



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office Of Inspector General
Office Of Audit Services

Region II
Jacob K. Javits Federal Building
26 Federal Plaza
New York, NY 10278

May 22, 2002

Our Reference Common Identification No. A-02-01-02003

Dr. Virginia C. Strand, DSW
Associate Director
Children FIRST
Fordham University Graduate Center
Neperan Road Room 309
Tarrytown, New York 10591

Dear Dr. Strand:

Enclosed are two copies of the U.S. Department of Health and Human Services, Office of the Inspector General, Office of Audit Services' final report entitled "Review Of The Administration For The Children And Families Discretionary Grant Number 90CT0010 Awarded To Fordham University For The Period September 30, 1997 Through September 29, 2000." This audit was part of a nationwide review of discretionary grants. A copy of this report will be forwarded to the action official noted below for his/her review and any action deemed necessary.

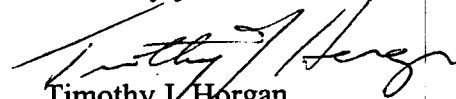
Final determination as to actions taken on all matters reported will be made by the HHS action official named below. We request that you respond to the HHS action official within 30 days from the date of this letter. Your response should present any comments or additional information that you believe may have a bearing on the final determination.

In accordance with the principles of the Freedom of Information Act (5 U.S.C. 552, as amended by Public Law 104-231), OIG, OAS reports issued to the Department's grantees and contractors are made available to members of the press and general public to the extent information contained therein is not subject to exemptions in the Act which the Department chooses to exercise. (See 45 CFR Part 5.)

Page 2 – Dr. Virginia C. Strand

To facilitate identification, please refer to Common Identification Number A-02-9-01-02005 in all correspondence relating to this report.

Sincerely yours,



Timothy J. Horgan
Regional Inspector General
for Audit Services

Enclosures – as stated

Direct Reply to HHS Action Official:

Ms. Mary Ann Higgins
Northeast Hub Director
Administration for Children & Families
26 Federal Plaza, Room 4114
New York, New York 10278

Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**



**REVIEW OF THE
ADMINISTRATION FOR THE CHILDREN & FAMILIES
DISCRETIONARY GRANT NUMBER 90CT0010
AWARDED TO
FORDAM UNIVERSITY
FOR THE PERIOD
SEPTEMBER 30,1997 through SEPTEMBER 29,2000**



**JANET REHNQUIST
INSPECTOR GENERAL**

**MAY 2002
A-02-01-02003**

Office Of Inspector General Notices

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OAS FINDINGS AND OPINIONS

The designation of financial or management practices as questionable or a recommendation for the disallowance of costs incurred or claimed as well as other conclusions and recommendations in this report represent the findings and opinions of the HHS/OIG/OAS. Final determination on these matters will be made by authorized officials of the HHS divisions.





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Dr. Virginia C. Strand, DSW
Associate Director
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Neperan Road Room 309
Tarrytown, New York 10591

Dear Dr. Strand:

This report provides you with the results of our review of the Administration on Children, Youth and Families (ACYF) Discretionary Grant No. 90CT0010 awarded to Fordham University (Fordham) for the period September 30, 1997 through September 29, 2000.

Objectives

The objective of this review was to evaluate the grantee's performance in achieving project objectives and complying with terms and conditions of the grant project.

Executive Summary

Overall, Fordham generally met the project goals of improving child welfare services through providing interdisciplinary training to public agency workers and supervisors and performing other project tasks.

Our review, however, disclosed several exceptions with respect to compliance with the terms and conditions of the grant as follows:

- Fordham awarded a Master of Social Work scholarship to a recipient who did not meet the project qualifications. After graduation, the recipient did not provide services in the child welfare field as intended by the grant.

- Fordham did not publish articles pertaining to the project lessons learned and conference proceedings in keeping with the approved project goals. These publications were intended to benefit others in the child welfare field.
- Course evaluations and attendance forms were not always retained by Fordham.

As a result of the above, \$9,451 in Federal funds used to pay program scholarship costs were not used for the intended purpose of the project. Dissemination of program results to those in the child welfare field was more limited than envisioned by the project. And, there were limited assurances that all aspects of the project were fully and satisfactorily performed since Fordham did not always retain all required documentation.

Recommendations

We recommend that Fordham:

- Refund \$9,451 to the Federal Government.

Comply with all conditions and terms of future grants or immediately notify the awarding Federal agency regarding any barriers in meeting them.
- Establish record retention policies for documenting Federal projects that comply with Federal record keeping requirements.

Auditee Comments

In comments dated May 1, 2002 (see Appendix A), Fordham University officials agreed to return \$9,451 to the Federal Government for scholarship costs awarded to a non-qualifying recipient. Regarding our non-publication of program results finding, they stated that summaries of the conference proceedings were disseminated throughout the ACS management system and to conference participants. Requests for copies of the interdisciplinary curriculum were received from other schools of social work and copies of the final year curriculum were sent to those who inquired.

OIG Comments

As stated in our report, the approved grant required Fordham University to publish the results of the training program in a social service journal to child welfare agencies in New York State and New York City areas. In addition, Fordham was to publish proceedings of the annual interdisciplinary child welfare conferences that were co-sponsored by ACS, Fordham and local foundations. Our review showed that Fordham did not publish the

articles and as a result dissemination of program results to those in the child welfare field was more limited than envisioned by the project.

Finally, Fordham University officials did not provide comments regarding our non-compliance with Federal record retention requirements finding.

INTRODUCTION

Background

The Fordham University is a fully accredited school of social work with courses of learning leading to Master and Doctoral degrees. Child welfare has been a priority at Fordham University Graduate School of Social Services (GSSS). In 1977 Fordham established the Center for Family and Children's Services to improve the delivery of services through training, research and consultation.

Fordham was a recipient of child welfare training grants from 1987 to 1992 when GSSS received several Federal grants for Child Welfare Scholarships. Fordham also received a 426-person professional development grant from 1995 to 1997. And, GSSS has been training public sector workers in social work under contract with the New York City Human Resources Administration (HRA) which had been renewed for five successful years. Fordham is currently an active participant in the title IV-E scholarships program.

In February 1996, the New York City Administration for Children's Services (ACS) was created as a Mayoral agency in the wake of several highly publicized fatalities of children known to HRA. An action plan for reforming the public child welfare agency in New York City was issued by ACS in December 1996. Among other reforms, the plan called for "improving the skills of all caseworkers, supervisors and managers to ensure quality investigations and assessments of needs.." This included "enhancing competency training needs for all caseworkers"; "constructing a neighborhood-based system...that will ...identify and coordinate the delivery of neighborhood-based resources that can and do provide effective services (including medical, mental-health, and substance abuse) to children and families"; and "encourage caseworkers to pursue Master's of Social Work (MSW) degrees".

To meet these goals, Fordham was awarded a 3-year grant from the Administration for Children and Families (ACF) for an "Interdisciplinary Training for Public Agency Workers and Supervisors to Improve Child Welfare Services" project. The project grant period was from September 30, 1997 through September 29, 2000. Fordham was awarded \$150,000 per year, for a total of \$450,000. As of the final financial status report dated January 31, 2001, Fordham claimed \$432,216 including \$103,247 for MSW scholarship grants.

Objectives, Scope and Methodology

The objective of this review was to evaluate the grantee's performance in achieving project objectives and complying with terms and conditions of the grant project.

Our review was performed in accordance with generally accepted government auditing standards. We determined the grantee's performance in achieving project objectives and complying with terms and conditions of the grant project by examining progress reports, statistical reports, meetings summaries, surveys, conference materials, curriculum materials, student records and selective expenditures. We also held discussions with Fordham and ACF officials.

We did not perform an in-depth review of Fordham's internal control structure, as the objective of our review did not require an assessment of internal controls. Our field review was performed at the offices of Fordham University in Tarrytown and New York City from June 4, 2001 to August 8, 2001.

RESULTS OF REVIEW

Our goal was to assess the grantee's performance in achieving project objectives and complying with the terms and conditions of the grant. The approved grant project established four general objectives as follows:

Objective No. 1

To develop and implement a model competency-based training program that reflected collaboration between a private university and a public agency, including development of curriculum materials and evaluation instruments that could be replicated in other parts of the country. Integrated into this model-training program will be a special emphasis on mental health, substance abuse and domestic violence.

The grantee accomplished this objective by the following:

In project year (PY) 1 of the grant, the curriculum was developed by Fordham project staff that performed an extensive review of the available literature in the domestic violence, substance abuse, and mental illness areas. The concepts were further defined through the use of four focus groups. The curriculum stressed coordination of community based service providers with public agency caseworkers from ACS. The program stressed how the above problems adversely affect children and the ways to identify and prevent them.

During PY2 and PY3 of the grant, the curriculum was evaluated through meetings held between Fordham and ACS. The training cohort changed in the second year, so the curriculum had to be similarly adjusted. The community service providers were included

in the training sessions, and emphasis was placed on linking them with ACS staff. In addition, ACS trainees included caseworkers in the areas of court ordered supervision and protection diagnosis. Therefore, there was more emphasis placed on risk assessment.

The PY2 evaluations indicated that the trainees found the interactive exercises in case conferences to be very useful. The PY3 curriculum was modified to include more of this in the training course. The final curriculum developed was disseminated in the following ways:

Parts of the curriculum were incorporated into a Master's Degree of Social Work level course given at Fordham.

- The ACS developed a three-day training course in substance abuse.
- A four-day training course was developed by an affiliate of Phoenix House (drug rehabilitation facility). This course integrates substance abuse treatment and child welfare.

Objective No. 2

To enhance public child welfare workers' and supervisors' knowledge and skills in interdisciplinary assessment, case planning and monitoring of services to families experiencing problems with mental illness, substance abuse and/or domestic violence.

The grantee accomplished this objective by the following:

In PY1 of the grant, 10 days of training were held for 12 supervisors and 23 caseworker employed by ACS. In PY2, during the course of training, there was an average of 62 ACS staff and 14 service providers in attendance each day. In PY3, as a result of a change in the training cohort, 45 ACS personnel and 15 community service providers were to be trained under this revision. Approximately 60 ACS staff and 20 service providers actually participated in the training.

Objective No. 3

To increase broad based assessment competencies that enhances the service provision to clients of public child welfare workers through professional development training of public, primarily minority, child welfare workers and supervisors leading to a Master's of Social Work (MSW) degree.

The grantee's accomplished this objective by awarding scholarships to nine recipients who successfully completed and received a Master of Social Work. As required by the project, the scholarship recipients received training in interdisciplinary assessment and

assisted in coordinating the yearly conferences. Eight of the nine scholarship recipients remained in the child welfare service area after graduation.

Objective No. 4

To increase knowledge, skills and collaboration between public and not-for-profit child welfare caseworkers and supervisors through planning and implementing an annual two-day interdisciplinary child welfare conference.

The grantee accomplished this objective by holding yearly conferences that covered all the proposed topics and whose enrollment ranged from 300 to over 500 child welfare caseworkers, supervisors and community providers.

Overall, we found that Fordham generally met the project goals of improving child welfare services by establishing and implementing a viable interdisciplinary training and educational program of public agency workers, supervisors and community providers.

Our review, however, disclosed several areas where Fordham did not fully comply with the terms and conditions of the grant.

Scholarship Awarded to Non-Qualifying Recipient

The approved grant project provided that Fordham was to award scholarships to eight ACS employees that were to lead to Fordham Master of Social Work degrees in order to enhance services to clients. To be eligible for the scholarships the employees had to have worked for ACS for at least 2 years, and have had satisfactory performance evaluations. Further, the persons selected for the program were to participate in the planning and implementation of the 2-day interdisciplinary conferences funded by this project and to make a commitment to work in the child welfare field for at least 2 years after graduation.

Fordham provided scholarships to nine recipients but one of the recipients was not an ACS employee as required by the approved grant project. The other scholarship recipients met the requirements of the grant in all respects. The non-ACS recipient was employed by a voluntary child welfare agency that worked closely with ACS. Moreover, after graduation the non-ACS recipient did not continue to work in the child welfare field as intended by the project. Since the MSW scholarship recipient was not an ACS employee and did not continue to work in the child welfare field, there are no assurances that the training and education funded by the project in this instance helped to improve services to the intended clients. As a result, \$9,451 in Federal funds was not used for the purposes intended under the approved project. This amount represented \$8,751 of tuition costs plus \$700 of indirect costs at the rate of 8 percent.

Fordham officials informed us that the non-ACS employee was provided a scholarship grant due to an insufficient number of available ACS employees at the start of the grant project. We were also informed that subsequent to graduation the recipient was placed as

a caseworker in a child welfare agency, but was not satisfied with the position and left for executive employment with a municipal union.

Non-Publication of Program Results

Fordham's approved grant provided that as a way of disseminating the results of the training program to child welfare agencies in New York State and New York City areas, an article was to be published in a social service journal. In addition, Fordham was to publish proceedings of the annual interdisciplinary child welfare conferences that were co-sponsored by ACS, Fordham and local foundations.

Our review disclosed that Fordham did not publish the articles about the lessons learned from the interdisciplinary training project nor the proceedings of its interdisciplinary child welfare conferences. Since the articles were not published, dissemination to those in the child welfare field was more limited than envisioned by the project.

The project co-directors indicated that publication of the articles did not occur due to a lack of time and budget resources. We were also informed that curriculum revisions necessitated in program year (PY) 2, at the request of ACS, contributed to time constraint and their inability to publish the required articles.

Non-Compliance with Federal Record Retention Requirements

The Code of Federal Regulations (CFR) 45 Part 74, Administration of Grants, requires that records relating to grant projects be retained for 3 years after the end of the grant period. Since the ACYF grant was approved for the period September 30, 1997 to September 29, 2000, Fordham was required to retain supporting records and documentation until September 29, 2003.

Our review disclosed that Fordham did not retain all attendance and evaluation forms for all the years of the program. Specifically, course evaluations that were completed by training program participants were not kept for PY1 and PY3. Also, the attendance forms were not kept for the PY1 and PY2 conferences. Instead, of program evaluations Fordham provided us with computerized data, which they had transcribed from source documents and for participants attendance we were only provided with class registration rolls. Consequently, since some of the basic supporting documentation was not kept by the grantee, Fordham was not in full compliance with the Federal regulations regarding retention of records. We were able to use the alternate documentation provided to evaluate whether Fordham met the project goals.

Fordham officials informed us that some grant records were discarded during a move of their offices to another location and that program personnel may not have been fully aware of the grant record keeping requirements.

CONCLUSIONS AND RECOMMENDATIONS

Fordham University completed and generally met the project goals of the ACYF grant which included improving the skills of caseworkers, supervisors and managers; enhancing the training needs of caseworkers and encouraging and making it possible for them to pursue MSW degrees so they may be better able to identify and coordinate the delivery of neighborhood-based resources for providing effective services to children and families. However, our review noted several areas where Fordham did not fully comply with or meet the terms and conditions of the grant.

We recommend that Fordham:

- Refund \$9,451 to the Federal Government.
- Comply with all conditions and terms of future grants or immediately notify the awarding Federal agency regarding any barriers in meeting them.
- Establish record retention policies for documenting Federal projects that comply with Federal record keeping requirements.

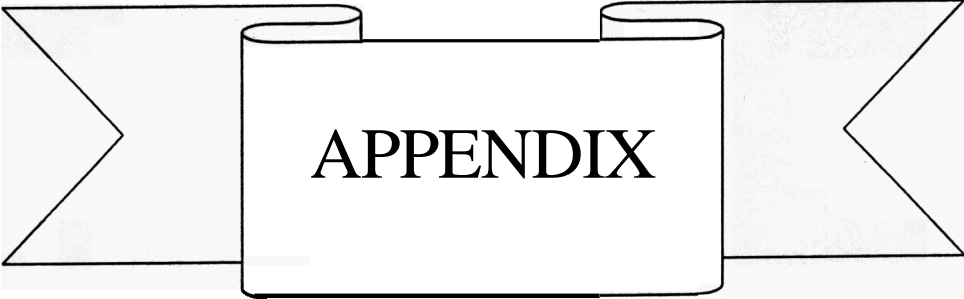
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Finally, Fordham University officials did not provide comments regarding our non-compliance with Federal record retention requirements finding.



FORDHAM
UNIVERSITY

New York City's Jesuit University

Graduate School of Social Service
Children FIRST
Children and Families Institute for Research, Support and Training

May 1, 2002

HHS/OIG
OFFICE OF AUDIT
NEW YORK REGIONAL OFFICE

Common Identification No. A-02-01-02003

MAY 3 2002

Mr. Timothy J. Horgan
Regional Inspector General
For Audit Services
Dept. of Health & Human Services, Region II
Jacob K. Javits Federal Building
26 Federal Plaza
New York, NY 10278

RECEIVED

Dear Mr. Horgan:

This letter is in response to your review of the Administration on Children, Youth and Families (ACYF) Discretionary Grant No. 90CT0010 that was awarded for the period September 20, 1997 through September 29, 2000.

The request that \$9,451.00 be returned to the Federal Government will be met by Fordham University and will be sent under separate cover. This amount was the \$8,751 tuition cost plus \$700 of indirect costs at the rate of 8 %. At the time the tuition stipend was given to the non-ACS student, it was Fordham's understanding that she would remain in the child welfare field. There was no indication given by her or her past employment experiences that would lead the university to believe otherwise.

In addition, summaries of the conference proceedings were disseminated throughout the ACS management system and to conference participants. Requests for copies of the interdisciplinary curriculum were received from other schools of social work and copies of the final year curriculum were sent to those who inquired.

We want to thank you for a fair review and your acknowledgement that we not only met but exceeded expectations in a number of areas.

Sincerely,

Virginia C. Strand (MFG)

Virginia C. Strand, DSW
Associate Professor and Director,
Children FIRST