May 2016



Pennsylvania Department of the Auditor General Eugene A. DePasquale, Auditor General Bureau of Performance Audits

INTERIM REPORT OF SIGNIFICANT MATTERS

REGARDING THE

DEPARTMENT OF HUMAN SERVICES' ADMINISTRATION OF THE STATEWIDE CHILD ABUSE HOTLINE (CHILDLINE)

May 2016

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The Department of the Auditor General is currently conducting a performance audit of the Department of Human Services' (DHS) administration of the Statewide Child Abuse Hotline (ChildLine). The objectives of our audit are to determine the effectiveness of DHS' intake process for ChildLine and determine whether child abuse and neglect calls to ChildLine are processed in accordance with applicable laws, regulations, and policies. The audit is being conducted under the authority of Section 402 of the Fiscal Code and in accordance with applicable *Government Auditing Standards* issued by the Comptroller General of the United States. As stated in the engagement letter dated November 9, 2015, our audit period is January 1, 2014 through the completion of our auditing procedures. In this document, we describe the procedures that we used during the audit only to the extent that they relate to the items included in this interim report.

Government Auditing Standards encourage the early communication of significant matters to facilitate prompt corrective action. During the course of our current 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 abused children further at risk. DHS appears aware of many of these circumstances but is not addressing the issues quickly enough while children are at risk. We consider these situations to be significant within the context of our audit objectives and chose to share this information with you so that you could take immediate corrective action.

We requested and obtained DHS' hotline call statistical data for calendar years 2014 and 2015, including detailed Verizon call reports for four months in each respective year. We also obtained DHS' staffing data for ChildLine and reports of calls monitored by supervisors in 2014 and 2015. Based on our analysis of this data, along with interviews of DHS' management, we identified the following significant matters 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**.



Nearly 42,000 calls to ChildLine not answered in 2015, putting children at risk.

The following table shows the number of calls made to the ChildLine hotline in calendar years 2014 and 2015. 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.

ChildLine Hotline Call Summary For Years Ending December 31, 2014 and 2015 (Unaudited)					
	2014 Call Count	Percentage of Total Calls Received	2015 Call Count	Percentage of Total Calls Received	
Calls Answered	158,131	96%	146,367	78%	
Calls Abandoned	4,222	2.5%	23,789	13%	
Calls Deflected	2,558	1.5%	18,201	9%	
Total Calls Received	164,911	100%	188,357	100%	

DHS' management stated its goal is for 4 percent or less of the hotline calls to go unanswered. 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. Each one of these unanswered calls could potentially be a child abuse allegation going unreported, putting children at risk.

We also reviewed unaudited call statistics provided by DHS regarding wait times for calls that are not immediately answered and enter the holding queue. 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 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 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 2014 and 2015, as shown in the following table:

	Queue Wait Times In Minutes						
	2014			2015			
Month	Average Wait Time			Average Wait Time	Longest Wait Time for Month	Monthly Average Longest Wait Time ^{a/}	
April	0.8	33.3	12.3	2.6	31.2	17.4	
June	0.6	27.8	11.7	1.6	36.4	20.3	
October	0.6	34.3	9.8	6.7	42.1	27.0	
November	0.8	48.0	11.7	5.7	39.7	25.5	

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."

As shown in the above table, for the four 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.

DHS attributed the high volume of unanswered calls and long wait times to be mostly due to changes brought about by amendments to the Child Protective Services Law,¹ 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:

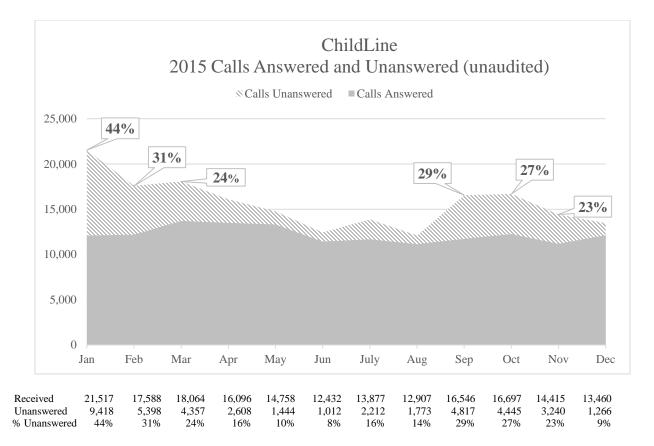
In 2014, the only method to report a child abuse referral was by calling the hotline and verbally providing the information. With the passage of 24 bills amending the Child Protective Services Law (CPSL), ChildLine also became responsible for registering General protective Services (GPS) information, as well as Child Protective Services (CPS) 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...

¹We do acknowledge that the CPSL was extensively amended in 2013, 2014, and 2015 with 24 pieces of legislation "...[being] enacted, changing 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 May 23, 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

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 $CPSL^2$ and the implementation of the new CWIS system undoubtedly created challenges and contributed to 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.

² 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, of help clarify and make more explicit the law's recently added provisions. *See* http://keepkidssafe.pa.gov/laws/index.htm accessed April 13, 2016.



The numbers and percent of hotline calls going unanswered is not acceptable with potentially abused and neglected children being at risk. While we have no idea as to whether these callers eventually called back, conceivably thousands of at risk children could be impacted either by the suspected abuse never getting reported or the abuse not getting reported as timely as it could have if the original calls were answered.

DHS did not achieve its goal of no more than 4 percent of calls going unanswered in any month during 2015. In fact, 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 increasing the number of ChildLine caseworker staff available to answer more calls; however, DHS is not addressing the issues quickly enough to ensure risk to children is minimized.

Significant Matter ChildLine continues to not be adequately staffed. Minimum staffing levels are based on available staff and minimizing overtime levels, not on children at risk.

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

Quarter Ended	Caseworkers Salary Filled	Caseworkers Wage Filled	Total Caseworkers Filled	Total Caseworkers Vacant	Percent of Vacant Positions	Annuitants _{b/}
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. 11, 2016 a/	36	16	52	16	23.5%	5

Notes:

^{a/} March 11, 2016 was the most current staff complement data provided by DHS.

^{b/} Annuitants may only work a maximum of 95 days in a calendar year.

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. The expectation would be the reverse, and therefore, we analyzed these staffing levels further. 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. According to DHS:

> 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, minimum staffing levels are 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 was 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.

Additionally, ChildLine was staffed under the already insufficient minimum level of 77 percent of the days and time periods tested.

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,³ 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 March 2016 the number of vacant caseworker positions ranged from 4 to 16 positions, or 9 to 23 percent of the total approved complement going unfilled, while thousands of calls of potential allegations of child abuse and neglect went unanswered.

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 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**.



Over 100,000 calls were received by ChildLine in 2014 and 2015 which did not generate referral reports of suspected child abuse/neglect. DHS assumes these calls were not for concerns involving children; however, these calls were not tracked or documented.

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

- a child protective service (CPS)
- general protective service (GPS)
- law enforcement only (LEO) issue
- a supplemental report for a CPS, GPS, or LEO
- a 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

³ 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.

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 111,245 calls in 2014 and 2015 combined which did not generate a referral report, as shown in the table below:

Description of Calls Answered (Unaudited)						
Referral Type	2014 Count	Percentage of Calls Answered	2015 Count	Percentage of Calls Answered		
Child Prot. Services ^{a/}	29,520	19%	27,641	19%		
General Prot. Services ^{b/}	^{c∖} 47,854	30%	59,279	41%		
Law Enforcement Only	^{c\} 7,397	5%	8,743	6%		
Supplementals	241	<1%	7,969	5%		
Complaints/Other	1,123	1%	3,486	2%		
Other – Not Referred	71,996	45%	39,249	27%		
Total Calls Answered	158,131	100%	146,367	100%		

Notes:

^{a/} "Child protective services." Those services and activities provided by DHS and each county agency for child abuse cases.

^{b/} "General protective services." Those services and activities provided by each county agency for cases requiring protective services, as defined by DHS in regulations.

^{c/} These counts were obtained from DHS's 2014 Annual Child Abuse Report.

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 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...

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 the next section of this interim report, 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 are assumed by DHS to 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 41,990 and 6,780 calls went unanswered in 2015 and 2014, respectively, 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.

Significant Matter

Only 56 calls were monitored by ChildLine Supervisors when more than 300,000 calls were answered during 2014 and 2015. Of these 56 calls, only 7 were in 2015.

ChildLine management failed to adequately monitor the performance of caseworkers (including salary, wage, and annuitants) answering hotline calls. During 2015, ChildLine supervisors only monitored 7 calls from a total population of 146,367 (0.005%) calls answered. These 7 calls monitored were taken by 3 different caseworkers when there was an average of 46 caseworkers on staff during 2015. During 2014, supervisors only monitored 49 calls taken by 29 different caseworkers from a total population of 158,131 (0.03%) calls and an average of 38 caseworkers on staff.

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 111,245 calls not generating a referral report and not tracked in 2014 and 2015 truly did not involve any allegation 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.

While ChildLine does have a standard evaluation form for supervisors to listen on a call taken by a caseworker and document their observations of the call process, ChildLine does not currently have a policy or standard procedure in place to guide the monitoring process. ChildLine has no policy or procedure for the number of phone calls and caseworkers that are to be monitored, how often monitoring will be conducted, and follow-up corrective action for caseworkers whose performance is unsatisfactory. 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.

Management stated that prior to our audit period beginning January 2014, individual caseworkers were monitored according to a monthly schedule. Based on the level of supervision needed, caseworkers were monitored daily, weekly, biweekly, or monthly. However, beginning in 2014, monitoring of caseworkers was only being done on an asneeded 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.

Recommendations:

We recommend that DHS:

- 1. Immediately evaluate and determine 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. Immediately hire and train additional staff necessary based on the results of the evaluation in Recommendation #1, including consideration of turnover.
- 3. Ensure the hotline is always staffed at or above the minimum staffing levels needed as determined in Recommendation #1.
- 4. Track and document the purpose of all calls received on the hotline, including those not generating referral reports.

- 5. Consider ways to divert calls not involving allegations of child abuse or neglect 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.
- 6. Develop procedures 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. Implement call monitoring procedures developed in Recommendation #6 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.

Agency's Response and Auditors' Conclusion

We provided draft copies of our *Interim ChildLine Report* – *Significant Matters* to DHS' management for their review. On the pages that follow, we have attached DHS' response to the draft interim report in its entirety. Our evaluation of DHS' response, which serves as our auditors' conclusion, follows DHS' response.



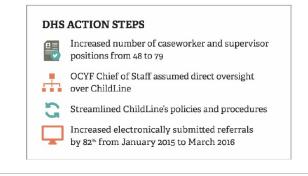
May 6, 2016

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

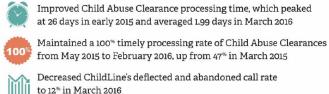
Dear Mr. DePasquale:

Thank you for providing the draft interim Report of Significant Matters regarding the Statewide Child Abuse Hotline (ChildLine), dated April 2016.

Keeping children safe is a critical part of our mission at the Department of Human Services (Department) and was a priority for me from the moment I began serving as Secretary. Within days of the Administration taking office in January 2015, we took immediate action to begin addressing the issues at ChildLine. The two figures below summarize the steps we took and the outcomes we achieved.



THE RESULTS



from May 2015 to February 2016, up from 47[%] in March 2015

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Specifically, the Department reassigned the Chief of Staff of the Office of Children, Youth and Families (OCYF) to work with ChildLine managers, conduct process and operational efficiency analyses, and assess necessary resources. We immediately planned and implemented multiple approaches to address the challenges identified, including streamlined operations, enhanced data collection, and increased temporary and permanent staffing resources. On-going quality improvement efforts have continued, to include technology enhancements and efficiencies and updated policies, procedures and performance measures. We also instituted a set of metrics to track the progress at ChildLine and identify any new issues as they arise.

The clearance processing time peaked at 26 days in early 2015, but due to implemented efficiencies and additional resources, the processing time was quickly reduced to a monthly average of seven days in April 2015 and less than four days in May 2015. From January 2015 to March 2016, ChildLine also showed improvement, including the deflected and abandoned call rate being reduced by 31%.

At its peak, the deflected and abandoned call rate was 43% in January 2015, which has reduced to 12% in March 2016. While progress has been made in improving the dropped and abandoned call rate, hiring and training additional staff, as well as improving operations, remains a priority.

We also began hiring additional staff in February 2015. As a result of that, and subsequent rounds of hiring, the number of ChildLine caseworker and supervisor positions have increased from 48 to 78 staff, an increase of 66% percent. When the number of staff did increase, reliance on overtime decreased from the first quarter of 2015 to the last quarter by 22% percent.

In addition, the Department requested an increase in funds to support ChildLine operations. The Fiscal Year 2016-2017 proposed budget for ChildLine increased by \$1.8 million from FY 2014-2015. From FY 2014-2015 to FY 2015-2016, staff complement for ChildLine also increased from 42 to 69, a 64% increase. Hiring ChildLine staff remains a priority of the Department in order to continue to drive down the dropped and abandoned call rate and ensure calls of child abuse and neglect are captured and transmitted to the appropriate investigative agency quickly. Once all approved staff are hired and trained, the Department expects to further reduce the dropped and abandoned call rate to less than 4%. Currently, 68 ChildLine caseworkers are slated to be in training or actively working by the end of May 2016.

As you can see, the Department has prioritized improvements at ChildLine and is continuing to do so. Below are our specific comments to each recommendation presented in the draft report. We ask that you consider our comments and incorporate those points into the final report.

Significant Matter 1 – Nearly 42,000 calls to ChildLine not answered in 2015, putting children at risk.

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Significant Matter 2 – ChildLine continues to not be adequately staffed. Minimum staffing levels are based on available staff and minimizing overtime levels, not on children at risk.

Significant Matter 3 – Over 100,000 calls were received by ChildLine in 2014 and 2015 which did not generate referral reports of suspected child abuse/neglect. DHS assumes these calls were not for concerns involving children; however, these calls were not tracked or documented.

Significant Matter 4 – Only 56 calls were monitored by ChildLine Supervisors when more than 300,000 calls were answered during 2014 and 2015. Of these 56 calls, only 7 were in 2015.

Department of the Auditor General (AG) Recommendation 1: Immediately evaluate and determine 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 of Human Services (DHS) Response: In February 2015, the Department immediately initiated an increase in ChildLine complement, followed by an internal time study and staffing assessment that was finalized in November 2015. This assessment was based on call volume and the number of self-service referrals received, in addition to quality assurance efforts, outcome finalizations and other responsibilities as assigned to ChildLine caseworkers. The resulting staffing request was developed with the goal of overstaffing in anticipation of call-offs to avoid crises, disrupted schedules, and high dropped and abandoned call rates. The request focused on the number of staff required to answer all calls in a timely manner and timely transmission of reports to ensure the safety of children. The assessment and subsequent request was based on staffing for the average volume of the busiest hour per shift from September to November of 2015, which are among the busiest months of the year.

AG Recommendation 2: Immediately hire and train additional staff necessary based on the results of the evaluation in Recommendation #1, including consideration of turnover.

DHS Response: ChildLine complement has increased from 42 to 69 caseworkers, and from 6 to 9 supervisors. As of April 27, 2016, 56 caseworker positions are filled, 9 new hires have start dates, 3 people are awaiting approval and start dates, and 1 position is currently posted. Three additional caseworkers are needed to address the findings of the staffing assessment. The interviews for the additional supervisor positions are occurring now. One supervisor will be used primarily as a trainer to ensure the implementation of consistent, quality training for all new caseworker staff.

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

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DHS Response: Based on the recommendations from the staffing assessment, ChildLine will be changing from 11 staggered shifts to 5 shifts starting May 21, 2016. In conjunction with hiring more staff, this change in shifts will allow us to adjust the minimums at the level needed to answer the call volume and process self-service online reports, while also staffing above the minimums in order to absorb call-offs.

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

DHS Response: Additional data fields and system functionality will be incorporated into the scheduled July 2016 CWIS Release to document the reason of all calls received. CWIS capabilities are being reviewed to determine options for tracking calls that do not allege child abuse or neglect, or the need of protective services. Additional functionality, if needed, will be incorporated into the CWIS 1.3 Release which is planned for March 2017.

AG Recommendation 5: Consider ways to divert calls not involving allegations of child abuse or neglect 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.

DHS Response: Clear information and guidance on where questions, concerns or information should be sent when not reporting suspected child abuse or neglect will be provided on <u>www.KeepKidsSafe.pa.gov</u> by the end of May 2016. Additionally, on March 22, 2016, DHS/OCYF issued a Request for Quote (RFQ) for a media campaign geared toward informing the general public about their roles and responsibilities in recognizing and reporting suspected child abuse. Information as to how the hotline should be utilized will be incorporated in all relevant materials developed as part of the media campaign, including pamphlets and written materials. Additionally, the campaign will promote the use of <u>www.KeepKidsSafe.pa.gov</u> as a vehicle for information.

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.

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DHS Response: The Department is in the process of analyzing other phone systems for ChildLine which would allow prompts to divert calls which do not involve the reporting of suspected child abuse or neglect to other appropriate staff. Depending on the timeframe for implementing a new phone system, the Department is determining if additional prompts are needed beyond the existing prompt that diverts calls related to child abuse clearances.

AG Recommendation 6: Develop procedures 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.

DHS Response: Policies and procedures exist for the monitoring of calls answered by caseworkers, but could not be followed in 2015 due to staffing capacity. In addition to ensuring staff adhere to these policies and procedures moving forward, ChildLine is in the process of implementing a performance management system for ChildLine operations. The performance management system will include performance metrics that will be used to evaluate individual caseworker, supervisor and overall ChildLine performance. The performance management system will identify specific process control points, performance expectations, methods for evaluating performance, and performance expectations. The monitoring process will include monitoring of calls and evaluation of the resulting referrals to assess performance and compliance with policies and procedures. The monitoring is part of an overall Quality Control 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. This system is currently being developed and is slated to be implemented in the fall of 2016.

AG Recommendation 7: Implement call monitoring procedures developed in Recommendation #6 to ensure calls are processed accurately, efficiently, and effectively.

DHS Response: The call monitoring procedures will be implemented as part of the overall performance management system being 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 will be included in 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.

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

DHS Response: We will explore the feasibility, including legal implications, of installing such a feature.

The Honorable Eugene A. DePasquale - 6 -

Thank you for the opportunity to respond to this draft report. I look forward to our meeting to discuss these issues. 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, if you have any questions regarding this matter.

Sincerely,

Theodore Dallas Secretary

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

Auditors' Conclusion to DHS' Response

We commend the Department of Human Services (DHS) for proactively addressing the significant matters contained in the Interim Report and are encouraged by DHS' agreement with all of our recommendations. We believe our recommendations will improve DHS' operations of the Statewide Child Abuse Hotline (ChildLine) and intake process to ensure all calls are effectively answered. We also appreciate DHS' efforts to follow our recommendation to conduct more outreach to mandated reporters and to the public by planning to add enhanced information and guidance to its child abuse dedicated website⁴ regarding where to report suspected child abuse or neglect by the end of May 2016 and making strides in having a media campaign to promote the use of its website for further educating the public about child abuse. Even one neglected or abused child in Pennsylvania is one too many. As part of this continuing performance audit, we will evaluate any actions taken by DHS to implement our recommendations that occur during the execution phase of this audit.

Based on our review of DHS' response to our Interim Report, we have the following clarification regarding DHS' response to Recommendation #1. The internal time study and staffing assessment that was finalized in November 2015 formed the basis for additional staffing requests in 2016. We were not aware of this study prior to drafting this interim report. However, regardless of this study, as noted in this report, staffing levels throughout 2015 were not adequate to meet the call volume. We will evaluate the effects of the staffing increases made in 2016 during the continuing execution phase of this audit.

⁴ <u>http://keepkidssafe.pa.gov/</u>