result of our interim report, DHS management stated that ChildLine staff were surveyed to develop additional categories to document all calls in CWIS. Management stated that functionality was upgraded in CWIS on July 30, 2016 to add new drop down call categories to select in order to track all calls not resulting in a referral. Management stated that ChildLine staff began tracking all calls on August 1, 2016, and this data will be reviewed monthly and used to determine additional phone prompts when calling the hotline and additional educational information to be provided on its website. This CWIS upgrade and new procedures to begin tracking all calls occurred subsequent to our audit review period, and therefore, we did not validate these new procedures.

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**Finding 1.4**

**Only 103 of more than 380,000 calls were monitored over 2 ½ years, providing little assurance calls were processed properly to protect children.**

ChildLine management failed to adequately monitor the performance of caseworkers (including salary, wage, and annuitants) answering hotline calls. The table below shows the extreme lack of monitoring performed during the period January 2014 through June 2016:

**ChildLine Call Monitoring**  
Jan. 2014 – Jun 2016

Year	Total Calls Answered	Calls Monitored	Percent of Calls Monitored	Number of Caseworkers Monitored
2014	158,131	49	0.03%	29
2015	146,367	7	0.005%	3
2016 <sup>a/</sup>	77,127	47 <sup>b/</sup>	0.06%	38
Total	380,625	103	0.027%	

Notes:

<sup>a/</sup> Includes only six months from January 1, 2016 to June 30, 2016.

<sup>b/</sup> 44 of the 47 calls were monitored in the last two weeks of June.

Source: Developed by Department of the Auditor General staff from manually prepared call monitoring documentation provided by DHS.

Without adequate monitoring of calls, there is a much higher risk that calls may not be processed efficiently and accurately, and subsequently referred to county children and youth offices and law enforcement properly. Additionally, ChildLine management cannot be assured that the 123,991 calls not generating a referral report and not tracked in 2014, 2015, and 2016 truly did not involve any allegations of child abuse or neglect. When children are potentially at risk, management should do all it can to minimize this risk with proper monitoring of calls.

From 2014 through May 2016, ChildLine had a standard evaluation form for supervisors to listen on a call taken by a caseworker and document their observations of the call process; however, ChildLine did not have a policy or standard procedure in place to guide the monitoring process. Without consistent procedures in place to monitor caseworker call intake performance, ChildLine is left without a process to monitor the quality and accuracy of the call intake conducted by hotline caseworkers, ultimately putting children at risk.

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Beginning in 2014, monitoring of caseworkers was only being done on an as-needed basis, when there was a concern with a particular caseworker, due to an increased need for hotline supervisors to assist with taking calls. There was even less monitoring in 2015 due to the need to also have supervisors process self-service referrals submitted through the new CWIS online system when volume was high.

After we issued our interim report in May 2016, DHS instituted a formal call monitoring procedure to ensure supervisors are monitoring all staff every month to include at least one call per worker every month. This call monitoring procedure was only partially implemented in June 2016, with full implementation in July 2016 which is subsequent to our audit review period through June 30, 2016. For the 44 calls monitored in the last two weeks of June 2016, we did verify that the calls were documented on a call monitoring form and signed by the supervisor and staff evidencing the results were discussed with the caseworker.

**Issue Area Recommendations**

We recommend that DHS:

1. Continue to refine its analysis and policy for determining the minimum number of staff needed based on call volume and self-service online reporting to ensure all calls received on the hotline are answered by caseworkers and callers are not placed on hold for an unreasonable amount of time, such as no longer than 3.5 minutes.
2. Continue to hire and train additional staff necessary based on the results of the evaluation from implementing Recommendation #1, including consideration of turnover.
3. Ensure the hotline is always staffed at or above the minimum staffing levels needed as determined from implementing Recommendation #1.
4. Track and document the purpose of all calls received on the hotline, including those not generating referral reports.
5. Monitor calls not involving allegations of child abuse or neglect in order to implement ways to divert calls from the hotline caseworkers to provide more time to answer calls that do involve allegation of child abuse or neglect, such as:



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- a. Conduct outreach to mandated reporters and the general public to inform that the hotline should be utilized to report suspected child abuse and neglect and provide information as to where calls for other purposes should be made. This outreach can be through DHS' website, developing a resource guide to circulate, media outlets, etc. More specific examples include email blasts with helpful tips and guidelines for child abuse reporting, additional information about training opportunities, and quarterly newsletters posted on DHS' website.
  - b. Add additional prompts when a call is made to the hotline for purposes other than allegations of child abuse or neglect. Based on the prompts selected, calls other than child abuse or neglect allegations may be diverted to other caseworkers or DHS offices separate from the hotline or perhaps, to voice mail in which a call may be returned at a later time by the appropriate DHS office separate from the hotline.
6. Ensure new procedures are fully implemented for supervisory monitoring of calls answered by caseworkers to include number of phone calls to be monitored for each caseworker, how often monitoring will be conducted, and follow-up on corrective actions for caseworkers whose performance is unsatisfactory.
  7. As call monitoring procedures are implemented in Recommendation #6, assess whether the number of calls monitored each month for each caseworker is sufficient to ensure calls are processed accurately, efficiently, and effectively.
  8. Consider recording hotline calls for training and monitoring purposes to ensure calls are processed properly.

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## Issue Area

## 2

**ChildLine’s ineffective tracking system and inadequate training leave vulnerable children at risk for harm.****Issue summary: Findings 2.1 — 2.4**

ChildLine serves as the primary collection point for reporting allegations of child abuse and neglect in Pennsylvania. The child abuse and neglect reports received through ChildLine are processed, evaluated and referred to the appropriate county and law enforcement agencies. The county agencies have the responsibility for investigation and assessment determinations (outcomes) of both Child Protective Services (CPS)<sup>29</sup> and General Protective Services (GPS)<sup>30</sup> reports.

The Child Protective Services Law<sup>31</sup> (CPSL) requires the investigations to be completed within 60 days from the date of the initial report and the Pennsylvania Department of Human Services (DHS) regulations also require the county agencies to submit the outcomes to ChildLine within the same 60 days.<sup>32</sup> The initial referral reports along with the outcomes are maintained on DHS’ Child Welfare Information Solutions (CWIS) database. CWIS is utilized by DHS to conduct child abuse clearances to individuals having direct contact with children, such as teachers, coaches, and counselors. To provide protective services to vulnerable children at risk of harm, it is critical that reports received by ChildLine are processed appropriately and timely in accordance with applicable laws, regulations, and policy.

<sup>29</sup> Services provided for cases of child abuse.

<sup>30</sup> Services to prevent the potential for harm to a child. The county agency will initially screen a GPS referral to determine if an investigation is necessary. If the county agency determines that an investigation is not necessary then no outcomes for these reports these reports are required. However, the county agency must provide ChildLine the reason for why the report was screened out from requiring an investigation.

<sup>31</sup> 23 Pa.C.S. § 6301 *et seq.*

<sup>32</sup> 23 Pa.C.S. § 6368(n) and 55 Pa. Code § 3490.34(c). DHS’ latest *Annual Child Protective Services Report* (from 2015) notes that the CPSL requires “child abuse investigations to be completed within 60-calendar days in all cases. The regulations, Title 55, Pa. Code, Chapter 3490 (relating to protective services), require the report to be unfounded if the status determination (indicated, founded, or unfounded) is not submitted to the department, specifically ChildLine, within 60–calendar days from the date of the initial report. The regulations have not been revised to reflect the numerous amendments made to the...[CPSL]. It is critical that we afford county children and youth agencies the ability to conduct a thorough, thoughtful and detailed investigation when receiving a report of suspected child abuse. DHS is considering a waiver of the regulation at § 3490.34(c) (relating to pending complaint file) which requires the status determination to be submitted to ChildLine, within 60-calendar days from the date of the initial report.” See page 7. The waiver is discussed later in this finding.

[http://www.dhs.pa.gov/cs/groups/webcontent/documents/document/c\\_226999.pdf](http://www.dhs.pa.gov/cs/groups/webcontent/documents/document/c_226999.pdf). Accessed September 7, 2016.

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Unfortunately, our review of referral reports received by ChildLine during calendar year 2015 revealed significant delays with ChildLine transmitting the reports to the county and law enforcement agencies responsible for investigating the allegations of abuse and neglect. Any delay with providing the reports to the investigating agencies could be the difference between life and death for a child that is in an abusive situation. Additionally, we found county agencies are not always submitting investigation outcomes back to ChildLine within the required 60 days, and in many cases outcomes have not been submitted at all. These delays are unacceptable with vulnerable children at risk.

We also found that DHS did not have an established on-going training program for ChildLine employees specific to their job-related duties, and there was a lack of documentation supporting the training that was received during the period January 1, 2014 through June 30, 2016. Without adequate on-going training, there is an increased risk that reports of suspected child abuse may not be properly received, processed, and transmitted to appropriate investigating agencies, and subsequently tracked to the outcome, ultimately putting children at risk.

In order to evaluate whether reports of child abuse and neglect received by ChildLine are processed in accordance with applicable laws, regulations, and policies, we obtained data from CWIS of all referral reports received by ChildLine during calendar year 2015. This data file included any investigation outcomes submitted by the investigating county agencies as of March 15, 2016. The following table summarizes the data received by referral method and referral type.

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### Referrals Received by ChildLine

(Calendar Year 2015)

Referral Type	Worker Portal <sup>a/</sup>	Self-Service <sup>b/</sup>	County <sup>c/</sup>	Total
CPS	27,620	9,203	5,182	42,005
GPS	59,246	23,306	59,139	141,691
LEO	8,742	3,732	136	12,610
Supplemental	7,998	6,243	660	14,901
Complaints/Other	3,396	483	2,192	6,071
Total	107,002	42,967	67,309	217,278

Notes:

a/ Referral received through a call to the ChildLine hotline. We noted minor differences between the CWIS data above and the call data in Finding 1.3; however, these differences do not affect our findings, conclusions, or recommendations.

b/ Self-Service report from a mandated reporter through the DHS on-line portal.

c/ Referral received directly by county agency and transmitted to ChildLine.

*Source: Developed by Department of the Auditor General staff from CWIS data provided by DHS. As discussed in Appendix A, the data file provided by DHS was determined to be not sufficiently reliable. See Finding 2.4 for further details.*

In analyzing this data file, we found significant issues, including missing and deleted records, and referral reports with no investigation outcomes. Additionally, the dates in the data file were not reliable for our purposes of analyzing the timeliness of transmissions of referral reports to county and law enforcement agencies and the submission of investigation outcomes back to ChildLine. Therefore, our testing of these areas was limited to our review of 85 referral reports judgmentally selected for testing,<sup>33</sup> and the results of testing should not be projected to the entire population of referral reports.

## Finding 2.1

### Delays in transmitting child abuse reports to investigating agencies leave children at risk.

Once reports of suspected child abuse are received by ChildLine caseworkers and the intake information is entered into CWIS by the caseworker or a self-service on-line report is received from a mandated reporter, the referral is evaluated by the caseworker. Based on the evaluation, the referral report will be transmitted to the appropriate

<sup>33</sup> The 85 referrals were judgmentally selected for review by considering several factors including coverage of the referral types (CPS, GPS, and LEO), the investigating county, the timeliness of transmitting the referral to the investigating agency, and the timeliness of submission of the investigation outcome back to ChildLine.

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county children and youth agencies and/or local law enforcement. DHS's written policy is to immediately transmit reports to respective county and law enforcement agencies, with the goal that all reports will be transmitted within two hours of receipt.

In order to evaluate the timeliness of reports of child abuse and neglect being transmitted to respective county and law enforcement agencies, we reviewed a selection 85 referral reports from the data file provided by DHS of referral reports received in 2015. Based on dates included in the data file, we found that 39 of the 85 referrals appeared to not have been transmitted to the county and/or law enforcement agencies within two hours of receipt. We conducted further follow-up with DHS to obtain explanations for the delays and obtained some additional documentation. Our results were as follows:

- 9 referrals were validated to be timely per review of initial CY 47 referral reports transmitted. Transmission dates/times in the data file were not the original dates/times because of later transmissions due to system errors and/or re-evaluations.
  - 8 referrals DHS claimed to be timely; however, we could not validate to initial CY 47 reports transmitted. While DHS did provide a spreadsheet for four of these referrals produced by the IT vendor maintaining the CWIS system that indicated that the original transmissions dates were timely, we could not verify the accuracy of the information provided by the vendor due to a lack of documentation supporting the dates and times in the vendor's spreadsheet.
  - 22 referrals were validated to not have been transmitted timely. The following table shows the detail by referral method and type of report, along with the respective time ranges from receipt of the initial report to transmission to the investigating agency.
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**PA Department of Human Services****Transmission Timeframe from Initial Receipt of Reports**

Referral Method – Type	2-3 hours	3-4 hours	5-8 hours	12-24 hours	Over 1 day	Total
WP – CPS	2		1	1		4
SS – CPS	7	1			1	9
WP – GPS				1		1
SS – GPS	3		1		1	5
WP – LEO	1	1				2
SS - Supplemental	1					1
Total	14	2	2	2	2	22

Notes:

WP – Referral received through a call to the ChildLine hotline.

SS – Self-Service report from a mandated reporter through the DHS on-line portal.

Source: Developed by Department of the Auditor General staff from supporting documentation and information provided by DHS for the selection of referrals tested.

DHS provided various reasons for the referral transmission delays, which are summarized as follows:

- 8 due to the report being received during peak time and prioritization of those referrals.
- 2 due to an extra level of supervisory review needed for a new employee taking the report.
- 3 due to transmission errors and/or needing to transmit the referral using a different, manual method.
- 4 due to caseworkers' failure to follow procedures.
- 5 no reasons were provided.

Any delay in transmitting a report of suspected child abuse or neglect to the appropriate county and/or law enforcement agencies responsible for investigation puts a child at further risk. Thirteen of these delayed referrals were CPS in which there was an allegation of abuse and harm to a child. The CPSL requires the county agencies to investigate these cases within 24 hours.<sup>34</sup> In one CPS referral noted above, ChildLine did not even get the report transmitted to the county within 24 hours, and another CPS referral was not transmitted for over 12 hours. CPS cases, where a child may have been harmed and is potentially at serious risk, is when timing is of utmost importance. Any delay - even

<sup>34</sup> 23 Pa.C.S. § 6368.

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a few hours - is too much when considering the safety of these children. The timeframe from intake of the report to transmission to the appropriate investigating counties and law enforcement agencies should be at an absolute minimum.

As discussed in Finding 1.2, during calendar year 2015, ChildLine was not adequately staffed. This undoubtedly contributed to delays, especially during peak call time periods, in transmitting referrals to the investigating agency. Additionally, the limited training of staff as noted in Finding 2.3 contributed to delays caused by failure to follow proper procedures. Caseworkers were not required to document the reasons for delays in transmission, thereby making it difficult to monitor, manage, and explain the reasons for delays in many cases. Without management knowing the causes of delays, it is difficult to fix or implement remedies going forward.

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**Finding 2.2****Children remain at risk due to investigation outcomes being received late or not being received at all.**

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The CPSL requires child abuse investigations to be completed within 60-calendar days from the date of the initial report.<sup>35</sup> DHS regulations also require the report outcome to be designated “unfounded” if the investigation results are not submitted to ChildLine within the required 60 days.<sup>36</sup> Therefore, it is imperative that the proper assessment determination<sup>37</sup> based on the report investigation by the county agency be submitted to ChildLine within the required 60-day time period. Otherwise, an investigation which determines child abuse was founded or indicated will be concluded as unfounded.

While it is the responsibility of the county agencies to investigate and assess whether the reported allegations of abuse are founded, indicated, or unfounded within the required 60 days, it is incumbent upon DHS ChildLine to monitor the number of days since the initial report and periodically remind the county agency that the 60-day window is

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<sup>35</sup> 23 Pa.C.S. § 6368(n).

<sup>36</sup> 55 Pa. Code § 3490.34(c).

<sup>37</sup> A CPS investigation can be determined to be one of the following: “indicated” meaning that substantial evidence exists of the alleged abuse or admission by the perpetrator; “founded” meaning there is judicial adjudication that the child was abused or there has been acceptance into an accelerated rehabilitative disposition program for the reason of acceptance of the factual circumstances involved in the allegation of child abuse; or “unfounded” meaning there is a lack of evidence that the child was abused. A GPS investigation can determine the allegation(s) of neglect to be “valid” or “invalid”.

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coming to a close. Considering that the safety and protection of children are at stake, and because CWIS is utilized by DHS to conduct child abuse clearances to individuals having direct contact with children, such as teachers, coaches, and counselors; it is critical that timely and accurate investigation outcomes are included in the CWIS database.<sup>38</sup>

Additionally, any future referrals will be linked to previous referrals regarding the same child or perpetrator. If these previous referrals are recorded as unfounded purely due to lack of timeliness of outcome submission when evidence of abuse was confirmed by an investigator to exist, this child, or other children coming in contact with the perpetrator, could be at risk of harm and, in some cases, potentially great risk of harm.

Due to the limitations with analyzing dates within the data file noted in Finding 2.4, we could not accurately compile overall totals of the CPS and GPS referrals requiring investigation outcomes that were actually received, or not received, by ChildLine within the required 60 days. However, our review of a judgmental selection of 85 referrals included 20 referrals that required investigation outcomes but did not have outcomes and another 20 referrals in which the outcome was received after the required 60 days. We inquired of DHS as to why no outcomes were received or the outcomes were received late for the respective referrals.

As of March 15, 2016 (up to and including the date that our data encompasses), the 20 referrals with no outcomes ranged from 35 days to 375 days past the required 60-day timeframe. DHS responded that system errors may have occurred when the county agency attempted to submit the investigation outcome into CWIS, or the county agency never submitted an outcome. DHS provided the following additional information:

- For 9 referrals, ChildLine received the outcome after March 15, 2016, well past the 60-day requirement.
- For 6 referrals, the respective county agencies provided ChildLine with information after March 15, 2016 that the referral was screened as not requiring an investigation, and therefore, would not require an outcome.

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<sup>38</sup> The CWIS system will not provide a child abuse clearance for an alleged perpetrator while an investigation outcome is still outstanding. In these instances, the system will provide a clearance result letter stating that there is an investigation pending.



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- For 5 referrals, ChildLine still has no outcome from the respective county agencies.

In regard to the 20 referrals with late outcome submissions as of March 15, 2016, ChildLine received the outcomes from the county agencies from 1 day to 296 days after the 60-day requirement. DHS provided the following additional information:

- For 11 referrals, DHS accepted the outcomes as timely due to the county office being able to provide evidence to confirm to DHS that it attempted to submit the outcomes within the 60-day timeframe. The outcome transmissions to CWIS initially were unsuccessful due to system errors. Therefore, outcomes were reported in CWIS as provided by the investigation agency.
- For 9 referrals, DHS did not accept the outcomes as timely because the county agency did not attempt to transmit the outcome to ChildLine within the required 60 days. Therefore, per DHS regulations, these outcomes must be recorded as unfounded. We noted, however, that one of these nine referrals was a CPS case in which the county agency determined the report to be founded stating that there was evidence of both physical and sexual abuse. Management stated that the outcome for this CPS case was changed to unfounded. The outcome for this case was submitted to ChildLine 249 days after the 60-day requirement, with no documented follow-up by DHS once the 60 days were passed.<sup>39</sup>

DHS management stated that there have been 76 cases as of July 18, 2016, in which outcomes of investigations were due during calendar year 2015 and child abuse was determined to be founded or indicated, meaning there was evidence of child abuse, but ChildLine changed the assessment to unfounded due to the outcomes not being submitted by the counties within the required 60 days.

DHS stated that, with the implementation of CWIS on December 27, 2014, ChildLine did not follow-up or provide notice to the respective investigating county agency until the referral report went past the

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<sup>39</sup> After our test work, DHS conducted additional research and found that the respective county completed its investigation of this referral within 60 days even though it did not submit the outcome of its investigation to ChildLine until 249 days after the 60-day requirement.

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required 60-day timeframe without an outcome being submitted. DHS stated this notice may be provided by phone or email. We requested documentation to support when notice was provided to the counties for each of the 20 referrals for which the outcomes were submitted after 60 days. DHS could only provide documented notices for 5 of these 20 referrals; however, these notices were not sent until February 5, 2016, which was from 128 to 190 days after the 60-day investigation due date had passed on these referrals.

DHS stated that notices weren't being sent because CWIS provides the county agencies with the ability to run reports in CWIS. Additionally, the counties' own systems can provide the current status of all referrals and monitor the date the investigation outcomes are due. However, as a result of our inquiry as to why there were over 12,000 referrals with no outcomes (see Finding 2.4) in the data provided to us on March 15, 2016, DHS management revised its procedures several times.

Management stated that on March 23, 2016, ChildLine began providing notices to county agencies whenever a referral went over the 62<sup>nd</sup> day without an investigation outcome submitted to ChildLine. On April 26, 2016, 55-day notices began being provided, and 45-day notices began being provided on June 6, 2016, all via email. Because these changes to procedures did not affect the referrals and related due dates for outcomes from the data file of 2015 referrals from which we tested 85 referrals, we did not determine whether these new procedures were implemented and operating effectively at the time of our review.

In July 2016, as a result of DHS' follow-up with county agencies to submit timely investigation outcomes, DHS received a request from a county to waive Section 3490.34(c) of the DHS' Child Welfare regulations<sup>40</sup> related to protectives services requiring the investigation outcome to be submitted to ChildLine within 60 days from the date of the initial report. As a result, DHS management stated it was drafting a blanket waiver to this regulation that would apply to all counties. This means there will be no required timeframe in which county agencies must submit investigation outcomes to ChildLine.<sup>41</sup>

The CPSL requires that the county agency complete the investigation within 60 days. DHS stated that it will revise the regulations to establish a new timeframe by which the submission of the outcome must be provided to ChildLine after the conclusion of the

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<sup>40</sup> 55 Pa. Code § 3490.34(c). This regulation was adopted January 1, 1986 and amended July 3, 1999.

<sup>41</sup> DHS management stated as of September 23, 2016, this waiver is still in draft form. DHS intends to include a requirement of a certain timeframe in which county agencies must submit investigations outcomes to ChildLine; however, this timeframe has not yet been determined.

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investigation. In waiving the 60-day outcome submission requirement in its current regulations, DHS will conduct additional research as to when the investigations were actually completed for the 76 cases in which child abuse was determined to be founded or indicated but for which ChildLine changed the assessment to unfounded due to the outcomes being submitted after the required 60 days.

This waiver to DHS regulations may alleviate the current circumstances and backlog of investigations that were completed within 60 days but recorded as unfounded due to untimely submission of the investigation outcomes to ChildLine. However, the waiver may also put children at risk. It is imperative that these investigations are completed within the 60 days required by the CPSL, with outcomes submitted to ChildLine immediately upon completion of the investigation to provide the best protection to children at risk of harm. Each day that passes by while a child is in an abusive situation is one day too many. Also, in order to provide accurate clearances to individuals who will directly work with children, it is critical that these investigation outcomes are timely recorded in CWIS.<sup>42</sup>

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**Finding 2.3****Documentation supporting training taken by ChildLine staff is incomplete and no established on-going training program for ChildLine staff exists.**

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With ChildLine serving as the primary collection point for reporting allegations of child abuse and neglect in Pennsylvania, it is critical that ChildLine staff, both caseworkers and supervisors, are adequately trained to properly obtain and record information from persons reporting suspected abuse or neglect, to evaluate the information to assess the type of referral, and to transmit the referral to the appropriate county or law enforcement agency in a timely manner.

We found that there was a lack of documentation supporting the training received for new caseworkers and on-going training for current employees. Additionally, DHS did not have an established on-

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<sup>42</sup> The CWIS system will not provide a child abuse clearance for an alleged perpetrator while an investigation outcome is still outstanding. In these instances, the system will provide a clearance result letter stating that there is an investigation pending.

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going training program specific to the employees of ChildLine and their job-specific duties.

***Training for New Caseworkers***

According to management, upon being hired, caseworkers are required to successfully complete a seven week training plan which includes obtaining a working knowledge of the CPSL and ChildLine's policies and procedures. During the seven week period, caseworkers are instructed and monitored by supervisors through the caller intake process.

Over the period January 1, 2014 to June 30, 2016, ChildLine staffing levels ranged from 37 to 60 caseworkers and 5 to 8 supervisors. We requested training records for a haphazard selection of nine caseworkers and two supervisors. We found no documentation in employee training files supporting the completed courses or the on-the-job training provided by ChildLine supervisors. However, beginning in November 2015, DHS required new caseworkers to sign a document acknowledging their understanding of the CPSL and ChildLine's policy and procedure manual at the conclusion of the seven week training period. Three of the caseworkers reviewed were hired after November 2015. For all three, we found the employees signed a form verifying they understand the CPSL and ChildLine's policy and procedures; however, this form was not signed by the employees' supervisor providing the on-the-job training.

According to ChildLine management, if an employee has not demonstrated a working knowledge of the CPSL and other training materials, the supervisor will not approve the employee's completion of the training and the caseworker will be asked to repeat certain elements that were deficient, but this is not documented. Management stated the following:

ChildLine has a training plan for new workers specifically geared for the new worker to independently and competently answer hotline calls....This plan is variable based on a worker demonstrating an understanding of the law, policy and procedure, ability to adequately document and process referrals, competently interview individuals calling the hotline and process self-service referrals without errors.... All workers are closely monitored by a supervisor during their training period in order to ensure that an

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informed decision can be made regarding their ability to independently answer and assess incoming referrals.

Management stated supervisors documented new employees' progress through the seven week training program by preparing informal notes that were not maintained in the employees training file. However, there was no documented evidence in the training file that the supervisor responsible for overseeing the employee's training was satisfied with his or her progress during the seven week training period. The new caseworker's comprehension was also not tested prior to being placed on the hotline rotation.

***Continual Training for ChildLine Employees***

During our audit period January 1, 2014 through June 30, 2016, DHS did not have a training plan in place for ChildLine staff, and employees were not required to attain a minimum number of training hours specific to ChildLine job duties. DHS management explained that on-going training topics and hours are based on staff needs and statutory or policy changes that effect hotline functions.

DHS listed the following courses as mandatory for ChildLine caseworkers and supervisors in 2014 and 2015:

- Child Protective Services Law (for new employees)
- Hotline Policy and Procedure Manual (for new employees)
- Mandated and Permissive Reporters<sup>43</sup>
- In-house staff training addressing changes to the CPSL, CWIS and the Policy and Procedure Manual.
  - Three training sessions in 2014 totaling 6 hours.
  - Four training sessions in 2015 totaling 4 1/2 hours.

According to ChildLine management, staff were required to sign in for attendance to the in-house staff training sessions. However, the attendance sheets were not retained and there was no other documentation that any of the training was actually completed by ChildLine staff.

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<sup>43</sup> DHS/ChildLine management stated all staff hired since 2015 are required to complete the new three hour online training developed by the University of Pittsburgh, Child Welfare Resource Center for Mandated and Permissive Reporters. ChildLine maintains copies of certificate of completion provided by the Resource Center in each employee's file.

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Per our review of the 11 employees selected for testing, we found that little or no documentation was maintained in the employees' files supporting completed training related to ChildLine as noted. We did find documentation to support completion of the Mandated and Permissive Reporters training for 9 of the 11 employees reviewed, but no evidence existed for the other 2 caseworkers. Three of the caseworkers reviewed were hired after November 2015; however, for the other eight employees, no documentation existed for other training received during 2014 and 2015.

During this same time period ChildLine did not have any designated staff to evaluate and determine the annual training needs of caseworkers and supervisors. Management stated that with approval for additional staff in 2016, one position that was filled in late May 2016 is designated as a training supervisor to track staff training needs.

On June 10, 2016, we received an update from DHS management regarding changes to ChildLine's employee training program subsequent to the release of our interim report in May 2016. Management stated that, as part of training development, tracking procedures will be implemented to ensure all staff are trained. Additionally, management stated that bi-weekly refresher trainings for current ChildLine caseworkers are being planned to cover changes to the law, policies and procedures, and existing expectations, along with yearly trainings for all staff to cover a variety of topics depending on staffing needs. These changes were subsequent to our audit period, and therefore, we have not evaluated the implementation of these new training procedures.

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**Finding 2.4**

**2015 CWIS data excluded nearly 11,000 records, contained more than 12,000 reports with no outcomes, and contained unreliable dates.**

Reports of suspected child abuse or neglect are received by ChildLine and recorded through an intake process with data being entered into the CWIS system. These reports may be received directly to the ChildLine hotline by a phone call, or the reports may be made by mandated reporters through the on-line self-service portal.<sup>44</sup> A county agency may also receive a report directly and transmit to CWIS. According to DHS management, CWIS is designed to automatically

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<sup>44</sup> <https://www.compass.state.pa.us/cwis/public/home>

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assign sequential numbers to the referral reports as the reports are received no matter from which source.

### Missing Report Numbers

Theoretically, this automatic sequential numbering system is an excellent control to ensure accountability of all reports. However, we obtained a data file which included a total of 217,278 records for all referral reports received during calendar year 2015 and found 10,789 missing report numbers.

DHS does not routinely reconcile the numbers for all reports to ensure no reports are missing; however, in response to our inquiry, management stated that these missing report numbers were caused by the following:

- **10,437 referrals were deleted by the caseworker because these referrals did not result in a child abuse or neglect report.**

When a caseworker takes a call for suspected child abuse or neglect, the caseworker creates a report and enters information for the report into the CWIS system. DHS management indicated a caseworker has the ability to delete a report at any time during this report create stage while entering information from the caller. Once the caseworker has completed entering information from the caller, the report will be moved into an evaluation stage in order to transmit the report to the appropriate county agency and/or law enforcement. Once the report is in the evaluation stage, only ChildLine management can delete the report. However, DHS failed to document and maintain records of the reason for the deletions. Therefore, we could not verify whether these calls were actually not a report of suspected child abuse or neglect.

In response to our inquiry regarding the missing records, DHS stated that, beginning in April 2016, it informed staff that they should no longer delete records that are in the create stage, and supervisors will check and review for referrals that should be deleted at the end of each shift. DHS stated this new expectation is being added to its policy and procedures manual, and DHS is planning to have a system control be implemented

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in CWIS to prevent a caseworker from deleting a referral. We did not evaluate or review this procedure.

- **352 report numbers were skipped by CWIS when assigning numbers automatically.**

DHS management stated that the function used in CWIS to generate sequence numbers has the potential to skip numbers when multiple users are trying to generate a sequence number at the same time. Accountability is lost when report numbers are skipped. Without full accountability of all report numbers, risk increases that an actual child abuse report could be mishandled by the system. Even one mishandled report could be a life or death situation given that one neglected or abused child in the commonwealth is one too many.

**Referral Reports with No Outcomes**

In addition to missing report numbers, we noted that there were more than 12,000 referral reports that should have included an outcome determination on the case but did not. According to the CPSL, for all CPS referrals and for GPS referrals, which have not been screened from needing an investigation by the county, the county agencies' must submit an outcome determination to ChildLine within 60 days from the date of the initial report.

The following table shows the total number of CPS and GPS referrals reports of suspected child abuse or neglect received on the hotline, through self-service on-line reporting from mandated reporters, and from county agencies receiving a direct report during calendar year 2015, along with the number of referrals which should have had investigation outcomes, but did not as of March 15, 2016.



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### 2015 CPS/GPS Referrals

As of March 15, 2016

Referral Type	Total Referrals Requiring Investigations	No Investigation Outcomes	Percent No Outcomes
CPS	42,005	396	1%
GPS	79,302 <sup>a/</sup>	11,757	15%
Total	121,307	12,153	10%

Note:

a/ There were a total of 141,691 GPS referrals, of which 62,389 were screened as not needing an investigation by the respective county agencies, with the remaining 79,302 requiring investigation outcomes.

*Source: Developed by Department of the Auditor General staff from CWIS data provided by DHS. As discussed in Appendix A, the data file provided by DHS was determined to be not sufficiently reliable. See Finding 2.4 for further details.*

As of March 15, 2016, ChildLine did not receive investigation outcomes for 12,153, or ten percent, of all reports of child abuse and neglect requiring an outcome. When an outcome determination is not submitted to ChildLine within 60 days of the initial report, the outcome will be determined unfounded regardless of whether or not the investigation actually found evidence of abuse. This means the child who was abused continues to be at risk for abuse, and since the report was recorded as unfounded, the perpetrator(s) committing the abuse may continue to abuse that child or potentially lead to the abuse of other children.

### Unreliable Transmission and Receipt Dates

As part of our testing of the reliability of the CWIS data provided to us for all referral reports received during calendar year 2015, we reviewed a judgmental selection of 85 reports.<sup>45</sup> We traced information included in the data file to the CY 47 referral reports which include the intake information transmitted to the county children and youth agencies and/or law enforcement. We found that in 19 of the referral reports reviewed that one or more of the dates in our data file did not agree with the dates of the original transmission of the reports to the counties and/or law enforcement. These dates included the transmit date of the reports to the primary recipient, the receipt

<sup>45</sup> See Issue summary section regarding judgmental selection methodology.

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date of the report by the primary recipient, and the acknowledge date by the primary recipient that the report was received.

We found that these dates did not agree due to various reasons. There may have been a system error which occurred with certain information in the initial transmission of the report. To clear this error, the report may need to be retransmitted by ChildLine. When the retransmission of the report occurs, the new transmission date and time is included in the system. Likewise, there are times that based on additional information received, the original referral report may be reevaluated. When this occurs, the reevaluated referral is transmitted to the county agency and the new transmission date and time is included in the system. In these cases, the data file provided to us by DHS included the later transmission dates and times, but not the original dates and times.

Because the data file provided to us did not include the original transmission and receipt dates in all cases, we could not rely on the dates in the data file when conducting our analysis. Therefore, we were not able to accurately analyze how many total reports for the population had transmission delays to the county offices and law enforcement. Likewise, we were not able to reliably analyze how many total reports did not have outcome determinations transmitted to ChildLine within the required 60 days. Our testing of these areas is limited to our review of the 85 referral reports selected for testing and should not be projected to the entire population of referral reports.

DHS management stated that the original history of dates and times is maintained in the CWIS system for each referral report. However, this cannot be viewed by ChildLine management and staff and must instead be provided by the IT vendor maintaining the system upon request. Management stated that they are currently looking into upgrading the CWIS system to enable management and staff to have the ability to also access and view the history of report transmissions and receipts. Without management having this ability, monitoring, managing, and implementing remedies for the delays could be more difficult.

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**Issue Area Recommendations**

We recommend that DHS:

1. Document reasons when a referral report is not transmitted to respective county or law enforcement agencies within two hours.
2. Once Recommendation #1 is implemented, analyze the documented reasons for why referral reports are not transmitted within two hours and implement corrective action to ensure reports are transmitted within 2 hours, such as:
  - a. Fix CWIS system issues causing transmission errors.
  - b. Ensure staffing levels are adequate during peak call time periods.
  - c. Monitor caseworkers' performance in meeting the two-hour transmission timeframe and coach accordingly.
  - d. Train staff to ensure proper procedures are always followed.
3. Actively monitor and track referral investigation due dates and outcomes received and not received from the county agencies.
4. Work with the counties to identify why outcome submission deadlines are not being met and implement corrective action to ensure timely submission.
5. Ensure notices are sent to county agencies at regular intervals as the 60-day investigation completion due date approaches and retained by DHS.
6. Implement a temporary time period for submission of investigation outcomes until regulations can be revised.
7. Based on the assessment in Recommendation #6, revise DHS regulations to ensure county agencies are timely completing investigations and submitting outcomes to ChildLine in order to protect children and minimize the risk of potential harm.

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8. Develop and implement an on-going training program for ChildLine staff to ensure referral reports of child abuse and neglect are properly received, processed, transmitted to investigating agencies, and outcomes tracked in accordance with laws, regulations, and policies.
9. Maintain documentation in each employee's file of the training he or she has completed.
10. Consider establishing a minimum number of training hours related to ChildLine job-specific duties that each employee should complete annually.
11. Continue with its plan to dedicate a supervisor position filled in late May 2016 to track staff training needs and to provide training to staff.
12. Eliminate the ability for caseworkers to delete referral reports from the system once the call is taken.
13. Ensure that any referral reports that are deleted from CWIS are previously reviewed by a supervisor and the reason for deletion by the supervisor is documented. The purpose of all referral reports received by ChildLine should be documented and tracked.
14. Perform necessary upgrades to CWIS to ensure accurate sequential numbering of referrals received by ChildLine, without numbers being skipped.
15. Periodically reconcile all referral report numbers in CWIS to ensure that there are no missing reports.
16. Perform necessary upgrades to CWIS to allow management and staff to view all referral reports' receipt and transmission history to enable better monitoring and implementation of remedies to ensure timely and accurate transmission of referrals to investigating agencies.

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**Agency's Response and Auditors' Conclusion**

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Prior to this audit report's release, we provided a draft copy of our audit findings and recommendations to DHS for its review. On the following pages, we present DHS' response to our findings and recommendations in its entirety. Our conclusion follows DHS' response.

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## PA Department of Human Services

**Audit Response from Department of Human Services**

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF HUMAN SERVICES

September 30, 2016

The Honorable Eugene A. DePasquale  
Auditor General  
Department of the Auditor General  
229 Finance Building  
Harrisburg, Pennsylvania 17120

Dear Auditor General DePasquale:

Thank you for the opportunity to respond to the draft findings of your *Performance Audit Report on the Pennsylvania Department of Human Services ChildLine*, dated September 2016.

We also appreciate the acknowledgement of how seriously the Department of Human Services (the Department) took your interim report recommendations and implemented changes that could help save children's lives.

Protecting the commonwealth's children from abuse and neglect is a critical part of our mission, a priority of the Wolf Administration, and we agree that even one neglected or abused child in the commonwealth is one too many.

The Department experienced significant challenges in January 2015, when the changes to the Child Protective Services Law (CPSL) went into effect, and by the Wolf Administration's first day in office, the Department was inundated with calls and clearance applications that we were not adequately staffed or funded to handle. From 2014 to 2015, the Department experienced a:

- 14 percent increase in calls to ChildLine from 164,911 to 188,357.
- 39 percent increase in reports of suspected child abuse.
- 162 percent increase in clearance requests from 587,545 to 1,536,921.

As a result of these increases, performance at ChildLine suffered in early 2015. Specifically:

- Processing time for child abuse clearances peaked at 26 days – well above the 14 days required by law.
- 48 percent of clearances were processed on time.
- 43 percent of calls to ChildLine were abandoned or deflected.

The Department acted immediately to address these challenges by streamlining operations, enhancing technology and data collection, increasing staffing resources, and improving training. In July 2016, the Department implemented technology changes that allow all calls to be documented, regardless of the nature of the call. As a result, the Department's data today reads much differently:

- Clearances are processed on average in 1.6 days, well below the statutorily required 14 days.
- 100 percent of clearances are processed on time.

OFFICE OF THE SECRETARY

## PA Department of Human Services

**Audit Response from Department of Human Services**

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- The abandoned or deflected rate is down to 2 percent.
- 80 percent of clearance requests and 42 percent of child abuse referrals are submitted electronically, reducing paperwork for the staff and the public.

The mission of the hotline is to efficiently and accurately take referrals regarding abuse or neglect of children and transmit that information to the appropriate investigating agency so the safety of at-risk children can be ensured. The dedicated management and staff in the Department and at ChildLine, in particular, are completely focused on this priority.

As you will see in our responses to your specific audit findings, the Department has prioritized improvements at ChildLine and we are continuing to do so. Thank you for considering our comments and incorporating them into the final report.

**Finding 1.1 – Nearly 58,000 calls unanswered over 2 ½ years leave children at risk.**

**Department Response:** We agree that ChildLine experienced significant challenges in 2015 after the passage of 24 amendments to enhance child protection laws and the implementation of a new data system. These amendments broadened the definition of child abuse, expanded the definition of mandated reporters and the circumstances under which they needed to report, and increased overall awareness of child abuse in Pennsylvania. As a result, there was a dramatic increase in calls and referrals to a hotline that was inadequately staffed and underfunded to handle this increase.

In addition to the 14 percent increase in calls, the Department received approximately 42,000 additional referrals electronically from mandated reporters. These electronic referrals also needed to be reviewed, processed and transmitted to the appropriate investigating agency. Through the hiring and training of additional staff and the continued implementation of both operational and system efficiencies, we have been able to effectively process this increase in referrals while also reducing the deflected and abandoned rate to 2 percent.

In August, the average wait until a caseworker answered a call was 34 seconds and the average wait until a caller abandoned a call was 2 minutes. The average longest wait time was less than half of what it was two months prior. Wait times continue to be assessed and we prioritize the busiest shifts when assigning new staff.

**Finding 1.2 – ChildLine understaffing persists while children remain at risk.**

**Department Response:** Thorough analyses were conducted in 2015 resulting in the Department taking a number of actions to address the ChildLine staffing issue. Caseworker positions are routinely posted so that multiple vacancies can be filled at one time, decreasing the length of time that positions remain unfilled. Additional positions were granted throughout 2015 and 2016 and these were prioritized by the Department, while adhering to both civil service and state hiring processes. Unfortunately, turnover also increased at an accelerated rate, hampering the Department's ability to identify and train qualified candidates so they were prepared to take on this demanding, high-stress, and critical position.

In 2015, the number of staff needed to keep up with the call volume and the processing of electronic referrals was higher than the number of staff at ChildLine. As additional staff were hired and trained, they were assigned to the highest priority shifts – as determined by call volume and an analysis of trends – to ensure that we were meeting demand. Management utilized overtime on every shift during peak times to maximize hotline coverage. Over time, the

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additional staff that we hired helped reduce reliance on overtime which, in turn, reduced turnover of our trained, experienced staff.

Our goal is to process and transmit all calls and electronic referrals in a timely manner, 24 hours a day. To that end, we continue to conduct frequent assessments to shift schedules and overtime. The number of staff scheduled is based on call volume, electronic referrals, a review of investigation outcomes, and additional duties as assigned during times of lower volume.

Using the ChildLine scheduling log, we assessed minimum staffing levels for a three month period. From June 18, 2016 to September 16, 2016, we were staffed at or above our minimums 97.4 percent of the time. Approximately three quarters of the time when we were understaffed, it was by one staff person. The most we were ever understaffed was by six caseworkers and this was for one, fifteen minute window.

**Finding 1.3 – DHS failed to document the purpose of nearly 124,000 calls that did not result in a referral report.**

**Department Response:** Prior to August 2016, details on routine phone calls to ChildLine involving information requests or questions unrelated to potential child abuse or neglect were not collected. These calls included questions about county children and youth agency contact information, mandated reporting requirements, clearances, appeals, policy, and system/technical inquiries.

Based on the recommendation of the Auditor General, the Department began to collect and document details on non-child abuse and neglect calls on August 1, 2016. To support this effort, we added new data fields and functionality to the Child Welfare Information Solution (CWIS). The data we are collecting is being reviewed monthly and used to determine if more phone prompts and public education are needed to reduce the number of non-priority calls unrelated to child abuse or neglect.

**Finding 1.4 – Only 103 of more than 380,000 calls were monitored over 2 ½ years, providing little assurance calls were processed properly to protect children.**

**Department Response:** We agree that ChildLine supervisors were unable to provide the optimal level of monitoring throughout 2015 due to the increased workload and staff vacancies. At that time, supervisors' priorities were to answer hotline calls and train new ChildLine staff; monitoring activities were secondary. Furthermore, although new employee core training is normally seven weeks long, it is often extended until the supervisor who is working one-on-one with the caseworker and monitoring all of their activity and phones calls, is confident that the individual can work independently and process electronic and hotline call referrals correctly.

We have increased our monitoring of caseworkers who have already been fully trained and improved our documentation of this activity. The addition of more caseworkers who are able to handle the volume of calls and electronic referrals with little assistance has freed up hotline supervisors so they can perform and document more monitoring activities. From June to August 2016, there were 151 calls formally monitored.

**Finding 2.1 – Delays in transmitting child abuse reports to investigating agencies leaves children at risk.**



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**Department Response:** The Department takes all reports of child abuse seriously and makes every effort to transmit these reports within two hours of receipt. At this time, we are transmitting 97 percent of referrals within this two-hour timeframe. We will continue to make improvements to ChildLine staffing, training, and technology to ensure all reports are transmitted within two hours.

To further safeguard children and ensure that not even one report of suspected abuse has a delayed transmission, we have strengthened our monitoring process and implemented an associated documentation process in the event a referral exceeds the two-hour policy.

**Finding 2.2 – Children remain at risk due to investigation outcomes being received late or not being received at all.**

**Department Response:** Although investigation outcome documentation timeliness is vital, the Department would like to clarify that child safety is a priority and ensured at the beginning of and throughout the entire county investigation, not just at the end.

Counties are statutorily required to complete all child abuse investigations within 60 days to protect the rights of children, families and alleged perpetrators. If the investigation is not completed within 60 days, it must be deemed unfounded as required by statute. Departmental regulations promulgated in 1999, require the submission of the investigation outcome within 60 days. As a result of recent statutory amendments and CWIS implementation, the Department has undertaken an extensive review of the CPSL and regulations, as well as impacts to systems, counties, stakeholders, families and policy. From this analysis, the Department has determined that the regulations are outdated and that it is appropriate to waive the regulation requiring the submission of the investigation outcome to ChildLine within 60 calendar days. We believe this waiver will enable the county children and youth agency to:

- Utilize the full 60-calendar days to conduct their investigation and obtain the necessary reviews before the status determination has to be sent to the Department.
- Ensure the safety and protection of children while also affording the perpetrator their appeal rights.

Prior to 2015, the Department provided notices to the counties regarding upcoming investigation deadlines. CWIS provides reports for all counties to monitor their open investigations and associated deadlines. However, once it was identified that there were challenges with timely submission, ChildLine began proactively monitoring outcomes not received and sending notices to counties as the investigation completion due date approached.

Recent advancements in process, training, and technology has resulted in a significant decrease in late receipt of investigation outcomes. The below chart illustrates improvements made in child abuse investigation outcomes being received in a timely manner.

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The Department would like to clarify that the case referenced in the audit of founded physical and sexual abuse which appeared to be untimely, was reviewed as part of the comprehensive case review of untimely cases. In compliance with statute, the county was able to provide documentation that the investigation was completed within 60 days making it timely with the waiver.

**Finding 2.3 – Documentation supporting training taken by ChildLine staff is incomplete and no on-going training program for ChildLine staff exists.**

**Department Response:** In May 2016, a ChildLine Training and Quality Assurance Supervisor was hired and is diligently working to enhance and strengthen ChildLine training. Since the addition of this dedicated position, the Department has significantly refined, improved, and expanded the new caseworker training plan. We have also formalized this plan with clear expectations and documented objectives. Ongoing refresher trainings for caseworkers are regularly held to standardize and strengthen the knowledge of all ChildLine staff. The Department is also implementing a quality assurance program to monitor trends and enact corrective actions in a timely manner, if necessary.

**Finding 2.4 – 2015 CWIS data excluded nearly 11,000 records, contained more than 12,000 reports with no outcomes, and contained unreliable dates.**

**Department Response:** Since 2015, the Department has made significant and continuous improvements in the quality of data collected and maintained in CWIS to ensure that Pennsylvania’s child abuse data is complete and reliable.

**Missing Report Numbers.** Accountability for all referrals of child abuse and neglect is paramount to our operations and we are taking action to implement additional system controls to restrict caseworkers’ ability to delete newly-created referrals. We are also going beyond compliance with industry standards for database operations to identify new opportunities to improve the monitoring of sequential IDs. To validate and account for all referral IDs that do not have a corresponding referral, system-generated reports are received to ensure all deletions were documented and justified.

**Reports with No Outcomes.** The Department continues to collaborate with county children and youth agencies to prioritize and improve the collection of investigation outcome data. There have been significant improvements and, as of September 2016, the 12,000 missing outcomes

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identified in the audit have been reduced to *zero* CPS investigation outcomes and 451 GPS assessment outcomes (GPS reports do not allege child abuse and are never reported on a child abuse clearance).

**Unreliable Transmission and Receipt Dates.** CWIS tracks *all* transmissions of referrals to the counties. The data file provided to auditors contained only the most recent transmission information, not historical information. Screens in CWIS are also limited to the most recent transmission information. Improving transparency of this information is a priority of the Department and a system change was requested in April 2015 to make the historical information more viewable. In the meantime, CWIS provides a dashboard and reports to ChildLine management to monitor transmissions.

The Department's response to the individual recommendations is included in the appendix to this response.

Thank you for the opportunity to respond to this draft report. Please contact Mr. David R. Bryan, Manager, Audit Resolution Section, Bureau of Financial Operations, at (717) 783-7217, or via email at [davbryan@pa.gov](mailto:davbryan@pa.gov), if you have any questions regarding this matter.

Sincerely,



Theodore Dallas  
Secretary

## Attachment

c: Mr. John M. Lori  
Ms. Janet B. Ciccocioppo  
Mr. Chris Corbo  
Mr. David Bryan

## PA Department of Human Services

**Audit Response from Department of Human Services****Appendix****Finding Area 1 Recommendations:**

**AG Recommendation 1:** Continue to refine its analysis and written policy for determining the minimum number of staff needed based on call volume and self-service online reporting to ensure all calls received on the hotline are answered by caseworkers and callers are not placed on hold for an unreasonable amount of time, such as no longer than 3.5 minutes.

**Department Response:** In February 2015, the Department immediately initiated an increase in ChildLine complement, followed by an internal time study and staffing assessment that were finalized in November 2015. This assessment and request resulted in the number of positions at ChildLine increasing from 48 to 81 staff. Monthly assessments are conducted to determine the minimum number of staff needed using trends and current volume, as well as average number of call-offs. This assessment and scheduling process was memorialized in a written policy in August 2016.

Due to increased staffing, ChildLine averaged a 2 percent abandoned and deflected call rate in August 2016. Additionally, the average wait until a caseworker answered a call was 34 seconds and the average wait until a caller abandoned a call was 2 minutes. The average longest wait time in August 2016 was less than half of what it was two months prior. The wait time data is also assessed monthly to adjust staffing levels as needed to strengthen hotline coverage. The Department will continue to improve these wait times as the new positions are filled.

**AG Recommendation 2:** Continue to hire and train additional staff necessary based on the results of the evaluation from implementing Recommendation #1, including consideration of turnover.

**Department Response:** All positions requested as a result of the staffing assessment have been granted. ChildLine complement has increased from 48 to 81 staff; 42 to 72 caseworkers and six to nine supervisors. One supervisor is focused solely on training and quality assurance. As of September 16, 2016, there are selected candidates for all remaining vacancies which are currently being processed in accordance with the civil service and hiring processes.

**AG Recommendation 3:** Ensure the hotline is always staffed at or above the minimum staffing levels needed as determined from implementing Recommendation #1.

**Department Response:** Based on the recommendations from the staffing assessment, eleven shifts were successfully reduced to five starting May 21, 2016. This reduction, in addition to complement increases, allowed staffing minimums to be adjusted as of June 2016 to ensure enough staff are scheduled to meet the volume of work. This reduction in shifts has simplified scheduling and allows staff time to complete all responsibilities and duties as assigned. Currently, overtime is needed to meet minimum staffing levels. However, once all staff are hired and trained, there will be enough staff to ensure minimums are met while also absorbing call-offs and eliminating the reliance on overtime.

**AG Recommendation 4:** Track and document the purpose of all calls received on the hotline, including those not generating referral reports.

**Department Response:** New data fields and system functionality were incorporated into a July 2016 CWIS Release. The Department began to collect and document details on non-child abuse and neglect calls on August 1, 2016. The data we are collecting is being reviewed

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monthly and used to determine if more phone prompts and public education is needed to reduce the number of non-priority calls unrelated to child abuse or neglect.

The August 2016 data showed that the most frequent calls from the public, which did not result in a referral, were questions related to mandated reporting or requests for county children and youth agency contact information. This data will be used to strengthen existing outreach and education. Information and training related to mandated reporting can be found at [www.keepkidssafe.pa.gov](http://www.keepkidssafe.pa.gov).

**AG Recommendation 5:** Monitor calls not involving allegations of child abuse or neglect in order to implement ways to divert calls from the hotline caseworkers to provide more time to answer calls that do involve allegation of child abuse or neglect, such as:

- a. Conduct outreach to mandated reporters and the general public to inform that the hotline should be utilized to report suspected child abuse and neglect and provide information as to where calls for other purposes should be made. This outreach can be through DHS' website, developing a resource guide to circulate, media outlets, etc. More specific examples include email blasts with helpful tips and guidelines for child abuse reporting, additional information about training opportunities, and quarterly newsletters posted on DHS' website.
- b. Add additional prompts when a call is made to the hotline for purposes other than allegations of child abuse or neglect. Based on the prompts selected, calls other than child abuse or neglect allegations may be diverted to other caseworkers or DHS offices separate from the hotline or perhaps, to voice mail in which a call may be returned at a later time by the appropriate DHS office separate from the hotline.

**Department Response to 5a:** Clear information and guidance on where questions, concerns, or information should be sent when not reporting suspected child abuse or neglect was updated on [www.keepkidssafe.pa.gov](http://www.keepkidssafe.pa.gov) on June 1, 2016. Additionally, a media campaign is being developed to inform the general public about their roles and responsibilities in recognizing and reporting suspected child abuse. Creative concepts for the campaign are slated for completion by September 30, 2016 with the media campaign airing in 2017. Specifically, the campaign is intended to:

- Inform the general public about their roles and responsibilities related to recognizing and reporting suspected child abuse.
- Motivate the public to take an active role in protecting Pennsylvania's children by reporting suspected child abuse to ChildLine.
- Inform the general public about the child abuse clearance requirements for certain individuals whose employment or volunteer service brings them into contact with children.
- Direct viewers to the [www.KeepKidsSafe.pa.gov](http://www.KeepKidsSafe.pa.gov), the Child Welfare Portal for electronic reporting of suspected child abuse by mandated reporters, and the ChildLine telephone number for verbal reporting of suspected child abuse.

The Department is also working with a commonwealth vendor to hold focus groups with hotline supervisors and caseworkers, county children and youth agencies, and mandated reporters to assist in identifying systemic improvement opportunities. The Department will also be facilitating conversations with stakeholders to gather feedback on ways to strengthen and enhance CWIS, specifically the streamlining of electronic submission of child abuse and neglect referrals. Focus groups were held with hotline supervisors and caseworkers in August. Focus groups will be

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scheduled with county children and youth agency staff in the next few months and mandated reporters in early 2017.

**Department Response to 5b:** Currently, callers are immediately informed that if they are calling about an emergency, they should hang up and dial 911. The hotline message then encourages mandated reporters to submit their referral electronically via [www.compass.state.pa.us/cwis](http://www.compass.state.pa.us/cwis). A current system prompt diverts callers who have questions related to child abuse clearances. Finally, if the caller needs technical assistance, a separate phone number is provided.

The Department is securing a new phone system and call center platform solution that will better support ChildLine's operational needs, including additional prompts to divert calls which do not involve the reporting of suspected child abuse or neglect to other appropriate staff. The solution will ensure that the Department will have safe, secure, reliable 24/7 phone services, as well as, improved call center platform and management reporting capabilities. The new phone system is slated for implementation in the first quarter of 2017.

**AG Recommendation 6:** Ensure new procedures are fully implemented for supervisory monitoring of calls answered by caseworkers to include number of phone calls to be monitored for each caseworker, how often monitoring will be conducted, and follow-up on corrective actions for caseworkers whose performance is unsatisfactory.

**Department Response:** Updated call monitoring policies have been established to include the official monitoring of at least one call per trained worker every month. These calls are documented on a call monitoring form, discussed with the staff, and signed by the supervisor and staff. In July and August, we monitored 100 percent of ChildLine staff who are answering phone calls. The monitoring is part of an overall quality improvement process that specifies the frequency, duration and coverage of call monitoring by ChildLine supervisors. The information gathered during call monitoring will be used as part of caseworker performance reviews and to identify individual and overall staff development needs. Please note that new staff have every call monitored until they have demonstrated an ability to meet established performance standards.

**AG Recommendation 7:** As call monitoring procedures are implemented in Recommendation #6, assess whether the number of calls monitored each month for each caseworker is sufficient to ensure calls are processed accurately, efficiently, and effectively.

**Department Response:** The call monitoring procedures were updated as part of the overall performance management system developed for ChildLine. The specific performance objectives for ChildLine caseworkers related to telephone calls are included as part of the employee's job descriptions and their performance reviews. The performance metrics related to call monitoring are being crafted to balance the requirements for customer service, accuracy and productivity by the ChildLine caseworkers. The monitoring of 151 calls was formally documented from June 1, 2016 to August 31, 2016. Calls are monitored to ensure compliance with the CPSL and the policy and procedure manual.

**AG Recommendation 8:** Consider recording hotline calls for training and monitoring purposes to ensure calls are processed properly.

**Department Response:** Requirements for a new phone system are currently being finalized. A RFQ was submitted for an upgraded phone system in early July, and included a workforce

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management solution, and a recording and monitoring module. During the development of phone system requirements, discussions were held with our Office of General Counsel to discuss the recording of hotline calls for training purposes. The legalities of performing call recording must be thoroughly reviewed and vetted to ensure the confidentiality of reporters. We anticipate requesting this functionality, which can be used if the caller is notified that the call is being recorded. These calls can be used for monitoring and training purposes only, and will not be maintained for extended periods of time.

**Finding Area 2 Recommendations:**

**AG Recommendation 1:** Document reasons when a referral report is not transmitted to respective county or law enforcement agencies within two hours.

**Department Response:** The Department agrees that the timely transmission of all referrals is critically important. ChildLine supervisors document the circumstances surrounding any referrals which are transmitted after two hours of receipt. A daily quality assurance report was implemented in September 2016 to ensure all referrals which are transmitted over two hours after intake have documented reasons in the record.

**AG Recommendation 2:** Once Recommendation #1 is implemented, analyze the documented reasons for why referral reports are not transmitted within two hours and implement corrective action to ensure reports are transmitted within 2 hours, such as:

- a. Fix CWIS system issues causing transmission errors.
- b. Ensure staffing levels are adequate during peak call time periods.
- c. Monitor caseworkers' performance in meeting the two-hour transmission timeframe and coach accordingly.
- d. Train staff to ensure proper procedures are always followed.

**Department Response:** ChildLine receives daily quality assurance reports of all transmissions which exceed two hours in order to ensure that the policy is being followed, and that the reason for the delayed transmission is addressed with immediate corrective action.

**AG Recommendation 3:** Actively monitor and track referral investigation due dates and outcomes received and not received from the county agencies.

**Department Response:** Prior to the implementation of CWIS, ChildLine provided notice to county agencies when an investigation outcome was not received on their reports as of day 45, 58, and then again if the referral went over the 60<sup>th</sup> day. With the implementation of CWIS, county agencies were provided the ability to run reports to verify the current status of all referrals and monitor the date the investigation is due. Once it was identified that there were challenges with timely submission, a rollout of preventative measures were developed in collaboration with county children and youth agencies to provide specific, timed reminders. Rollout was planned and implemented as report logic was developed and delivery methods were determined. This was a formalized process being implemented to ensure regular and consistent notice was given to counties and documented appropriately. On March 23, 2016, ChildLine began providing daily notices to the county agency whenever a referral went over the 62<sup>nd</sup> day without an outcome. ChildLine began providing 55 day notices on April 26, 2016, and 45 day notices on June 6, 2016. These notices are tracked and maintained by OCYF.

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**AG Recommendation 4:** Work with the counties to identify why outcome submission deadlines are not being met and implement corrective action to ensure timely submission.

**Department Response:** The Department has taken significant steps to obtain and assess feedback from county agencies in an effort to identify and resolve any issues contributing to the late submission of outcomes. This feedback has been obtained through workgroups that have been meeting monthly since April 2015, monthly conference calls with county case workers and county case management system owners, and assessments of specific issues reported by county staff to the Department. The concerns expressed by county agency staff are consistently assessed, and the Department has taken the following steps to address these identified areas of concern:

- The Department continues to work with counties through their annual budgeting process in order to ensure county agencies have adequate staffing and resources to meet the needs of the children and families they serve.
- The Department has distributed tip sheets and guides to support county utilization of CWIS functionality.
- The Department maintains a CWIS helpdesk where issues are logged for research by the CWIS technical team to determine if system changes are warranted.
- System changes have been implemented and continue to be prioritized that will add efficiencies to both CWIS and county systems.

**AG Recommendation 5:** Ensure notices are sent to county agencies at regular intervals as the 60-day investigation completion due date approaches and retained by DHS.

**Department Response:** Please see response to number 3.

**AG Recommendation 6:** Implement a temporary time period for submission of investigation outcomes until regulations can be revised.

**Department Response:** While the waiver will extend the time period by which investigation outcomes must be submitted to ChildLine following the completion of an investigation, there was never an intention of waiving the regulation without specifying a timeframe for submission. The Department is currently working with our Office of General Counsel to establish the time period by which investigation outcomes must be submitted by investigating agencies. Once established, the time period will remain in effect pending the final issuance of revised regulations.

**AG Recommendation 7:** Based on the assessment in Recommendation #6, revise DHS regulations to ensure county agencies are timely completing investigations and submitting outcomes to ChildLine in order to protect children and minimize the risk of potential harm.

**Department Response:** The Department has identified 55 Pa. Code, Chapter 3490, for regulatory revision and will convene a stakeholder workgroup in early 2017.

**AG Recommendation 8:** Develop and implement an on-going training program for ChildLine staff to ensure referral reports of child abuse and neglect are properly received, processed, transmitted to investigating agencies, and outcomes tracked in accordance with laws, regulations, and policies.



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**Department Response:** The Department continues to evaluate and enhance its training program for ChildLine caseworkers and supervisors. The Department has implemented the following steps:

- Hired a training and quality assurance supervisor in May 2016.
- Expanded caseworker onboarding training which includes specific objectives and performance metrics.
- Conducted refresher trainings beginning on June 22, 2016 for both caseworkers and supervisors. Logged and maintained all training efforts, including training objectives, materials, attendees, and timeframes.

**AG Recommendation 9:** Maintain documentation in each employee's file of the training he or she has completed.

**Department Response:** Since the hiring of the dedicated training and quality assurance supervisor, all training received by ChildLine staff is documented in their personnel file. In addition, the training supervisor tracks and maintains all training conducted for ChildLine staff.

**AG Recommendation 10:** Consider establishing a minimum number of training hours related to ChildLine job-specific duties that each employee should complete annually.

**Department Response:** The training and quality assurance supervisor position is filled and we are working diligently to enhance and strengthen our caseworker training. To date, we have updated our training manual and established regular refresher trainings for staff. We continue to work on establishing a quality assurance program to proactively seek and correct any known deficiencies. Quality assurance issues are then evaluated and trainings are developed, as needed.

The Department will continue using the monthly monitoring forms to identify additional staff training needs. Training will also occur based on enactment of new legislation or issuance of revised regulations impacting the caseworker's job responsibilities. The Department will conduct outreach with other states that operate child abuse hotlines to identify best practices related to training of staff, both upon hiring and on an ongoing basis. This information will assist the Department in determining whether any changes are needed to our training processes and expectations, including the establishment of a minimum number of training hours.

**AG Recommendation 11:** Continue with its plan to dedicate a supervisor position filled in late May 2016 to track staff training needs and to provide training to staff.

**Department Response:** In May 2016, a ChildLine Training and Quality Assurance Supervisor was hired to enhance and strengthen ChildLine training. This individual is responsible for:

- Working with ChildLine supervisors to identify staff training needs.
- Developing and modifying the training curriculum.
- Providing training either directly or through sub-contractors.
- Ensuring that learning goals are met by existing staff as well as new hires.

The supervisor also updates and maintains the training plan, which sets forth a seven week training agenda that defines seven core competencies for ChildLine staff, an onboarding plan, and performance expectations. In addition to overseeing training, this supervisor is responsible

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for carrying out and conducting a quality control process for all hotline staff and producing the associated reports for the OCYF leadership team.

**AG Recommendation 12:** Eliminate the ability for caseworkers to delete referral reports from the system once the call is taken.

**Department Response:** Currently the delete option in CWIS is available to caseworkers when creating a referral, intended to support them in deleting a blank record that was accidentally created. A caseworker cannot delete a referral that contains any allegation information.

Beginning in April 2016, caseworkers were informed that they should no longer be deleting any referrals. Supervisors are checking the system for blank referrals at the end of each shift.

A CWIS system change has been logged for future prioritization. This system change will prevent caseworkers from ever deleting referrals and will alert supervisors of blank referrals requiring their review. Until this system change is implemented, a system-generated report is received allowing ChildLine management to ensure all deletions were documented and justified.

**AG Recommendation 13:** Ensure that any referral reports that are deleted from CWIS are previously reviewed by a supervisor and the reason for deletion by the supervisor is documented. The purpose of all referral reports received by ChildLine should be documented and tracked.

**Department Response:** The existing policy is that supervisors review all referrals that need to be deleted. A description and justification for deletions must be provided to the ChildLine Director for referrals that have any information entered. The ChildLine Director reviews, approves and completes these deletions. Documentation is provided by our IT vendor confirming all deletions, and of those, which were blank.

**AG Recommendation 14:** Perform necessary upgrades to CWIS to ensure accurate sequential numbering of referrals received by ChildLine, without numbers being skipped.

**Department Response:** A system change has been logged for future research and prioritization to review system functionality as it relates to sequential numbering.

**AG Recommendation 15:** Periodically reconcile all referral report numbers in CWIS to ensure that there are no missing reports.

**Department Response:** Reports will be run weekly to reconcile all referral report numbers to ensure there are no missing reports.

**AG Recommendation 16:** Perform necessary upgrades to CWIS to allow management and staff to view all referral reports' receipt and transmission history to enable better monitoring and implementation of remedies to ensure timely and accurate transmission of referrals to investigating agencies.

**Department Response:** Screens in CWIS are limited to the most recent transmission information. Improving transparency of this information is an efficiency prioritized by ChildLine management. A system change was requested in April 2015 to make the historical information more viewable. In the meantime, CWIS provides a dashboard and daily reports to ChildLine management to monitor transmissions.

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**Auditors' Conclusion to the Department of Human Services' Response**

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DHS agreed with the findings and recommendations and stated it is in various stages of taking action to remedy the issues identified. We commend DHS for taking immediate actions related to our interim report recommendations and making notable improvements by June 2016, such as increasing staffing levels and reducing calls not answered. Additional improvements are needed, but we are confident that, once DHS fully implements our recommendations, the administration of ChildLine will be strengthened in regard to the effectiveness of its intake process and processing of child abuse and neglect reports in accordance with applicable laws, regulations, and policies. Ultimately, implementing our recommendations will help protect vulnerable children from harm in Pennsylvania.

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## Appendix A

## Objectives, Scope, and Methodology

The Department of the Auditor General conducted this performance audit in order to provide an independent assessment of the Department of Human Services' (DHS) ChildLine.

We conducted this audit in accordance with *Government Auditing Standards*, issued by the Comptroller General of the United States. 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.

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**Objectives**

Our audit objectives were as follows:

- Determine the effectiveness of DHS' intake process for ChildLine.
- Determine whether child abuse/neglect calls to ChildLine are processed in accordance with applicable laws, regulations and policies.

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**Scope**

Unless otherwise noted, our audit covered the period January 1, 2014 through June 30, 2016, with updates through the report's release.

DHS management is responsible for establishing and maintaining effective internal controls to provide reasonable assurance that ChildLine is in compliance with applicable laws, regulations, contracts, grant agreements, and administrative policies and procedures.

In conducting our audit, we obtained an understanding of relevant internal controls, including any information systems controls, if applicable, that we considered to be significant within the context of our audit objectives.

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For those internal controls that we determined to be significant within the context of our audit objectives, we also assessed the effectiveness of the design and implementation of those controls as discussed in the Methodology section that follows. Any deficiencies in internal controls that were identified during the conduct of our audit—and determined to be significant within the context of our audit objectives—are included in this audit report.

**Methodology**

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To address our audit objectives, we performed the following:

- Reviewed applicable provisions of the Child Protective Services Law (CPSL) and DHS regulations.
- Reviewed policies and procedures contained in the DHS/ChildLine Policy and Procedure Manual.
- Conducted interviews with DHS' management responsible for overseeing the ChildLine hotline, observed ChildLine intake procedures on-site, and obtained Child Welfare Information Solution (CWIS) screen prints to obtain an understanding of the child abuse hotline process to take referral reports of suspected child abuse, refer the reports to investigating agencies, and receive investigation outcomes.
- Obtained and evaluated DHS spreadsheets of calls received and answered on the ChildLine hotline for the period January 1, 2014, through June 30, 2016.
- Judgmentally selected ten months of Verizon call reports, ensuring coverage each year over the period January 2014 through June 2016. We ensured the Verizon call reports agreed to DHS spreadsheets for these 10 months.
- Analyzed call queue wait times using the Verizon call reports for the 10 months selected.
- Obtained and evaluated ChildLine staffing levels, including approved casework complement and filled positions during the period January 1, 2014 through June 30, 2016.

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- Randomly selected 32 days from 8 months tested in 2014 and 2015, and judgmentally selected 256 time slots to get coverage of various time periods throughout the days and split equally between 2014 and 2015 to test whether minimum staffing levels were met.
- Judgmentally selected 52 time slots during the period June 18, 2016 through June 30, 2016, to get coverage of 4 time periods throughout each of the 13 days, to determine whether ChildLine's actual staffing levels met its new formula for absolute minimum staffing required to process referral reports received by ChildLine.
- Reviewed ChildLine staff call monitoring forms that were completed during the period January 1, 2014 through June 30, 2016.
- Reviewed DHS ChildLine training policies.
- Haphazardly selected nine ChildLine caseworkers and two supervisors and evaluated training records for ChildLine job-related duties. Note that over the period January 1, 2014 through June 30, 2016, ChildLine staffing levels ranged from 37 to 60 caseworkers and 5 to 8 supervisors.
- Obtained a data file from CWIS of all referral reports received by DHS/ChildLine from January 1, 2015 through December 31, 2015. This data file included any investigation outcomes submitted by the investigating county agencies as of March 15, 2016.<sup>46</sup>
- Reviewed the population of ChildLine referrals for completeness. Specifically, we evaluated the number of gaps in the sequential numbering of referrals and blank data fields where dates or other data should have been entered by ChildLine or County staff.
- Judgmentally selected 85 referral reports from the referrals received by ChildLine in 2015 by considering several factors including coverage of the referral types (Child Protective

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<sup>46</sup> In order to determine whether child abuse/neglect calls to ChildLine are processed in accordance with applicable laws, regulations, and policies, we focused on referral reports received by ChildLine during calendar 2015 and did not review referrals received in 2014 since DHS processes and procedures changed at the beginning of 2015 with the changes to the CPSL and implementation of the CWIS system.

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Service (CPS), General Protective Service (GPS), and Law Enforcement Only (LEO)), the investigating county, the timeliness of transmitting the referral to the investigating county, and the timeliness of the submission of the investigation outcome back to ChildLine.

- Evaluated the 85 referral reports selected for compliance with applicable CPSL provisions, DHS regulations and policies, including reliability of the information in the data file, reasonableness of the referral type determination, timeliness of the transmissions to the respective investigating agencies, and timeliness of the submission of the investigation outcomes.

### Data Reliability

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In performing this audit, we obtained computer-processed information from DHS regarding calls to the ChildLine hotline and the referrals of child abuse and neglect processed by ChildLine. *Government Auditing Standards* requires us to assess the sufficiency and appropriateness of computer-processed information that we use to support our findings, conclusions, or recommendations. The assessment of the sufficiency and appropriateness of computer-processed information includes considerations regarding the completeness and accuracy of the data for the intended purposes.

In regard to computer-processed data for calls to the ChildLine hotline, DHS provided monthly Verizon call reports which included statistics regarding number of calls answered, calls abandoned, calls deflected, call wait times, and number of staff signed into the system to answer calls. We obtained a general understanding of the information system environment. Although we did compare the data on the Verizon reports to statistics compiled by DHS for agreement and reasonableness of the numbers, we did not perform procedures to validate the statistical/informational data from Verizon. As such, we deemed this data to be of undetermined reliability. Although this determination may affect the precision of the numbers we present, there is sufficient evidence in total to support our findings, conclusions, and recommendations.

In regard to computer-processed data for referrals reports of child abuse and neglect received and processed by DHS/ChildLine, we obtained a data file from CWIS of all referral reports received by DHS/ChildLine from January 1, 2015 through December 31, 2015.

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This data file included any investigation outcomes submitted by the investigating county agencies as of March 15, 2016. To assess the completeness and accuracy of the referral report data, we conducted audit procedures as follows:

- Obtained an understanding of the information systems environment.
- Reviewed DHS' Bureau of Information Systems Service Organization Control Report (SOC1 Type II) covering the CWIS system. This is a report on the description of information technology support and services of DHS' strategic business systems and on the suitability of the design and operating effectiveness of controls.
- Interviewed DHS/ChildLine officials with knowledge about the data, and specifically the processes for data entry and/or input.
- Reviewed the CWIS referral data for completeness of the fields and gaps in sequential numerical order of referral ids assigned to each referral report.
- Reviewed the judgmental selection of 85 referral reports mentioned previously in the methodology section to determine whether the information included in the CWIS data agreed to the CY 47 referral reports transmitted to the county and/or law enforcement agencies.

Based on the above procedures, we have concluded the data to not be sufficiently reliable in regard to completeness of the data and dates included in the records. See Finding 2.4 for further details.



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**Appendix B** **Distribution List**

Upon its release, this report was distributed to the following Commonwealth officials:

**The Honorable Tom Wolf**  
Governor

**The Honorable Ted Dallas**  
Secretary  
Department of Human Services

**Mr. Brendan Harris**  
Executive Deputy Secretary  
Department of Human Services

**Ms. Cathy D. Utz**  
Deputy Secretary for Office of  
Children, Youth, and Families  
Department of Human Services

**Ms. Amy Grippi**  
Chief of Staff for Office of  
Children, Youth, and Families  
Department of Human Services

**The Honorable Randy Albright**  
Secretary of the Budget  
Office of the Budget

**The Honorable Timothy Reese**  
State Treasurer  
Treasury Department

**The Honorable Bruce R. Beemer**  
Attorney General  
Office of the Attorney General

**The Honorable Sharon P. Minnich**  
Secretary of Administration  
Office of Administration

**The Honorable Michele Brooks**  
Majority Chair  
Senate Aging and Youth Committee

**The Honorable Art Haywood**  
Democratic Chair  
Senate Aging and Youth Committee

**The Honorable Katharine M. Watson**  
Majority Chair  
House Children and Youth Committee

**The Honorable Scott Conklin**  
Democratic Chair  
House Children and Youth Committee

**Mr. Brian Lyman, CPA**  
Director, Bureau of Audits  
Office of Comptroller Operations

**Ms. Mary Spila**  
Collections/Cataloging  
State Library of Pennsylvania

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